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**SUPPLIER CODE
OF CONDUCT
FOR APP INDONESIA**

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SUPPLIER CODE OF CONDUCT



APP Indonesia has established a Business Code of Conduct (BCoC) company standard that include ethical business practices and regulatory compliance. These standards apply to all APP employees, directors, and officers.

Similarly, APP Indonesia (hereafter termed APP) Similarly expects its suppliers and the suppliers' subcontractors to embrace this commitment with integrity by complying with and training its employees on APP's Supplier Code of Conduct.

01 Be honest, fair and trustworthy in all of your APP-related activities and relationships.

02 Obey applicable laws and regulations governing APP's business around the world.

03 Fulfill your obligation to act with Integrity and promptly report any concerns you have about compliance with the national law, APP policy and this Code.

04 Conduct your business with APP in as competitive a way as possible — with speed, accountability and compliance.

WHO SHOULD COMPLY WITH THIS CODE

The **APP Indonesia (called APP) Supplier Code of Conduct** must be followed by suppliers and their employees, agents, and subcontractors (collectively as “**Suppliers**”) **whilst conducting business with or on behalf of APP.**

Suppliers must promptly inform their APP contact (or a member of APP management) when any situation develops that causes the Supplier to operate in violation of this Code of Conduct. While APP Suppliers are expected to self-monitor and demonstrate their compliance with this Code of Conduct, APP may request reasonable audit or inspection rights on Suppliers or their facilities to confirm compliance. APP may require the immediate removal of any Supplier representative(s) or personnel who behave in a manner that is unlawful or inconsistent with this Code of Conduct or any APP policy.

About This Guide

Compliance with this Code of Conduct, and attending training on this Code of Conduct, as may be offered by APP, is required in addition to any other obligations in any agreement a Supplier may have with APP.

LEGAL AND REGULATORY EXCELLENCE



OUR POLICY

All APP Suppliers must conduct their business activities in full compliance with the applicable laws and regulations whilst conducting business with and/or on behalf of APP, and must, without limitation:

- **Trade:** Comply with all applicable trade controls, as well as all applicable export, re-export, and import laws and regulations.
 - **Anti Monopoly Law:** Conduct business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which they conduct business.
 - **Anti-Corruption:** Not participate in bribes or kickbacks of any kind, whether in dealings with public officials or individuals in the private sector. APP is committed to the anti-corruption and anti-money laundering laws of the countries in which APP operates.
- Suppliers must comply with all applicable anti-corruption and anti-money laundering laws, as well as laws governing lobbying, gifts, and payments to public officials, political campaign contribution laws, and other related regulations. Suppliers must not, directly or indirectly, offer or pay anything of value (including travel, gifts, hospitality expenses, and charitable donations) to any official or employee of any government, government agency, political party, public international organization, or any candidate for political office to :
 - (i) improperly influence any act or decision of the official, employee, or candidate for the purpose of promoting the business interests of APP in any respect, or
 - (ii) otherwise improperly promote the business interests of APP in any respect. As representatives of APP, Suppliers must comply in all respects with APP's Anti-Corruption Policy.

What You Should Know

Raise your concerns

To APP Integrated Call Center.

This Call Center allows you to raise your integrity questions and concerns, anonymously if preferred.

Please use the toll-free number from any Indonesian landline.

Charges will apply for calls made from mobile devices and outside Indonesia.

Alternatively, send an email.

 TOLL FREE | **0800 1 368 368**
app_callcenter@app.co.id

FAIR EMPLOYMENT PRACTICES

OUR POLICY

APP expects its Suppliers to share its commitment to human rights and equal opportunity in the workplace. All APP Suppliers must conduct their employment practices in full compliance with all applicable laws and regulations, and must, without limitation adhere to the below.

YOUR ROLE

- Cooperate with APP's commitment to a workforce and workplace free of harassment and unlawful discrimination. While we recognize and respect cultural differences, we require that Suppliers not engage in discrimination in hiring, compensation, access to training, promotion, termination, and/or retirement based on race, color, sex, national origin, religion, age, disability, gender identity or expression, marital status, pregnancy, sexual orientation, political affiliation, union membership, or others.
- Use only voluntary labor. The use of forced labor whether in the form of indentured labor, bonded labor, or prison labor by APP Suppliers is prohibited. Also prohibited is support for any form of human trafficking of involuntary labor through threat, force, fraudulent claims, or other coercion.
- Comply with all local and national minimum working age laws or regulations and not use child labor. Suppliers cannot employ anyone under the age for completing compulsory education, or under the legal minimum working age for employment— whichever is higher. APP only supports the development of legitimate workplace apprenticeship programs for the educational benefit of young people and will not do business with those who abuse such systems..
- Not engage in physical discipline or abuse. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment, and verbal abuse or other forms of intimidation are unacceptable.
- All disciplinary measures should be recorded. Wages and benefits paid for a standard working week must meet local and national legal standards.



What You Should Know

APP absolutely prohibits taking adverse action against an employee because he/she has raised a concern about a violation of policy or law.

PROTECTING APP'S INTELLECTUAL PROPERTY

OUR POLICY

Protection of intellectual property rights is vital for any company. APP depends on intellectual property such as information, processes and technology. All APP Suppliers must, without limitation:

- Respect and protect the intellectual property rights of all parties by only using information technology and software that has been legitimately acquired and licensed. Use software, hardware, and content only in accordance with their associated licenses or terms of use.
 - Protect and responsibly use the physical and intellectual assets of APP, including intellectual property, tangible property, supplies, consumables, and equipment. Use such assets only when authorized by APP.
 - Comply with the intellectual property ownership rights of APP and others including but not limited to copyrights, patents, trademarks, and trade secrets; and manage the transfer of technology and know-how in a manner that protects intellectual property rights.
- Comply with all APP requirements and procedures for maintaining passwords, confidentiality, security and privacy as a condition of providing APP with goods or services or receiving access to the APP internal corporate network, systems, and buildings. All data stored or transmitted on APP-owned or -leased equipment is to be considered private and is the property of APP. APP may monitor all use of the corporate network and all systems (including email), and may access all data stored or transmitted using the APP network.
 - Use APP-provided information technology and systems (including email) only for authorized APP business-related purposes. APP strictly prohibits Suppliers from using APP-provided technology and systems to
 - (i) create, access, store, print, solicit, or send any material that is intimidating, harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate, or
 - (ii) send any false, derogatory, or malicious communication.



What You Should Know

IP is among APP's most valuable assets. IP includes patents, trade secrets, trademarks, copyrights and designs and helps protect APP's inventions, manufacturing processes, brands, business plans, marketing documents and graphics, software, product shapes, proprietary information and many other things.

Proprietary information is information that is undisclosed, for example, not publicly known or generally available, and that is held in confidence.

ENVIRONMENT, HEALTH & SAFETY

OUR POLICY

APP Suppliers are expected to integrate sound health and safety management practices into all aspects of business, respond to challenges posed by climate changes and work towards protecting the environment.

- Provide a safe and healthy work environment and fully comply with all safety and health laws, regulations, and practices including those applicable to the areas of occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food, and housing. Adequate steps must be taken to minimize the causes of hazards inherent in the working environment.
- Prohibit the use, possession, distribution, or sale of illegal drugs while on APP-owned or -leased property.
- Comply with all applicable environmental laws and regulations regarding hazardous materials, air emissions, waste, and wastewater discharges, including the manufacture, transportation, storage, disposal, and release to the environment of such materials
- Endeavor to reduce or eliminate waste of all types, including water and energy, by implementing appropriate conservation measures in their facilities, through their maintenance and production processes, and by recycling, re-using, or substituting materials.
- Obtain, maintain, and keep current all required environmental permits and registrations and follow the operational and reporting requirements of such permits
- If applicable, identify the chemicals or other materials being released that pose a threat to the environment and manage them appropriately to ensure their safe handling, movement, storage, use, recycling, or reuse and disposal.
- Adhere to all applicable laws, regulations, and customer requirements regarding prohibition or restriction of specific substances, including labeling for recycling and disposal
- Comply with all applicable environmental laws and regulations regarding hazardous materials, air emissions, waste, and wastewater discharges, including the manufacture, transportation, storage, disposal, and release to the environment of such materials.

What You Should Know

Follow EHS procedures and be alert to environmental and safety hazards in the workplace.

BUSINESS PRACTICES AND ETHICS

OUR POLICY

▪ Conflicts of Interest

Suppliers should take care to avoid the appearance of or actual improprieties or conflicts of interests when conducting business with APP. Any potential conflicts of interest situations should be declared in writing, ahead of conducting business with APP.

Business Records

Suppliers are required to honestly and accurately record and report all business information related to their dealings with APP, as well as to comply with all applicable laws regarding their completion and accuracy. Create, retain, and dispose of business records in full compliance with all applicable legal and regulatory requirements. Be honest, direct, and truthful in discussions with regulatory agency representatives and government officials.

▪ Gifts

The Procurement Division in APP Indonesia operates a policy of NO GIFTS, entertainment or anything else of value to be received from its Suppliers (potential and otherwise). Please help us to comply with this policy. Even a well-intentioned gift might constitute a bribe under certain circumstances, or create conflicts of interest. Do not offer anything of value to obtain or retain a benefit or advantage for the giver, and do not offer anything that might appear to influence, compromise judgment, or obligate the APP employee. If offering a gift, meal, or entertainment to APP employees, always use good judgment, discretion, and moderation.

Any gift from a Supplier must be permissible under the policy of the APP employee's business. Any gifts, meals, or entertainment must comply with applicable law, must not violate the giver's and/or recipient's policies on the matter, and must be consistent with local custom and practice.



What You Should Know

A conflict of interest is not necessarily a violation of APP policy; failing to promptly disclose a conflict is **always** a violation.

Disclosing potential conflicts of interest allows Management to mitigate risks which may influence business decisions.

Report such situations to below:

 TOLL FREE | **0800 1 368 368**
app_callcenter@app.co.id

Bribery means giving, offering or promising anything of value to gain an improper business advantage.

KEY QUESTIONS OF INTEGRITY

Suppliers must remember that APP Indonesia Supplier Code of Conduct is not a substitute for your good judgment. The Code is not meant and cannot cover every conceivable situation. Suppliers should be alert to signs that they might be in an integrity grey area and ask themselves three simple questions if there are doubts about what they should do.

1 >

How would this decision look to APP, your own company and other parties ?

2 >

Is your action compliant with laws, your own company's policies and this Supplier Code of Conduct ?

3 >

Would your action damage APP's and/or your company's reputation ?

Remember:

Act if you see an issue.
Ask if you're not sure.



ICC
Integrated
Call Center

We want everyone to **SPEAK UP!**

 TOLL FREE | **0800 1 368 368***
app_callcenter@app.co.id

*calls from mobiles and international are charged.