

# WHISTELBLOWER POLICY

## 1. INTRODUCTION

### Objective

The Company believes to conduct its affairs in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behavior. The Company has established a vigil mechanism for its Directors, Employees and Associates to report their genuine concerns generally impacting/affecting business of the Company, regarding unethical behavior, misconduct, actual or suspected fraud or violation of the code of conduct or any policy of the Company.

Any actual or potential violation of code of conduct or any policy, would be a matter of serious concern for the Company.

The Company has made provision for direct access in exceptional cases, to:

- the chairperson of the Audit Committee, where any entity part of PT Asianet Media Teknologi has a designated Audit Committee, or
- a Director (nominated by the Board of Directors specifically for this purpose) to perform the role of the Audit Committee for the purpose of this mechanism, for any other entity part of PT Asianet Media Teknologi.

### Scope

Directors, Employees and Associates of the Company are eligible to make Protected Disclosures<sup>1</sup> under the Whistleblower policy pertaining to the following issues:

- Abuse of authority
- Unethical behavior
- Any unlawful act whether criminal or civil
- Fraud (actual or suspected)
- Financial irregularities
- Insider trading
- Misuse of confidential Information
- Misuse of Company's name or that of its associates or affiliates or group companies
- Conflict of Interest
- Bribery or corruption
- Misappropriation of company funds/assets
- Breach of IT Security and data privacy
- Any other issue as deemed fit

## 2. PROTECTED DISCLOSURES

### Disqualification of Protected Disclosure

The Company reserves the right to not investigate the Protected Disclosure in case of the following scenarios:

- Protected Disclosure related issue not covered under Scope of this policy
- Protected Disclosure without obtaining minimum information such as location of incident, timing of incident, personnel involved, specific evidence or source of evidence and detailed description of the incident

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<sup>1</sup> Protected Disclosure" refers to any communication made in good faith that discloses or demonstrates facts that could be used to prove unethical or improper behaviour.

## **Protection for Whistleblowers**

The Company will ensure protection for the Whistleblowers and will not tolerate any form of reprisal or retaliation under this Policy. Retaliation includes discrimination, reprisal, harassment, hostility, victimization or vengeance in any manner. The Whistleblower will not suffer loss in any other manner like transfer, demotion, refusal of promotion or the like including any direct or indirect use of authority to obstruct the Whistleblower's right to continue to perform her/his duties including making further Protected Disclosure, as a result of reporting under the Policy.

Beside above protection, the company shall provide legal protection based on Act 15 of 2002 junction Act 25 of 2003 regarding Money Laundering Act, Act 13 of 2006 regarding witness and victim protection, and Presidential Decree No. . 57 of 2003 regarding Special Protection Procedures for Whistleblowers and Witnesses in Money laundering Act.

However, this protection is available provided that:

- The Protected disclosure is made in good faith;
- The Whistleblower is not acting for any personal gain.

Any other Director, Employee or Associate assisting in the investigation shall also be protected to the same extent as the Whistleblower.

An Employee, Director or Associate who knowingly makes false allegations of unethical or improper practices or alleged wrongful conduct shall be subject to disciplinary action, up to and including termination of employment/contract, in accordance with Company rules, policies and procedures.

## **Reporting Procedure**

The Whistleblower can make a Protected Disclosure by emailing his/ her concerns at [ethic@asianet.co.id](mailto:ethic@asianet.co.id) The reporting channel will be managed by the Compliance Officer and will be over seen by the Audit Committee or the Nominated Director, as applicable.

Protected Disclosure should be written to provide clear understanding of the issues raised and should either be typed or written in a legible handwriting in English or Indonesian or any vernacular language. All Protected Disclosure concerning financial or accounting matters or those concerning the Compliance Officer or HOD and above shall be addressed directly to the Audit Committee or the Nominated Director, as applicable. Protected Disclosures should be factual and should contain as much specific information as possible to allow proper assessment of the Protected Disclosure.

## **3. HANDLING OF PROTECTED DISCLOSURES**

### **Investigation**

- All Protected Disclosures reported under this Policy will be thoroughly investigated by the Compliance Officer over seen by the Audit Committee or the Nominated Director, as applicable.
- The Compliance Officer/Audit Committee/Nominated Director may, at its discretion, consider appointing an internal or external investigator or investigation team
- Identity of the Subject (i.e. a person against whom the Complaint is made) and Whistleblower should be kept confidential to the extent possible given the legitimate needs of law and the investigation. Any other Director, Employee or Associate assisting in the investigation shall also be protected to the same extent as the Whistleblower.
- Subject shall co-operate with the Compliance Officer or Investigators and should not interfere with the investigation process.
- The Subject shall be informed of the outcome of investigation.

- The investigation shall be completed normally within 90 (ninety) days of receipt of the Protected Disclosure. The findings of the investigation will be shared with the Audit Committee or the Nominated Director, as applicable.

## **Investigators**

The Compliance Officer shall decide to conduct or get an investigation conducted by external investigators after preliminary review of Protected Disclosure, which establishes that:

- The alleged act constitutes an improper or unethical activity or conduct as defined in Scope of this Policy.
- The allegation is supported by specific or minimum information provided by the Whistleblower as defined under “Disqualification of Protected Disclosure” section of this policy.
- All investigators shall be independent and unbiased in both fact and as perceived. Investigators shall derive their authority and access rights from Compliance Officer during the investigation.

## **Decision**

If an investigation leads the Compliance Officer, Audit Committee or Nominated Director as may be applicable, to conclude that an improper or unethical act has been committed, the Audit Committee or the Nominated Director, as applicable shall direct the Management of the Company to take such disciplinary or corrective action as the Audit Committee or the Nominated Director may deem fit.

## **Reporting**

At least once in every six months and whenever else as deemed necessary, the Compliance Officer shall submit a report to the Audit Committee/Board of Directors with the summary of each complaint made in the last 12 months and show specifically: (a) the Subject and the complainant (unless anonymous, in which case report will so indicate), (b) a description of the complaint, (c) the status of the investigation, (d) any conclusions reached by the investigator, and (e) findings and recommendations.

Further, matters related to bribery and corruption of public officials should be additionally reported to the legal counsel for their advice on compliances with Act 31 of 1999 along its amendment Act 20 of 2001 regarding Eradication of Corruption Act, US Foreign Corrupt Practices Act, 1977, UK Bribery Act, 2010 and other applicable laws.

## **4. RETENTION OF DOCUMENTS**

All Protected Disclosures in writing or documented along with the results of investigation relating thereto shall be retained by the Company for a minimum period of ten years or other limitation period required under law.

## **5. AMENDMENT AND OTHER POWERS**

The Company has the right to amend, suspend or replacethis Policy anytime and shall inform the Employees, Directors and Associates of such amendment in due course.

The Company may also establish further rules and procedures, from time to time, to give effect to the intent of this Policy and further the objective of good corporate governance.