

ANTI-FRAUD & ANTI-CORRUPTON POLICY
PT Astra Graphia Tbk



Anti-Fraud & Anti-Corruption Policy

I. Introduction

PT Astra Graphia Tbk (hereinafter referred to as ("**Astragraphia**" or "**the Company**") aspires to become a business institution that benefits all of its stakeholders.

The Company has stated its intention to implement the principles of Good Corporate Governance (GCG), which include transparency, accountability, responsibility, independency, equality, and fairness. The Company chooses to conduct business in accordance with the moral and social norms, as well as the general public's interests.

To implement the principles of *Good Corporate Governance*, the Company's Code of Ethics has been developed to serve as a guidance for all employees of the Company in behaving appropriately.

The Company's Code of Ethics consists of guidelines on Business Ethics and Work Ethics that contain the principles of the Company, Employees, Board of Directors, and Board of Commissioners of the Company in behaving and dealing with external and internal parties of the Company. To provide further guidance on these guidelines related to measures to prevent *fraud* and corruption that harm the Company and/or the state, the Anti-Fraud and Anti-Corruption ("**Policy**") implemented by Company. This policy is a guidance for the Company's Employees, Board of Directors, and Board of Commissioners at the head office and all operational offices.

II. Actions to Avoid

All Employees, Board of Directors, and Commissioners must avoid enriching themselves or others that result in financial harm to the Company and/ or the state finance, including:

1. Abuse of authority, opportunity, or facility (including the Company's Confidential Information), provided by Company because of it's title or position in the Company.
2. Do fraud, burglary, or embezzlement of money, securities, and/or other assets owned by Company.
3. Falsify accounting records and/or make false statements in letters and/or documents related to the Company's financial or non-financial matters;
4. Engage in any activity that involves improperly altering, destroying, copying, or manipulating Company data or data used by the Company;
5. Provide and/or promise anything in any substantial form to state officials, central or regional governments, military and/or police agencies;
6. Provide and/or promise anything in any substantial form to the Company's Employees or Customers to incite them to do or not do something in their position that is contradictory to their obligations;
7. Receive something and/or a promise of something in any substantial form from the Company's employees, Business Partners, or Customers to incite the Employees, Board of Directors, or Board of Commissioners of the Company to do or not do something in their position that is contradictory to their obligations;
8. Engage in other criminal acts of corruption (including money laundering) and/or fraud that violates the laws and regulations
9. Provide other parties with support, opportunity, facilities, and/or information, or participating/cooperating with other parties to carry out the acts listed in points 1 through 8 of this part.

III. Participation

Chief/Head of Department and supporting organ of the Company are responsible for (i) understand the types of fraud and/or corruption that may occur in their work area, (ii) respond to indications of fraud and/or corruption, and (iii) implement function control to prevent these actions.

All Employees are responsible for carrying out their functions to prevent fraud and/or corruption. They must be aware of the occurrence of fraud and/or corruption and of transactions or inappropriate acts that are an indication of fraud or corruption, and report suspected violations of this Policy to the responsible Chief/Head of Department of the Company immediately.

IV. Sanctions

Any breach of this Policy and/or Company Regulations, Company shall disciplinary action among others: termination of employment, referral of criminal proceedings, and/or civil lawsuits to the parties involved by the Company in accordance with applicable laws and regulations.

Furthermore, any infringement of laws and regulations related to Corruption Eradication and/or fraud may result in criminal and/or civil sanctions for the person involved.

V. Questions and Reports

If Employee of the Company have any questions or intend to report a suspected violation of this Policy, they should contact their line manager or their Chief or Human Capital Management & Services Division or Corporate Secretary, Legal and Corporate Communication Division.