

COMPANY POLICY
PT ABEL GRUP INDONESIA

Through this Company Policy, PT Abel Grup Indonesia (hereinafter referred to as “We”, “Abel”, or the “Company”) establishes internal principles and provisions as guidelines for conducting Abel’s business activities and carrying out duties and responsibilities within Abel. Abel is a company engaged in the provision of mining and industrial solutions by offering products and technologies across the pump, mechanical, and construction segments.

Abel is committed to conducting its business activities responsibly, with integrity, and in accordance with the applicable laws and regulations in Indonesia, while adhering to the principles of anti-corruption and anti-bribery, respect for human rights, environmental protection, as well as occupational health and safety.

This Company Policy serves as a reflection of Abel’s commitment to implementing the principles of good corporate governance, while simultaneously serving as a guideline for Abel and all of its employees in carrying out business activities responsibly, with integrity, and in compliance with the applicable provisions.

1. Compliance with Laws and Regulations

We are subject to with and are committed to complying with all laws and regulations and/or legal provisions applicable within the territory of the Republic of Indonesia relating to Abel’s business activities and the implementation of this Company Policy.

This Company Policy is prepared with reference to the laws and regulations and/or legal provisions relevant to each policy set forth herein, as follows:

- a. Law Number 1 of 1970 on Work Safety (hereinafter referred to as “Law 1/1970”);
- b. Law Number 31 of 1999 on Eradication of the Criminal Acts of Corruption, as amended by Law Number 20 of 2001 on Amendment to Law Number 31 of 1999 on Eradication of the Criminal Acts of Corruption, as adjusted pursuant to Law Number 1 of 2006 on Adjustment of Criminal Provisions, and partially repealed pursuant to Law

Number 30 of 2002 on the Corruption Eradication Commission and Law Number 1 of 2003 on the Criminal Code (hereinafter referred to as “Anti-Corruption Law”);

- c. Law Number 39 of 1999 on Human Rights (hereinafter referred to as “Human Rights Law”);
- d. Law Number 32 of 2009 on Environmental Protection and Management, as amended by Law Number 6 of 2003 on the Enactment of Government Regulation in Lieu of Law Number 2 of 2002 on Job Creation into Law (hereinafter referred to as “Environmental Law”); and
- e. Government Regulation Number 50 of 2012 on the Implementation of Occupational Safety and Health Management System (hereinafter referred to as “GR 50/2012”).

2. Scope of the Company Policy

This Company Policy shall apply within Abel’s internal environment and serve

as a guideline in the performance of Abel's business activities. In conducting

its business activities, Abel is committed to implementing the principles of integrity, anti-corruption and anti-bribery, respect for human rights, environmental protection, as well as occupational health and safety. To support Abel's commitment to applying these principles, Abel has established and implemented a number of policies applicable within Abel's internal environment and serving as guidelines for all relevant parties in conducting Abel's business activities. Such Company Policies comprise:

- a. ***Anti-Corruption & Bribery Policy;***
- b. ***Grievance Mechanism;***
- c. ***Human Rights Policy;***
- d. ***Environmental Policy; and***
- e. ***Health & Safety Policy.***

These policies form part of Abel's commitment to ensuring that business activities are conducted responsibly, with integrity, sustainably, and in compliance with the provisions of applicable laws and regulations.

3. Objectives of the Company Policy

This Company Policy is intended to establish internal principles and standards to serve as guidelines for Abel and all of its employees in conducting business activities responsibly, with integrity, and in compliance with applicable laws and regulations, while adhering to the principles of anti-corruption and anti-bribery, respect for human rights, environmental protection, as well as occupational health and safety.

This Company Policy also serves as a basis for Abel to establish good corporate governance, ensure consistent standards of conduct in the implementation of business activities, and encourage every employee to understand and fulfill their responsibilities according to their respective roles and authorities. The implementation of this Company Policy shall be carried out through regular supervision and evaluation, as well as the development of necessary improvement measures to support the effective implementation of corporate standards.

4. Policies

a. *Anti-Corruption & Bribery Policy*

Abel is committed to conducting its business activities with integrity, transparently, and free from corruption, bribery, unlawful gratuities, as well as other improper business practices, in accordance with the applicable laws and regulations in Indonesia, including the Anti-Corruption Law and other applicable provisions concerning bribery.

To fulfill such commitment, Abel implements the provisions as follows:

- i. We are committed to conducting business activities by upholding integrity, honesty, and transparency, and avoiding any action that may be categorized as corruption, bribery, unlawful gratuities,

- or other improper business practices;
- ii. We are prohibited from offering, promising, giving, requesting, or receiving anything of value, directly or indirectly, with the intent to influence a decision, obtain an improper advantage, or obtain or provide preferential treatment, including through the provision or acceptance of gifts, entertainment, or facilitation payments;
 - iii. We are obligated to avoid and disclose any conflict of interest that may affect the performance of duties and responsibilities, and to ensure that all financial transactions, procurement of goods and/or services, payments, and expenses are recorded accurately, completely, and consistently in accordance with actual conditions to prevent potential manipulation of data or records;
 - iv. We prohibit improper financial recording and reporting, omission of material information, manipulation of financial data, and recording of transactions that do not reflect actual conditions. Every transaction entry shall be recorded according to actual conditions and managed and stored systematically to ensure traceability, accountability, and availability of necessary information;
 - v. We provide and ensure the availability of a reporting mechanism for alleged corruption, bribery, gratuities, or violations of this Company Policy, and are committed to ensuring that any report submitted in good faith is followed up in accordance with applicable provisions; and
 - vi. We apply a zero-tolerance principle against all forms of corruption, bribery, extortion, unlawful gratuities, or other improper business practices in the conduct of Abel's business activities.
- b. *Grievance Mechanism***
- Abel is committed to providing a safe, transparent, and accountable reporting and grievance mechanism for any alleged violations of law, ethical breaches, irregularities, or other actions that do not comply with applicable provisions in Abel's business activities.
- To fulfill such commitment, Abel implements the provisions as follows:
- i. We provide official, safe, and easily accessible grievance facilities for

relevant parties through the grievance channel as specified in Point 6 of this Company Policy to report alleged violations of law, fraud, ethical breaches, or other violations in the conduct of Abel's business activities;

- ii. We guarantee the confidentiality of the information submitted in the report and the identity of the whistleblower, as well as provide the option for anonymous reporting, while taking into consideration the need to verify and handle the report;
- iii. We provide full protection to whistleblowers against acts of intimidation, threats, or retaliation resulting from the submission of reports or grievances in good faith, including actions that adversely affect the employment relationship, provided that such actions relate to the submission of such report or grievance; and
- iv. We are obligated to follow up on and examine every report or grievance received objectively, fairly, and based on available information within a

reasonable timeframe, as well as record and document the reports, handling processes, and follow-ups conducted as materials for the continuous evaluation and improvement of Corporate governance.

c. ***Human Rights Policy***

Abel is committed to respecting, upholding, and protecting Human Rights across all of the Company's operational activities, in accordance with the Human Rights Law and other applicable laws and regulations.

To fulfill such commitment, Abel implements the provisions as follows:

- i. We strictly prohibit all forms of forced labor, slavery, human trafficking, and the use of child labor in all of Abel's business activities;
- ii. We are committed to ensuring the creation of an inclusive, safe, and diversity-respecting work environment, and prohibit all forms of discrimination, intimidation, and harassment based on ethnicity, religion, race, gender, age, disability, or other conditions protected under applicable

provisions, including physical, verbal, and sexual harassment;

- iii. We guarantee the fulfillment of workers' normative rights in accordance with the provisions of laws and regulations, including rights to wages, working hours, rest periods, and other labor rights; and
- iv. We are committed to actively identifying and mitigating potential negative impacts on Human Rights arising from Abel's business activities and taking appropriate measures to address such impacts.

d. Environmental Policy

Abel is committed to conducting its operational activities responsibly with due regard to environmental protection and management, and minimizing negative environmental impacts in accordance with the Environmental Law and other applicable laws and regulations.

To fulfill such commitment, Abel implements the provisions as follows:

- i. We are committed to complying with the provisions of laws and

regulations in the field of environmental protection and management, and ensuring the fulfillment of business licensing and/or environmental approvals required in accordance with Abel's business activities;

- ii. We are committed to optimizing the efficiency of the use of natural resources, energy, water, and raw materials to minimize environmental impacts arising from Abel's business activities;
- iii. We are obligated to ensure that the handling, storage, transportation, utilization, and/or management of waste, including Hazardous and Toxic Waste (B3), is carried out safely, responsibly, and in accordance with applicable laws and regulations and technical standards; and
- iv. We encourage the application of environmental protection awareness and practices across all of Abel's internal activities, and endeavor to apply environmental protection principles to activities involving business partners.

e. Health & Safety Policy

Abel is committed to providing and maintaining a safe, healthy, and conducive working environment to prevent occupational accidents and work-related illnesses, in accordance with Law 1/1970, GR 50/2012, and other applicable laws and regulations.

To fulfill such commitment, Abel implements the provisions as follows:

- i. We prioritize occupational safety and health in every implementation of the Company's operational activities and endeavor to implement preventive measures against potential occupational accidents and work-related illnesses;
- ii. We are obligated to regularly conduct hazard identification, risk assessment, and risk control on equipment, machinery, worksites, and operational processes that have potential risks to occupational safety and health;
- iii. We are obligated to provide Personal Protective Equipment ("PPE") that complies with applicable standards and is appropriate to the level of occupational risk for workers performing tasks in areas or under conditions requiring PPE, as

well as conduct occupational safety and health training periodically; and

- iv. We grant workers the right to temporarily stop work if conditions or actions are identified that clearly may endanger safety or health, with the obligation to immediately report such conditions to the responsible party within Abel.

5. Amendments to Company Policy

We may make changes and/or amendments to this Company Policy from time to time in accordance with the needs of the Company and/or developments in applicable laws and regulations.

Any change and/or amendment to this Company Policy shall be communicated through Abel's available internal communication channels. Every party involved in the implementation of this Company Policy is obligated to read, understand, and comply with any applicable change and/or amendment.

6. Contact Us

For inquiries, input, or further information regarding this Company Policy, employees may contact Abel through the internal communication channels as follows:

Electronically

Website : <https://abelgrup.com/en/contact/>
Email : abel@abelgrup.com

Non-Electronically

Mailing : Attn: PT Abel
Address : Grup Indonesia
Pondok Indah
Office Tower 1
5th Floor Unit
506
Jl. Sultan
Iskandar Muda
Kav. V - TA

Pondok Indah –
South Jakarta
12310

Thus, this Company Policy is drawn up to serve as a guideline for Abel and all of its employees in conducting business activities responsibly, with integrity, and in accordance with applicable provisions.

Jakarta, 06 Januari 2025



Eben Tambunan

PT Abel Grup Indonesia