

Tanggung Jawab Sosial Perusahaan Terkait Operasi yang Adil

Corporate Social Responsibilities Related to Fair Operation

Komitmen dan Kebijakan Tanggung Jawab Sosial Perusahaan Bidang Operasi yang Adil

PT TIMAH Tbk berkomitmen untuk menerapkan prinsip tata kelola perusahaan yang baik atau *Good Corporate Governance* (GCG) sebagai landasan utama dalam pengembangan usaha. Perseroan menerapkan prinsip GCG secara menyeluruh dalam setiap aktivitas operasional Perseroan, salah satunya dengan mengembangkan praktik bisnis yang bersih dan menjauhi segala bentuk kecurangan. Hal tersebut dilandasi atas penerapan prinsip GCG yang telah berjalan dengan baik di Perseroan dan terus ditingkatkan kualitasnya.

Dalam menjalankan proses bisnisnya, PT TIMAH Tbk berkomitmen untuk tetap menjaga persaingan usaha yang sehat sesuai dengan peraturan dan perundang-undangan yang berlaku serta menjunjung prinsip-prinsip efisien, efektif, kompetitif, transparan, adil dan wajar serta akuntabel.

Lingkup Tanggung Jawab Sosial Bidang Operasi yang Adil

Ruang Lingkup penerapan tanggung jawab sosial terkait operasi yang adil di PT TIMAH Tbk meliputi penerapan *Code of Conduct*, kebijakan anti korupsi dan pengendalian gratifikasi, pengadaan barang dan jasa, serta persaingan usaha yang sehat dan anti monopoli.

Perencanaan Tanggung Jawab Sosial Bidang Operasi yang Adil

PT TIMAH Tbk senantiasa menjamin terlaksananya semua kebijakan praktik operasi yang adil. Setiap pelanggaran yang terjadi akan dikenakan sanksi dengan tegas sesuai kebijakan Perseroan dan peraturan yang berlaku.

Upaya Mempromosikan Rantai Nilai Operasi yang Adil

Dalam upaya implementasi praktik operasi yang adil, Perseroan secara berkala melakukan sosialisasi terkait penerapan kode etik. Perseroan melakukan sosialisasi baik secara langsung dalam pelatihan dan *sharing* internal maupun melalui online oleh karyawan.

Bentuk pelaksanaan tanggung jawab Perseroan dalam memastikan implementasi GCG di lingkungan PT TIMAH Tbk adalah berdasarkan Instruksi Direksi No. 047/TBK/INST-0000/2013-B1 tentang Penyusunan Laporan Implementasi Sistem Tata Kelola Perusahaan yang Baik, maka dimulai

Commitment and Policy of Corporate Social Responsibility on Fair Operation

PT TIMAH Tbk is committed to implement the principle of Good Corporate Governance (GCG) as the basic of business development. The Company implements GCG thoroughly in each of its operational activities, one of the example is by developing a clean business practice and staying away from all type of frauds. The implementation is based on GCG principles in the Company and the quality will be improved further.

In carrying out its business process, PT TIMAH Tbk is committed to maintain a healthy business competitions in accordance with the prevailing law and regulations as well as to uphold the principle of efficiency, effectiveness, competitiveness, transparency, honesty and fairness as well as accountable.

Scope of Social Responsibility on Fair Operation

The scope of the implementation of social responsibility related to fair operation in PT TIMAH Tbk consists of the implementation of Code of Conduct, anti-corruption policy and gratification control, procurement of goods and services, as well as a health business competition and anti-monopoly.

Social Responsibility Planning for Fair Operation

PT TIMAH Tbk ensures the implementation of a fair operational practices. Every violations that happens are subject to strict penalty according to the Company's policy and the prevailing regulations.

Efforts to Promo Fair Operation Chain Value

In the effort to implement fair operation practice, the Company periodically conduct socialization related to the implementations of code of conduct. The socialization is conducted directly and online through internal training and sharing by employees.

The implementation of corporate responsibility in ensuring the implementation of GCG in PT TIMAH Tbk refers to the Board of Directors Instruction No. 047/TBK/INST-0000/2013-B1 concerning the Arrangement of Good Corporate Governance Report, therefore since 2015,



sejak tahun 2015 telah dilakukan sosialisasi GCG secara rutin dan berkelanjutan kepada seluruh karyawan (termasuk sosialisasi kebijakan Anti-Korupsi), Perseroan bekerjasama dengan Diklat P2SDM untuk dimasukkan ke dalam agenda pelatihan karyawan.

Pelaksanaan Inisiatif Tanggung Jawab Sosial Bidang Operasi yang Adil

Kode Etik [GRI 102-16]

PT TIMAH Tbk telah menetapkan norma dan asas yang diterima dan disepakati bersama sebagai landasan tingkah laku dalam menjalankan usaha, yang lazim disebut sebagai Kode Etik (*Code of Conduct*). Kode Etik PT TIMAH telah ditetapkan melalui Surat Keputusan Direksi No. 1664/Tbk/SK-0000/2014-S11.2 Tahun 2014. Seluruh insan Perseroan wajib mematuhi dan mentaati pedoman perilaku yang ditetapkan dalam dokumen Kode Etik.

Pembahasan lebih detail terkait Kode Etik dapat dilihat pada bagian Tata Kelola Perusahaan pada Laporan ini.

Anti Korupsi dan Pengendalian Gratifikasi

PT TIMAH Tbk selalu sejalan dengan program pemerintah yang tengah giat melakukan gerakan pemberantasan praktik Korupsi, Kolusi, dan Nepotisme (KKN). Perseroan berkomitmen tinggi untuk mendukung gerakan tersebut melalui realisasi beragam program. Seperti misalnya pelatihan karyawan yang bertanggung jawab terhadap peran pengawasan, perbaikan sistem dan prosedur pengadaan barang dan jasa, perbaikan kebijakan operasional, maupun penerapan sistem pelaporan pelanggaran (*whistleblowing system*). [GRI 103-1, GRI 103-2, GRI 205-2]

GCG socialization has been conducted routinely and continuously to all employees (including the socialization of Anti-Corruption policy), the Company collaborates with Diklat P2SDM to be included in the employee training agenda.

Implementation of Social Responsibility Initiative on Fair Operation

Code of Conduct [GRI 102-16]

PT TIMAH Tbk has established the norms and principles that are mutually agreed as the basis of behavior in running a business, which is commonly known as Code of Conduct. PT TIMAH Tbk's Code of Conduct has been established through the Board of Directors Letter No. 1664/Tbk/SK-0000/2014-S11.2 Year 2014. All personnel of the Company are obliged to comply and adhere to the behavior guidances that are stipulated in the Code of Conduct.

Detail explanations on code of conduct can be seen in the chapter of Corporate Governance of this Annual Report.

Anti Corruption and Gratification Control

PT TIMAH Tbk is always in line with the government programs to eradicate Corruption, Collusion, and Nepotism (KKN). The Company has a high commitment to support the movement through the implementations of various programs. Such as employee training to be responsible towards supervision, improvement system and the procedure of goods and services procurement, improvement of operational policies, as well as the implementation of whistleblowing system. [GRI 103-1, GRI 103-2, GRI 205-2]

Untuk lebih memperkuat komitmen tersebut, Perseroan telah memiliki Pedoman Pengendalian Gratifikasi yang ditetapkan melalui Peraturan Perusahaan No. 002/Tbk/PER-0000/19-S11.1. Seluruh Organ Tata Kelola Perusahaan yang meliputi Organ Utama (Dewan Komisaris, Direksi), Organ Pendukung (Komite Dewan Komisaris, Sekretaris Dewan Komisaris, Sekretaris Perusahaan, SPI) dan seluruh karyawan telah memahami dan berkomitmen untuk menerapkan kebijakan dan prosedur anti-korupsi yang dibuktikan dengan penandatanganan Pakta Integritas.

Berdasarkan data yang dihimpun Perseroan selama tahun buku 2020 terdapat 4 (empat) pelaporan gratifikasi yang telah diteruskan ke KPK RI. Seluruh laporan penerimaan gratifikasi tersebut sudah diproses dan ditindaklanjuti sesuai dengan ketentuan pedoman gratifikasi PT TIMAH Tbk yang diatur dalam Peraturan Perusahaan No. 002/Tbk/PER-0000/19-S11.1, tanggal 8 April 2019 tentang Pedoman Pengendalian Gratifikasi di Lingkungan PT TIMAH Tbk.

Pengadaan Barang dan Jasa yang Transparan

Perseroan telah memiliki kebijakan tentang seleksi dan peningkatan kemampuan pemasok atau vendor yang diatur dalam Surat Keputusan Direksi No. 1236/TBK/SK-0000/15-S11.2 tentang Pedoman Pengadaan Barang/Jasa. Selain itu, PT TIMAH Tbk juga telah mengembangkan sistem pengadaan yang didukung teknologi informasi melalui layanan *e-procurement*. Persentase pengadaan lokal Perseroan selama periode laporan adalah lebih dari 90%. **[GRI 103-2, GRI 103-3, GRI 204-1]**

Sistem pengadaan barang dan jasa yang dikembangkan Perseroan dilaksanakan dengan memperhatikan hal-hal sebagai berikut:

- Diimplementasikan secara konsisten sesuai aturan berlaku.
- Dikaji secara berkala mengenai kecukupan sistem pengadaan yang ada agar terpenuhi prinsip-prinsip efisien, efektif, kompetitif, transparansi, adil, dan wajar serta akuntabel.
- Senantiasa menghindari transaksi benturan kepentingan dan transaksi afiliasi oleh segenap karyawan Perseroan dalam sistem pengadaan barang dan jasa.
- Memenuhi persyaratan aspek sosial dan lingkungan yang diantaranya memiliki sertifikat AMDAL sesuai PP No. 27 tahun 2012 tentang Izin Lingkungan, sudah mempunyai laporan uji kualitas air, udara dan limbah B3 harus menggunakan laboratorium terakreditasi yang sesuai dengan Peraturan Menteri Lingkungan Hidup No. 06 Tahun 2009; Untuk mitra pengelolaan Limbah B3 harus menggunakan pihak ketiga berizin yang sesuai dengan Peraturan Pemerintah No. 101 Tahun 2014. **[GRI 308-1]**

To further reinforce the commitment, the Company has a Guidelines of Gratification Control through the Company Regulation No. 002/Tbk/PER-0000/19-S11.1. All Corporate Governance Organs that consists of Main Organs (Board of Commissioners, Board of Directors), and Supporting Organs (Board of Commissioners Committee, Board of Commissioners' Secretary, Corporate Secretary, SPI) and all employees has understood and committed to the implementations of anti-corruption policy and procedure that are proven by the signing of Integrity Pact.

Based on the data collected by the Company throughout 2020 fiscal year, there are 4 (four) reports of gratification that has been forwarded to KPK RI. All of those gratification reports has been processed and followed up in accordance with the gratification guidelines in PT TIMAH Tbk which is regulated in the Company Regulation No. 002/Tbk/PER-0000/19-S11.1 dated April 8th, 2019 concerning the Guidance of Gratification Control in PT TIMAH Tbk.

Transparent Procurement of Goods and Services

The Company has established a policy regarding selection and improvement of supplier/vendor capability that are regulated in the Board of Directors Decree No. 1236/TBK/SK-0000/15-S11.2 concerning the Guidelines of Goods/Services Procurement. Furthermore, PT TIMAH Tbk has also developed procurement system which is supported by information technology through *e-procurement*. The percentage of local procurement in the Company during the reporting period is more than 90%. **[GRI 103-2, GRI 103-3, GRI 204-1]**

Goods and services procurement system which is developed by the Company has been implemented by paying attention to the following things:

- Implemented consistently in accordance with the prevailing regulations.
- Reviewed periodically regarding the sufficiency of the existing procurement system in order to fulfill the principles of efficiency, effectivity, competitiveness, transparency, fairness, as well as proper and accountable.
- Constantly avoid transaction with conflict of interest and affiliation transaction by all employees of the Company in the procurement of goods and services system.
- Fulfills the requirements in social and environment aspects such as acquiring AMDAL certificate in accordance with PP No. 27 year 2012 concerning Environmental Licence, acquiring report on the quality of water, air and B3 waste through an accredited laboratory which is in accordance with the Minister of Environment Regulation No. 06 Year 2009; As for the partner to manage B3 Waste has to be from a licensed third party in accordance with the Government Regulation No. 101 Year 2014. **[GRI 308-1]**

Persaingan Usaha Sehat dan Anti Monopoli

Undang-Undang No. 5 Tahun 1999 tentang Larangan Praktek Monopoli dan Persaingan Usaha Tidak Sehat merupakan panduan utama bagi PT TIMAH Tbk dalam menjalankan usahanya. Perseroan berupaya untuk terus meningkatkan daya saing dan menerapkan strategi pengembangan usaha yang tepat agar dapat memenangkan persaingan.

Sepanjang tahun 2020, tidak terdapat laporan pelanggaran persaingan usaha tidak sehat yang diterima Perseroan, khususnya dari Komisi Pengawas Persaingan Usaha (KPPU).

Capaian dan Penghargaan Inisiatif Tanggung Jawab Sosial Bidang Operasi yang Adil

Tahun 2020, PT TIMAH Tbk telah memperoleh sertifikasi SNI ISO 37001:2016 Sistem Manajemen Anti Suap (SMAP) dari Sucofindo dan berkomitmen untuk menjalankan penerapan SMAP dengan berpedoman pada 4 No's yaitu:

1. *No Bribery* (tidak boleh melakukan tindakan suap menyuap dan pemerasan);
2. *No Kickback* (tidak boleh menerima komisi, tanda terima kasih baik dalam bentuk uang dan dalam bentuk lainnya);
3. *No Gift* (tidak boleh menerima hadiah atau gratifikasi yang bertentangan dengan peraturan dan ketentuan yang berlaku);
4. *No Luxurious Hospitality* (tidak boleh melakukan/ menerima penyambutan dan jamuan yang berlebihan).

Healthy Competition and Anti-Monopoly

Law No. 5 Year 1999 concerning the Prohibition of Monopoly Practice and Unhealthy Business Competition is the main guidance for PT TIMAH Tbk in carrying out its business. The Company strives to continuously improve the implementation of an appropriate business development strategy in order to win the competition.

Throughout 2020, there was no prohibition report related to an unhealthy business competition that was received by the Company, especially from the Business Competition Supervision Agency (KPPU).

Achievements and Awards of Social Responsibility Initiative on Fair Operation

In 2020, PT TIMAH Tbk has acquired the certificate of SNI ISO 37001:2016 Anti-Bribery Management System (SMAP) from Sucofindo and has committed to implement SMAP based on 4No's, which are:

1. No Bribery (prohibition of briberies and extortions);
2. No Kickback (prohibition to receive commission, gratitude in form of money and other forms);
3. No Gift (prohibition to receive gifts or gratification which is against the applicable regulations and provisions);
4. No Luxurious Hospitality (Prohibition to conduct/receive a luxurious hospitality).