



ANTI-CORRUPTION POLICY

PT CITA MINERAL INVESTINDO Tbk

ANTI-CORRUPTION POLICY

PT Cita Mineral Investindo Tbk ("the Company") is committed and compliant with applicable laws and supports the Government of Indonesia's program. To ensure that the Company's activities and businesses are protected from actions that can harm the Company, the Company has established an Anti-Corruption Policy.

The purpose of implementing this Anti-Corruption policy is to prevent material and immaterial losses, increase compliance with regulations, discipline and ethics of the Company towards the law, in carrying out the Company's daily operational activities related to external parties, business partners, and Government agencies.

Scope

This policy covers all actions taken by the Board of Commissioners and Board of Directors, and all employees of the Company without exception.

The objectives of implementing the Anti-Corruption Policy are:

1. To prevent material and immaterial losses that could harm the survival of PT Cita Mineral Investindo Tbk.
2. To increase the compliance and discipline of PT Cita Mineral Investindo Tbk towards laws, regulations and ethics as well as to support government programs in order to prevent Corruption in Indonesia.
3. To increase awareness of high ethical culture in carrying out work activities related to external parties, in this case, business partners and Government agencies related to PT Cita Mineral Investindo Tbk.

Policy

All employees, the Board of Commissioners, and the Board of Directors must ensure that the Company's activities and businesses are protected from acts of corruption as defined in Law No. 31 of 1999 in conjunction with Law No. 20 of 2001 concerning Eradication of Corruption, relating to the activities of:

1. Harming State Finances
2. Bribery
3. Embezzlement
4. Blackmail
5. Cheating
6. Conflict of Interest
7. Gratuities

To maintain independence in carrying out the roles/functions of each major organ in the Company (Shareholders, Board of Commissioners, Board of Directors and Employees), the following matters need to be considered:

- 1) Prohibition from conducting transactions with conflict of interest and gaining personal benefit from the activities of the Company concerned;
- 2) Prohibition from holding multiple positions which may cause a conflict of interest;
- 3) No authorization to represent the Company if it has interests that conflict with the interests of the Company;

Types of Actions categorized as Corruption

1. Prohibition of Bribery for Private and Public

All employees and related parties of the Company may not ask, accept, offer, give or allow bribes of any kind or anything that can be interpreted as bribes either directly or indirectly. Every employee or related parties of the Company is required to carry out their functions properly in anticipation of any bribery, and is responsible for knowing what is permitted by law in the country of operation regarding benefits provided or received by them or on their behalf. This includes finding out whether a certain person they are dealing with is a public official or not.

2. Prohibition of Payment for Facilitation

A public official can, in return for a small payment, offer to activate or speed up the process that belongs to them or their job to carry out such as issuing permits,

licenses or other official documents, processing government documents, such as visas and work orders, providing police protection, pick-up and mail delivery, provide utility services and handle cargo. Such payments are often called facilitation payments and such payments may not be made within the Company.

3. Guidelines and Control over Gifts, Hospitality and Promotional Costs

Definitions of gratuities / giving or receiving gifts / commissions for personal gain are as follows:

- i. Employees of the Company are prohibited from requesting, accepting or allowing close family members to receive gifts, services, loans or special treatment, directly or indirectly, cash or non-cash from customers, suppliers or any other parties in return for a business relationship with the Company in the present or in the future;
- ii. Every gift and/or acceptance of other matter as stated above must be refused politely and/or fully attempted to be returned and must be reported to the supervisor. If there are acceptable reasons for which refusal and return of said gift is difficult to perform, by taking into account the interests of the Company, the gifts and acceptance of other matters referred to must be enjoyed/utilized by all employees, the head of the work unit with the approval of the Board of Directors is responsible for this implementation.

4. Guidelines on Political Contributions

As part of business principles, the Company does not permit its funds or resources to be used to contribute to political campaigns, political parties, political candidates or their affiliated organizations.

The management and employees of the Company can make personal political contributions and engage in political activities on their own time. However, because they are also Company employees and their activities are sometimes mistaken for Company activities, they must:

- i. Not use company time, property or equipment to carry out or support their personal political activities;
- ii. Always make it perfectly clear that their views and actions are their own and not the Company's; and
- iii. Never ask for compensation in any way from the Company for these contributions.

5. Guidelines on Contributing to Charitable Activities

The Company and all employees and related parties can make contributions or charity sponsors on their behalf or on behalf of the Company only to trustworthy charitable purposes (for example given to a charity organization or other non-profit organization that does not receive tangible benefits, or is expected to receive, by the Company). However, this must be in accordance with prevailing laws and regulations and the charity or other non-profit organizations are required to fill out the Charity Contributions Questionnaire which is part of this Policy.

Gratuities within PT Cita Mineral Investindo Tbk

A Gratuity will turn into a criminal act of bribery if it is given to a civil servant or state official, related to their position and contrary to their duties and obligations.

The basic principles of Gratuity are as follows:

- i. In certain conditions, where employees cannot avoid gratuities that are considered bribes, the employee must report and submit the money/goods/facilities.
- ii. Every employee is prohibited from accepting and is obligated to reject Gratuities that are considered bribes and directly received from any party, which can affect the independence and objectivity of the implementation of their duties and authority in the Company
- iii. Every employee, if offered or given Gratuities that is considered a bribe, must refuse politely and provide an adequate explanation of the policies and rules contained in this guideline to business partners/third parties.
- iv. Every employee is prohibited from giving Gratuity that is considered as bribe both directly or indirectly to any party, which aims to influence the

intended party to do and/or not do something contrary to their functions and authority

Sanction

Offenders who are proven to have committed acts of corruption will be subject to sanctions in accordance with Article 25 of the Company Regulations (PP) and applicable laws. This policy will be reviewed periodically based on the needs and developments both from within and outside the Company.

Employees and external parties' participation

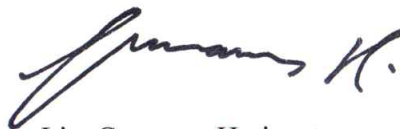
Employees and External Parties can participate in helping the efforts to prevent and eradicate corruption by informing the Company through the Violation Reporting System via email: wbs@citamineral.com or by reporting to the Head of Internal Audit on the occurrence of corruption.

PT Cita Mineral Investindo Tbk appreciates all Employees and External parties who have contributed to helping the efforts to prevent, eradicate, or disclose acts of corruption in accordance with company policy.

APPROVAL SHEET

Approved on behalf of the Boards of Directors and Commissioners of
PT Cita Mineral Investindo Tbk
in Jakarta, 2 August 2020

Board of Commissioners



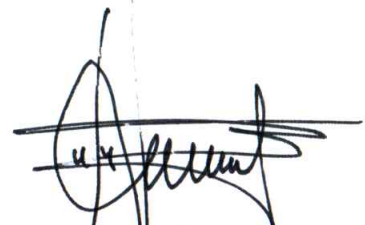
Lim Gunawan Hariyanto
President Commissioner



James Gregory Baxter
Commissioner




A. Ibrahim Saleh
Independent Commissioner



Darjoto Setyawan
Independent Commissioner

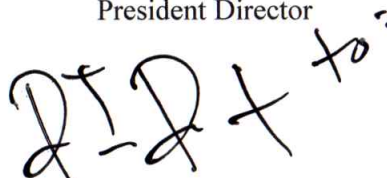
Board of Directors



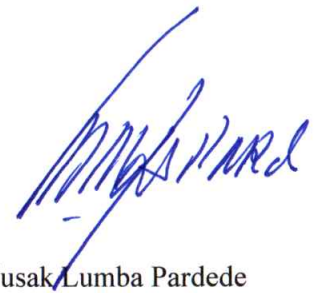
Harry Kesuma Tanoto
President Director



Ferry Kadi
Director



Robby Irfan Rafianto
Director



Yusak Lumba Pardede
Director