

PROFESSIONALS WITH BUSINESS ETHICS
CORPORATE ETHICS POLICY

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GLOSSARY OF TERMS

1. **Company** with capital letter C is PT Timah (Persero) Tbk, while company with small letter c refers to a company in general.
2. **Board of Commissioners** is an Organ of the Company comprising all members of the Board of Commissioners as a whole (a Board) tasked to conduct supervision generally or specifically in accordance with the Articles of Association as well as to impart advice to the Board of Directors.
3. **Member of the Board of Commissioners** is a member of the Board of Commissioners as an individual (not a Board).
4. **Board of Directors** is an Organ of the Company comprising all members of the Board of Directors as a whole (a Board) which has authority and responsibility for the Company's stewardship for the interest of the Company, in accordance with the purpose and objectives of the Company, and also for representing the Company inside and outside of the courts in accordance with the Articles of Association.
5. **Member of the Board of Directors** is a member of the Board of Directors as an individual (not a Board).
6. **The Company's Personnel** are all members of the Board of Commissioners, all members of the Board of Directors, and all Employees of the Company.
7. **Employees** are all personnel formally bound in an employment relationship with the Company, both permanent employees and contractual employees in accordance with prevailing laws and regulations, from the lowest level to the highest level, which is one level below the Board of Directors.
8. **Management** is the Board of Directors along with structural officials in accordance with the organizational structure, which functions to carry out activities based on the predetermined limit of authority.
9. **Head of Unit** is an official whose position is one level below the Board of Directors.
10. **Direct Superordinate** is the position above the position held by personnel to whom he/she must answer.

11. **Stakeholders** are the parties with interest or concern in the Company, directly and indirectly, namely Shareholders, Board of Commissioners, Board of Directors, Employees, Government, Creditors and other parties with interest or concern.
12. **Business Partners** are the parties, both individual and companies, entering into business cooperation with the Company based on potential and feasibility with due regard to principles of mutual needs, strengthening one another and mutual benefit.
13. **Suppliers or Providers of Goods/Services** are business entities or individuals/persons providing goods/construction works/consultancy services/other services for the Company.
14. **Creditors** are individuals/persons, business entities or other business entities granting loans or funds/those similar to funds to the Company for a certain period under the agreed terms and conditions.
15. **Competitors** are companies producing or selling products/services that are similar with the Company's products/services.
16. **Intellectual property** is the property that is most notably related to products or processes useful to humans and derived from the thinking ability or creations of the mind.
17. **Gratuities** are gifts in the broad sense, which include money, goods, rebates (discounts), commissions, and loans without interest, travel tickets, lodging facilities, tours, free medical treatment, and other facilities. Such gratuities are either used with electronic means or without electronic means.
18. **Good Corporate Governance** shall be the principles underlying company management process and mechanism based on prevailing laws and regulations and business ethics.¹
19. **Corporate Values** are moral foundations in pursuing the Company's vision and mission.
20. **Ethics** is a system of values or norms believed by all Personnel of the Company as standards of behavior in the Company.

¹ Regulation of the Minister of SOE No. PER-09/MBU/2012 in conjunction with the Regulation of the Minister of SOE No. PER-01/MBU/2011 regarding Implementation of Good Corporate Governance within the State-Owned Enterprises (SOEs), Article 1

21. **Business Ethics** shall mean reference for the Company in conducting business activities including in interacting with stakeholders.
22. **Work Ethics** shall mean a system of values or norms embraced by all Leaders and Employees in carrying out their duties including the conduct in the relations amongst Employees and the Company.
23. **Code of Conduct** is a set of commitments consisting of the Company's Business Ethics and Employees' Work Ethics arranged to form, manage and align behaviors with a view to achieve consistent outputs that are in conformity with the Company's culture in achieving its vision and mission.
24. **Conflict of Interest** is a difference between economic interests of the Company and economic interests of members of the Company's Board of Directors, Board of Commissioners, or Ultimate Shareholder, that may be detrimental to the Company.

CHAPTER I INTRODUCTION

A. BACKGROUND AND SYSTEMATICS OF CODE OF CONDUCT

The Company recognizes the importance of Good Corporate Governance (GCG) implementation as one way to enhance value, business development, enhance competitiveness, and long-term business growth on an ongoing basis not only for shareholders but also for stakeholders, which means that the management of business is not merely to pursue profit but also a management that is full of trust, transparent and accountable.

The trusts of the stakeholders such as Employees, Business Partners, Suppliers, Customers, Communities and other stakeholders are crucial factors for the development and viability of the Company's business. The loss of stakeholder's trust may cause the loose of business opportunities and may threaten the continuation of Company's business.

The Company's credibility and trust are closely related to the Company's behavior in interacting with the stakeholders. In addition to the compliance of the applicable laws and regulations, the management of the Company shall also uphold ethical norms and values. Awareness of good ethics will enhance and strengthen the Company's positive image. Based on this basis, the Company prepares the Code of Conduct or the COC. COC is a set of commitments, consist of Company's business ethics and work ethics, which was created to form, organize and conform the behavior of all Company's Personnel to achieve consistent output that aligns with the Company's culture in achieving its vision and mission.

In the preparation of this COC, the Company always take into account the applicable laws and regulations, vision, mission, objectives and values of the Company, internal and external best practices and the Code of Corporate Governance (COCG).

As a dynamic policy, the COC will be reviewed periodically and continuously in accordance with the dynamics of the business environment. However, for any changes made, the Company will not sacrifice the existing values for short-term advantages.

B. BASIS OF CODE OF CONDUCT ARRANGEMENT

The Company's COC is arranged based on the following conduct:

1. Prioritizing compliance to applicable laws and regulations and taking into account the norms applicable in the communities in which the Company operates
2. Avoiding acts, behaviors or other offenses that may lead to conflicts of interest, corruption, collusion and nepotism and always put the interests of the Company above personal, family, accountability, independence and justice in the management of the Company, or other groups.
3. Being aware that the Company is required to grow and develop in accordance with the dynamics and market developments and demands of the stakeholders.

4. Prioritizing the safety and health of employees and communities in which the Company operates.
5. Contributing to the improvement of the welfare of society, nation and state.
6. Implementing principles of transparency, accountability, responsibility, independence and fairness in managing the Company.

C. VISION, MISSION AND CORPORATE VALUES

VISION

Becoming a world-class mining company towards quality life.

MISSION

Optimizing corporate values, contributing to shareholders, and being socially responsible.

Building competent human resources that possess integrity, creativity and positive values.

Establishing harmonious relationships with related parties (stakeholders).

CORPORATE VALUES

In conducting its business, the entire elements of PT Timah (Persero) Tbk and subsidiaries uphold:

INTEGRITY

Possessing honesty, responsibility for and consistency in all actions in achieving the Company's goals.

COMMITMENT

Able to fulfill agreements and promises with full responsibility.

OPEN

Easy to accept the inputs and able to adapt to any environmental changes that occur.

RATIONAL

Able to perform activities in a well-planned, organized manner with full consideration and calculation.

VISIONARY

Having the ability to innovate and look ahead without space and time constraints.

D. PURPOSE, GOALS AND BENEFIT OF CODE OF CONDUCT

1. The purposes of applying the Code of Conduct to the Company are as follows:
 - a. Every Personnel of the Company understands that all activities of the Company are based on the principles of good corporate governance.
 - b. To encourage all Personnel of the Company to have good behavior in carrying out all activities of the Company.
 - c. To create a healthy and comfortable working environment within the Company.
 - d. To minimize the possible occurrence of violations as part of risk management and to build the Company's reputation.

2. The Goals of the Company's Code of Conduct are as follows:
 - a. As a joint commitment to realize the Company's vision and carry out the mission in a professional and ethical manner.
 - b. As behavioral guidelines for all Personnel of the Company that must be adhered to while carrying out all activities in the Company.
 - c. As a guidance to avoid conflicts of interest in carrying out all activities in the Company.
 - d. To achieve harmonious relationships with stakeholders

3. The Company undertakes to implement the Code of Conduct consistently to provide long-term benefits for:
 - a. The Company
 - 1) To encouraging the Company's operational activities to be more efficient and effective, considering the Customers, Community, Government and other Stakeholders' relations have ethical standards that must be followed.

2) To increase the value of the Company by providing assurance and protection to stakeholders in dealing with the Company to produce good reputation; this eventually will lead to long-term business goals.

b. Shareholders

To increase the trust that the Company is managed in a trustworthy, prudent, efficient, transparent, accountable and fair manner to achieve level of profitability expected by the Shareholders while still considering the interests of the Company

c. Personnel of the Company

1) To provide guidance for Personnel of the Company regarding the behaviors desired and prohibited by the Company.

2) To create a work environment that upholds the values of honesty, ethics and openness, so that will improve the performance and productivity of every Company's Personnel as a whole.

d. Communities and other related parties create harmonious and mutually beneficial relationships with the Company, which will ultimately create social economic welfare for society and other related parties

E. TARGET OF CODE OF CONDUCT

The parties that are required to comply with and implement the COC are:

1. All Personnel of the Company
2. Subsidiaries
3. Investors (Shareholders)
4. Business Partners
5. Customers
6. Suppliers
7. Other related parties

F. RESPONSIBILITIES OF PERSONNEL OF THE COMPANY

1. To learn and understand in details the COC related to their works in accordance with the ethical standards set forth in the COC
2. Any question concerning COC implementation and violation may be submitted to the direct supervisor and/or to the Director of Business Development as the party responsible for the implementation of COC in the Company
3. To understand the procedures used to notify or report potential violations of the COC.
4. To be willing to cooperate in the investigation process against possible violations of the COC

G. RESPONSIBILITIES OF THE COMPANY'S LEADERS

1. To build and maintain the culture of compliance with COC by:
 - a. Personally encouraging the compliance with COC.
 - b. Conducting regular monitoring of programs with an aim to encourage the compliance of the Company's Personnel with COC
 - c. Providing a good example of how to behave or act everyday.
2. To ensure that each Personnel of the Company understands that compliance with COC is as important as performance achievement.
3. To consider the issue of compliance with COC in evaluating and rewarding the Company's employees.
4. To prevent possible violations of the COC by:
 - a. Ensuring that the risk of potential violations of COC related to business processes can be identified early and systematically.
 - b. Conducting identification and reporting pursuant to the established procedures the activities of Subsidiaries and Business Partners that may lead to potential violations of COC.
 - c. Ensuring the implementation of education and training of COC for all Personnel of the Company, Subsidiaries, Affiliates and disseminate to Business Partners so that the all parties understand COC thoroughly

5. To detect possible violations of COC by:
 - a. Applying inherent supervision to minimize the risk of possible violations of the COC.
 - b. Creating a reporting system for possible violations of the COC to protect the confidentiality of the Company's Personnel's reporting.
 - c. Ensuring periodic evaluation of COC implementation by the Business Development Director to assess the effectiveness of implementation and how to improve on existing weaknesses.

6. To follow up reports of possible violations of COC by:
 - a. Fixing quickly and appropriately the deficiencies encountered in the assessment of compliance with COC implementation.
 - b. Providing legal sanctions for undisciplined acts.
 - c. Consulting with the Legal Task Force if a COC violation needs the intervention of law enforcement apparatus or the authorities.

CHAPTER II

BUSINESS ETHICS OF THE COMPANY

In conducting its business activities, the Company shall pay attention to the Company's internal and external ethics. Ethics in the COC is the moral values and norms as the guidance for an individual or a group of people to regulate their behavior. The Business Ethics of the Company is an explanation of how the Company as a business entity behaves ethically and acts in an effort to balance the interests of the Company with the interests of all Stakeholders in accordance with GCG principles and healthy corporate values while maintaining the Company's profitability.

A. COMPLIANCE WITH THE REGULATIONS

Regulation is a legal product that must be complied with and become guidance. Therefore, compliance with laws is the standard of ethics to be followed. Understanding of the prevailing laws and regulations in all activities must be embraced in every business activity of the Company.

Complying with the laws and regulations is the key element that must be maintained in every action undertaken by each Personnel of the Company. Further stipulation shall be pursuant to the Company's regulations in force.

B. GIVING AND ACCEPTING GIFT / GRATIFICATION, BRIBERY AND OTHERS

Giving and/or receiving gifts, souvenirs and also business reception are conducted in order to enforce social interaction and fostering good relationships between the Company and partners in a healthy and reasonable and accountable manner without causing conflict of interest which may affect the decision making in running the Company's business.

The Company prohibits the following actions:

1) Gratification

Gratification is a gift in a broad sense, including money, goods, rebate (discount), commissions, interest-free loans, travel tickets, lodging, travel, treatment free of charge, and other amenities. Gratuities are either carried out by using electronic means or without electronic means.

Each of the Company's personnel is not permitted to receive gratification that could influence in decision-making or associated with the position.

2) Bribery

Bribery is a gift or pledge to give to someone or official that can influence decisions related to his/her position among others by doing or not doing something in his post contrary to its obligations, to benefit the giver of bribes.

Bribery can be in the form of money, goods, and facilities giving or accepting the post of the official's family or forms and other facilities that could become a reward.

Each of the Company's personnel is not allowed to offer or accept bribes or directly tell others to do so for the interests of the person concerned.

3) Improper Payments

Improper Payment is special payment practices, entertainment and support to parties outside the Company in order to expedite the course of business of the Company in excess of reasonableness/feasibility applicable in the business world.

Each of the Company's personnel is not justified to practice the improper payment to the parties outside of the Company or directly tell others to do so for the interests of the parties concerned.

C. CONCERN TO OCCUPATIONAL HEALTH AND SAFETY AND THE ENVIRONMENT

The Vision of the Company's Occupational Health and Safety and Environment (OHSE) is to realize employees who are healthy, safe, productive, independent, effective and efficient in all aspects of activities in the Company. OHSE management is critical to the success of the Company's business activities. Implementing and maintaining behaviors that can realize OHSE is a shared responsibility of the Company's Personnel. Therefore, the Company's Personnel are obligated to:

1. Comply with all the prevailing laws and regulations of national and international levels concerning Occupational Safety and Health.
2. Create and maintain a safe working environment and prioritize preventive measures to avoid the accident
3. Handle environmental pollution problem occurring in an effective and efficient manner
4. Understand and comply all established Safety procedures

D. GRANTING THE SAME OPPORTUNITIES OF EMPLOYMENT, PROMOTION AND TERMINATION TO EMPLOYEES

1. Upholding the principles of justice, equality and non-discrimination (regardless of religious background, race, ethnicity, nationality, personal relationships (friendship and kinship), skin color, nationality,

sex (including pregnancy), sexual preference, age, disability, veteran status or other characteristics protected by law in treating prospective Employees and current Employees to obtain employment, education and training, compensation, promotion or retirement in accordance with applicable regulations.

2. Upholding the Company's laws and regulations consistently without distinction of race, gender, religion and position.
3. Complying with applicable labor regulations, including regulations governing freedom of association, assembly and making opinion.

E. ETHICAL STANDARDS FOR RELATIONSHIP WITH STAKEHOLDERS

Trust is an important element to improve the loyalty of Customers and other parties related to the Company. In addition, service quality improvement is an added value for the Company. To create a harmonious and trustworthy business, the Company in conducting its business always acts professionally, honestly, fairly and consistently in providing services to stakeholders. The Company's foundation in fostering relationships with Stakeholders is conducted under the following conditions:

1. Relationship with the Company's Personnel

Behavior of the Company's Personnel is a specific response of each Personnel of the Company to the daily work situation in the field, which results in the achievement of the Company's vision and business performance. In order to realize quality relationship that is fair and able to spur intensity and quality of the Company's personnel's participation, the Company will treat its Personnel in a fair manner as members of the Company by doing the following:

- a. Respect the right of the Company's personnel and always involve the Company's Personnel in establishing the policy of Employee management consistently in accordance with prevailing laws and regulations.
- b. Disseminate all regulations, in particular new regulations, to all Personnel of the Company.

- c. Apply the systems of recruitment, selection, promotion, and career development in a fair and consistent manner based on competency according to the Company's needs.
- d. Create equal job opportunities to all Personnel of the Company regardless of ethnicity, race, gender and religion.
- e. Provide work environment that is healthy, safe and productive and maintain occupational safety and health of the Employees.
- f. Make efforts to promote the welfare of the Company's Personnel in a fair, decent, and transparent manner according to the Company's performance and ability.
- g. Give assessment, appreciation, and payment of remuneration based on performance and competency of the Employees, either as corporate, in team work, and as an individual.
- h. Respect the creativity, innovation and, initiative of Employees that can give value added to the Company.

2. Relationship with Customers/Consumers

The Company's success depends on the creation of productive relationship with customers based on integrity, professionalism, communication, and attitude to serve according to the Company's corporate values by doing the following:

- a. Develop quality services that meet customers' expectations and establish long-term relationship that is mutually beneficial.
- b. Maintain an excellent quality of products and services based on national and international standards.
- c. Provide clear information on the Company's products and services and make available means of communications for the Customers.

3. Relationship with Suppliers

- a. Give equal treatment to all suppliers or vendors.
- b. Procurement process of goods and services in the Company must be free from Corruption, Collusion and Nepotism.

- c. Do not influence each other, either directly or indirectly, which may give rise to unfair competition and decreasing quality of procurement process of goods and services and work results.
- d. Prevent the occurrence of conflict of interest of the parties involved directly or indirectly in the procurement process.
- e. Carry out procurement process transparently, competitively, and fairly to get Suppliers that meet the qualification requirements and accountable price.
- f. Fulfill each other's right and responsibility pursuant to the agreement that is mutually agreed.
- g. Establish a good communication with Suppliers including to follow-up complaints and objections.

4. Relationship with Creditors

- a. Make available actual and prospective information to prospective creditors.
- b. Choose Creditors which have credibility and accountability, and is bona fide, free from Corruption, Collusion and Nepotism by emphasizing the principle of prudence, selectivity, competitiveness and fairness.
- c. Provide information transparently on the use of funds to increase the creditors' trust.
- d. Fulfill the rights and obligations in accordance with agreements between the Company and its Creditors.

5. Relationship with Surrounding Communities and Environment

Fostering a good relationship with the community is a basic principle for the Company's long-term success. Therefore, the Company continuously makes efforts to:

- a. Respect values, norms, and culture of the communities surrounding the Company's areas of operations and realize a harmonious relationship with local communities.
- b. Maintain environmental sustainability and cleanliness.

- c. Carry out Corporate Social Responsibility and environmental and community development programs according to prevailing laws and regulations.

6. Relation with Government

One of the relationships the Company should maintain is the relationship with regulators. This understanding underlies the Company's commitment to building relationships with all Government agencies and officials (Regulators) under applicable laws and regulations.

The Company is committed to maintaining good and communicative relationships with all Government agencies and officials (Regulators) related to the Company's business activities.

Matters of importance in maintaining the relationship with the Government (Regulator) are as follows:

- a. To comply with and support prevailing regulations related to the Company's operations including compliance with tax payments, user charges, employment and environmental issues.
- b. To foster healthy, harmonious and constructive relationships with Regulator and other relevant agencies from both the Central and Local Governments.
- c. To avoid the practice of Corruption, Collusion and Nepotism (KKN) in dealing with the Government (Regulator).
- d. To prioritize honesty and openness in fostering relationships with all Government agencies and officials in accordance with applicable regulations.
- e. Not to take any advantage of good relationship with the Government to obtain business opportunities in a way that is not in accordance with applicable regulations.

7. Relation with Shareholders (Investors)

The Company guarantees that the shareholders are entitled to equal treatment in accordance with the class and the proportion of the shares held and may perform their rights in accordance with the Company's Articles of Association and the applicable laws and regulations.

The Company is committed to continuously striving for the sustainable growth of the Company based on mutually beneficial business standards so as to contribute optimally to Shareholders.

In order to maintain good relationship with Shareholders that complies with the applicable laws and regulations, the Company adopts the following policies:

- a. The Company always respects and ensures so that the rights of Shareholders pursuant to Articles of Association and other applicable regulations can be met in a transparent, fair, on-time and proper manner.
- b. The Company always guarantees that material information concerning the Company is always provided in a fair, honest, on time and regular manner to the Shareholders in accordance with applicable laws and regulations.
- c. Not to perform any act benefiting individual and others by using the Company's information that is not for public or that may give rise to a conflict of interest.
- d. To be attentive to and respect Shareholder's directions and decisions in accordance with the Articles of Association and applicable laws and regulations.

8. Relationship with Business Partners

The Company's relationship with prospective Business Partners is conducted in a professional, equal and mutually beneficial manner by meeting the following principles:

- a. Choosing a Business Partner by prioritizing the principle of benefit and providing the best synergy to the Company and free of Corruption, Collusion and Nepotism (KKN).
- b. Avoiding cooperation with Business Partners who engage in business practices that are not in accordance with applicable laws and regulations.
- c. Maintaining good relations, equal, transparent and mutually beneficial.

- d. Always conducting employment in accordance with ethical values and within the limits of tolerance permitted by law.
- e. Fulfilling the rights and obligations of each party in accordance with the contract.
- f. Ensuring that the Business Partner has complied with the Company's policy specifically in the relationship between the Company and the Business Partner.

9. Relationship with Competitors

Pursuant the Law No. 5 Year 1999 on Prohibition of Monopolistic Practices and Unfair Business Competition, the Company strongly supports healthy business competition climate within the tin mining industry.

The Company upholds the business ethics in every business activity, by:

- a. Carrying out business with due regard to the principles of fair and ethical competition in accordance with applicable regulations
- b. Always respecting each other and maintaining a healthy relationship with Competitors
- c. Prohibiting commitments/ agreements with competitors to engage in business activities that violate laws and regulations concerning monopoly and unfair business competition

10. Relationship with Mass Media

- a. Conveying information about the Company openly and responsibly in order to build a positive corporate image while respecting the journalistic code of ethics
- b. Providing accurate, relevant, balanced and educative information to the public in understanding the Company's business
- c. Receiving and following up on constructive criticisms delivered through the mass media

11. Relationship with Subsidiaries

- a. The Company continues to maintain good relationships with its Subsidiaries in an effort to build synergy and enhance the image of the Company and its business groups
- b. Relationship with Subsidiaries is performed to build a reasonable and mutually beneficial business relationship

F. STANDARDS OF ETHICS FOR MANAGEMENT AND EMPLOYEES

The continuity of the Company is mostly determined by the performance and image of the Company. The performance and image of the Company itself are determined by two things: the ability (capability and competence) and behavior of each Personnel of the Company as the wheels driving the organization.

Therefore, it is very important for the Company to regulate ethical behavior in conducting daily activities in the work place.

1. Conduct of Superiors towards Subordinates

- a. Receive ideas and input from subordinates as decision-making considerations
- b. Listen to subordinate's complaints and help with practical solutions
- c. Be an example of discipline of the Company's working hours
- d. Transfer of knowledge of the education and training attended
- e. Always provide motivation and direction in doing the job
- f. Reprimand subordinates who take lunch break exceeding the determined time.
- g. Encourage a culture of compliance with COC and Company's policies
- h. Make corrections or reprimands subordinates constructively, fairly and without breaking their work spirit.
- i. Respond to any report received on disciplinary violations and follow it up in a fair and transparent manner according to Company's regulations
- j. Not to intimidate or pressure, humiliate, and harass the subordinates

2. Conduct of Subordinates towards Superiors

- a. Work honestly and professionally in carrying out duties with full responsibility
- b. Be courteous towards the superior and fellow Personnel of the Company.
- c. Always strive to improve skills, knowledge and professionalism in performing the task
- d. Provide advice and positive feedback to the superior
- e. Be courageous and free in expressing opinion in discussing the policies that are inconsistent with of the Company's goals and / or objectives and give suggestions for improvement
- f. Not discuss negatively the policies of superiors with fellow subordinates which potentially invite defamation and counter productive to the performance of the Company
- g. Inform and request permission to the Supervisor if there is any need or interest both for the benefit of the Company and not, which uses working hour.
- h. Listen to the feedback without prejudice and carry out the improvement sincerely
- i. Carry out routine jobs or tasks of the responsibility without having to "be reminded" or "ordered" by the superiors
- j. Comply with the Company's regulations and inform the management if there are indications of irregularities
- k. Comply with and be consequent to the law, policy and Standard Operating Procedure (SOP) that have been set
- l. Not perform any act beyond the authorities
- m. Comply with and honor the agreement contained in the Collective Labor Agreement (PKB)

3. Conduct as Coworkers

- a. Remind the colleagues to optimize the application of IT-based systems within the Company's internal environment
- b. Remind each other to complete the job in on time in the sense of not delaying the work even though there is still plenty of time and if

there is overtime, remind each other to be accountable for the excess time and arrange business trips in accordance with schedule

- c. Receive complaints, feedback and suggestions from other work units as inputs for group introspection and for other improvements
- d. Transfer of knowledge acquired from training to co-workers
- e. Solve problems by focusing on core of the problems and finding solution.
- f. Receive co-worker's strengths as the advantage for the group and the Company
- g. Straighten out negative or incorrect news about the Company that appears in the conversation outside the Company
- h. Always maintain the behavior, be polite and well manner both inside and outside of work
- i. Develop skills and competency to work in groups for the progress of the Company
- j. Have a high spirit of cooperation and always be ready to help colleagues or any other work units for the good of the Company
- k. Respect others, not underestimate and not discriminate in the employment relationships
- l. Be open for information among colleagues and between work units to support good cooperation and coordination for the progress of the Company but keep the Company's secrets and/or the job's secrets as best as possible
- m. Be open, sympathetic and helpful to others, respect and appreciate others' opinions, and be able to accept disagreements
- n. Have a healthy competition spirit to motivate job performance optimally
- o. Avoid actions and speeches that invite elements of intimidation, harassment, humiliation, mockery, defamation and underestimating, as well as overthrowing the co-workers
- p. Work harmoniously based on dedication and mutual trust to achieve common goals

4. Intellectual Property Rights

- a. The Company must respect the intellectual property rights of other parties.
- b. All Personnel of the Company must actively participate to protect the Company's intellectual property rights.
- c. The Company's Personnel participating/working in the development of a process or product to be used by the Company, or a personnel of the Company possessing the property right to the work result, shall treat information related to such process or product as the belonging to the Company either during the period of employment or after the Personnel no longer works for the Company
- d. All Personnel of the Company must inform results of their work in relation to the business or operations of the Company, either during or outside of business hours using/not using facilities and data/information of the company
- e. The Company shall give acknowledgment to results of the work referred to in point (c) and (d).

CHAPTER III
CODE OF CONDUCT OF THE COMPANY'S PERSONNEL

A. COMMITMENT OF THE COMPANY'S PERSONNEL

In order to realize the Company's commitment to the Stakeholders, all the Company's Personnel are committed to:

1. Always thinking and behaving in corporate manner by prioritizing the interests of the Company over personal and/or group interests to give the best for the Company.
2. Performing professional duties with full responsibility and upholding integrity, honesty and spirit of togetherness.
3. Caring and responding to complaints/input and immediately conducting a follow-up.
4. Making work plan properly in accordance with the scope of duties.
5. Understanding the work objectives along with the measures of success.
6. Working hard and trying to find the best way to accomplish the duty effectively and efficiently.
7. Having a strong motivation to self-develop and expand knowledge.
8. Complying with all Company's regulation and corporate values to maintain and safeguard the Company's reputation.

B. MAINTAINING THE COMPANY'S REPUTATION

1. All Personnel of the Company are required to always maintain polite and courteous behavior both inside and outside the work.
2. Always strive to improve self-competence along with the development occurring.
3. Respect others, not to underestimate and discriminate against each other.
4. Always care and maintain the Company's good image and reputation.

C. MAINTAINING GOOD RELATIONSHIP AMONGST THE COMPANY'S PERSONNEL

1. All Personnel of the Company are required to always maintain polite and courteous behavior among Company Personnel.
2. All Personnel of the Company should respect each other and not underestimate and discriminate each other.
3. Try to understand and recognize the needs of the Company's Personnel.
4. Willing to share knowledge and skills and help other co-workers without fear of being rivaled.
5. Always be honest and think positive among Personnel of the Company.

D. MAINTAINING THE COMPANY'S CONFIDENTIALITY

One of the Company's most important responsibilities is to maintain the trust of Stakeholders (Business Partners, Customers and Suppliers) and ensure that information related to Stakeholder business issues is kept confidential at all times. The Company has an obligation to maintain the confidentiality of information gained in any business activities. Respect to Stakeholders' privacy is as important as the protection of Company's assets.

Personnel of the Company are required to treat Company's confidential information in their possession during performing their duties with due regard to the following provisions:

1. Protect confidential information, not only applied to the Company's Personnel who are still actively working but also to Company Personnel working temporarily for a certain period of time in accordance with applicable laws and regulations.
2. Access to information, arrangement of authority and scope of duties of the Company's Personnel with access to the Company's information required both in general or special nature.

3. Dissemination of information, explanations of disclosure or use of the Company's confidential information in the form of speech or writing to or by any party, whether individual, company, association or other legal entities may only be performed by an officer appointed by the Company.

Obligation to keep the confidentiality is exempted for:

1. Taxation purpose.
2. Billing of the Company's receivable accounts delegated to the State Agency of Accounts Receivable and State Auction/State Receivables Committee.
3. Legal purpose of a criminal case trial.
4. Court purpose in the case between the Company and its business partners.
5. Information exchange between companies.
6. Upon written request, approval given by Stakeholders to the Company.

E. MAINTAINING AND USING THE COMPANY'S ASSETS

Assets are resources owned by the Company to be used in an effort to achieve the Company's objectives.

Maintenance and use of assets are part of the efforts to maintain the Company's business continuity.

With respect to Company assets, each Personnel of the Company Personnel is required to:

1. Maintain the use of Company assets for the purpose of value creation for the Company in accordance with social, economic and financial principles that can be accounted for by taking into account of related business risks.
2. It is prohibited to keep Company assets outside the Company's designated premises.

3. Keep, maintain, secure and save the Company assets in accordance with applicable regulations.
4. Use the Company's assets according to the position, authority and scope of work carried out.
5. Use the Company's assets in accordance with their designation.
6. Any recording and reporting of the Company's assets shall be in conformity with generally accepted accounting standards.

F. MAINTAINING OCCUPATIONAL SAFETY AND HEALTH AND ENVIRONMENT

The Management of occupational safety and health and environment is essential to the success of the Company's business activities. Applying and maintaining behaviors that help to achieve occupational safety and health and environment should be a must. Therefore, the Company's Personnel must work by:

1. adhering to laws and/or standards of occupational safety and health and environmental management.
2. mastering and understanding working environment situation and condition by complying with the provisions of laws and regulations on occupational safety, health and environment.
3. prioritizing preventive measures which are avoidance of pollution, occupational accidents and occupational diseases.
4. avoiding any action that is self-destruction or detrimental to other people and not good for health, such as intoxicating drinks, taking drugs, etc., in accordance with the Company's provisions.
5. improving employees' skills in the maintenance of Safety and Health and control of environmental impacts.
6. increasing awareness of Occupational Safety and Health and Environment issues.
7. performing continuous improvement in Occupational Safety and Health as well as Environment including but not limited to regular evaluation or checking of equipment, monitoring of the environment.

G. IMMORAL BEHAVIORS, NARCOTICS, ILLICIT DRUGS, GAMBLING, SMOKING, AND OTHER ACTIONS DISRUPTING WORK ENVIRONMENT

A healthy behavior characterized by moral values and decency of every Personnel of the Company is believed to affect the performance contributed to the Company and affect the establishment of corporate image. Therefore, every Personnel of the Company shall be:

1. Prohibited from engaging in any act violating the moral values, such as harassment, humiliation, slander and behaviors that lead to disruptive sexuality.
 2. Prohibited from using, distribute and sell things related to narcotics and other illicit drugs and liquor.
 3. Prohibited from downloading, opening, storing and circulating matters related to pornography in any form of electronic media.
 4. Prohibited from gambling in any form whatsoever.
 5. Comply with the prohibition of smoking in public places and within the Company.
 6. Prohibited from carrying sharp weapons and firearms or other weapons within the Company, except those related to the place and duty/work.
- Prohibited from bring animals/pets that interfere with the work environment and may cause health effects for other colleagues.

H. COMPANY DATA RECORDING AND PREPARING REPORTS

Each Personnel of the Company shall support the implementation of data management in a neat, orderly, thorough, accurate and timely manner:

1. Only provide data that can be accounted for.
2. Record data and prepare reports based on sources that are correct with verified accuracy and accountability.
3. Deliver reports correctly, completely, concisely, clearly, accurately and timely, and relevant to the decision-making process.
4. Do not hide data and documents of the Company, either in office or after completion of term/position.

5. Do not allow incorrect records or unlawful transactions.
6. Keep all Company's documents, reports and files in an orderly manner that is always easy to find and use at any time by all interested parties.
7. Each Personnel of the Company shall be prohibited from falsifying the Company's records, documents, and information.
8. The use/dissemination and destruction of the Company's records, documents, and information must be approved by an authorized official.
9. The Company does not justify the existence of any person due to his/her position or profession or business relationship with the Company to use the Company's records, documents and information for personal benefit that is potentially harmful to the Company and other Stakeholders.

I. INSIDER TRADING

The Company's Personnel who have access to material information must not abuse their position and occupation in disclosing material information that may affect investors' decisions.

Material information is information which has not been widely published that may encourage a person to buy, sell or hold shares of the Company.

J. GIVING AND RECEIVING GIFTS, GRATIFICATION, BRIBERY AND OTHERS

The Company's Personnel's behaviors regarding giving and/or receiving gifts are as follows:

1. Not allowed to receive and/or give Gifts, Souvenirs, Business Dinner, or other facilities that may affect decision making in contrary to prevailing legislation.

2. Only hold and accept Business Dinner with Business Partners and/or other stakeholders as long as it is for the interest of the Company, at the expense of the Company at reasonable costs and executed within reasonable limits in a respectable place that does not pose a negative image to the Company. Business Dinner that can be accepted/granted by the Company's Personnel in the course of business activities (and become the expense of the Company) is a dinner to establish cooperation with Business Partners.
3. Surrender Gifts and/or Souvenirs obtained from Business Partners such as placards, trophies, etc. to be kept in the Company.
4. Only carry out all expenses related to the giving of Gifts, Souvenirs and Business Dinners that have been authorized by the Company's authorized officers.

Gifts and Souvenirs can be accepted in accordance with the applicable legislation for the following occasion:

- a. Marriage;
- b. Circumcision;
- c. Disaster;
- d. Award of the Company on the personnel's achievement;
- e. Souvenir from other companies in the form of, among others, pens, agenda, calendar, and others alike.

The Company's personnel is prohibited from receiving/giving bribes or promises to give/receive bribes, and directing others to commit bribery to Company's personnel in all its forms, both in conducting business activities within the Company and outside the Company, will not give/offer directly or indirectly any gift or other improper payments to others outside the Company to gain advantage or preferential treatment in business transactions of the Company.

K. CONFLICT OF INTEREST

All Personnel of the Company must avoid conflicts of interest by:

1. Performing duties and obligations by giving priority to the Company's economic interests over personal economic interests or the economic interests of family or other parties;
2. Not abusing the current position for personal interest or benefit, family and other parties;
3. In terms of discussion and decision-making containing elements of conflict of interest, the parties concerned are not allowed to participate;
4. Making a statement of not having conflict of interest on each decision made and of having obeyed all the Company's Code of Conduct each year, every year for the Company's personnel with decision-making authority;
5. Not having a business that is directly related to the Company's activities.
6. Not taking advantage of confidential information and business data of the Company for interests outside the Company;
7. Not holding any position in companies/other institutions that are about to do and/or currently doing business with and are about to compete and/or currently competing with the Company;
8. Not holding a job or profession outside the Company during working hours and always disclosing and reporting all interests and/or activities outside of the Company during normal business hours to superiors in stages to obtain a permit.

L. POLITICAL ACTIVITIES

The Company guarantees that all personnel of the Company are able to perform their right to channel political aspirations. The Company provides no political contribution and is not affiliated with any political party.

With regard to their political activities, all Personnel of the Company are obliged:

1. Not to take advantage of the Company's name, assets, and potential for a specific political purpose;
2. Not to make use of the Company's name for or give contribution on behalf of the Company to any political party;
3. Not to make any agreement, engagement, and statement, either directly or indirectly, that may indicate that the Company has an attachment to any political party;
4. Each activity to channel political aspirations should be conducted beyond work hours and without using the Company's attributes;
5. If anyone holds a position in a political party or political activity that disrupts his duty implementation in the Company, he must resign from the Company.
6. Do not conduct political activities either directly or indirectly within the Company's work environment.
7. Not allowed to use attributes of any political party or social community organization within the Company's work environment.

CHAPTER IV ENFORCEMENT AND REPORTING

A. COMMITMENT TO CODE OF CONDUCT

1. All Personnel of the Company are required to sign the Integrity Pact which is the commitment of the Company's Personnel to implement COC that is updated every year.
2. The Board of Directors is responsible for the implementation of the Integrity Pact of all Personnel of the Company.

3. Each Personnel of Company receives a copy of the Integrity Pact and signs the form of the Integrity Pact that he/she has received, understood and agreed to comply with the COC which is documented by Director of Business Development.
4. The COC must be disseminated to and understood by all Personnel of the Company.
5. All Heads of Work Units must be responsible and become an example for their subordinates for the application of COC.

DISSEMINATION AND INTERNALIZATION

In order to enforce this COC, all Heads of Work Units within the Company are responsible for ensuring that the COC has been socialized.

The objectives of the dissemination are as follows:

1. Realizing awareness of all Employees to implement the COC.
2. Improving all employees knowledge and insight on the importance of COC for the continuity of the Company's business.
3. Giving awareness to Employees that the COC is an integral part of business practice and performance appraisal of all Employees of the Company.

C. VIOLATION

A breach/violation of COC is an undisciplined act and will be handled by Director of Business Development. Every Personnel of the Company having knowledge of the occurrence of a COC violation shall report to his/her Direct Supervisor and Director of Business Development is responsible for:

1. Monitoring compliance with the Code of Conduct.
2. Recording all types of alleged violations.
3. Processing violations occurring.
4. Reporting violations to the Board of Directors

Each Personnel of the Company reporting Code of Conduct violation should not have a worry, as based on the report, further investigation will be conducted confidentially.

Breach/Violation of COC will be subject to sanction or punishment in accordance with the Company's prevailing rules and regulations.

D. VIOLATION REPORTING MECHANISM

1. COC implementation is a commitment and responsibility of all Personnel of the Company. In the event of any violation or deviation, the Company's Personnel shall report such violation through:
 - a. Direct Supervisor.
 - b. Director of Business Development
 - c. Complaint Box/Whistleblowing System, email, telephone or other media determined by the Company.
2. Disclosure must be conducted in a good faith and not a personal complaint or based on bad intention/slander.
3. All the Company's Personnel and external parties (Customers, Business Partners and Communities) may report violation of COC and the Company is required to follow up the reporting that is potentially detrimental to the Company and may damage the Company's image, which is caused by, among others deviations, manipulations and so on.
4. The Informant shall include his/her identity clearly on the report, accompanied with relevant supporting evidence. Recipient of the report shall keep confidential the informant's identity.
5. The Company shall follow up any report received pursuant to applicable procedures and mechanisms.
6. The Company will also provide legal protection in accordance with applicable laws and regulations.

E. SANCTIONS FOR VIOLATIONS

1. Each Personnel of the Company proven to violate COC is subject to a sanction in accordance with applicable laws and regulations.
2. Sanction for Employee who commits violation is decided by the Direct Supervisor or Board of Directors in accordance with the level of violation after receiving a report for violation committed by the said Employee.
3. The Board of Directors gives directives on correction actions, disciplinary sanctions and/or other actions and prevention that must be implemented by the Direct Supervisor in each workplace.
4. Sanction for the Board of Directors committing violation shall be decided by the Board of Commissioners.
5. Sanction for the Board of Commissioners committing violation shall be decided by the Shareholder.
6. If the parties committing violation are Business Partners or other Stakeholders, they will be subject to the provisions stipulated in the contract. If the violation is related to a criminal act, it can be forwarded to the law enforcement agency.

F. REWARD FOR COMPLIANCE WITH CODE OF CONDUCT

All Personnel of the Company complying with the COC will get a reward in accordance with the Company's policy. The aim is to motivate every Personnel of the Company to behave in accordance with the Company's COC.

ATTACHMENT SHEET I

INTEGRITY PACT OF
GOOD CORPORATE GOVERNANCE IMPLEMENTATION OF
PT TIMAH (PERSERO) Tbk

In order to enforce Good Corporate Governance in PT Timah (Persero) Tbk, we the Board of Commissioners/Directors (*) hereby represent that:

1. We will perform our duties and obligations in a clean and professional manner in accordance with the principles of Good Corporate Governance in the sense that we will deploy all the best skills and resources to deliver the best results for the Company.
2. We never and will never make decisions and/or give orders aiming at making use of the Company either directly or indirectly for the benefit of our personal, family and/or certain group interests.
3. We do not have other positions in other Business Entities that may cause direct or indirect conflict of interest to the Company.
4. We have a commitment to implementing whistleblowing system and instructing all Employees to report any violation immediately through the media provided by the Company.
5. We instruct all Employees within PT Timah (Persero) Tbk to implement the Integrity Pact consistently and responsibly.
6. We invite businessmen directly or indirectly related to PT Timah (Persero) Tbk to also implement the Integrity Pact.
7. We have read, understood, and agreed to implement Code of Corporate Governance, Whistleblowing System Policy and Code of Conduct appropriately for the achievement of Good Corporate Governance.
8. Violation of this Integrity Pact will bring consequences in accordance with prevailing laws and regulations.

Jakarta,
BOARD OF COMMISSIONERS/BOARD OF DIRECTORS
PT Timah (Persero) Tbk

President Commissioner/President Director (*)
Members of the Board of Commissioners/Directors (*)
Members of the Board of Commissioners/Directors (*)

ATTACHMENT SHEET II

INTEGRITY PACT OF
GOOD CORPORATE GOVERNANCE IMPLEMENTATION OF
PT TIMAH (PERSERO) Tbk

In order to enforce Good Corporate Governance in PT Timah (Persero) Tbk, I hereby represent that:

1. I will perform my duties and obligations in a clean, transparent and professional manner in accordance with the principles of Good Corporate Governance in the sense that I will deploy all the best skills and resources to deliver the best results for the Company.
2. I never and will never give recommendation, make decisions and/or give orders that will use the Company either directly or indirectly, to benefit my personal, family and/or certain group interests.
3. I will instruct all Employees within the work environment who are my responsibility to implement the Integrity Pact consistently and responsibly.
4. I have read, understood, and agreed to implement Code of Corporate Governance, Whistleblowing System Policy and Code of Conduct appropriately for the achievement of Good Corporate Governance.
5. Violation of this Integrity Pact will bring consequences in accordance with prevailing laws and regulations.

Jakarta,

Acknowledged by (*)

Statement made by

Name

Position

Information (*)

1. For Head of Work Unit, the acknowledging party is President Director.
2. For Head of Work Unit, the acknowledging parties are the Director in charge of the Work Unit and the person making statement.
3. For the level under Head of Work Unit, the acknowledging parties are the Head of Work Unit and the person making statement.

Appendix Sheet III:

INTEGRITY PACT OF
GOOD CORPORATE GOVERNANCE IMPLEMENTATION OF
PT TIMAH (PERSERO) Tbk

I hereby represent that I will apply and implement the principles of Good Corporate Governance consistently in performing my duties as Employee at PT Timah (Persero) Tbk.

I also represent that I am in compliance with the Company's Code of Conduct and will not use the Company, directly or indirectly, for my personal benefit and the benefit of my family and/or certain group's interests.

I have read, understood and agreed to implement Code of Corporate Governance, Whistleblowing System Policy and Code of Conduct appropriately for the achievement of Good Corporate Governance.

I am willing to accept sanctions in accordance with the terms and regulations of PT Timah (Persero) Tbk, if I do not comply with the Integrity Pact.

This statement is made truthfully and to be used accordingly.

Jakarta,

Acknowledged by (*)
Statement made by

Name
Position