

# ANTI CORRUPTION POLICY

## A. Preliminary

Based on the Financial Services Authority Circular No. 32 / SEOJK.04 / 2015 concerning Guidelines for Governance of Public Companies, the Company as an issuer must have provisions regarding anti-corruption policies.

As one of the leading issuers on the Indonesia Stock Exchange, compliance with laws and regulations is a priority for PT United Tractors Tbk ("the **Company** "). In connection with this, the Company established this anti-corruption policy.

## B. Aim

The objectives of the establishment and application of this anti-corruption policy are:

1. To increase the compliance and discipline of the Company group with regard to law, regulation and ethics and support government programs in order to prevent acts of corruption in Indonesia.
2. So that the Company has a system and procedures to prevent bribery and acts of corruption.
3. To increase awareness of high ethical culture in carrying out work activities that relate to external parties, in this case, partners and government agencies related to the group of companies.
4. To prevent material and immaterial losses that can disrupt the Company's business continuity.

## C. Scope

This anti-corruption policy applies to all organizations in the Company, the executive and all employees of the Company. In explaining its business activities, the Company applies this anti-corruption policy to customers, suppliers / partners and other stakeholders.

## D. Anti-Corruption Principles and Policies

Principles and anti-corruption policy of the Company are as follows:

1. The Company will not provide, submit or promise money or anything in other forms or certain interests (including all forms of adequacy to satisfaction, whether in whole or in part, on the basis of other people's requests including but not limited to financial interests) ("**Prohibited Benefits**") to all government employees in Indonesia and abroad (if any). The Company is also prohibited from assisting or deceiving other business actors in connection with the actions referred to above.
2. The Company will not give gifts or provide entertainment prizes to government employees in Indonesia or abroad (if any) that violate the Company's Code of Ethics and applicable laws and regulations.
3. The Company will not give instructions, assist or give approval to agents, consultants, agencies, prime contractors, sub-contractors, joint business partners, and / or other business partners ("**Business Partners** ") to bind themselves to agreements with Business Partners to fulfill Prohibited Benefits both domestic and foreign government organizations or other consumers with the aim of making unreasonable requests. Furthermore, when the Company commits itself to the Agreement with Business Partners, the Company is required to comply with the initial inspection and outline the provisions regarding anti-corruption in the agreement with the Business Partner in connection with the Company's internal policies.
4. The Company will not provide, or promise benefits that are prohibited to executives or employees of other business entities (both domestic and foreign) with the intention of causing someone to perform an improper function. The Company is also prohibited from receiving Prohibited Benefits from other business entities with the same purpose.
5. The Company will always be subject to the anti-corruption legislation in force in Indonesia.

#### **E. Actions taken when there are actions that violate the Anti-Corruption Policy.**

All bribery or receipt of bribes offered or any forms of contents intended in connection with transactions with the Company, must be reported to the contact below. The identity of the reporter will be kept confidential and all personal information collected through the report will be processed fairly and legally in connection with the provisions of confidentiality and data protection in terms of identifying and investigating illegal acts or non-compliance with Company policies.

The Company also owns *Tim Khusus Pelaporan Pelanggaran* ("**TKPP**"), among others:

1. Corporate Human Capital Division Head;
2. Corporate Secretary;
3. Legal Function Head Group;
4. Corporate Audit Head;
5. Procurement and Investment Function Head.

The details regarding the contact of the TKPP members are listed in the annex to this anti-corruption policy which can change at any time based on the Company's decision.

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**Appendix to the Special Team for Reporting Violations of Anti-Corruption and Anti-Fraud  
Policies**

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2. Name : Sara Kristi Loebis  
Position : Corporate Secretary  
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3. Name : Nataza Perdamenta Purba  
Position : Legal Function Head Group  
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4. Name : Donny Setiawan  
Position : Corporate Audit Head  
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5. Name : Arif Burhanthoyib  
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