



**PT PERTAMINA ROSNEFT
PENGOLAHAN & PETROKIMIA**

GUIDELINES ON WHISTLEBLOWING SYSTEM

No. PED-008/PRPP-130/2021-S0

Revision Number 0 1 2 3 4

**COMPLIANCE
PT PERTAMINA ROSNEFT PENGOLAHAN DAN PETROKIMIA**

Fungsi/Function	Compliance	No.	PED-008/PRPP-130/2021-S0
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Approval & Stipulation Sheet

Approved

Board of Commissioners

No.	Title	Name	Signature
1	President Commissioner/ Independent Commissioner	Alexander Romanov	
2	Vice President Commissioner	Budi Santoso Syarif	
3	Commissioner	Amir Hamzah Siagian	
4	Commissioner	Alexander Zubchenko	
5	Commissioner	Beni Syarif Hidayat	

Stipulated

Board of Directors

No.	Title	Name	Signature
1	President Director	Kadek Ambara Jaya	
2	Director of Finance	Pavel Vagero	
3	Director of Development	Eriyadi	

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1. INTRODUCTORY PROVISIONS

PURPOSE

These Guidelines establish the procedure and requirements to verification of information on theft of the Company's property, corporate fraud, corruption, unfair competition, conflicts of interest reported through the Compliance Hotline.

These Guidelines set the rules of interaction when checking the information reported through the Compliance Hotline, and a procedure for making decisions based on the findings of information verification and controlling the execution thereof.

These Guidelines have been developed in compliance with provisions of the anti-corruption laws of Indonesia, and pursuant to the Company's Anti-corruption Policy, other Company's internal regulations concerning protection from corporate fraud and corruption.

SCOPE OF APPLICATION

The Guidelines are mandatory for the employees of:

- Company's Compliance Function;
- Company's HSE Function;
- Company's Legal and Corporate Function;
- Company's HR Function;
- Company's Internal Audit Function;
- Company's administrative support personnel;

None of the executive documents, internal regulations or any other by-laws shall contradict these Guidelines.

VALIDITY AND AMENDMENTS

These Guidelines are a permanent internal regulation.

These Guidelines shall be approved, enacted, amended and revoked by the resolution of the Board of Directors after approval by the Board of Commissioners.

Changes to the Guidelines can be introduced in case of changes in organizational structure or management authorities.

Amendments to these Guidelines can be initiated by: the Company's Compliance Function, as well as by other the Company's functions upon review by the Compliance Function.

2. TERMS AND DEFINITIONS

COMPLIANCE HOTLINE or *HOTLINE* - communication channels for reporting by the employees on any facts or elements of corruption, bribery, conflict of interest, thievery, fraud and/or violation of laws and Company's Regulations, by means of: email or Compliance Hotline.

COMPLIANCE FUNCTION means the Company's Function receiving, logging, and processing the messages reported through the Hotline, preliminary analysis thereof and proposing further actions in regards to the reports on the alleged or actual theft, corporate fraud, corruption, unfair competition, conflicts of interest.

AUDIT AND RISK SUBCOMMITTEE is a permanent advisory body established by the

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Company's Board of Commissioners for preliminary consideration of the most important issues under the Board of Directors' competence, and development of recommendations to the Board of Directors concerning their decision making on such issues.

CONFLICT OF INTEREST means a situation in which personal interest (whether direct or indirect) of the Company's employees or members of the corporate management bodies have or may affect the proper, objective and impartial performance of their official duties or exercising of their authorities.

CORPORATE FRAUD means the actions or omission of the individuals and/or legal entities with the purpose of obtaining personal advantage and/or advantage for other persons to the detriment of the Company's interests, and/or causing pecuniary and/or non-pecuniary damage to the Company through fraud, abuse of trust, misrepresentation or otherwise.

CORRUPTION means: a) abuse of official position, bribery, accepting bribes, abuse of authority, corrupt business practices, or any other unlawful use by an individual of his/her official position against the lawful interests of the society and state, with the purpose of obtaining benefits in form of money, valuables, other property, or property-related services, other property rights for himself/herself or third parties, or unlawful provision of such benefits to an indicated person by other individuals; b) committing actions, specified in subparagraph (a) above, for or on behalf of a legal entity .

UNFAIR COMPETITION means any actions of business entities and/or groups of individuals, aimed at obtaining advantages when conducting business, which are contrary to the laws of Indonesia, good business practices, honesty, reasonable and equitable discretion, and which have inflicted or may inflict losses to other business units, competitors, or damage their reputation.

ANONYMOUS REPORT means a written report submitted via the Hotline with no indication of the reporter's name or return details.

CONFIDENTIALITY means a prohibition of transferring the information, which could allow identification of the reporter, who has submitted a report via the hotline, without his/her consent given via the hotline or phone.

REPORTER means a person or a group of persons using the Hotline to report the information about facts or indication of theft of the Company's property, corporate fraud, corruption, unfair competition, conflict of interest, etc., .

INCIDENT means a fact or a combination of facts indicating an occurred, developing or probable threat to the Company's assets, resulting in the breach of the laws of Indonesia, Company's internal regulations, corporate fraud, corrupt practices, financial violations.

VERIFICATION means the actions taken by an authorized officer to verify the reliability of information reported via the hotline.

COMPANY means PT Pertamina Rosneft Pengolahan dan Petrokimia (or PRPP).

BUSINESS UNIT means a business unit of the Company with independent functions, objectives and liability within the limits of its competence.

TOP MANAGERS OF THE COMPANY means Company's Deputy Directors, Vice Presidents, Function Managers and Chiefs, advisers and heads of business units.

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AUTHORIZED OFFICER means an employee of the Company's Compliance Function or business unit responsible for verification of the information reported via the hotline.

3. RECEPTION AND LOGGING OF INFORMATION REPORTED VIA THE HOTLINE

3.1 RECEPTION AND LOGGING

Information can be delivered to the Company via a dedicated Hotline phone number, e-mail address (HotlinePRPP@pertamina.com) or regular mail to the Company's address.

Information is received via the Hotline during working hours by the staff of the Company's Compliance Function, or will be recorded automatically outside of working hours. Dedicated e-mail box is checked on daily basis.

Upon receiving, an analysis and recommendations on further actions in relation to the information on Company's property theft, corporate fraud, corruption, unfair competition, conflict of interest will be conducted.

3.2 CONFIDENTIALITY AND NON-RETALIATION

The Company guarantees confidentiality of sources of information reported via the Hotline, except when the reporting person voluntarily discloses or allows to disclose the fact of his/her report.

The Company guarantees that the Company's employees, in good faith reporting violations of other Company's employees, will not be subject to any sanctions for such reporting, will not be dismissed from their job, downgraded, deprived of bonuses or other material or non-material advantages. The Company reserves the right to make any Company's employees accountable for any misleading information reported via Hotline.

3.3 LIABILITY FOR LOGGING AND STORAGE OF INFORMATION

Employees of the Compliance Function bear personal liability for recording and storage of received information in an electronic Hotline Log, and for protection of its content as per Company's Confidentiality Policy. When it is necessary to ensure confidentiality of the reporting person's details, employees of the Compliance Function have the right not to disclose such information.

3.4 GENERALIZATION OF INFORMATION RECEIVED

Consolidated information gathered via Hotline is provided by the Compliance Manager to the Audit and Risk Subcommittee on quarterly basis.

4. INTERACTION WITH COMPANY'S BUSINESS UNITS

When interaction between the Compliance Function and the employees of the Company's business units is required in regards to the information reported via the Hotline, to ensure confidentiality of the reporting persons' details such employees shall have authorization to handle confidential information. These employees shall comply with the Confidentiality Policy requirements towards handling confidential information and ensure the safety of the information at their workplaces.

4.1. AUDIT AND RISK SUBCOMMITTEE

Compliance Function collects information reported via Hotline, including violations of

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Code of Conduct and Code of Corporate Governance and proposals for development thereof, and provides the consolidated report to the Audit and Risk Subcommittee for analysis and inclusion in internal audit inspections.

4.2. HR DEPARTMENT OF THE COMPANY

Compliance Function informs the Head of the Company's Human Resource Function on information received via Hotline and related to issues of compliance with labor laws, compensations, career development, training of the employees, compliance with internal labor regulations.

4.3. ADMINISTRATIVE STAFF

Company's administrative staff shall forward the messages concerning breaches of law received at Company's official email address pertamina.rosneft@pertamina.com or postal address: Patra Jasa Office Tower 3A floor, Jl. Gatot Subroto Kav. 32-34, Jakarta, Indonesia 12950 to the Compliance Function, with the exception of the messages addressed to the President Director, missing any certain addressee, or addressed to Compliance Manager.

4.4. HSSE

Within one hour upon receiving at the Hotline address, the Compliance Function shall forward any messages concerning concealment of information on industrial incidents, oil spills, fires, maintaining confidentiality of the sender, to the HSSE Function.

Within one day upon receiving at their email addresses, the HSSE employees shall forward any messages concerning theft of the Company's property, corporate fraud, corruption, unfair competition, conflict of interest, to the Hotline email address.

5. PROCEDURE FOR PROCESSING THE INFORMATION REPORTED VIA COMPLIANCE HOTLINE

Information concerning theft of the Company's property, corporate fraud, corruption, unfair competition, conflict of interest, reported via Hotline, shall be properly logged, subjected to preliminary analysis by the Compliance Function. Based on that, the proposals for further actions shall be formed.

In response to any other messages received via the Hotline, except for those specified in paragraphs 4.2-4.4 above, the senders shall be provided with explanations/answers. Messages containing broadcast and advertising shall not be considered and registered in the Hotline Log.

Messages, received via the Hotline, shall be registered in the Hotline log, but will not be considered in case:

- a message refers to an issue, which was already investigated and resolved, and the message doesn't provide new evidence;
- a message includes foul, abusive language;
- a message includes no information referring to specific incidents;
- message includes no information related to the Company;
- message text is unreadable or cannot be understood;
- message does not include sufficient information for arrangement of an inspection, and contains no sender's contact details for clarification;
- message includes contradictory information, signs of misleading information.

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No anonymous message received via the Hotline will be answered.

Compliance Function shall perform an analysis of the information, contained in the messages, specified herein to evaluate its accuracy, completeness, relevancy, allowing or disallowing an inspection.

Basing on the analysis the Compliance Manager shall take a decision on the next course of actions in regards to the reported information and it's deadline:

- conducting an inspection by Compliance Function;
- conducting an inspection jointly with the Company's relevant business unit;
- discarding an inspection to verify the information;
- transferring the information to the Company's relevant business unit.

6. VERIFICATION OF INFORMATION REPORTED VIA THE COMPLIANCE HOTLINE

The inspection shall be conducted within 30 calendar days of the date of the decision by the Compliance Manager to conduct the inspection.

6.1. OBJECTIVES

Objectives of verification of information about the facts or signs indicating thievery, corporate fraud, corruption, unfair competition, conflict of interest, reported via the Hotline, are:

- to confirm the availability or absence of the incident and inflicted damage;
- to identify the person(s), involved in the incident, and feasibility of compensation/minimization of the damage by such person(s);
- to identify the grounds for reporting to the law enforcement authorities;
- to identify the measures for prevention of recurrence of similar incidents;
- to determine the suitability of awarding the person, who reported the information allowing the Company to compensate the inflicted damage.

6.2. CONDITIONS FOR INFORMATION VERIFICATION

Within one day upon written request by the officer conducting the inspection, the managers of the Company's concerned functions/business units shall provide the requested information related to the incident, provide access to the documents, databases, premises, and property, as well as a possibility to interview the employees.

Access to the confidential information shall be granted in compliance with the Company's Confidentiality Policy.

Processing and transferring the information, which includes personal data, shall be performed in compliance with the Company's Policy and Guidelines on Personal Data Processing.

6.3. AUTHORITIES OF THE INSPECTING OFFICER

In his/her work, the inspecting officer shall have the authority to:

- study the contracts, source documents, accounting/management accounting/tax accounting records;
- study and copy (if necessary) the information not constituting official and trade secret;
- interview the employees of the Company's business units;
- verify the availability of material valuables and cash;

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- request a manager of a Company's business unit to conduct an inventory⁶ and to participate as a member of inventory committee;
- make photo, audio, and video recording during inspections;
- take other measures for collection of information confirming/disproving the fact of incident.

Upon the inspecting officer's request, the inspected employee shall provide the inspecting officer with the documents required to support the inspection report.

6.4. REPORTING AND REVIEW

A report with the findings of the conducted inspection shall be signed by the Compliance Manager.

The report shall include:

- a summary of initial information, which constituted the reason for the inspection;
- detailed findings of verification of the reported information and conditions contributing to the incident;
- an assessment of the inflicted damage or suggestion to involve the Company's auditors to evaluate the inflicted damage with the purpose of claiming compensation. The internal audit shall be conducted in compliance with the Company's internal regulations governing the internal auditing.
- proposed measures for reimbursement of damage, elimination of conditions contributing to the incident, bringing the offenders to responsibility;
- proposed resolution of a discovered conflict of interest;
- advisability of informing the reporter concerning the results of his/her report;
- proposals on rewarding the reporter;
- advisability of conducting internal investigation of circumstances related to the incident.
- reasoned confirmation/discarding of the reporter's information and termination of the inspection, accompanied by copies of relevant documents.

The inspecting officer shall be responsible for the integrity of the provided information, validity of conclusions and proposals based on the inspection findings.

Decision on further measures shall be taken by the Company's Compliance Manager.

7. REFERENCES

1. Regulation No. 20/2016 on Protection of Personal Data in Electronic Systems by the Ministry of Communications and Informatics;
2. Law No. 31/1999 as updated by the Law No. 20 of 2001 on Corruption Eradication;
3. Law No. 11/1980 on Bribery;
4. Law No. 8/2010 on Prevention and Eradication of Criminal Act of Money Laundering;
5. Law No.30/2002 on Trade Secrets
6. Law No. 5 /1999 on Anti-Monopoly Practice and Unfair Business Competition;
7. Company's Code of Corporate Governance;
8. Company's Code of Conduct;

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9. Company's Anti-Corruption Policy;
10. Company's Confidentiality Policy;
11. Company's Internal Audit Policy;
12. Company's Policy and Guidelines on Personal Data Processing.

Prepared by:	Approved by:
Compliance Manager	President Director
Vladislav Smetanin	Kadek Ambara Jaya
Dated: 24/05/2021	Dated: 24/05/2021