




**PROCEDURE FOR  
ANTI-BRIBERY MANAGEMENT SYSTEM  
(ABMS)**

PT Sarana Multi Infrastruktur (Persero)

2021

|   |  |              |
|---|--|--------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-  |
|   | <b>COMMITMENT ANTI-BRIBERY</b>                                 | Amendment :- |
|   |  |              |


## **COMMITMENT**

### **ANTI-BRIBERY**

PT Sarana Multi Infrastruktur (Persero) ("PT SMI") as a State-Owned Company must consistently strive to apply the principles of Good Corporate Governance and Corporate Values in every activity it carries out, as well as upholding trust. Shareholders and Stakeholders so that PT SMI's business activities are free from bribery;

To meet these goals, PT SMI personnel are committed to:

1. Do not offer, promise, give, receive or ask for undue benefits of any value (in the form of financial or non-financial), directly or indirectly, in any location which is a violation of laws and regulations related to the implementation of performance and duties.
2. Comply with PT SMI's Anti-Bribery Management System and the applicable Law on the Eradication of Corruption Crimes and any amendments and replacements thereto.
3. Take action to prevent, detect and report all forms of bribery to the PT SMI Whistleblowing System.
4. Guarantee confidentiality and protection for whistleblowers from retaliation for reports of alleged violations based on good faith and fairness.

|   |  |              |
|---|--|--------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-  |
|   | <b>COMMITMENT ANTI-BRIBERY</b>                                 | Amendment :- |
|   |  |              |

5. Guarantee the authority and independence of the Anti-Bribery Compliance Function in ensuring that the Anti-Bribery Management System runs effectively.

Violations of the Anti-Bribery Policy will be subject to sanctions according to applicable regulations.

Jakarta,

Determined by,

Edwin Syahrudad

President Director


PT Sarana Multi Infrastrukt  
(Persero)

Approved by,

Mahendra Siregar

President Commissioner

PT Sarana Multi Infrastrukt  
(Persero)

|   |  |               |
|---|--|---------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision : -  |
|   |  | Amendment : - |
|   | <b>LIST OF CONTENTS</b>  |               |

**CHAPTER I - INTRODUCTION 1**


|                            |   |
|----------------------------|---|
| 1. Background.....         | 1 |
| 2. Aims & Objectives.....  | 1 |
| 3. Scope.....              | 1 |
| 4. Legal Basis.....        | 2 |
| 5. Special Conditions..... | 3 |
| 6. Definition.....         | 3 |

**CHAPTER II - ORGANIZATION AND MANAGEMENT 5**

|                                    |   |
|------------------------------------|---|
| 1. Board of Commissioners.....     | 5 |
| 2. Board of Directors.....         | 5 |
| 3. Director in charge of FKAP..... | 5 |
| 4. FKAP.....                       | 6 |

**CHAPTER III - GENERAL PROVISIONS 7**

|  |    |
|--|----|
| 1. ABMS Principles.....                            | 7  |
| 2. Risk.....                                       | 7  |
| 3. ABMS Ethics.....                                | 8  |
| 4. Competence, Awareness and Training.....         | 8  |
| 5. Communication and Information Delivery.....     | 8  |
| 6. ABMS Documentation.....                         | 9  |
| 7. Gratification.....                              | 9  |
| 8. Operational Planning and Control.....           | 9  |
| 9. Anti-Bribery Control of Business Partners ..... | 10 |
| 10. Reporting WBS Violations.....                  | 10 |

|   |  |              |
|---|--|--------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-  |
|   |  | Amendment :- |
|   | <b>LIST OF CONTENTS</b>  |              |

**CHAPTER IV - IMPLEMENTATION OF 11**


**THE ANTI-BRIBERY MANAGEMENT SYSTEM (ABMS)**

|    |                               |    |
|----|-------------------------------|----|
| 1. | Planning.....                 | 11 |
| 2. | Feasibility Test.....         | 12 |
| 3. | Control.....                  | 13 |
| 4. | Investigation of Bribery..... | 15 |
| 5. | Evaluation.....               | 15 |

**CHAPTER V - CLOSING..... 18**

**CHAPTER VI - ANNEX..... 19**

|  |    |
|--|----|
| Appendix I - Specimen of Target and Work Program Format<br>..... | 19 |
| Appendix II - Integrity Pact.....                                | 20 |
| Appendix III - ABMS Organizational Structure.....                | 22 |

|   |  |                  |
|---|--|------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-      |
|   |  | Amendment :-     |
|   | <b>INTRODUCTION</b>  | <b>CHAPTER I</b> |


## 1. Background

In order to increase stakeholder trust, especially in efforts to prevent and eradicate criminal acts of corruption, collusion and nepotism within PT Sarana Multi Infrastruktur (Persero) ("**the Company**"), the Company is committed to complying with all applicable laws and regulations, running its business. The company is based on the principles of good corporate governance, complies with the code of conduct and implements an Anti-Bribery Management System ("**ABMS**"). ABMS is a mechanism designed to identify and evaluate the risk of bribery as well as to prevent, detect and respond to bribery.

To be able to provide guidance and a basis for the Company in preparing a systematic ABMS framework so that all activities related to the implementation of ABMS can be implemented and there are continuous improvements, it is necessary to prepare an ABMS Procedure based on the principles of good corporate governance.

## 2. Aims & Objectives

The ABMS procedure is intended to provide guidance to all Company Personnel to prevent, detect and respond to bribery, as follows:


|   |  |                  |
|---|--|------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-      |
|   |  | Amendment :-     |
|   | <b>INTRODUCTION</b>  | <b>CHAPTER I</b> |

- a. Increase understanding and compliance of all Company Personnel with ABMS.
- b. Create an environment that is aware and understanding in handling/controlling all forms of bribery.
- c. Provide references and guidance for Company Personnel regarding the importance of complying with ABMS to protect themselves and their immediate families from possible accusations of bribery.
- d. Create Company Personnel who are clean and free from Corruption, Collusion and Nepotism.

### **3. Scope**

This ABMS procedure is prepared with a scope and is applied throughout the Company's activities. The scope of the ABMS Procedure is as follows:


- a. Explanation of provisions regarding ABMS and matters related to its implementation.
- b. Mechanism and methodology for implementing ABMS in the Company.
- c. Implementing functions and functions involved in implementing ABMS.
- d. ABMS documentation and reporting.

|   |  |                  |
|---|--|------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-      |
|   |  | Amendment :-     |
|   | <b>INTRODUCTION</b>  | <b>CHAPTER I</b> |


#### **4. Legal Basis**

- a. Law Number 31 of 1999 as most recently amended by Law Number 20 of 2001 concerning Amendments to Law Number 31 of 1999 concerning Eradication of Corruption Crimes;
- b. Law Number 28 of 1999 concerning State Administration that is Free from Corruption, Collusion and Nepotism (KKN);
- c. Law Number 13 of 2006 concerning Protection of Witnesses and Victims, as most recently amended by Law Number 31 of 2014 concerning Amendments to Law Number 13 of 2006 concerning Protection of Witnesses and Victims;
- d. Law Number 11 of 2008 concerning Information and Electronic Transactions;
- e. Minister of Finance Regulation Number 83/PMK.01/2015 concerning Gratification Control within the Ministry of Finance;
- f. Financial Services Authority Regulation Number 1/POJK.07/2013 concerning Consumer Protection in the Financial Services Sector;
- g. Financial Services Authority Regulation Number 46/POJK.05/2020 concerning Infrastructure Financing Companies;



|   |  |                  |
|---|--|------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-      |
|   |  | Amendment :-     |
|   | <b>INTRODUCTION</b>  | <b>CHAPTER I</b> |

- h. Government Regulation of the Republic of Indonesia Number 53 of 2020 concerning Second Amendment to Government Regulation No. 66 of 2007 concerning State Capital Participation of the Republic of Indonesia for the Establishment of a Limited Liability Company (Persero) in the Infrastructure Financing Sector;
- i. Decree of the Chairman of the Capital Markets and Financial Institutions Supervisory Agency Number Kep-431/BL/2012 concerning Submission of Annual Reports for Issuers or Public Companies;
- j. Circular Letter Number 2/SEOJK.07/2014 regarding Service and Resolution of Consumer Complaints for the Financial Services Sector;
- k. Supreme Court Regulation Number 13 of 2016 concerning Procedures for Handling Criminal Cases by Corporations;
- l. SNI ISO 37001:2016 Anti-Bribery Management System;
- m. Articles of Association of the Company;
- n. Company Policy related to Corporate Governance (Code of Corporate Governance);
- o. Company Policy regarding Business Ethics & Code of Conduct;


|   |  |                  |
|---|--|------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-      |
|   |  | Amendment :-     |
|   | <b>INTRODUCTION</b>  | <b>CHAPTER I</b> |

- p. Company Policy regarding the Implementation of Anti-Money Laundering and Terrorism Prevention Programs;
- q. Company Policy regarding Risk Management;
- r. Company Policy regarding Gratification Control;
- s. Company Policy regarding Operational Risk Management;
- t. Company Policy related to the Preparation of Company Policy;
- u. Audit Committee Charter; and
- v. Internal Audit Charter.

**5. Special Conditions**

In the event that there are special conditions regarding matters that have not been regulated and/or conflict with this Procedure, then on a case by case basis these special conditions can be considered with the approval of the Board of Directors. If necessary, the Board of Directors can request a review from the Relevant Division first.


The special conditions referred to must be based on careful consideration and are not related to the application for changes to this Procedure. Provisions regarding submission of changes and/or revisions to this

|   |  |                  |
|---|--|------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-      |
|   |  | Amendment :-     |
|   | <b>INTRODUCTION</b>  | <b>CHAPTER I</b> |

Procedure must refer to the Company's policy regarding the preparation of applicable Company policies.

## 6. Definition

- a. Anti-Bribery : The work unit has the responsibility and authority to carry out ABMS Compliance Function (FKAP) operations.
- b. *Governing Body* : The group or agency that has primary responsibility and authority to provide reasonable oversight of the implementation and effectiveness of the ABMS.
- c. Gratification : Giving in a broad sense includes giving money, discounts, commissions, interest-free loans, travel tickets, lodging facilities, tourist trips, free medical treatment and other facilities, both received domestically and abroad. and which are carried out using electronic means or without electronic means.
- d. Company : Board of Commissioners, Directors,


|   |  |                  |
|---|--|------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-      |
|   |  | Amendment :-     |
|   | <b>INTRODUCTION</b>  | <b>CHAPTER I</b> |

Personnel supporting organs of the Board of Commissioners, Sharia Supervisory Board, and all employees of the Company.

e. Bribery Risk Assessment/BRA : Tools used by the Company to identify and understand risks to processes or activities and weaknesses in controls that pose a risk of bribery to the Company.


f. Bribery : Actions carried out for an interest by offering, promising, giving, receiving or requesting improper benefits of any value (in the form of financial or non-financial), directly or indirectly, regardless of location, constitute a violation of laws and regulations, as an inducement or a reward for a person who acts or refrains from acting regarding the performance of that person's duties.

g. Business partner : External parties who have a reciprocal relationship with the

|   |  |                  |
|---|--|------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-      |
|   |  | Amendment :-     |
|   | <b>INTRODUCTION</b>  | <b>CHAPTER I</b> |

Company and can reasonably be assessed as having a risk of bribery. Business Partners include but are not limited to debtors, goods/services providers, outsourcing providers, and consultants.

- h. Anti-Bribery Management System (ABMS) : A management system that includes establishing, documenting, implementing, maintaining, reviewing and continuously improving all processes in anti-bribery activities in the Company.
- i. *Top Management* : The person or group of people who directs and controls an organization at the highest level.
- j. Whistleblowing System (WBS) : A reporting system for violations, unlawful acts, unethical/immoral acts, or other acts that could harm the organization or its stakeholders committed by employees or organizational leaders.

|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-       |
|   |  | Amendment :-      |
|   | <b>ORGANIZATION AND MANAGEMENT</b>                             | <b>CHAPTER II</b> |

The Company formed an organization by paying attention to the needs and development of business and operational activities so that the implementation of ABMS is more optimal, controlled and directed. The organization in implementing ABMS as intended consists of:


### **1. Board of Commissioners**

The Board of Commissioners as one of the Company Organs is tasked and responsible collectively for supervising and providing advice to the Board of Directors and ensuring that the Company has implemented ABMS. The Board of Commissioners can form a Committee that will assist the Board of Commissioners in carrying out its duties in accordance with the Company's needs and with reference to the GMS decisions, Articles of Association and applicable laws and regulations.

### **2. Board of Directors**

In implementing ABMS the Board of Directors acts as a Governing Body responsible and committed to:

- a. Approve the ABMS policy; and
- b. Carry out supervision of the implementation and effectiveness of ABMS, including;


|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-       |
|   |  | Amendment :-      |
|   | <b>ORGANIZATION AND MANAGEMENT</b>                             | <b>CHAPTER II</b> |

- Ensure that the organization's anti-Bribery strategy and policy are aligned;
- Receive and review information regarding ABMS implementation periodically; And
- Ensure that sufficient and appropriate resources are available.

### **3. Director in charge of FKAP**

In implementing ABMS, the Director in charge of FKAP acts as Top Management who is responsible and committed to:


- a. Ensure that ABMS is established, maintained, implemented and reviewed to overcome the risk of Bribery in the Company;
- b. Ensure integration of ABMS requirements into the Company's processes;
- c. Ensure the availability of sufficient and appropriate resources for the effectiveness of ABMS implementation;
- d. Ensure that ABMS is communicated to internal and external parties effectively and meets the requirements of the Anti-Bribery Management System;
- e. Encourage the use of reporting procedures related to Bribery through the Company's Whistleblowing System and ensure that no employee suffers retaliation,

|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-       |
|   | <b>ORGANIZATION AND MANAGEMENT</b>                             | Amendment :-      |
|   |  | <b>CHAPTER II</b> |

discrimination or disciplinary action for reports related to Bribery;


- f. Report to the Governing Body regarding the implementation of ABMS;
  - g. Ensure that ABMS is designed appropriately to achieve its targets;
  - h. Direct and support personnel to contribute to the effectiveness of ABMS;
  - i. Promote an appropriate anti-Bribery culture in the organization and continuous improvement;
  - j. Support other relevant management roles to demonstrate leadership in preventing and detecting Bribery occurring in their area of responsibility;
- And
- k. Provide sanctions to both internal and external parties for deviations that occur in the ABMS based on existing analysis and initial evidence. More detailed provisions regarding sanctions against external parties refer to the provisions in the agreement that has been agreed between the Company and external parties.



|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-       |
|   |  | Amendment :-      |
|   | <b>ORGANIZATION AND MANAGEMENT</b>                             | <b>CHAPTER II</b> |

In implementing ABMS, the Company established FKAP through a Decree (SK) of the Board of Directors with the following duties and responsibilities:

- a. Oversee the design and implementation of ABMS;
- b. Provide instructions and guidance for employees on the Anti-Bribery Management System and Bribery-related issues;
- c. Ensure that ABMS complies with applicable standard requirements; And
- d. Reporting ABMS performance to the Governing Body and Top Management.

|   |  |                    |
|---|--|--------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-        |
|   |  | Amendment :-       |
|   | <b>GENERAL REQUIREMENTS</b>                                    | <b>CHAPTER III</b> |

To support ABMS management effectively and in accordance with applicable standards, the following things are needed:

## **1. ABMS principles**


### **a. Policy Adequacy**

Existing policies must be proportional to the Bribery risks faced. This is adjusted to the culture and scope of policy implementation in the Company, in order to achieve organizational goals in preventing bribery. In a broader scope, significant risks need to be regulated further and with more detailed methods in supporting policies that are separate from this Procedure.

### **b. Management Commitment**

Effective leadership in Bribery prevention is adapted to the organization, management structure and current circumstances. Management always maintains the implementation of policies, communicates with third parties, and guarantees the results of risk analysis of the Company's activities.

## **2. Risk**

|   |  |                    |
|---|--|--------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-        |
|   |  | Amendment :-       |
|   | <b>GENERAL REQUIREMENTS</b>                                    | <b>CHAPTER III</b> |

Based on related stakeholders and internal and external issues, the organization then analyzes risks and carries out documentation. The complexity of the methods adopted reflects the maturity of the organization.


In carrying out anti-bribery management activities, you must pay attention to and consider potential risks that may occur and try to take mitigation measures for the risks:

**a. Legal Risk**

Risks arising from lawsuits and/or weaknesses in legal aspects.

Legal risk mitigation is carried out by ensuring that all activities carried out are based on or in accordance with and bound by the Company's Articles of Association and applicable regulations and legislation as well as carrying out an updating process based on the latest regulations and legislation on a regular basis.

**b. Reputational Risk**

|   |  |                    |
|---|--|--------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-        |
|   |  | Amendment :-       |
|   | <b>GENERAL REQUIREMENTS</b>                                    | <b>CHAPTER III</b> |

Risk resulting from a decrease in the level of stakeholder trust originating from negative perceptions of the Company.


Mitigate reputation risk by ensuring that the Company's governance is always well maintained and creating a reliable reputation risk management system.

**c. Compliance Risk**

Risk resulting from the Company not complying with and/or not implementing the laws and regulations that apply to the Company.

Compliance risk mitigation is carried out by ensuring the effectiveness of the implementation of compliance risk management related to the procedures and technical instructions of the Company Policy as well as periodically updating the procedures and technical instructions of the Company Policy related to ABMS management.

**d. Operational Risk**

|   |  |                    |
|---|--|--------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-        |
|   |  | Amendment :-       |
|   | <b>GENERAL REQUIREMENTS</b>                                    | <b>CHAPTER III</b> |

Risks resulting from inadequacy and/or non-functioning of internal processes, human error, system failure, and/or external events that affect the Company's operations.


Operational risk mitigation is focused on the adequacy of procedures and technical instructions governing the management of ABMS activities, there is a culture of control (dual control) and clear separation of duties (segregation of duties).

### **3. ABMS Ethics**

Implementers and parties involved in implementing ABMS must comply with the provisions and uphold the Company's ethics and behavior as stated in the Company's policies regarding Corporate Governance (Code of Corporate Governance), Company policies regarding Business Ethics and Code of Conduct, and Company policies regarding Gratification Control.

### **4. Competence, Awareness and Training**

The Company provides regular training to all employees so that they have awareness in implementing ABMS based on

|   |  |                    |
|---|--|--------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-        |
|   |  | Amendment :-       |
|   | <b>GENERAL REQUIREMENTS</b>                                    | <b>CHAPTER III</b> |

the duties and responsibilities, involvement and needs of employees as intended.


## **5. Communication and Delivery of Information**

The Company carries out communication activities and conveys information about ABMS periodically to both internal and external parties.

These activities can be carried out, among others, through:

- a. Townhall Meeting
- b. Customer Gathering
- c. Vendor Gathering
- d. Communication via e-mail
- e. Company Website
- f. Online Training
- g. Workshops
- h. Posters, Banners

Provisions regarding communication activities and information delivery refer to the Company's internal policies regarding communication, socialization and information delivery.

|   |  |                    |
|---|--|--------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-        |
|   |  | Amendment :-       |
|   | <b>GENERAL REQUIREMENTS</b>                                    | <b>CHAPTER III</b> |


## 6. ABMS documentation

In implementing ABMS, things that are documented include:

- a. ABMS Commitment
- b. Internal policy regarding ABMS
- c. Supporting policies related to the implementation of ABMS (including integrity pact, Policy on Gratification, Whistle Blowing, etc.).
- d. Documentation of ABMS implementation consisting of employee acceptance of the anti-Bribery policy, results of Bribery risk assessment, implementation of ABMS training, implementation of due diligence, Gratification reporting, FKAP review, Internal Audit review, and Management review.

The provisions regarding documentation points a to d above also refer to internal policies that specifically regulate each activity with the scope of application of ABMS or Certification related to ABMS, namely:

- a. Main Directorate;
- b. Directorate of Financing and Investment;
- c. Directorate of Project Development and Consulting Services;
- d. Directorate of Operations and Finance; And
- e. Risk Management Directorate.

|   |  |                    |
|---|--|--------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-        |
|   |  | Amendment :-       |
|   | <b>GENERAL REQUIREMENTS</b>                                    | <b>CHAPTER III</b> |

## **7. Gratification**

The Company has established an internal policy to prevent giving in a broad sense, which includes giving money, goods, rebates (discounts), commissions, interest-free loans, travel tickets, lodging facilities, tourist trips, free medical treatment, and other facilities, whether received domestically or abroad, carried out using electronic means or without electronic means.

Further provisions regarding Gratification refer to the Company's Policy regarding Gratification Control.


## **8. Operational Planning and Control**

In preparing plans each year, FKAP will outline a planning table with the following criteria:

- a. Work program containing information about what will be done;
- b. Budget/resources required;
- c. Implementation period.
- d. Implementation Unit

Planning proposals need to get approval from Top Management. The results of the implementation of ABMS




|   |  |                    |
|---|--|--------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-        |
|   |  | Amendment :-       |
|   | <b>GENERAL REQUIREMENTS</b>                                    | <b>CHAPTER III</b> |

will be evaluated every year independently and reported to Top Management. Furthermore, Top Management will provide notes and/or direction if there is a significant implementation failure.

#### **9. Anti-Bribery Control of Business Partners**


In managing ABMS so that it can run effectively and according to standards, it is necessary to apply anti-bribery controls to business partners. For this matter, the Company may require, among other things, the following:

- a. Commitment of Business Partners to prevent Bribery in connection with transactions, projects, activities or relationships relevant to the Company through signing an Integrity Pact with Business Partners.
- b. In the event of Bribery by a Business Partner, the Company has the right to terminate the relationship with the Business Partner as intended.
- c. In the event that there are inadequate anti-bribery controls on a Business Partner, the Company can terminate, stop, postpone, immediately withdraw and refuse to continue business activities with the Business Partner.

|   |  |                    |
|---|--|--------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-        |
|   |  | Amendment :-       |
|   | <b>GENERAL REQUIREMENTS</b>                                    | <b>CHAPTER III</b> |

#### **10. WBS Violation Reporting**

The Company has a WBS violation reporting system which can be used as a means of reporting both internally and externally. Further provisions regarding WBS refer to the Company's internal policy regarding the violation reporting system (WBS).

|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-       |
|   |  | Amendment :-      |
|   | <b>IMPLEMENTATION OF ANTI-BRIBERY<br/>MANAGEMENT SYSTEM</b>    | <b>CHAPTER IV</b> |


## 1. Planning

### a. Identification and Analysis

In line with the dynamics of the business world, developing market demands and technological advances, the Company identifies and analyzes factors that have an impact on the implementation of business and operational activities as well as the Company's commitment to fulfilling the obligations and expectations of stakeholders including the implementation of the inherent ABMS.

Analysis of internal and external issues, expectations and needs of stakeholders that have an impact on the implementation of the Company's activities is carried out using the PESTEL Analysis Method (Political, Economic, Social, Technological, Environmental and Legal).

FKAP carries out periodic monitoring regarding internal issues, external issues and stakeholder expectations. These activities are carried out according to the Company's needs by taking into account developments in activities, strategies and

|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-       |
|   |  | Amendment :-      |
|   | <b>IMPLEMENTATION OF ANTI-BRIBERY<br/>MANAGEMENT SYSTEM</b>    | <b>CHAPTER IV</b> |

current conditions. In the event that follow-up is required on the results of monitoring that has been carried out, FKAP can initiate discussions on the follow-up as intended.


**b. Setting ABMS Targets and Work Programs**

Every year, the Company sets ABMS targets and work programs that are consistent, measurable, achievable, monitored, communicated and updated based on the results of the identification and analysis that has been carried out. An example of the format for explaining ABMS targets and work programs is as described in **Appendix I**.

In determining ABMS targets and work programs, the Company needs to:

**i. Bribery Risk Assessment**

The Company carries out an assessment of the risk of Bribery throughout the organization, including at management level. Bribery risk assessments need to be reviewed periodically or when there are substantial changes to the

|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-       |
|   |  | Amendment :-      |
|   | <b>IMPLEMENTATION OF ANTI-BRIBERY<br/>MANAGEMENT SYSTEM</b>    | <b>CHAPTER IV</b> |

organizational structure and/or activities in the Company.

ii. Bribery Risk Mitigation


In preparing the ABMS work program, the Company needs to develop mitigation for the risk of Bribery by considering the following matters:

- 1) Ensure that the implementation of ABMS can achieve the desired results;
- 2) The plan for implementing actions to mitigate the risk of Bribery is in accordance with the Company's risk profile;
- 3) Conduct effectiveness evaluations so that there are corrective actions and continuous improvements.

**2. Due Diligence**

Based on the Anti-Bribery Commitment that has been prepared, the Company carries out due diligence carried out by each relevant Work Unit regarding:


- Certain transactions, facilities, projects and activities;

|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-       |
|   |  | Amendment :-      |
|   | <b>IMPLEMENTATION OF ANTI-BRIBERY<br/>MANAGEMENT SYSTEM</b>    | <b>CHAPTER IV</b> |


- Business partner; and
- Employee.

Implementation of the feasibility test includes:

- a. Feasibility testing of certain transactions, facilities, projects and activities by evaluating matters including the following:
  - i. Structure, properties and complexity;
  - ii. Financing and payment arrangements;
  - iii. Scope of the Company's involvement and availability of resources;
  - iv. Level of control and visibility;
  - v. Business Partners and other third parties involved (including public officials) as well as the relationships between these parties;
  - vi. Competence and qualifications of the parties involved;
  - vii. Client reputation;
  - viii. Location; and
  - ix. Reports in the market or media.
- b. Feasibility test for Business Partners by evaluating things including the following:

|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-       |
|   |  | Amendment :-      |
|   | <b>IMPLEMENTATION OF ANTI-BRIBERY<br/>MANAGEMENT SYSTEM</b>    | <b>CHAPTER IV</b> |

- i. Legality of the entity (company administrative documents, annual financial reports, taxpayer number, public company);
- ii. Qualifications, experience and resources available;
- iii. Ownership of ABMS provisions or other anti-bribery rules (internal policies or programs related to anti-bribery and corruption, code of conduct, integrity pact, gratification rules, whistleblowing system rules, ISO certificate, etc.);
- iv. Reputation Bribery or other negative acts (fraud, dishonesty, been investigated, accused, sanctioned); and
- v. Data regarding management which includes:
  - 1) There is a reputation for acts of Bribery, or other negative acts such as fraud, dishonesty, and so on;
  - 2) Being the object of investigation, accused, sanctioned, or banned for Bribery or similar criminal acts; And
  - 3) Direct or indirect relationships with the Company, clients, public officials

|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-       |
|   |  | Amendment :-      |
|   | <b>IMPLEMENTATION OF ANTI-BRIBERY<br/>MANAGEMENT SYSTEM</b>    | <b>CHAPTER IV</b> |


and/or other parties that could lead to  
Bribery.

c. The suitability test for employees is carried out by evaluating things including the following:

- i. Carrying out due diligence before employees are hired, transferred or promoted, to ensure that the employee has never been involved in Bribery;
- ii. Regularly review performance targets, facilities received, and other incentives to mitigate the occurrence of Bribery;
- iii. Carrying out knowledge tests on Company policies, ethics and values on employees who are prone to bribery in transactions/projects/activities/business partners on a regular basis; and
- iv. Prepare an Integrity Pact regarding compliance with the anti-Bribery policy which must be signed/completed by employees periodically (Attachment II);

The feasibility test method is evaluated periodically so that if there are changes or new



|   |  |              |
|---|--|--------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-  |
|   | <b>IMPLEMENTATION OF ANTI-BRIBERY<br/>MANAGEMENT SYSTEM</b>    | Amendment :- |
|   | <b>CHAPTER IV</b>  |              |

information it can become the basis for improving the method.

### **3. Control**


All functions in the Company are required to control ABMS, in accordance with their main tasks and functions.

The scope of control includes:

#### a. Financial Control

The Company has financial management policies and mechanisms that ensure financial control in accordance with ABMS requirements. These financial control mechanisms include:

- i. Implementing separation of functions so that there are differences between the party proposing and the party approving the transaction;
- ii. Implementing tiered authority in transaction approval;
- iii. Carrying out verification to find out whether transactions have been carried out according to their duties and functions;
- iv. There are at least 2 (two) officials who provide approval for the transaction;


|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-       |
|   |  | Amendment :-      |
|   | <b>IMPLEMENTATION OF ANTI-BRIBERY<br/>MANAGEMENT SYSTEM</b>    | <b>CHAPTER IV</b> |

- v. Requires supporting documents to be attached as the basis/proof of each transaction;
- vi. Limiting the use of cash and implementing effective cash control methods;
- vii. Require accurate and clear categorization and description of transactions;
- viii. Implement regular management reviews of significant financial transactions; And
- ix. Implementing audits regarding financial management periodically and independently, as well as regularly changing the employees carrying out the audits.


More detailed provisions regarding financial control mechanisms are regulated in internal policies regarding financial management.

b. Non-Financial Controls

The Company has implemented control mechanisms for non-financial activities in relation to efforts to mitigate the risk of Bribery. These control mechanisms include:

|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-       |
|   |  | Amendment :-      |
|   | <b>IMPLEMENTATION OF ANTI-BRIBERY<br/>MANAGEMENT SYSTEM</b>    | <b>CHAPTER IV</b> |

- i. Using the services of Business Partners who have undergone a selection and due diligence process;
- ii. Award of contracts only after a fair and transparent competitive tender process;
- iii. Request at least 2 (two) persons to evaluate tenders and contract approval;
- iv. Implementing separation of duties so that the party agreeing to the contract is different from the party requesting the contract (user);
- v. Require at least 2 (two) contract signatories (at least 1 (one) representative from the Company and Business Partners), on the document if there are changes to the terms and conditions;
- vi. Place a higher level of management oversight on potentially high bribery risk transactions;
- vii. Protect the integrity of tenders and other sensitive information by restricting access; and

|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-       |
|   | <b>IMPLEMENTATION OF ANTI-BRIBERY<br/>MANAGEMENT SYSTEM</b>    | Amendment :-      |
|   |  | <b>CHAPTER IV</b> |


viii. There are internal policies that can serve as a guide in implementing activities.

c. Anti-Bribery Controls against Business Partners

To implement anti-Bribery controls on Business Partners, the Company may require the implementation of ABMS in every business activity. The Company can also recommend the implementation of ABMS to parties involved in business activities with the Company's Business Partners.

For Business Partners who are not controlled by the Company but have a risk of Bribery, the Company applies the following:

- i. Identify and ensure whether the party has internal anti-bribery controls aimed at mitigating the risk of bribery; and
- ii. If the Business Partner does not have anti-Bribery internal controls or it is impossible for the Company to check the existence and adequacy of controls then:


|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-       |
|   |  | Amendment :-      |
|   | <b>IMPLEMENTATION OF ANTI-BRIBERY<br/>MANAGEMENT SYSTEM</b>    | <b>CHAPTER IV</b> |

- The Company will require the implementation of anti-Bribery controls in connection with transactions, facilities, projects, work or related activities; and
- The Company will conduct an analysis and evaluation of the risks of Bribery related to the Business Partner.

d. Managing the inadequacy of anti-Bribery controls

Based on the risk analysis and evaluation of the Business Partner, if the risk of Bribery cannot be managed by existing anti-Bribery controls, the Company will implement additional or enhanced anti-Bribery controls or take other appropriate actions. Appropriate actions that the Company can take in managing the risk of Bribery are:

- i. In the case of transactions, projects, activities or relationships that are already underway, the Company can take action to terminate, stop, postpone or withdraw as soon as practicable; And
- ii. In the event of a proposed new transaction, project, activity or relationship, the Company

|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-       |
|   | <b>IMPLEMENTATION OF ANTI-BRIBERY<br/>MANAGEMENT SYSTEM</b>    | Amendment :-      |
|   |  | <b>CHAPTER IV</b> |

may take action to postpone or refuse to proceed.


#### **4. Investigation of Bribery**

In implementing ABMS, the Company can carry out investigations into indications of bribery. This investigation was carried out to prove the truth of indications of attempted bribery and/or acts of fraud that were detrimental to the Company. The results of the investigation include presenting all facts, data and information regarding any deviations from applicable regulations as well as providing input to management regarding weaknesses in the control system that have the potential to cause bribery. Further provisions regarding the implementation of investigations are regulated in the internal policy regarding the implementation of investigations by internal audit.

#### **5. Evaluation**

##### **a. Monitoring and Measurement**

To ensure the implementation of ABMS, the Company has established a monitoring and measurement mechanism which includes, among other things:


|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-       |
|   |  | Amendment :-      |
|   | <b>IMPLEMENTATION OF ANTI-BRIBERY<br/>MANAGEMENT SYSTEM</b>    | <b>CHAPTER IV</b> |

- i. Measuring the effectiveness of ABMS implementation, for example by conducting surveys with internal and external parties;
- ii. Measuring employee understanding of ABMS, for example by providing questionnaires to all employees;
- iii. Monitoring the frequency and measuring the impact of Bribery cases by looking at the number of cases that occur each year; and
- iv. Monitor the achievement of the established ABMS implementation targets.

**b. Internal Audit**

The Company carries out an internal audit regarding the implementation of ABMS. Internal audits are carried out based on an audit program which includes the frequency of audits, methods used, duties and responsibilities of the parties involved, requirements, and reporting taking into account program prioritization and previous audit results.

Internal audits are planned, implemented and coordinated by the Internal Audit Division ("DAI").

|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-       |
|   |  | Amendment :-      |
|   | <b>IMPLEMENTATION OF ANTI-BRIBERY<br/>MANAGEMENT SYSTEM</b>    | <b>CHAPTER IV</b> |


In carrying out audits, DAI carries out all stages of the process in a reasonable, proportional and risk-based manner.

The internal audit objects in implementing ABMS include the process and control of:

- i. Bribery or suspected Bribery;
- ii. Violation of the anti-Bribery policy or ABMS requirements;
- iii. Business Partner's failure to comply with anti-Bribery requirements applicable to the Company;  
and
- iv. Weaknesses and/or opportunities for improving ABMS.

In the event that there are internal audit findings regarding the implementation of ABMS, DAI reports the audit results to the Governing Body, Top Management and FKAP. More detailed provisions regarding the implementation of internal audits are further regulated in the Company's policy regarding internal audits.



|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-       |
|   |  | Amendment :-      |
|   | <b>IMPLEMENTATION OF ANTI-BRIBERY<br/>MANAGEMENT SYSTEM</b>    | <b>CHAPTER IV</b> |

**c. Non-conformities and Corrective Actions**


In the event that there is a non-compliance with standards or policies regarding anti-Bribery, the Company will take action to control, correct and evaluate to mitigate the risk of such non-conformity.

The Company will also implement necessary corrective actions and review their implementation periodically.

**d. Periodic Review**

Governing Body & Top Management conducts regular evaluation, analysis and review of policies and requirements to ensure the effectiveness of ABMS implementation. During the review, obstacles and other matters related to achieving the ABMS implementation target were also discussed.

If necessary, the review can be carried out through discussion meetings initiated by FKAP and DAI.


|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-       |
|   |  | Amendment :-      |
|   | <b>IMPLEMENTATION OF ANTI-BRIBERY<br/>MANAGEMENT SYSTEM</b>    | <b>CHAPTER IV</b> |

The matters that are the object of the review include:

- i. Follow-up status of the previous period's review results;
- ii. Changes in internal and external issues relevant to ABMS;
- iii. ABMS performance information, including non-conformities and corrective actions, monitoring and measurement results, audit results, Bribery reports, investigations, and Bribery risks faced by the Company.
- iv. Effectiveness of actions taken to mitigate Bribery risks;
- v. Opportunities for improving ABMS.


FKAP conducts reviews to assess the level of effectiveness of ABMS in managing Bribery risks faced by the Company on a regular basis, and is implemented effectively.

The results of the FKAP review are reported in the Governing Body & Top Management periodic review.

|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-       |
|   |  | Amendment :-      |
|   | <b>IMPLEMENTATION OF ANTI-BRIBERY<br/>MANAGEMENT SYSTEM</b>    | <b>CHAPTER IV</b> |


**e. Improvement**

The Company continues to make improvements to support better implementation of ABMS.

|   |  |                  |
|---|--|------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-      |
|   |  | Amendment :-     |
|   | <b>CLOSING</b>   | <b>CHAPTER V</b> |


This procedure is effective from the date of stipulation of the Board of Directors Regulations. Matters that have not been regulated in this Procedure will be explained further in other related policies.

When this Procedure comes into force, provisions that conflict with the provisions in this Procedure are declared no longer valid.


|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision : -      |
|   |  | Amendment : -     |
|   | <b>APPENDIX</b>  | <b>CHAPTER VI</b> |

Appendix I - Specimen of Target and Work Program Format


| No | Activity                                      | Target   | Work Program  | PIC                                   | Implementation Period | Evaluation Method  | Implementation Frequency         |
|----|---|--|---|---------------------------------------|-----------------------|--|----------------------------------|
| 1  | Fulfillment of document of SNI ISO 37001 ABMS | 1. Know the gap between the requirements of SNI ISO 37001 ABMS and the documents owned by PT SMI<br>2. Fulfill the requirements in the SNI ISO 37001 ABMS clause based on the results of the Gao Analysis report | 1. Conduct SNI ISO 370001 ABMS Awareness Training for all employees<br>2. Conduct a Gap Analysis between the SNI ISO 370001 ABMS clauses and those owned by the company<br>3. Create ABMS policies and guidelines<br>4. Adjust existing procedures based on the results of the Gap Analysis | <b>FKAP and the Relevant Division</b> | July - December 2020  | Ensure that all document requirements according to the clauses have been fulfilled | 1 time of implementation         |
| 2  | Dissemination of ABMS Policies and            | Understanding and awareness of Anti-Bribery by   | 1. Disseminate policies and guidelines to all   | <b>FKAP and Relevant Division</b>     | July - December 2020  | Conduct an understanding survey of all   | Periodic (once a year/as needed) |

|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision : -      |
|   |  | Amendment : -     |
|   | <b>APPENDIX</b>  | <b>CHAPTER VI</b> |

| No | Activity                            | Target  | Work Program   | PIC                               | Implementation Period | Evaluation Method  | Implementation Frequency         |
|----|-------------------------------------|---|--|-----------------------------------|-----------------------|--|----------------------------------|
|    | Guidelines                          | all employees, business partners and stakeholders                                       | employees, business partners and stakeholders<br>2. Create Posters & Banners related to ABMS Policies and Guidelines<br>3. Digital Socialization (email Blast, website) to all employees, business partners and stakeholders |                                   |                       | employees, business partners and stakeholders  |                                  |
| 3  | Whistleblowing System Socialization | Understanding and awareness of WBS by all employees, business partners and stakeholders | 1. Disseminate Whistleblowing System to all employees, business partners and stakeholders<br>2. Create Posters & Banners related to  | <b>FKAP and Relevant Division</b> | July - December 2020  | Conduct an understanding survey of all employees, business partners and stakeholders | Periodic (once a year/as needed) |


|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision : -      |
|   |  | Amendment : -     |
|   | <b>APPENDIX</b>  | <b>CHAPTER VI</b> |

| No | Activity   | Target   | Work Program  | PIC                               | Implementation Period | Evaluation Method  | Implementation Frequency         |
|----|--|--|---|-----------------------------------|-----------------------|--|----------------------------------|
|    |  |  | Whistleblowing System<br>3. Digital Socialization (email Blast, website) to all employees, business partners and stakeholders   |                                   |                       |  |                                  |
| 4  | Socialization of Gratification Control Implementation Guidelines | Understanding and awareness of provisions regarding gratification by all employees, business partners and stakeholders | 1. Disseminate provisions regarding Gratification to all employees, business partners and stakeholders<br>2. Create Posters & Banners related to provisions regarding Gratification<br>3. Digital Socialization (email Blast, website) to | <b>FKAP and Relevant Division</b> | July - December 2020  | Conduct an understanding survey of all employees, business partners and stakeholders | Periodic (once a year/as needed) |


|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision : -      |
|   |  | Amendment : -     |
|   | <b>APPENDIX</b>  | <b>CHAPTER VI</b> |

| No | Activity                                   | Target   | Work Program  | PIC                               | Implementation Period | Evaluation Method   | Implementation Frequency         |
|----|--|--|---|-----------------------------------|-----------------------|---|----------------------------------|
|    |  |  | all employees,<br>business partners<br>and stakeholders   |                                   |                       |   |                                  |
| 5  | Signing of the Employee Integrity Pact     | Signing Integrity Pact related to ABMS by all employees  | 1. Digital signing of the ABMS compliance Integrity Pact for all employees                                | <b>FKAP and Relevant Division</b> | July - December 2020  | Ensure that all employees have signed the integrity pact                | Periodic (every year)            |
| 6  | Signing of Business Partner Integrity Pact | Signing Integrity Pact related to ABMS by Business Partner (Vendor and Debtor)                     | 1. Signing the ABMS compliance integrity pact by business partner   | <b>FKAP and Relevant Division</b> | July - December 2020  | Ensure that the business partner have signed the integrity pact         | Periodic (once a year/as needed) |
| 7  | Internal Assessment                        | Fulfill the requirements in the SNI ISO 37001 ABMS clause based on the results of the Gap Analysis | Fulfill the requirements in the SNI ISO 37001 ABMS clause based on the results of the Gap Analysis report | <b>FKAP and Internal Audit</b>    | July - December 2020  | Ensure that all requirements of the SNI ISO 37001 SMAO clause have been | 1 time implementation            |




|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision : -      |
|   |  | Amendment : -     |
|   | <b>APPENDIX</b>  | <b>CHAPTER VI</b> |

| No | Activity                         | Target  | Work Program   | PIC                               | Implementation Period | Evaluation Method                                   | Implementation Frequency  |
|----|----------------------------------|---|--|-----------------------------------|-----------------------|---|---------------------------|
|    |                                  | report  |  |                                   |                       | fulfilled   |                           |
| 8  | Management Review                | Report to the Governing Body & Top Management regarding the entire implementation of SNI ISO 37001 ABMS at PT SMI | 1. Conduct management review meetings  | <b>FKAP and Internal Audit</b>    | July - December 2020  | Report on the results of management review meetings | Periodically (every year) |
| 9  | SNI ISO 37001 ABMS certification | SNI ISO 37001 ABMS certification  | 1. Determine the Certification Body that will conduct the certification audit<br>2. Undergo an audit conducted by a Certification Body<br>3. Follow up on non-conformance findings from the Certification Body | <b>FKAP and Relevant Division</b> | July - December 2021  | SNI ISO 37001 ABMS certification                    | Periodically (every year) |

|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision : -      |
|   |  | Amendment : -     |
|   | <b>APPENDIX</b>  | <b>CHAPTER VI</b> |

| No | Activity | Target | Work Program | PIC | Implementation<br>Period | Evaluation<br>Method | Implementation<br>Frequency |
|----|----------|--------|--------------|-----|--------------------------|----------------------|-----------------------------|
|    |          |        | (if any)     |     |                          |                      |                             |

|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-       |
|   |  | Amendment :-      |
|   | <b>APPENDIX</b>  | <b>CHAPTER VI</b> |

Appendix II - Specimen of Integrity Pact

Employee Integrity Pact:

**STATEMENT LETTER**

I, the undersigned,

Name : .....

NIK : .....


Position : .....

Division : .....

Directorate : .....

In connection with the implementation of my main duties and functions, I hereby declare that:

1. I have received, read, understand, and will continue to comply with the provisions in the Company Regulations, Company Policies, and other provisions applicable at PT Sarana Multi Infrastruktur (Persero) ("PT SMI") including but not limited to the Policies Business Ethics and Code of Conduct, Anti-Bribery Management System Procedures (ABMS) and PT SMI Company Regulations in the year.....
2. This statement applies continuously as long as I am an employee, including if in the future there are changes to

|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-       |
|   |  | Amendment :-      |
| <b>APPENDIX</b>   |  | <b>CHAPTER VI</b> |


my main duties and functions, including those caused by the transfer of my duties to another work unit.

3. In the event that in the future it is discovered that there is a violation of the statements above, I am willing to accept sanctions as regulated in the PT SMI Company Regulations.

Jakarta, \_\_\_\_\_

[Stamp Duty]

(Name of Employee)

|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-       |
|   |  | Amendment :-      |
|   | <b>APPENDIX</b>  | <b>CHAPTER VI</b> |

Business Partner Integrity Pact:

**INTEGRITY PACT**

I, the undersigned:

Name : .....


Position : .....

Company name : .....

Directorate : .....

Within the framework of the process of .....  
at PT Sarana Multi Infrastruktur (Persero) ("PT SMI"), we  
hereby declare that:

1. Will not practice Corruption, Collusion and Nepotism (KKN).
2. Not offer, promise, give, receive, or ask for undue benefits of any value (financial or non-financial), directly or indirectly related to his position and contrary to his duties/obligations.
3. Promise to carry out duties in a clean, transparent, and professional manner, meaning that we will mobilize all abilities and resources optimally to provide the best work results at every stage of carrying out your duties.

|   |  |                   |
|---|--|-------------------|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision :-       |
|   |  | Amendment :-      |
|   | <b>APPENDIX</b>  | <b>CHAPTER VI</b> |

4. If we violate the any points that we have stated in this INTEGRITY PACT, then we are willing to be subject to sanctions in accordance with PT SMI's internal provisions and applicable laws and regulations.

In witness whereof, we have made this Integrity Pact statement with full awareness and a sense of responsibility.

Jakarta, \_\_\_\_\_


[Business Partner Entity Name]

[Stamp Duty and Seal of Business Partner]

Signature

**Nama**

Position

|   |  |  |
|---|--|--|
|  | <b>PROCEDURE FOR ANTI-BRIBERY<br/>MANAGEMENT SYSTEM (ABMS)</b> | Revision : -                           |
|   | <b>APPENDIX</b>  | Amendment : -<br><br><b>CHAPTER VI</b> |

**Appendix III - ABMS Organizational Structure**

**ORGANIZATIONAL STRUCTURE**

**ANTI-BRIBERY MANAGEMENT SYSTEM (ABMS)**

