





PROCEDURES FOR GRATIFICATION CONTROL

PT Sarana Multi Infrastruktur (Persero)


2021

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1. Background

PT Sarana Multi Infrastruktur (Persero) ("PT SMI"), hereinafter referred to as the "Company", consistently continues to strive to apply the principles of Good Corporate Governance (GCG) and Corporate Values in every activity it carries out. carried out, as well as upholding the trust of shareholders and stakeholders so that the Company's business activities are free from corruption, collusion, and nepotism.

One of the things that is often encountered in carrying out business activities and establishing business relationships is the giving and/or request for gratification from one party to another. This gratification is one of the concerns of the Corruption Eradication Commission of the Republic of Indonesia ("KPK") considering that this has the potential to lead to criminal acts of bribery.

In order to realize business and business activities that are transparent and accountable, the Company realizes the importance of handling gratification involving Company Personnel. For this reason, it is necessary to improve the mechanisms that regulate all Company Personnel as an


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effort to increase integrity through uniform understanding and implementation of matters relating to Gratification within the Company.

2. Aims & Objectives

The Gratification Control Procedure is intended to provide guidance to all Company Personnel as a preventive, protective and reporting mechanism in dealing with actions that have the potential or lead to criminal acts of Corruption, especially Gratification, with the following objectives:

- a. Increase understanding and compliance of all Company Personnel with Gratification Control provisions.
- b. Forming a Company environment that is aware and understanding in handling/controlling all forms of Gratification.
- c. Providing references and guidance for Company Personnel regarding the importance of compliance in reporting Gratifications to protect themselves and their families from possible accusations of bribery.
- d. Creating Company People who are clean and free from Corruption, Collusion and Nepotism.
- e. Creating a transparent and accountable environment to support the creation of GCG within the Company.


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3. Scope

This procedure regulates the implementation, management, and control of Gratification, namely within the scope of coordination with the KPK as well as sanctions for deviations from Gratification provisions carried out by all Company Personnel.

4. Legal Basis

- a. Law of the Republic of Indonesia Number 31 of 1999 concerning the Eradication of Corruption Crimes (State Gazette of the Republic of Indonesia of 1999 Number 140, Supplement to State Gazette of the Republic of Indonesia Number 3874), as amended by Law of the Republic of Indonesia Number 20 of 2001 concerning Amendments to the Law Number 31 of 1999 concerning the Eradication of Corruption Crimes (State Gazette of the Republic of Indonesia of 2001 Number 134, Supplement to the State Gazette of the Republic of Indonesia Number 4150).
- b. Law of the Republic of Indonesia Number 30 of 2002 concerning the Corruption Eradication Commission (State Gazette of the Republic of Indonesia of 2002 Number 137, Supplement to State Gazette of the


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Republic of Indonesia Number 4250) as amended by:


(i) Law Number 10 of 2015 concerning Determination of Government Regulations Replacement of Law Number 1 of 2015 concerning Amendments to Law Number 30 of 2002 concerning the Corruption Eradication Commission into Law (State Gazette of the Republic of Indonesia of 2015 Number 107, Supplement to the State Gazette of the Republic of Indonesia Number 5698); and (ii) Law Number 19 of 2019 concerning the Second Amendment to Law Number 30 of 2002 concerning the Corruption Eradication Commission (State Gazette of the Republic of Indonesia of 2019 Number 197, Supplement to the State Gazette of the Republic of Indonesia Number 6409).

c. Law of the Republic of Indonesia Number 19 of 2003 concerning State-Owned Enterprises (State Gazette of the Republic of Indonesia of 2003 Number 70, Supplement to State Gazette of the Republic of Indonesia Number 4297).

d. Law of the Republic of Indonesia Number 40 of 2007 concerning Limited Liability Companies (State Gazette of the Republic of Indonesia of 2007 Number 106, Supplement to State Gazette of the Republic of Indonesia Number 4756).

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- e. Law of the Republic of Indonesia Number 28 of 1999 concerning the Administration of a State that is Free from Corruption, Collusion and Nepotism (KKN) (State Gazette of the Republic of Indonesia of 1999 Number 75, Supplement to the State Gazette of the Republic of Indonesia Number 3851).
- f. Minister of Finance Regulation Number 88/PMK.06/2015 concerning the Implementation of Good Corporate Governance in Limited Liability Companies (Persero) Under the Guidance and Supervision of the Minister of Finance.
- g. Decree of the Minister of Finance Number 505/KMK.06/2020 concerning Guidelines for Assessment and Evaluation of the Implementation of Good Corporate Governance in Limited Liability Companies (Persero) Under the Guidance and Supervision of the Minister of Finance.
- h. KPK Regulation Number 02 of 2019 concerning Gratification Reporting.
- i. Corruption Eradication Commission Letter Number B.143/01-13/01/2013 dated January 21 2013 regarding Appeals Regarding Gratification, addressed among other things to the Board of Directors of BUMN.

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- j. Corruption Eradication Commission Letter Number B.1341/01-13/03/2017 dated March 15 2017 concerning Guidelines and Limits on Gratification, addressed among other things to the Bord of Directors of BUMN.
- k. Articles of Association of PT Sarana Multi Infrastruktur (Persero).
- l. PT Sarana Multi Infrastruktur (Persero) Company Regulations.
- m. Company Policy regarding Corporate Governance (Code of Corporate Governance).
- n. Company Policy regarding Business Ethics and Code of Conduct.
- o. Company Policy related to the Preparation of Company Policy.
- p. Company Policy regarding Handling Legal Issues.
- q. Company Policy regarding Anti-Bribery Management System.

5. References

- a. Minister of Finance Regulation Number 7/PMK.09/2017 concerning Guidelines for Gratification Control within the Ministry of Finance.
- b. SNI ISO 37001: 2016 Anti-Bribery Management System.

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6. Special Conditions

In the event that there are special conditions that require exceptions to this Procedure and/or there are matters that have not been regulated, then the proposing work unit/division must obtain approval from the Board of Directors. If necessary, the Board of Directors may request a prior review from the relevant work unit/division.

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

7. Definition


- a. *Conflict of Interest* : A condition where the Company's personnel, in carrying out their duties and obligations, have interests outside of official interests, whether involving personal, family or other parties' interests, thereby affecting

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the objectivity of decision making and the implementation of basic duties and functions in accordance with the authority granted by the Company.


b. *Good Corporate Governance* (GCG) : The process and structure used by the Company's Organs to determine policies in order to increase the Company's business success and accountability so that it can increase added value for shareholders in the long term by taking into account the interests of stakeholders based on the provisions of the Articles of Association and applicable laws and regulations.

c. *Gratification* : 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, both received domestically and abroad. country, which is carried out using electronic means or without

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electronic means.

- d. Company Personnel : Board of Commissioners, Sharia Supervisory Board, Directors, Supporting Organs of the Board of Commissioners, and all Company Employees.
- e. Official Activity : All official activities of Company Personnel related to the implementation of their duties, functions and positions or assignments.
- f. Corruption Eradication Commission of the Republic of Indonesia (KPK) : State Institutions as referred to in Law Number 30 of 2002 concerning the Corruption Eradication Commission as amended several times, most recently by Law Number 19 of 2019 concerning the Second Amendment to Law Number 30 of 2002 concerning the Corruption Eradication Commission.
- g. Corruption : Corruption is a criminal act as intended in the provisions of laws and regulations governing criminal acts of corruption. Corruption crimes are:

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i. breaking the law, enriching other people/entities which is detrimental to the state's finances/economy;

ii. abusing authority due to position/position which can harm the state's finances/economy;

iii. bribery;

iv. embezzlement in office;

v. extortion in office;

vi. relating to contracting;


vii. Gratification.

h. Official who : Parties/officials who receive Has the delegation of authority from the Board Authority to of Directors specifically for Make Decisions activities/activities as regulated in (PBM) this Procedure.

i. Reporter : Company Personnel who submit reports regarding acceptance or rejection of Gratification.

j. Giver : The party giving the gratification.


k. Recipient : Company Personnel who receive Gratuities.

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1. Other Party : Individuals and/or legal entities who have or do not have a business relationship with the Company or are competitors of the Company, including but not limited to debtors, clients, vendors, suppliers, dealers, agents, bank counterparts, notaries, consultants and third party work partners.


m. Bribery : The act of offering, promising, giving, receiving or requesting undue benefits of any value (financial or non-financial), directly or indirectly, regardless of location, is a violation of laws and regulations, as an inducement or gift for the person acting or refrain from acting regarding the performance of the person's duties.

n. Company Values : A philosophy based on values that are believed to and implemented in the Company on an ongoing basis which are used as a reference and reflected in

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ethical business behavior in all lines and aspects of the Company's business management to achieve the Company's goals.

- o. Gratification : The implementing unit is tasked and responsible for implementing, managing and controlling Gratification in the Company in accordance with the Main Duties and Functions of the Division.

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1. Basic Principles of Gratification Control

The basic principles in preparing this Gratification Control Procedure are as follows:


a. Rejection of Gratification

Company personnel are required to politely and courteously reject the offer/gift of Gratification by providing an explanation of this Procedure to the Giver and, if necessary, convey these rules to Other Parties as part of the socialization of these rules.

b. Acceptance of Gratification

Company personnel are prohibited from receiving gratification either directly or indirectly, either on their own initiative or from other people from any party with a business relationship or competitor with the aim of obtaining information, or something that is not permitted by applicable laws and regulations, or influencing the party in question does and/or does not do something related to their position/authority.

c. Giving Gratification


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Company personnel are **prohibited from giving/carrying out Gratification**, outside the terms/conditions as regulated in Chapter IV.3. Permitted Gifts in this Procedure.


2. Commitment of the Board of Commissioners, Sharia Supervisory Board and Directors of the Company

The Company's Board of Commissioners, Sharia Supervisory Board and Directors are always committed to implementing Gratification controls, including:

- a. Do not offer, give, and/or receive Gratification, bribes, or other forms that are contrary to the position, duties, and obligations as well as statutory regulations.
- b. Implement or carry out Gratification control functions including through UPG.
- c. Provide the necessary resources in implementing Gratification control.
- d. Maintain the confidentiality of Whistleblower data and provide guaranteed protection for Gratification Whistleblowers.
- e. Strive to prevent Corruption and/or Gratification, bribery or other forms that are contrary to their

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position, duties, and obligations as well as the laws and regulations in their environment.

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1. Establishment of a Gratification Control Unit

In order to support the effectiveness of the implementation of Gratification control within the Company, the Company formed and established a Gratification Control Unit (UPG) which is responsible for implementing, managing, and controlling Gratification in the Company in accordance with the Main Duties and Functions of the Division.


2. Duties and Responsibilities of the Gratification Control Unit

In carrying out duties as a Gratification control unit in the environment of the Company, UPG has the following duties and responsibilities:

- a. Provide information and data related to the development of the Gratification control system for Company leaders.
- b. Receive, analyze, administer reports of acceptance or rejection of Gratifications from Company Personnel, record the completeness of the Gratification reports, and forward reports of acceptance or rejection of Gratifications to the Corruption Eradication Commission.


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- c. Request information from the Reporting Party if necessary.
- d. Carry out maintenance of Gratification goods until the status of the goods is determined.
- e. Submit a recapitulation/management result of the monthly Gratification control report by attaching the relevant data/files to the Director in charge of the UPG function and a recapitulation of the annual Gratification control report to the Corruption Eradication Commission.
- f. Follow up on recommendations from the Director in charge of UPG functions, Head of Division in charge of UPG functions, or the Corruption Eradication Committee in terms of handling and utilization of Gratifications.
- g. Monitor follow-up on recommendations for handling and utilization related to Gratification control provided by the Director in charge of UPG functions, Head of Division in charge of UPG functions, or the Corruption Eradication Commission.
- h. Coordinate with each work unit to carry out regular socialization/internalization of Gratification provisions and implementation of Gratification

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control including forwarding it to external parties of the Company.

- i. Coordinate with each related work unit to monitor the follow-up on the receipt of Gratification which is determined to belong to the Company or to the Reporter/Gratification Recipient.
- j. Monitor and evaluate the implementation of Gratification control with the Corruption Eradication Committee.
- k. Coordinate and consult with the Head of Division in charge of UPG functions in implementing Gratification control including but not limited to mapping vulnerable points for receiving and giving Gratification in the event of a violation of this Procedure by Company Personnel.


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1. Gratifications that must be reported

Gratifications that must be reported are gratifications received by Company Personnel that are related to their position and are contrary to their obligations or duties. Gratification in this category is receipt in any form obtained by Company Personnel from parties suspected of being related to the Recipient's position.

Acceptance of gratification must in principle be rejected and the rejection reported to the UPG to be forwarded to the Corruption Eradication Commission. However, under conditions it cannot be rejected due to, among other things:


- a. the process of the giving is unknown (the Company's personnel do not know the time and location of the receiving process or the Gratification is not received directly) and the identity and address of the Giver is unknown;
- b. the existence of certain conditions that cannot be rejected, such as causing damage to good institutional relations, causing harm to the Company's good name, endangering the Recipient's self/career, there are other threats; or

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c. recipients are doubtful about the qualifications of Gratification.

Therefore, the rejection and/or acceptance of the Gratification above, as stated in points a, b, and c, must be reported to UPG no later than 10 (ten) working days from the time of rejection and/or acceptance of the Gratification to be forwarded by UPG to the Corruption Eradication Committee within 10 (ten) working days from the date of receipt of the Gratification Report. If the time period for submission to the UPG has passed, the Gratification Report Form which has been filled in by the Company Personnel Receiving Gratifications shall be submitted by the Company Personnel to the Corruption Eradication Committee within 30 (thirty) working days from the date of receipt or rejection of the Gratification. In the event that Company Personnel have reported the Gratification received to UPG, then the violation of the Gratification provisions which must be reported by Company Personnel will not apply.

Examples of receiving Gratification in this category include but are not limited to:


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- Receiving gratuity money from partners before, during, after the auction process, or other processes related to the Recipient's position.
- Receiving of gifts in a broad sense, for example money, goods, facilities and/or accommodation from other parties which are known or reasonably suspected to be given due to authority related to their position and contrary to their obligations or duties.
- Receiving of gifts in any form from employers regarding promotion as a sign of introduction.
- Receiving of entertainment facilities, tourist facilities, and/or vouchers from other parties that meet one of the conditions below:
 - which are not relevant (outside the scope of work) to the implementation of their duties and obligations.
 - does not apply generally according to fairness and propriety.
 - have a conflict of interest.
- Receiving due to family relationships that have a conflict of interest, namely from grandfather/grandmother, father/mother/in-law,

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husband/wife, child/daughter-in-law, grandchild, in-laws, uncle/aunt, brother/sister/sister-in-law, cousin, or nephew.

- Receiving money/goods from parties who have an official relationship and potential conflict of interest for Company Personnel in an activity such as a wedding, birth, *aqiqah*, baptism, circumcision, or other religious/customary/tradition ceremonies that exceed Rp. 1,000,000.00 (one million rupiah) for each Giver.
- Receiving money/goods from parties who have an official relationship and potential conflict of interest with the Recipient regarding a disaster/disaster experienced by Company Personnel, which exceeds Rp. 1,000,000.00 (one million rupiah) per Giver.
- Receiving from fellow Company Personnel for farewells, retirements, promotions, and birthdays which are not in the form of money or not in the form of cash equivalents (cheques, bills, demand deposits, shares, deposits, vouchers, credit, etc.) which exceeds the equivalent value of Rp. 300,000.00 (three hundred thousand rupiah) per gift per person

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with a total gift of Rp. 1,000,000.00 (one million rupiah) in 1 (one) year from the same Giver.

- Receipts from fellow Company Personnel are not in the form of money or not in the form of cash equivalents (cheques, bills, demand deposits, shares, deposits, vouchers, credit, etc.) which exceed Rp. 200,000.00 (two hundred thousand rupiah) per gift per person with a maximum total giving of Rp. 1,000,000.00 (one million rupiah) in 1 (one) year from the same Giver.
- Receiving transportation facilities, accommodation, pocket money, honorarium, souvenirs in activities related to the implementation of duties and obligations from other parties based on official appointments and assignments from the Company outside the standard costs applicable in the Company, there is double financing and/or contrary to internal provisions or external that applies to the Company.
- Receiving prizes during open contests/competitions organized by other agencies or institutions based on official appointment or assignment.

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2. Gratifications that do not have to be reported


Characteristics of Gratification that are not required to be reported in general are:

- a. Generally applicable, namely a condition of giving that is applied equally in terms of type, form, requirements, or value, to all participants and meets the principles of fairness or propriety.
- b. Does not conflict with applicable laws and regulations.
- c. Viewed as a form of expression, friendliness, or respect in social relations between people within the limits of reasonable values.
- d. It is a form of giving that is within the realm of customs, customs and norms that live in society within the limits of reasonable values.

Receipt of Gratification which is not required to be reported can be received and enjoyed (benefited) by the Recipient without any obligation to report to UPG.


Examples of receiving Gratification in this category are:

- Receiving due to family relationships as long as there is no conflict of interest, including from


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grandfather/grandmother, father/mother/in-law, husband/wife, child/daughter-in-law, grandchild, in-laws, uncle/aunt, brother/sister/sister-in-law, cousin, and/ or nephew.


- Receiving gifts (tokens of love) in the form of money or goods that have sales value in organizing weddings, births, *aqiqah*, baptisms, circumcisions, and/or other religious/custom/tradition ceremonies with a maximum value limit of Rp. 1,000,000.00 (one million rupiah) for each Giver.
- Flower arrangements as greetings given at events such as engagement, wedding, birth, death, *aqiqah*, baptism, circumcision, tooth cutting or other traditional/religious ceremonies, farewell, retirement, or promotion;
- Receiving related to calamities or disasters experienced by the Recipient, father/mother/in-law, husband/wife, and/or children of the Gratification Recipient as long as there is no conflict of interest and meet fairness and propriety at a maximum of Rp. 1,000,000.00 (one million rupiah) every Giver.

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- Receiving from fellow Company Personnel for farewells, retirements, promotions, and birthdays which are not in the form of money or not in the form of cash equivalents, a maximum of Rp. 300,000.00 (three hundred thousand rupiah) per gift per person with a total of maximum Rp. 1,000,000.00 (one million rupiah) in 1 (one) year from the same Giver.
- Receiving from fellow Company Personnel are not in the form of money or not in the form of cash equivalents (cheques, giro bills, shares, deposits, vouchers, credit, etc.) at a maximum of Rp. 200,000.00 (two hundred thousand rupiah) per gift per people with a maximum total giving of Rp. 1,000,000.00 (one million rupiah) in 1 (one) year from the same Giver.
- Receiving generally accepted dishes or offerings.
- Receiving prizes, appreciation, or awards for academic or non-academic achievements that are participated in at one's own expense, such as championships, competitions, or competitions not related to official service.

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- Profits or interest from general placement of funds, investments or private share ownership.
- Benefits for all employee cooperative participants based on general employee cooperative membership.
- Seminar kit which, among other things, takes the form of a set of modules and stationery as well as certificates obtained from official investments, activities such as meetings, seminars, workshops, conferences, training, or other similar activities that are generally accepted.
- Prizes are not in the form of money or other means of exchange, which are intended as promotional or outreach tools that use logos or outreach messages, as long as they do not have a conflict of interest and are generally applicable.
- Receiving gifts or allowances in the form of money or goods related to improving work performance provided by the Company or the Government in accordance with applicable laws and regulations.
- Those obtained from compensation or honorarium for professions outside the Service, is not related to the duties and responsibilities of the Company's Personnel, does not have a conflict of interest,


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and/or does not violate the Company's applicable internal rules.


- Receiving direct prizes or raffles, discounts or rebates, vouchers or reward points, or generally accepted souvenirs in accordance with fairness and propriety, does not have a conflict of interest, and is not related to official duties.
- Compensation received is related to official activities such as honorarium, transportation, accommodation, and financing which have been determined in the applicable cost standards at the Company, as long as there is no double financing, there is no conflict of interest, and does not violate the provisions applicable to the Company.
- Receiving souvenirs/plaques to the Company in the context of official relations, both domestically and abroad as long as they are not given to Company Personnel.

3. Permitted Gifts


Gratification Control also includes gift activities that can be carried out by Company Personnel to Other Parties, provided that they fulfill the following conditions:

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- a. Not related to his position.
- b. It is not intended/intended for the purpose of giving bribes or providing prohibited Gratification or things that are considered prohibited bribes or Gratification.
- c. Not in the form of cash or other means of payment, except for:
 - i. Honorarium for meetings or resource persons for activities at the Company;
 - ii. Prizes for events organized by the Company;
 - iii. Giving to Other Parties if Company Personnel attend weddings, circumcisions, births; or
 - iv. Giving to other parties affected by disaster.
- d. In relation as a service user, this is carried out for promotional activities, sponsorship, accommodation, discounts, donations, and other gifts which are official and generally applicable in relation to business relations as a user of the Company's services.
- e. Provisions in the form of sponsorship or donations are carried out based on an official proposal from the submitting agency.


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- f. Giving gifts/souvenirs using the Company's logo, as long as the giving has been budgeted for by the Company.
- g. Providing meals and/or entertainment, with the following conditions:
- i. To foster good relationships within reasonable limits and pay attention to equal, mutually respectful relationships.
 - ii. It does not aim to bribe the party concerned to provide something to the Company that is not within the Company's legal rights.
 - iii. Meals do not need to be limited, as long as they are reasonable.
 - iv. Carried out in a respectful place and while maintaining a positive image of the Company.
 - v. The implementation of the banquet must obtain PBM approval.
- h. Providing honorarium for meetings, resource persons or moderators of activities at the Company in the form of money or goods or banquets to Other Parties is given as appreciation for the contribution of thought and expertise that has been provided by the Party in question to the Company and activities held

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by the Company at the official invitation of the Company. The criteria and amount of honorarium are given by referring to the provisions applicable in the Company.

- i. Providing entertainment facilities for sports activities (golf/other sports) or other entertainment activities to representatives of Government agencies or other parties in accordance with the amount of costs budgeted for each such activity and approved by the PBM.
- j. Giving gifts/souvenirs in the form of goods/money/cash equivalent, to other parties for weddings, circumcisions, births, or mourning events, can be given with a maximum gift value of Rp. 1,000,000.00 (one million rupiah) for each series of events.
- k. Giving is not permitted in a form that violates morality and the law and is not intended to influence a decision that is contrary to propriety.
- l. Giving to Civil Servants or State Administrators by taking into account the following provisions:


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- i. Not because of his position as controller/manager of government agency accounts.
- ii. Not intended to do/not do something in the interests of the Company.
- m. It has been budgeted in accordance with applicable regulations.


4. Implementation of Gratification Control

In order to ensure that this Procedure can be known by all Company Personnel and all third parties related to the Company, all related parties within the Company must do the following:


- a. Include provisions prohibiting the acceptance of Gratifications (gifts/facilities) in every announcement in the process of procuring goods/services and/or in contracts for procuring goods/services as well as in letters sent to partners/associates or other third parties.
- b. Assign UPG within the Company to continuously provide information and outreach to all employees and third/external parties regarding the Gratification Control Procedure.

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- c. Assign all related divisions that have working relationships with third parties to deliver Gratification Control Procedures to all related parties in the supply chain within the Company (goods/service providers, agents, distributors, consultants, auditors/assessors, and/or customers).
- d. Provide clear information to any party regarding the provisions contained in the Gratification Control Procedure.
- e. Assign UPG to carry out monitoring, evaluation, and regular adjustments to this Procedure in accordance with the Company's developments and business dynamics and refers to applicable legislation.
- f. Monitor the implementation/implementation of this Procedure and provide a recapitulation of reports on receipt and/or rejection of Gratification periodically, namely once a month, to the Director in charge of UPG functions, including reports that arise after the existence of this provision.
- g. Assign the Internal Audit Division (DAI) to monitor the implementation of this Gratification Control Procedure in accordance with the provisions

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stipulated in the Company's policy regarding internal control.

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1. Subject of the Reporter


The reporter is the Company Person who submits a report regarding the acceptance or rejection of Gratification.

2. Gratification Reporting Mechanism

a. Submission of reports on receipt of Gratification by the Reporter is carried out with the following conditions:

i. The Reporter submits a report on receipt or rejection of Gratification to the Corruption Eradication Commission via UPG, either manually or via electronic media by filling in the Gratification Report Form no later than 10 (ten) working days from the time the Reporter receives or rejects the Gratification.

ii. The UPG then forwards the Gratification report to the Corruption Eradication Commission no later than 10 (ten) working days from the date the Gratification acceptance or rejection report is received, using the report form determined by the Corruption Eradication Committee and attaching related documents and submitting it through a mechanism or system


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that has also been determined by the Corruption Eradication Commission.

iii. If the time period for submitting a report on receipt or rejection of Gratification to UPG as regulated in letter i has passed, then the report on receipt or rejection of Gratification is submitted directly to the Corruption Eradication Committee by the Reporter within 30 (thirty) working days from the date of receipt or rejection of Gratification.

b. The Gratification Report Form submitted to UPG must at least contain:

- i. full name and identity of the Reporter and the Giver of Gratification;
- ii. position of the Gratification Reporter;
- iii. type of report (acceptance or rejection of Gratification);
- iv. place and time of receipt or rejection of Gratification;
- v. description of the type of Gratification accepted or rejected by attaching evidence in the form of samples or photos;

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vi. value or estimated value of Gratification received; and

vii. chronology of acceptance or rejection of Gratification.

c. The Gratification Report Form received is then recorded and reviewed by UPG.

d. The review carried out by UPG consists of:


i. Review of the completeness of data/files related to the Gratification Report Form; and

ii. Review of Gratification Report Form.

e. If necessary, UPG can request information/confirmation regarding the Gratification Report Form from the Reporter regarding the results of the review of the Gratification Report Form in question.

3. Alternative Use of Gratification

Upon receipt of Gratifications whose utilization has been decided or determined to be the property of the Company by the Corruption Eradication Commission, UPG submits a request for approval to the PBM for Gratification


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utilization with proposals for alternative uses of Gratifications that can be made, including:

- a. Returned to the Giver of Gratification.
- b. Donated to parties in need, including social foundations or other social institutions (orphanages, nursing homes, and other places where aid is distributed).
- c. Used by the Company, among other things, for operational activities, for the library, or for displaying items resulting from Gratification reporting.
- d. Auctioned internally by the Company, then the proceeds from the auction can be donated to social foundations or other social institutions.
- e. Handed over to the Reporter who received the Gratification to be used as performance support.

4. Handling Gratification Receipts in the Form of Perishable or Damaged Goods


For receipt of Gratification in the form of perishable or damaged goods, including food parcels and/or fruit which are feared to be expired and difficult to return to the Giver of Gratification, these goods can be distributed as social assistance or to parties in need within the

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Company, after the Gratification receipt report is received. completed by UPG, obtained PBM approval, and will then be reported to the Company accompanied by an explanation of the estimated price and documentation of the perishable or damaged goods.

5. Follow-up on Gratification Determination


- a. The obligation to hand over Gratifications in the form of money and/or goods to the KPK is carried out after obtaining a determination of the Gratification ownership status by the KPK Leadership.
- b. In the event that the Gratification status is determined to be state property, the Reporter through the UPG submits the Gratification to the Corruption Eradication Committee with the following conditions:
 - i. For Gratification in the form of money, the Reporter deposits the Gratification money into the KPK account via UPG and submits proof of the deposit to the KPK.
 - ii. For Gratification in the form of goods, the Reporter submits the Gratification goods to the KPK via UPG and submits proof of receipt of the goods by the KPK. If the Reporter is unable to

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hand over the Gratification items due to any reason, then the UPG or KPK will ask the Reporter to hand over money as compensation for the goods received in the amount stated in the KPK Chairman Decree regarding Determining the Status of Gratification Ownership.


6. Protection, Rewards and Sanctions

- a. Every Reporter who reports gratification to UPG and KPK (via UPG) must have their rights and obligations protected.
- b. Procedures for protecting the Reporter are implemented in accordance with statutory provisions.
- c. The Company can give awards to parties who are considered to be exemplary in implementing gratification control.
- d. Company personnel who are proven to have violated the procedures will be subject to sanctions in accordance with applicable Company Regulations.

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This procedure applies and is binding on all Company Personnel. With this procedure, it is hoped that the Company's personnel can carry out the Company's activities and business in a transparent and accountable manner and reflect GCG principles.

This procedure is effective from the date stipulated by the Board of Directors Regulations. Matters that have not been regulated in this Procedure will be explained further in the technical implementation instructions.

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Gratification Report Form

GRATIFICATION REPORT FORM

PT SARANA MULTI INFRASTRUKTUR (PERSERO)

To:

I, the undersigned, submit a report of Acceptance/Rejection*)
of Gifts/Souvenirs and Entertainment as follows:

Data of the Reporter :

Name :

ID Card No. :

Employee Identification No :

Address, Date of Birth :

Job Title :

Directorate - Division :

E-mail :

Mobile Phone No. :

Data of Giver/Requester:


Name :

Jobs & Titles :

Address :

Telephone & Email/Fax :

Relationship :

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1. Gifts/Souvenirs and Entertainment accepted/rejected*) as listed in the table below:

No	Place, Date, Time of the Receipt	Chronology of Acceptance	Acceptance Form	Value ¹	Amount	Description of Acceptance	Notes

*) Cross the unnecessary ones

¹ Fill in the gratuity value according to the currency received or the estimated value if the receipt is in non-monetary form

2. The reporter hereby submits the receipt object according to the table above to UPG for follow-up according to the provisions.

3. The receipt of Gifts/Souvenirs and Entertainment is known to the Direct Supervisor: Yes/No*)

4. This report is prepared in 2 (two) copies, the first copy is for the UPG and the second copy is for the Reporter

Jakarta, 20...

Immediate Supervisor

Reporter

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