



**PT PERTAMINA ROSNEFT  
PENGOLAHAN & PETROKIMIA**

**CODE OF CONDUCT**

**No. CODE-002/PRPP-130/2021-S0**

Revision Number  0  1  2  3  4

**COMPLIANCE  
PT PERTAMINA ROSNEFT PENGOLAHAN DAN PETROKIMIA**

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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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## **MESSAGE FROM THE PRESIDENT DIRECTOR**

### **Dear Colleagues and Partners,**

At PT Pertamina Rosneft Pengolahan dan Petrokimia, we share common goals driven by respect, integrity and teamwork. Our goals shape the way we treat one another, how we develop and run the business, and how we are perceived in the marketplace.

Although our employees and partners represent different countries and cultures, we are one company with one global ethical standard, outlined here. Please take the time to read this Code and to understand how the Code requirements apply to your job responsibilities.

We take the Code seriously. Just as there are standards that apply to the industry, in which we are creating our own place and reputation, there are standards that apply to our work at PRPP. The Code outlines these important legal and ethical requirements.

If you ever have a question about the right course of action, consult our Code. Talk to our ethics unit. They will help you find the right answer.

Let me be clear: under no circumstances we will support unethical or illegal behavior, even if it results in a short-term business success. It's up to each of us to conduct ourselves in a way that earns trust and respect of our partners, clients, market, and the wider business community.

Always act with integrity. We owe that to ourselves as well as the stakeholders working with us, and who we continue to inform and inspire.

Thank you,

**Kadek Ambara Jaya**

President Director

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## **1.0 GENERAL PROVISIONS**

### **1.1 Company's Values**

PRPP's culture is built on Corporate Excellence Values. All employees of the Company regardless of their title and position must ensure that they behave in compliance with these values:

#### **Integrity**

We take responsibility and accountability for everything: our words, our actions and decisions. In our day-to-day behavior, we are ethical, fair, honest, open and consistent towards our colleagues, clients and partners, keeping promises and setting an example to others. Our highest priority is the safety of life and health, our community and environment.

#### **Team Spirit**

We get the best outcomes when we work together with our colleagues, both inside and outside our Company, in teams and between teams. To improve creativity and to produce the best ideas we establish solid teams with shared goals, care and trust to each other.

#### **Professionalism**

We understand and comply with all applicable laws, rules, and regulations in our professional activities. We set and achieve the goals relying on competence, discipline and collaboration. We are diligent, careful and objective in our analysis and judgment to maintain our professional independence. We act in a way that our reputation and integrity get no reflections of dishonesty, fraud, deceit or incompetence.

#### **Innovation**

We use the most original ideas, innovative approaches and state-of-the-art technologies. We are purposefully creative, open-minded to new ideas and innovative to challenge the status quo. We encourage elaborate risk taking to create value.

#### **Excellence**

We strive for leadership continuous performance improvement in all our activities, meeting our commitments and exceeding expectations in everything we do. We deliver the highest quality of outcomes and undertake ambitious tasks. We are constantly learning and improving our knowledge and skills.

### **1.2 Parties Required to Comply with PRPP's Code of Conduct**

This Code of Conduct shall be binding for:

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- a. PRPP's personnel (including Board of Directors, Board of Commissioners, permanent employees, non-permanent employees, secondees and supporting service workforce working within PRPP territory);
- b. External parties acting for and on behalf of PRPP;
- c. Partners in cooperation with PRPP.

An organization can only achieve its goals through commitment of its personnel and with solid cooperation and valuable contributions from all members of the organization. Compliance and commitment of PRPP's personnel to this Code of Conduct leads to achievement of PRPP's vision of becoming a world class National Downstream Company.

## **2.0 OPERATIONS IN COMPLIANCE WITH HEALTH, SAFETY, SECURITY, ENVIRONMENTAL ASPECTS**

### **Commitment to Health, Safety, Security, and Environment**

The Company is committed to conducting its construction and operational activities in a safe, comfortable and environmentally-friendly manner by applying high standards in Health, Safety, Security and Environmental risk management by preventing the occurrence of accidents, fires, occupational diseases, pollution and security disturbances, as well as any other impacts on environment resulting from the failure of Company's operations.

To fulfill this, PRPP's personnel must:

- a. prioritize health, safety, security and environment requirements;
- b. minimize the risk of any incidents by identifying, evaluating, controlling, and monitoring any potential hazards and threats;
- c. comply with laws and regulations in health, safety, security and environment protection area;
- d. adopt the best appropriate technology meeting the industry standards;
- e. set performance in health, safety, security, and environment activities as a part of assessment and promotion issues for employees;
- f. increase awareness and competence to ensure proper, safe and environmentally friendly workplaces;
- g. inform any conditions or unsafe actions in the workplace to supervisors.

## **3.0 HUMAN RESOURCES**

### **3.1 Integrity at the Workplace**

The Company is committed to conducting business activities with integrity and professionalism, avoiding and fairly disclosing conflicts of interest, having zero tolerance to bribery, dishonesty, fraud, or deceit, maintaining trust, and following Company values.

To achieve this, the Company's personnel must:

- a. comply with national and international laws, regulations, and statutes as well as Company's internal regulations prevailing within their activities ;

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- b. ensure that personal interests do not conflict with duties and responsibilities to the Company and Company stakeholders;
- c. avoid any form of conflict of interest and taking actions while being under an unresolved conflict of interest, either directly or indirectly, if the conflict cannot be avoided fully and fairly disclose any conflict of interest to the Company;
- d. refrain from being involved in any form of corruption, collusion, and nepotism;
- e. refrain from offering, providing, and/or receiving anything that is not in compliance with gratification principles for the purpose of obtaining benefits/rewards/counter-performance and preferential treatment from certain parties.

### 3.2 Professional Behavior

The Company realizes that PRPP's personnel professionalism is key to PRPP's success. This is the Company's commitment to create competitiveness and provide the best service to customers.

Company's personnel are required to:

- a. act in compliance with laws, policies and procedures;
- b. be loyal to the Company while performing assigned duties;
- c. build trust to each other on the basis of mutual respect and tolerance, be sincere, heartfelt and consistent, and to find synergies to achieve the Company's vision;
- d. do every job in good faith and full responsibility;
- e. be disciplined and perform no other activities for personal interest during working hours;
- f. maintain confidentiality of Company's documents and information in compliance with Company's established rules;
- g. strictly follow the laws and regulations in force;
- h. make decisions based on the principles of prudence and full responsibility;
- i. refrain from taking any advantage of position or office for personal, group or other party interests.

Leaders of PRPP are required to:

- j. be a good role model in activities and speeches, be fair and open with subordinates;
- k. coordinate well and establish harmonious relationships within a working team;
- l. provide subordinates with opportunities to develop;
- m. assess the performance of subordinates objectively using predetermined criteria;

Employees of PRPP are required to:

- n. be respectful and courteous to the leaders and;
- o. refrain from taking any actions beyond authority;
- p. always be disciplined in carrying out each of duties;
- q. honor duties and instructions from supervisors;
- r. use discussion as a dispute resolution tool;

### 3.3 Equal Career Opportunities

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The Company is committed to ensure that every employee has equal professional development opportunities. The Company provides all employees with training and education facilities.

The Company ensures that decisions, such as recruitment, appraisal, compensation, promotion, and employment termination shall be based on objective qualification and performance factors.

### **3.4 Avoid Discrimination**

The Company is committed to respect human rights, employees' rights to maintain a discrimination-free workplace. The Company will not allow any discriminative actions against any individual for ethnicity, race, nationality, religion, gender, age, disability, or any other reasons.

The Company's personnel are not allowed to employ any kind of intimidation, humiliation, harassment, provocation, and unfair competition.

## **4.0 COMMITMENT TO PREVENTION OF NON-COMPLIANCE WITH RULES AND STANDARDS**

### **4.1 Fair Business Competition**

The Company is committed to follow fair business principles in compliance with the Law on the Prohibition of Monopolistic Practices and Unfair Business Competition.

Company's personnel will be required to:

- a. ensure that the Company's business activities are conducted in compliance with statutory and regulatory provisions of the Law on the Prohibition of Monopolistic Practices and Unfair Business Competition in Indonesia;
- b. be alert to any efforts that may lead to unfair business competition;
- c. follow fair and ethical business practices to maintain fair competition and do not disseminate any sensitive information to any other parties;
- d. perform a transparent procurement process of goods and/or services in compliance with Company regulations;

### **4.2 Financial Statements and Management Accounting**

The Company is building its reputation as an open and bona fide entity. It ensures that the data processed in its accounting operations and documents is precise and reliable in strict compliance with Indonesian and international laws and rules.

The Company strictly follows definite standards for keeping financial and managerial records and issuing relevant reports:



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- business transactions are recorded fully and accurately reflected in financial statements and accounting records;
- strict compliance with internal control procedures ensures the reliability of financial record keeping and accounting;
- accounting documents are kept and used in compliance with the requirements of applicable laws and regulations.

### 4.3 Gifts, Corporate Hospitality and Entertainment

Gifts and various hospitality services to or by business partners are aimed at strengthening long-term business relations.

Decision-taking employees of the Company must act with independence and objectivity while performing their professional activities. They should not take any gifts or benefits of any kind that could hamper their independence and objectivity in performing their duties.

If a decision-taking employee is given hefty gifts (implicit or explicit), it may force him/her into a conflict of interest.

When deciding whether to accept a gift or anything of value from a business partner or, alternatively, whether to give a gift, we abide by the following rules:

- Company's employees shall not accept or give any gifts including money, securities, precious metals, gems, loans, certificates, gift cards and discounts and services under non-standard terms and conditions. They shall not attend events that can lead to emergence of binding obligations.
- The above rules also apply to the kith and kin of the employees, including spouses, adult and underage natural and adopted children, full and half-blood brothers and sisters, parents and adoptive parents.

### 4.4 Prevention of Corporate Fraud and Corruption

In its day-to-day work the Company is governed by Indonesian and foreign anti-corruption laws, the principles laid down in this Code and the provisions of Company policies on prevention of corporate fraud and corruption activities, and confirms its commitment to international standards of corruption control.

The Company takes preventive measures against all forms of corporate fraud, misstatement of financial reports, acts of corruption, embezzlement, willful damage and other wrongdoings relating to Company assets.

The Company is committed to preventing and eradicating the crime of money laundering.

Company's personnel are required to exercise due diligence and be alert of any suspicious financial transactions.

### 4.5 Prevention of Conflicts of Interest

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Company employees pursue the Company's interests while performing their duties.

A conflict of interest is a situation in which private interests of an employee or people close to him/her contravene or may contravene Company interests, and as a result influence or may influence fulfilling employee's duties, including making decisions. This may result in inflicting harm on the Company, violation of its rights and lawful interests, loss of its property and damage to its business reputation.

Concurrent outside employment or engagement in a professional activity can raise conflict of interest and conflict of commitment concerns. Company's employees who wish to engage in concurrent employment or other professional engagement must disclose it to the employer and get an approval to ensure that this poses no conflict of interest.

To prevent conflicts of interest avoid:

- holding participation interest or securities in the business of a Company partner or competitor;
- receiving loans or guarantees from them, acquire membership of their management bodies, act as their agent or representative or in any other way be financially interested in the performance of an organization in violation of the Company's requirements for these issues;
- acting as a direct supervisor of related persons or participate in their promotion in the Company or in the assessment of their performance;

Any other conflict of interest should be fully and fairly disclosed to Company.

An employee is prohibited from taking any action under an unresolved conflict of interest.

#### **4.6 Due Diligence**

The Company shall conduct counterparty due diligence and job applicants with regards to their good faith and reputation.

Before making a decision to start or continue cooperation with an intermediary, agent or other counterparty the Company shall conduct preliminary due diligence of potential counterparties to counteract any potential fraudulent or corruption practices.

The Company shall conduct due diligence of job applicants in order to avoid conflicts of interest.

#### **5.0 COMMITMENT**

The Company is committed to its leadership role in the national economic development under the Indonesia's New Grass-root Refineries (NGRR) program, and to build national pride.

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Partnership based on long-term, fruitful, confidential and mutually beneficial relations with stakeholders, government authorities, society and business partners, is a major resource for development, enabling the Company to achieve its strategic goals.

## 5.1 Commitment to Stakeholders

The Company seeks to become a leading downstream oil and gas company and to continuously increase the shareholder value, and to present financial reports in accordance with the applicable financial reporting principles.

The Company is committed to building mutually beneficial relationships with stakeholders based on Good Corporate Governance principles to generate added value for all stakeholders.

## 5.2 Government Authorities

Company liaises and builds good relations with state-level and local government authorities on a continuous basis.

The Company meets all legal requirements, pays its taxes and salaries in full, and professionally manages any personnel-related matters.

The Company does not finance any political parties and movements.

## 5.3 Social Responsibilities

The Company intends that its existence will be able to provide the greatest benefit to the people in places where the Company runs its business operations.

The Company is committed to responsibly manage social, environmental and economic effects from its operations contributing to sustainable community development.

## 5.4 Political Activities and Professional Organizations

The Company respects political rights and to self-organization rights of the Company's personnel. The Company is neutral while not participating directly or indirectly in any political party activities and not making donations or contributions in any form whatsoever. As a form of its commitment, the Company determines the following:

- a. Company's personnel are prohibited from engaging in any political activities within the Company and making donations and other assistance in any form on behalf of the Company, including the use of the Company's facilities, infrastructures, and funds for the benefit of political parties;
- b. Company's personnel are prohibited from carrying, installing, displaying, and wearing symbols, pictures and/or ornaments of political parties at the workplace/other public facilities owned by the Company;
- c. Company's personnel may become caretakers of a political party and/or candidates/members of the legislature or candidates of Regional/Government

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Leaders by applying for resignation as employees or by the Company's termination of their employment relationship;

- d. the Company supports its personnel to actively participate in the activities of professional organizations or any other social organizations.
- e. Employees shall disclose to the Company their participation/intention to participate in political activities.

## 5.5 Openness of Public Information and Liaison with Media

Company may post any necessary and relevant information on its website or other relevant open sources. In particular, open-access information about the Company, its management bodies, performance, achievements, contact details, etc. is available at the Company's official web-site <https://prpp.pertamina.com/home>.

Any written, electronic or other communication with mass media, related to cooperation or information exchange on Company activities must be approved by the Company.

If a media representative offers cooperation on matters related to Company activities, an immediate supervisor or head of the public relations unit should be informed of such an offer.

The Internet opens up unique opportunities for communication and information exchange. A reasonable approach to the use of the Internet by Company's employees presupposes compliance with a number of rules:

- a. Never place working material and/or information on Company activities on the Internet.
- b. Do not use corporate mail for personal purposes.
- c. Do not place any photos, audio and video recordings, made at Company corporate events, workplaces and production facilities, on the Internet.
- d. Avoid participating in discussion of Company news, management or personnel decisions, and information related to Company business partners and clients.
- e. Make statements, comments and assessments as a representative of the Company only if you have an approval.

## 6.0 PROTECTION OF THE COMPANY'S ASSETS

### 6.1 Protecting the Company's Property and Assets

The safety of the property owned by the Company is an important element of its development and prosperity. The Company's property includes any construction and/or production plants and machinery, office equipment, expendable materials, intellectual property and other means of production used in day-to-day work. The Company is committed to safeguarding its property

Company's personnel are obliged to protect the Company's property and assets, and are prohibited from misusing the Company's property for their personal interest.

### 6.2 Confidentiality of Data and Information

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Information containing commercial secrets, restricted to in-house use, personal data and other information on the Company's operations and development determine its ability to compete in the market. A disclosure of confidential information may prove detrimental to the Company's interests and reputation and it is the duty of all of us to protect it.

When handling such information observe the following rules:

- a. Confidential information may be used only as part of one's job duties in compliance with corporate procedures in force.
- b. An obligation not to disclose confidential information shall continue after an employee leaves the Company unless agreed otherwise.
- c. Not only corporate intellectual property must be handled with care and respect, but also the information owned by our partners which we get access to. The Company's intellectual property including innovations developed by its employees may be used only in its interests.
- d. When working with confidential information, use certified technical security measures to protect information.

### **6.3 Personal Data Protection**

In compliance with Indonesian legislation regarding data protection, the Company meets all provisions and informs each employee on the nature of personal data processed, on the processing methods, and on disclosure of data, adopting appropriate measures to guarantee confidentiality.

### **6.4 Intellectual Property Rights**

The Company is committed to develop ideas and knowledge as valuable assets that contribute to the Company's competitiveness and profits. The Company is committed to safeguard intellectual property from any unauthorized parties.

The Company's personnel must respect and honor intellectual property rights and comply with laws and regulations governing intellectual property ownership rights.

### **6.5 Irregularities Reporting Channels**

The Company is committed to safeguarding all Company's assets so that its business/operational activities run based on the Corporate Excellence Values. Company's personnel are obliged to actively participate in reporting any suspected fraud to the best extent of their knowledge. Reports shall be supported by relevant data with no aim of bringing someone down.

Company's personnel are required to report any irregularities through the Whistle Blowing System for any suspected violation, including the following:

- a. corruption;
- b. bribery;
- c. conflict of interest;

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- d. thievery;
- e. fraud; and
- f. violation of laws and Company Regulations.

Reports submitted to the Whistle Blowing System are anonymous and confidential.

Reports can be submitted to the highest leader within the relevant function of the Company. If the Company's employee is uncomfortable to make a report directly, it can be submitted through the following channels:

**Telephone:** .....  
**E-mail:** [HotlinePRPP@pertamina.com](mailto:HotlinePRPP@pertamina.com)

Violation of the Code of Conduct will result in a disciplinary measure. Sanctions for any violation committed will be imposed in compliance with applicable regulations.

No retaliation measures, such as dismissal, withholding of a bonus or refusal to grant promotion may be used against a Company employee for disclosing in good faith any corporate fraud, corruption, bribery, suspected violations of control procedures and other wrongdoings.

## 7.0 COMPLIANCE WITH CODE STANDARDS

In our day-to-day work we comply with the rules and standards stated in this Code. The Company management actively supports and is committed to a lawful and ethical conduct of business in accordance with the principles set forth in this Code, organizes regular communication activities and personnel training.

Every employee is responsible for compliance with ethical standards. The responsibility of applying this Code is binding on all employees regardless of their title and position in the Company and stated in the Company regulations.

Violating the requirements of this Code shall be subject to disciplinary actions in compliance with the Company regulations and laws of the Republic of Indonesia, as well as laws of countries where the Company operates.

## 8.0 CODE AMENDMENT

Every employee may propose changes to this Code by mailing to [vladislav.smetanin@pertamina.com](mailto:vladislav.smetanin@pertamina.com). The Company's Manager of Compliance will review the proposals and submit the amended version to the Board of Directors. The Board of Directors will seek the Company's Board of Commissioners adoption after its own review.

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