## **Anti-Bribery Policy**

It is our policy to conduct all of our business in an honest and ethical manner. We will not tolerate bribery or corruption and are committed to acting professionally, fairy and with integrity in all our business dealings and relationships.

The Company is committed to comply with the requirements set out in ISO 37001:2016 Anti Bribery Management System and will continually improve our Anti-Bribery Management System. The requirements and prohibitions under this policy include:

- 1. Bribery (of any forms) is prohibited. It is prohibited to offer, promise, give, accept or solicit an improper advantage of any value to any parties for any purposes.
- 2. Any form of gifts, invitations and/or hospitality received or offered, including suspicions about the practice of bribery or corruption must be declined and immediately reported.
- 3. We must comply with all applicable regulations related with anti-bribery laws.
- 4. We are responsible for the prevention, detection and reporting of all forms of bribery and corruption.
- 5. Anyone who violates this policy will face disciplinary action, which can result in dismissal due to a serious violation.
- 6. The Company encourages openness and will support anyone who raises concerns in good faith under this policy in confidence without fear of reprisal.
- 7. This policy must be read in conjunction with The Company's Code of Conduct, Company Regulations, Anti-Bribery Manual, Whistleblowing System and "Giving and/or Receiving Gift Entertainment Procedure".

This policy applies in all locations where the Company operates and Company's subsidiaries, including all individuals who work at all levels and other parties working with the Company. The Anti-Bribery Compliance Function as an independent function, will be responsible for overseeing the design and implementation of the Anti-Bribery Management System.

The President Director is accountable and committed towards the effectiveness of the Anti-Bribery Management System. The Company will periodically evaluate the policy, including reporting systems to ensure that the policy is carried out effectively.

Michael

President Director

PT Petrosea Tbk.

December 2023

**Osman Sitorus** 

Chairman of Audit, Risk and Compliance Committee

