

# APP Sinar Mas Business Code of Conduct

# Greeting from APP Management

**Dear fellow APP employees that I'm proud of - wherever you are,**

Asia Pulp & Paper (APP) is a pulp and paper manufacturer in Asia. For more than 50 years, APP continues to innovate and deliver quality products, such as paper, packaging, and tissue, to meet the needs of more than 150 countries on six continents. APP has employed more than 40,000 employees with diversity in them. Therefore, it is a challenge for us to establish a business code of conduct that practical for implemented globally to support the sustainability of the APP's business.

The trust placed in the APP by Shareholders, Regulators, Business Partners, and all Stakeholders must always be well-maintained. Therefore, good ethical behaviour, integrity, professionalism, and always being committed to upholding and maintaining APP's reputation in maintaining the trust of all Stakeholders and Investors, must be carried out seriously by all employees at every level of the organization.

This Business Code of Conduct (BCOC) is a reference that is applied globally, which reflects of the

Company's ethical norms, culture, and character, as well as a standard of conduct and business for all APP's Employees towards Stakeholders.

It is the duty and responsibility of APP's Employees to comply with and implement the BCOC faithfully. Our ultimate goals are to achieve sustainable business objectives and always maintain good business ethics to benefit APP's Stakeholders.

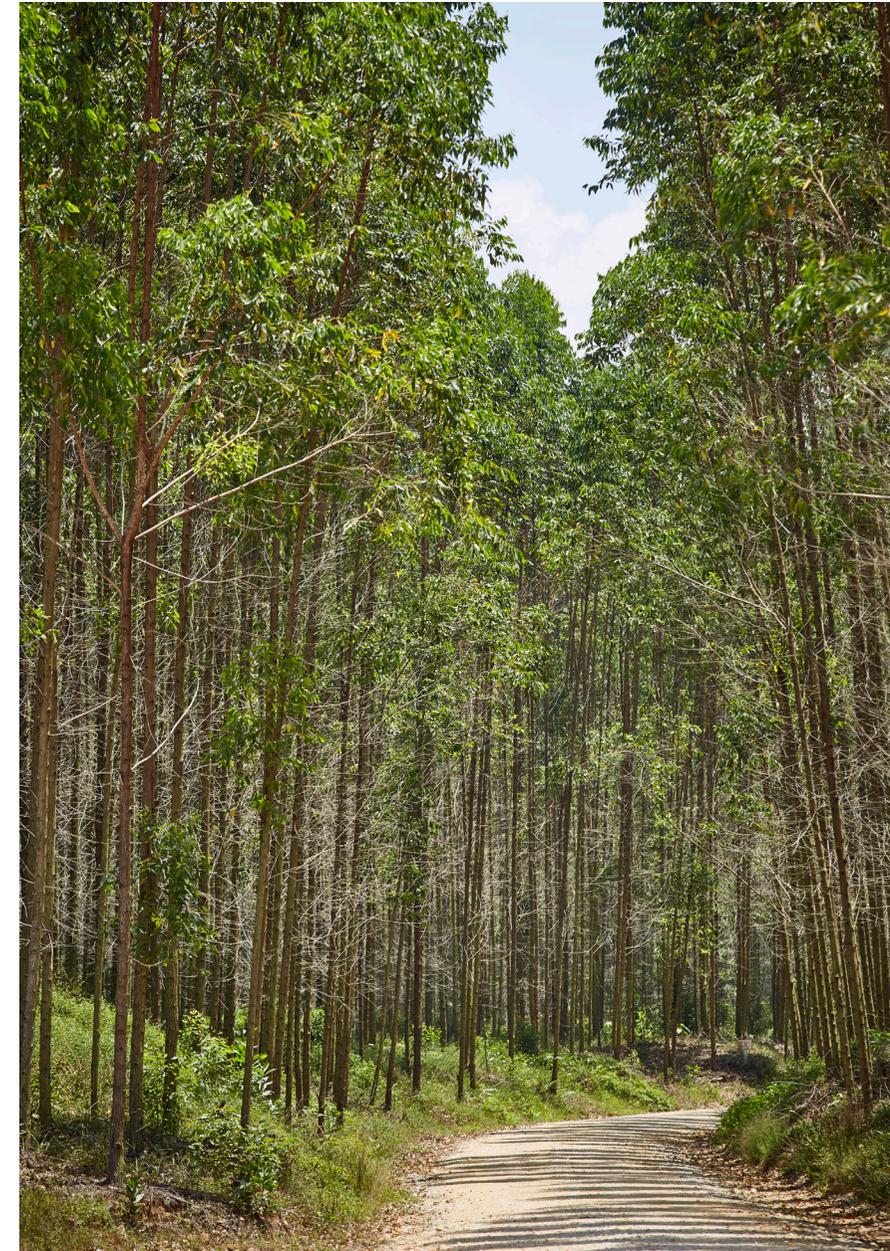
All APP's Management are confident that we can conduct our business in line with this BCOC. **Let's all be committed to implementing this BCOC to build a sustainable business and create value for all Stakeholders.**

Thank You.

Regards,



**Hendra J. Kosasih**  
Deputy CEO



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# Be Aware

**What is the BCOC and Why Do We Have It?**

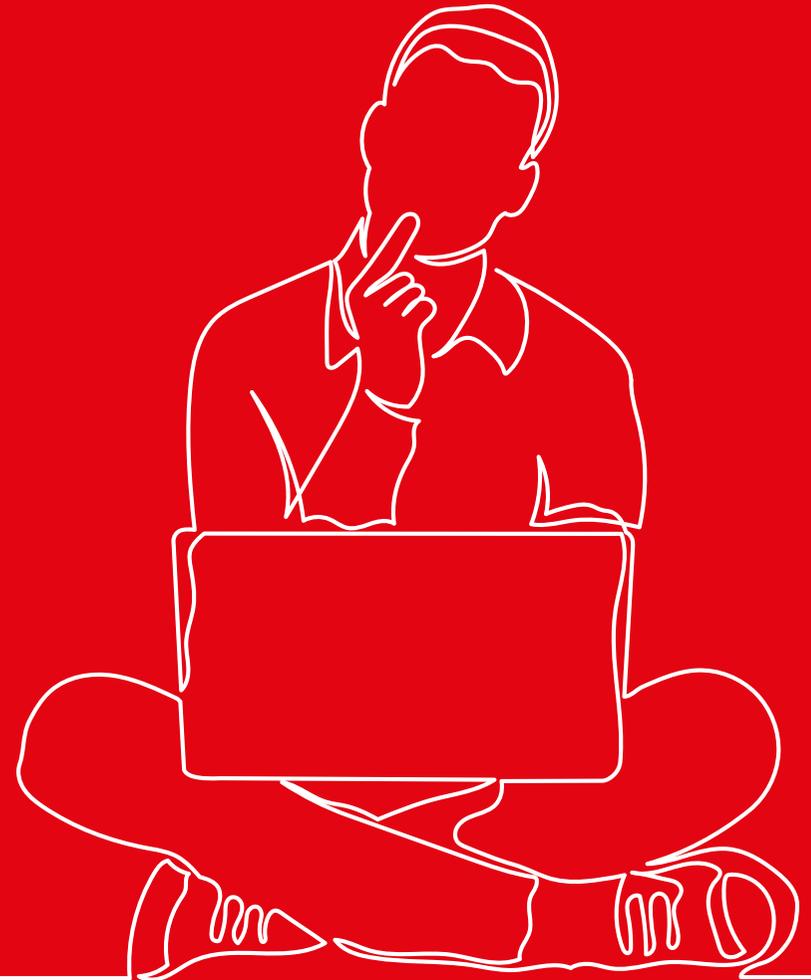
**Who Must Follow the BCOC?**

**What is Our Responsibility for the BCOC?**

**Speak Up – When and How?**

**Integrated Call Center (ICC)**

**Zero Tolerance on Retaliation**



# Be Aware

## What is the BCOC and Why Do We Have It?

**At Asia Pulp & Paper (APP) Sinar Mas, we believe that maintaining the highest ethical standards is vital to our business's long-term sustainability and growth.**

**Our daily conduct is the key to upholding the Company's reputation among employees, suppliers, customers, competitors, communities, and other stakeholders.**

**We all have to respect the law, act with integrity and honesty in all matters. We must be accountable for our actions.**

Our Business Code of Conduct (BCOC) acts as a set of guiding principles to help you as our employee and others make informed and ethical decisions at work and ensure we all act consistently with the Company's values. It is also the foundation of APP' Culture, which is based on honesty and integrity.

### Waivers and Modifications of Rules:

APP operates globally, and as a result, there may be times when local laws and regulations conflict with the BCOC. Whenever there is a difference or conflict between local legal requirements and the BCOC, we shall apply the strictest requirement.

### Who Must Follow the BCOC?

This BCOC applies to all APP's employees worldwide, except for employees under the management of companies in China's mainland area. It applies to you, whether you are a full-time/permanent, temporary/contract, or intern employee, and anyone who works on our behalf.

We also expect our joint ventures and business partners, including suppliers, vendors, third parties, and their employees, to act in a way consistent with our BCOC.





## What is Our Responsibility for the BCOC?

As APP's employees, each one of us has the responsibility to:

- Read, understand, and be familiar with the requirements in the BCOC, along with any policies applicable.
- Complete the BCOC training on an annual basis.
- Consistently act and behave in accordance with APP's values and BCOC.
- Ensure our suppliers, contractors, and business partners act consistently with the provision in our BCOC.
- Speak Up. Raise questions or concerns when in doubt or when you are aware of any possible violations of our BCOC.
- Cooperate fully with an audit or investigation.

As a supervisor, line manager, head, or leader, you have additional responsibilities to:

- Ensure all your team members read, understand, and be familiar with our BCOC. You are responsible for helping your team members understand our BCOC.
- Ensure all your team members complete the BCOC training on an annual basis.
- Be a role model by consistently acting and behaving in accordance with our BCOC.
- Encourage your team members and other parties to Speak Up.
- Listen and properly respond to questions and concerns raised.

## Speak Up – When and How?

### When should you Speak Up?

Every one of us has a responsibility to Speak Up, ask questions when in doubt, or raise concerns. As our employee, you are responsible to submit a report when you see any unethical behaviour, unsafe act, and potential violations of our BCOC. You should also ask questions whenever you are in doubt or have an ethical dilemma in making a decision at work.

We also encourage our third parties or stakeholders to Speak Up and raise their concerns related to our Companies.

For you to feel comfortable to Speak Up, we provide an option for everyone to report concerns anonymously.

### How can you Speak Up?

There are several options for you to Speak Up, as follows:



We understand it is not always easy to raise concerns but we do **encourage you to come forward** with any concerns and Speak Up!

Any concern will be dealt **appropriately** and **confidentially**.



### Integrated Call Center (ICC)

One of the options for everyone to Speak Up is through the Integrated Call Center (ICC). ICC is a 24/7 Speak Up channel for APP's internal and external parties to ask questions and raise concerns. You may contact ICC anonymously, and your report will be kept confidential following the applicable policies and regulations.

### Zero Tolerance on Retaliation

Retaliation can be in many forms, e.g., threats, intimidation, exclusion, humiliation, and unfair treatment. APP does not tolerate any forms of retaliation against anyone who reports any violations in good faith. We consider retaliation as misconduct, which will be subject to an internal investigation.

If you believe that you or someone else is experiencing retaliation, you shall Speak Up.

Learn more: [Whistleblower Program](#)

# Section 1 - People

**Diversity and Inclusion**

**Equal Opportunity**

**Safe Working Environment**

**Protection of Personal  
Information**

**Conflict of Interest**



# Section 1 – People

## Diversity and Inclusion

APP is committed to a working environment that promotes diversity, inclusion, and equal opportunity. We believe in the importance of a workplace with mutual trust, respect for human rights, and no discrimination. Therefore, we recruit and retain the best talent from around the world and value each individual's unique background and talent.

We believe that diverse backgrounds, experiences, talents, ideas, as well as the ability to work together in an inclusive environment will lead the Company in a better direction to achieve common goals.

### What you shall do:

- Be aware and respectful of cultural differences.
- Treat everyone with respect.
- Recognize each other's diverse backgrounds and abilities.

- Value input and ideas of others.
- Encourage and listen to those who Speak Up.

## Equal Opportunity

We are committed to providing equal employment opportunities and to treat everyone with respect, fairness, and dignity. Decisions regarding our employees and applicants must always be based on merit, qualifications, and job-related performance.

### What you shall not do:

- Base the employment decisions (e.g., hiring, training, promoting, and compensation) on non-job-related characteristics such as race, ethnicity, national origin, gender, age, religion, disability, and others legally protected status.
- Inappropriate behaviour, including making offensive comments and inappropriate jokes of a violent or sexual nature.

## Safe Working Environment

At APP, we are committed to prevent workplace violence and maintain a safe working environment. We support your physical and mental wellbeing as an employee and ensure safe working conditions. APP is committed to not use any form of forced, trafficked, or child labour. We respect the dignity of the individual, also your right to freedom of association and collective bargaining.

We do not tolerate acts of verbal or physical abuse, behaviour that make another individual feel threatened or unsafe, and any form of sexual harassment. All employees, customers, vendors, and business partners should be treated with courtesy and respect at all times. We are all responsible for maintaining the workplace that is free from harassment and violence.



**What you shall do:**

- Help to create and maintain a workplace environment that is free from harassment and violence.
- Do not threaten, intimidate, or coerce another employee, customer, vendor, or business partner.
- Do not make any inappropriate or offensive comments to another employee, customer, vendor, or business partner.
- Do not make any inappropriate comments of a sexual nature or engage in any sexual offensive behaviour against other employees, customers, vendors, or business partners.
- It is prohibited to possess or use weapons while on company premises or while undertaking company business unless you have received specific authorization from the Company to do so and the possession or use of weapons is applicable under the local laws. You must store the weapons in an approved safe or locked facility while on company premises.
- Do not use company resources (tools, materials, spare parts,

and others) to threaten, stalk, or harass anyone at or outside the workplace.

- As soon as possible, report any direct or indirect harassment, threats of violence, incidents of actual violence, and suspicious individuals or activities noticed.

**Protection to Personal Information**

We respect your privacy as an employee, including your personal information. We only use employees' personal information for legitimate business reasons and when needed to comply with the laws and regulations.

**What you shall do:**

- Protect personal information with appropriate care to prevent misuse and loss. You are strongly advised to label the personal information as "confidential" to alert the confidentiality.
- Obtain approval from authorized personnel before sharing personal information with anyone. Only those with a need to know may use confidential information.
- Consult with HR when in doubt.

**Conflict of Interest**

Conflict of interest means any activities and situation that would constitute an actual or perceived conflict between personal interests and our Company's interests. Conflicts of interest may arise where an employee places his or her personal interests before the interests of APP, where such personal interests unduly influence that employee's business judgments, decisions, or actions.

We prohibit any conflict of interest that might hinder you from making business decisions in our Company's best interest.

**What you shall do:**

- Read, understand, and comply with our Company's policy of Conflict of Interest (E-Kinship).
- Make business decisions in the best interest of our Company at all times.
- Avoid, eliminate, resolve, and appropriately disclose any situation that creates, or appears to create, a conflict of interest between personal and the Company's interests.
- Disclose any situation that creates or appears to create

a conflict of interest in the E-Kinship system, which must be updated every year, so that we could review the situation and determine steps that should be taken to manage the potential conflict.

Learn more:  
[Conflict of Interest \(E-Kinship\) Policy](#)



# Section 2 - Duty of Care

**Workplace Health, Safety, and Security**

**Drugs and Alcohol Use**



## Section 2 – Duty of Care

### Workplace Health, Safety, and Security

APP is committed to the highest standard of health, safety, and security. All of us share the responsibility to maintain health, safety, and security at our workplace to protect our people and the Company's ongoing business.

Everyone must strive to maintain a safe and healthy working environment. The Company's facilities must operate in compliance with the applicable health and safety regulations and the Company's standards, which may be more stringent.

#### What you shall do:

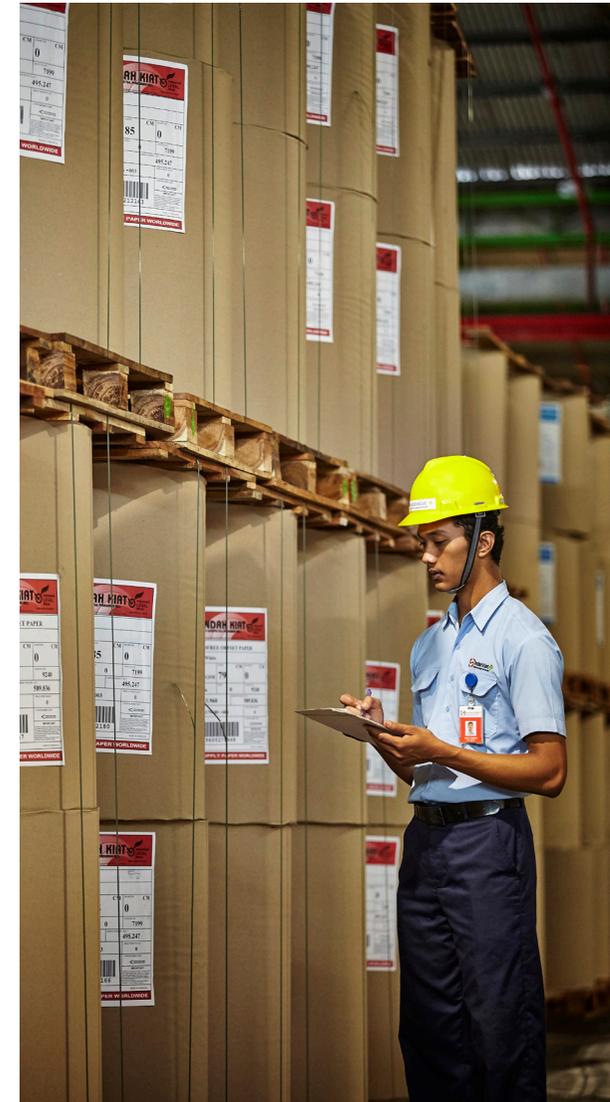
- Understand and get involved with the workplace health, safety, and security systems.
- Keep the workplace tidy to minimize the risk of any slips and falls.
- Adhere to safe working procedures and use the equipment correctly.
- Wear protective clothing and equipment whenever required.
- Help new employees and visitors to understand the proper workplace health, safety, and security procedures, and why they should play an active role.
- Tell your supervisor or manager of any health, safety, and security concerns as soon as they arise.
- Promptly report any pain, discomfort, accidents, or anything else that might present a risk to the health and safety of any person.

- Report minor work-related injuries, minor accidents, and "near-misses." This is essential to help us identify hazards and take corrective action before serious injuries occur.
- Encourage our vendors, suppliers, contractors, and others to comply with health, safety, and security regulations.

### Drugs and Alcohol Use

Drug and alcohol use at work poses a threat to our people's health and safety, and the Company's security. Everyone is prohibited from being under the influence of alcohol or drugs (both legal and illegal drugs) when at work on company premises or engaged in company business.

Unauthorized buying, selling, manufacturing, or dispensing alcohol or drugs is strictly prohibited within our company premises. Moderate consumption of alcohol as a part of work-related external relations activities is acceptable where reasonable and aligned with the applicable provision and laws.



# Section 3 - Business Partners

**Maintaining Long-Term and Sustainable Relationships**

**Gift and Entertainment**

**Prevention of Money Laundering**

**Avoidance of Anti-Competitive Conduct**



## Section 3 – Business Partners

### Maintaining Long-Term and Sustainable Relationships

Our business partners are essential to our business, including our customers, suppliers, vendors, contractors, and third parties. APP is committed to acting fairly in selecting our suppliers and customers. APP also seeks to work with business partners who share the same commitments with our ethics and compliance.

#### What you shall do:

- Clearly communicate our expectations to suppliers, customers, and other business partners; and agree on the applicable contractual obligations.
- Take the appropriate measure in a situation where our business partners does not meet the expectations and obligations.
- Treat our business partners fairly and honestly.
- Protect business partners' confidential information, e.g., pricing, technology, data, and others.
- Report any indications that our business partners are not complying with the applicable laws or the contractual agreement

### Gift and Entertainment

Receiving and providing gifts and entertainment from and to our business partners can become risky. Exchanging gifts and entertainment in return for any business, services, or confidential information is strictly prohibited.

#### What you shall do:

- Read, understand, and comply with the Company's applicable policy of Gift and Entertainment.

Learn more:  
[Gift and Entertainment Policy](#)



## Prevention of Money Laundering

Money laundering is the process of concealing illegal sources of funds and makes it look legitimate through different stages, placement, layering, and integration. We strictly prohibit this practice in APP.

### What you shall do:

- Build your awareness of the money laundering process.
- Follow the counterparty due diligence process before engaging with business partners.
- Never get involved in money laundering activities.
- Raise concerns when you see any indications of money laundering.

## Avoidance of Anti-Competitive Conduct

Anti-competitive conduct is a business practice that limits or prevents competition. Anti-competitive conduct is against the law. We prohibit any engagement in anti-competitive practices, including an agreement with competitors to fix the price, rigs bid, or restrict supplies.

### What you shall do:

- Know your counterparty before making any business deal by following and performing due diligence.
- Do not solicit or accept bribes or kickbacks from anyone who is seeking to do business with APP.
- Do not offer, give, or receive any bribes, kickbacks, facilitation payments, or other forms of illegitimate payments.
- Keep accurate records with its supporting documents and ensure all payments are legitimate and not used for any unlawful purpose.
- Raise concerns if you see any indication of anti-competitive conduct.



# Section 4 - Environment, Community, and Government

**Environmental Protection**

**Engagement with Communities**

**Managing Public Communication**

**Anti-Bribery and Corruption**

**Stance on Political Contributions and Activities**



## Section 4 – Environment, Community, and Government



### Environmental Protection

Environment protection is one of the targets to be achieved from the three sustainability pillars that form the basis of our sustainability initiatives. APP fully supports the nation's commitment to protecting the environment. APP is also committed to carefully and responsibly manage these resources.

#### What you shall do:

- Understand and comply with health, safety, and environmental regulations in your daily activities.
- Ensure that the Company's facilities meet and exceed the relevant regional, national, and international standards wherever we operate.
- Demonstrate awareness of and commitment to APP's environmental policies.
- Promptly report any environmental risks, hazards, or any potential violation of our environmental policies.
- Encourage our suppliers, contractors, customers, and other business partners to engage in responsible stewardship practices.
- Contact the Sustainability Department or your local HSE (Health, Safety, and Environment) expert for further information and if you are in doubt.

### Engagement with Communities

We are committed to being a trusted partner to the communities where we operate and contribute to those communities' development through our various investment programs.

#### What you shall do:

- Maintain a sustainable relationship with the surrounding community.
- Contact the CSR (Corporate Social Responsibility) team under Sustainability or HSE (Health, Safety, and Environment) Department for any information and questions related to our communities.

## Managing Public Communication

The public communications must be clear, accurate, consistent, and responsible. Only a person appointed or authorized by the Company can talk to the public and media. We prohibit the disclosure of any confidential and proprietary information to anyone without prior approval.

### What you shall do:

- Always be careful when posting anything on social media. Do not expect privacy if you participate in social media.
- Always consult with the Corporate Communication Department before making a post related to APP on social media.
- Many of you are a subject matter expert in your area and are invited to share your expertise through presentations. Make sure you consult with the Corporate Communication Department before presenting any company-related materials to the public.
- When in doubt, please contact the Corporate Communication Department.

Learn more:  
[Social Media Policy & Guideline](#)

## Anti-Bribery and Corruption

We do not tolerate any forms of bribery and corruption in conducting our business. We are committed to complying with the applicable anti-bribery and corruption laws and regulations wherever APP operates.

### What you shall do:

- Understand and comply with the Company's applicable Anti-Bribery & Corruption policy and the local laws and regulations.
- Know your counterparty before making any business deal by following and performing due diligence.
- Do not offer, give, or receive any bribes, kickbacks, facilitation payments, or other forms of illegitimate payments or allow others to do so on the Company's behalf.
- Do not solicit or accept bribes or kickbacks from anyone.
- Keep accurate records with supporting documents and ensure all payments are legitimate and not used for any unlawful purpose.

- If you are dealing with government officials, you must know and follow the particular rules related to this situation. If you are in doubt, please consult with the Ethics and Compliance Department.

Learn more:  
[Anti-Bribery and Corruption Policy](#)



## Stance on Political Contributions and Activities

We do not prohibit our employees from participating in the political and governmental process or communicating personal views to appointed and elected officials. However, you cannot identify yourselves as representative of APP or any of its affiliates, contractors, and suppliers when communicating personal views. The company name shall not be used in political campaigns or to promote the interests of political parties or candidates.

### What you shall do:

- You should not engage in personal political activities during paid working hours or using our company resources (such as funds, e-mail, phones, and meeting rooms) since such actions can be considered as political contributions by APP.
- You need to obtain approval from your manager before engaging in any political activities.
- Personal political activities can sometimes create a conflict of interest. Talk to your manager or the Ethics and Compliance Department if it occurs.

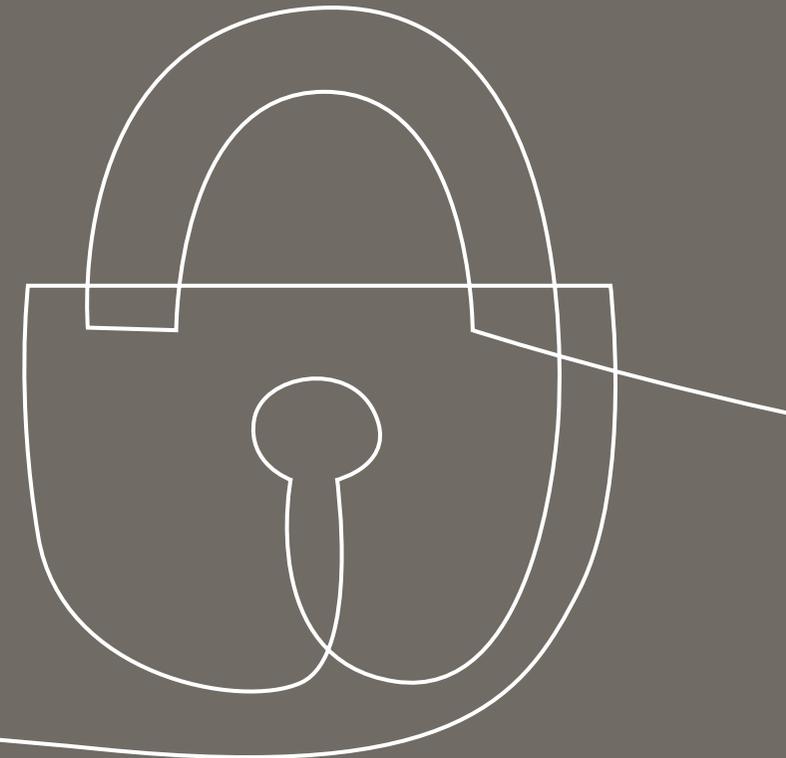


# Section 5 - Asset Protection, Records, and Financial Integrity

**Protecting the Company's Assets**

**Maintaining Accurate and Complete Records**

**Avoidance of Insider Dealing**



## Section 5 – Asset Protection, Records, and Financial Integrity



### Protection to the Company's Assets

We are all responsible for protecting our Company's assets, including funds, facilities, property, machines, spare parts, computers, IT systems, information, intellectual property, scrap, energy, electricity, and others. We are also responsible for safeguarding our Company's intellectual property and for respecting the intellectual property of others.

You should only use the Company's assets for business purposes and to properly manage company assets to ensure that they are not damaged, misused, lost, stolen, or wasted. All of us also need to manage budgets, expenses, and other funds properly and accurately.

### What you shall do:

- Ensure efficient daily use of our company resources.
- Follow APP's travel rules and policies.
- Any company's information/data can be deemed confidential. Do not share the Company's information/data without prior approval from an authorized person.
- Do not share your user ID and password with others.
- Be vigilant against cyber-attacks such as phishing and spam. Report any incidents of cyber-attack that you are aware of to the IT Department or contact ICC if you are in doubt.

### Maintaining Accurate and Complete Records

The Company's books and records must be prepared accurately and truthfully. Books and records can include expenditure reports, job

logs, sales reports, materials and stock reports, finished goods and production reports, waste reports, measurements, and others.

APP is committed to ensuring all financial statements, regulatory reports, and publicly filed documents comply with all applicable requirements. We all responsible for ensuring that all transactions are appropriately recorded, authorized, and reported as required.

### What you shall do:

- Ensure that all transactions are properly recorded, authorized, and reported as required.
- Ensure all financial statements, regulatory reports, and publicly filed documents comply with all applicable requirements.
- Follow the applicable requirements related to retaining, maintaining, and destroying data and documents.
- Always provide clear and truthful information and cooperate fully during audit programs and the investigation process.

## Avoidance of Insider Dealing

In our work, we may become aware of information about APP that is not publicly available. However, the information may be relevant to investors in making a decision whether to invest in APP shares or not. Insider dealing is strictly prohibited in APP. Sharing this “inside information” for a trading purpose is considered illegal based on law and regulation and can result in penalties.

### What you shall do:

- Do not share inside information with anyone as a tip to buy or sell APP shares.
- Do not share any non-public information without prior approval and consultation with the Legal Department.
- Never buy or sell APP shares based on inside information that is not publicly available.
- Consult with the Legal Department for further details related to insider dealing.

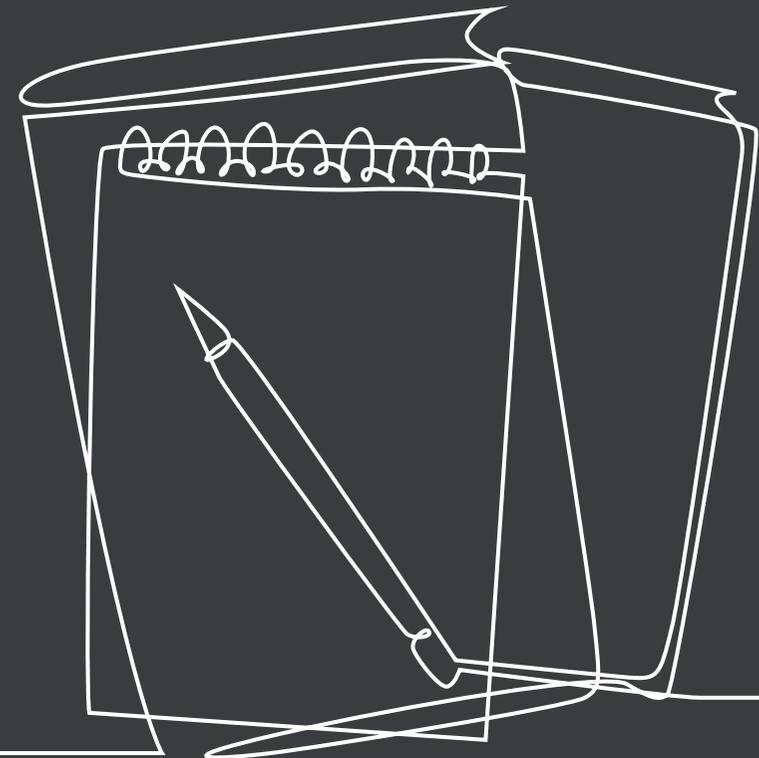


# Other Information

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**Glossary**

**Contact Information**



# Glossary

<b>Retaliation:</b>	Any detrimental treatment, such as dismissal, disciplinary action, discrimination, threats, intimidation, exclusion, humiliation, and unfair or unfavourable treatment resulting from a concern raised in good faith.
<b>Gift &amp; Entertainment:</b>	Any form of a gift, entertainment, hospitality, reward, benefit, or other incentives that are received or offered.
<b>Anything of value:</b>	Refers to cash or cash equivalent (voucher, e-cash, cheque, deposit, others); gifts to family members; debt write-off; loans; personal favours; sexual favours; rebates; kickbacks; insider information; entertainment; meals and travel; political, social and charitable contributions; business or employment opportunities; medical care; and others. Items of value that are given in compliance with the requirements of this policy and the applicable Anti-Corruption Laws; and which are not given with the intent to secure an undue or improper advantage will not be considered as bribes.
<b>Bribe:</b>	The act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting anything of value, whether directly or indirectly, to induce or influence an action or decision, which interferes with the Company's value, policies, and procedure, and/or the applicable laws, rules, or regulation.
<b>Facilitating payment:</b>	Bribes or unofficial payments given to or by APP employee intended to speed up routine transactions to which the payer is already entitled, such as to speed up licensing or invoicing process.
<b>Phishing:</b>	Fraudulent attempts through electronic communication, mostly e-mail, to obtain sensitive personal information, such as username and password, PIN, Credit Card.
<b>Spam:</b>	Refers to the e-mail sent without request, which mainly contains advertisement content.

# Contact Information

Purpose	Contact Person	Contact Information
1. <b>Reporting concern or alleged violation towards BCOC</b>	Your Manager, Ethics & Compliance function, Whistleblower Channel through Integrated Call Center (ICC) Service	ICC E-mail: <b>App_CallCenter@app.co.id</b>  ICC Indonesia toll-free phone: +62-800-1-368-368 (24 hours) ICC International: +62-21-5312-0412 (24 hours)
2. <b>Question about BCOC</b>	Ethics and Compliance Department	Contact your Local ECD Ambassador or the Ethics & Compliance function at:  E-mail: <b>Ethics_Compliance@app.co.id</b>  Mail: Wisma Indah Kiat - Building B, 4th Floor. Raya Serpong Street, Km. 8, Tangerang, Banten, Indonesia - 15310
3. <b>Health, safety, environment, and sustainability-related policy, procedure, or question</b>	HSE (Health, Safety, and Environment) and/or Global Sustainability Department	Contact your local HSE Officer
4. <b>Community-related question</b>	Corporate Social Responsibility Department	Contact your local CSR function under the HR/External Relation/GA function
5. <b>Legal or law question</b>	Legal Department	Contact your local Legal Counsel
6. <b>HR-related policy, procedure, or question</b>	Human Resources Department	Contact your local HRBP
7. <b>Finance and accounting related policy, procedure, or question</b>	Finance and Accounting Department	Contact your local Finance & Accounting Support
8. <b>Internal and public communication-related policy, procedure, or question</b>	Corporate Communication Department	E-mail: <b>Corporate_Communications@app.co.id</b>

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**ICC** Integrated  
Call  
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