

Corporate Code of Conduct (COC) related to Corporate Social Responsibility

Labor, Human Rights, Health, Safety and Environment

SANWA understands the importance to sustain good human relations - internally and externally, Healthy and safe work environment is our priority as well as managing Environmental Impact properly.

We are committed to improve our standard continuously to meet our customer requirements; therefore, we have adopted these policies to communicate the messages and to assist those working for/with us to uphold it.

Steven Lim

Executive Director

I. CORPORATE SOCIAL RESPONSIBILITY

Our company will carry out corporate social responsibilities (CSR) activities in accordance with our basic policy of expertise, human and capital resources to reflecting our values and social awareness.

II. PURPOSE

The purpose of this policy is to:

- a. Set out SANWA's principles as well as the responsibilities of those working for us or associated with us, in observing and upholding our position on human rights, health, safety, environment and corporate social responsibility.
- b. Provide information and guidance to those working for us on how to recognize and deal with these issues

In this policy the use of the terms “we”, “our”, and “us” refer to SANWA

It is important that you read, understand, and act in accordance with this policy

III. TO WHOM THIS POLICY APPLIES?

The policies apply to all individuals working at all level and grades, including Senior Managers, Officers, Directors, Employee (whether permanent or contract), Consultants, Contractors, Seconded Staff, Home Workers, Casual Workers and Agency Staff, Agents, Channel Partners or any-other person associated with us, or any of subsidiaries or their employees, whether located (collectively referred to as “**Workers**” in this policy)

IV. LABOR – HUMAN RIGHTS

In the context of its overall commitment to protecting human rights, our company pays special attention to upholding the rights of indigenous peoples, acknowledging their unique social and legal status under national and international laws, conventions and declarations, such as the International Labor Organization Convention 169 and Indonesian labor laws, as well as other unique histories and cultural contributions throughout the world.

Human Resource Department is acting as Ethics Committee for the policy implementation and monitoring.

Our principles and Efforts in Human and Labor Rights consist of:

- 4.1 As part of our Fundamental Human Rights awareness, we are **committed** to create **non-discrimination** workplace, fair treatment and support of diversity.

We are against all abuses/harassment; mentally or physically, as well as personal preference based on certain gender, race, color, political affiliation, etc.

Effort : Monitoring the whole scope of operations, allowing whistleblowers and prompt action/investigation to suspected event, create Hotline to report cases and Awareness Training

Target : Achieve zero number of cases

- 4.2 Child & forced labor hiring is **prohibited**; company obliges to comply with national labor regulations for employment such as age and or other term and conditions to avoid the incident.

Effort : Recruitment process is strictly controlled, administratively employees have to submit documents to verify their age and also recommendation letter/card from Manpower Department.

Target : No child or forced labor is hired (zero)

- 4.3 Career Management and Talent Development are to be continuously developed through training, career mobility and individual/group coaching.

Effort : Training, Job Transfer, Coaching, Promotion.

Target : 5 promotions annually

- 4.4 We encourage open communication and engagement to resolve industrial relation issues. Freedom of Association is protected in Indonesia under Act No 21 Year 2000 about Trade Union.

Effort : Facilitate Labor Union by providing room space, 50 man-days permit in a year for Labor Union activity and Payroll support for fee collection.

We also setup Bipartite Forum for frequent feedback.

Target : 50 mandays permission for Labor Union Activity.

- 4.5 Continuous working condition improvement. Therefore, wage, Benefits & Working Hours which had been stipulated in Collective Work Agreement, Bipartite Forum and other agreements (which involve management and workers) are to be implemented strictly. Issues which have not been covered in Collective Work Agreement will refer to Labor Laws of Indonesia.

Effort : Creating Channel for discussion on Working Conditions Improvement and implementation.

Target : Bipartite meeting to be held at least 4 times a year.

V. HEALTH, SAFETY AND ENVIRONMENT

It is our objective to provide a safe and healthy environment in our company. HSE Committee and HSE Officer is in-charge in daily monitoring of the policy implementation.

Our Principal and Efforts in Health, Safety and Environmental Areas consist of:

- 5.1 Eliminating Unsafe Act, Unsafe Condition and Manage Emergency Condition.
- 5.1.1 Providing Worker Personal Protection Equipment to prevent employees from over exposure of hazards.
 - 5.1.2 To have proper Emergency Response and Preparedness on site as well as continuous improvement in managing overall safety risks.

- 5.1.3 Provide trainings, install safety signs and conduct regular meeting to bring awareness of safety, health and environmental issues to all employees.
- 5.1.4 Engage with 3rd party agent to ensure the operational safety of equipments, machines, compressors, lifter, etc.
- 5.1.5 Obtaining, publicizing and conducting awareness for MSDS (Material Safety Data Sheet).
- 5.2 Monitor and Regulate Environmental Health Hazard.
 - 5.2.1 Monitor Environmental Aspects such drinking water, air, industry waste by engaging 3rd party.
 - 5.2.2 Ensuring all chemical purchased are safe and in compliance with RoHs certification.
 - 5.2.3 Establishing SOP for chemical handling and hazardous waste management.
 - 5.2.4 Continuously reducing usage of energy such as fuel consumption, electricity and water.
- 5.3 Establishing Internal and External Feedback for safety, health and environmental issues.
 - 5.3.1 Internal and external auditing of any risks related to safety, health and environmental issues.
 - 5.3.2 Open discussion and feedback by Safety Committee.
- 5.4 Last but not least, it includes all other actions which are in accordance with the implementation of local health, safety and environmental laws as well as customer requests.

Targets are stated in EHS Policy & Objective Doc# HSED-01

VI. RESPONSIBILITIES TO WHOM THESE POLICIES APPLY

- 6.1 You must ensure that you read, understand and comply with these policies at all times.

- 6.2 The prevention, detection and reporting of any offense are the responsibility of all those working for us or under our control. All Workers are required to avoid any activity that might lead to, or suggest, a breach of these policies.
- 6.3 You must notify your manager/Ethics Committee as soon as possible if you believe or suspect that a conflict with any of these policies has occurred, or may occur in the future.
- 6.4 Any employee who breaches any of these policies may face disciplinary action, which could result in dismissal for gross misconduct.
- 6.5 We reserve our right to terminate our contractual relationship with other parties if they breach this policy.

VII. HOW TO RAISE A CONCERN/WHISTLEBLOWING

You are encouraged for **raising concerns** about any issue or suspicion of malpractice of our Code of Conduct at the earliest possible stage.

If you are unsure whether a particular act constitutes an offense, or if you have any other queries, these should be raised with our Departmental Head or directing to the Compliance Manager (Human Resource Department).

- 7.1 Your identity would be kept confidential. There would be no identity disclosure without your personal agreement and acknowledgment. Your security will also be our top priority.
- 7.2 Hotline number to report the case is 0811777148, ensure that you have written your complete name, badge number & feedbacks with some evidence. The more complete information you supply us, the most likely the investigation is going to be effective and efficient.
- 7.3 Ethics Committee shall take action immediately within one week of the report and do prompt investigation, proper reporting and

acknowledgment by Director. The whole process shall not take longer than 6 months except if the impending is caused by External Parties. You would be notified of the on-going process.

7.4 Whistleblower who makes a report which is not done in good faith (intentional false accusation) or the offender of Code of Conduct shall be put into disciplinary actions or even dismissal from employment or partnership for serious offence.

7.5 Criminal offence will be reported to the law enforcement and resulted in automatic dismissal from employment or partnership.

VIII. MONITORING AND REVIEW

8.1 The Ethics Committee will monitor the effectiveness and review the implementation of this policy, considering its suitability, adequacy and effectiveness. Improvements identified will be made as soon as possible.

8.2 All Workers are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

8.3 Workers are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Ethics Committee.

8.4 Our Business Partners such as Contractors, Consultants and Agents shall also adapt our Principles stated in this Code of Conduct with their independent approach and implementation.

8.5 SANWA reserves the right to vary and/or amend the terms of this policy from time to time at its absolute discretion.

-----YOUR DECLARATION FORM-----

I/We are obliged and committed to obey this policy and SANWA reserves the right to terminate the employment/partnership in case we are proved to be breaching SANWA Code of Conduct.

DATE : _____

NAME : _____

DEPARTMENT/COMPANY : _____

SIGNATURE & STAMP : _____

Please sign every page and complete declaration page before submitting to SANWA HR-HSE
DEPARTMENT