

CORPORATE CODE OF CONDUCT

CODE OF CONDUCT'S IMPLEMENTATION FOR BOARD OF DIRECTORS, BOARD OF COMMISSIONERS AND EMPLOYEES

The implementation of Telkom's code of conduct has met the provisions of Circular Letter of Financial Service Authority No. 32/SEOJK.04/2015 regarding Governance Guidelines for Public Companies. In addition, the implementation of Telkom's code of conduct is also in accordance with the Sarbanes-Oxley Act (SOA) 2002 section 406. Telkom has a code of conduct which is stipulated in the Board of Directors Regulation No.PD.201.01/2014 regarding Business Ethics in the TelkomGroup Environment and Regulation of the Director of Human Capital Management No.PR.209.05/r.01/HK250/COP-A4000000/2020 regarding Employee Discipline.

This code of conduct applies to all levels of the organization including members of the Board of Directors, members of the Board of Commissioners, and the extend family of Telkom employees. Telkom's code of conduct covers business ethics aimed at the external environment and employee work ethics aimed at Telkom's internal. Business ethics for the external environment dealing with customers, suppliers, contractors, and other external parties. On the other hand, employee work ethics applies to fellow employees while working at TelkomGroup.

Furthermore, Telkom also has a Board Manual which contains the duties and responsibilities of the Board of Commissioners and Directors also regulates the code of conduct which must be followed by all members of the Board of Commissioners and Directors. The Board Manual which was approved through Joint Regulation of the Board of Commissioners and Directors No. 08/KEP/DK/2020 and No.PD.620.00/r.00/HK200/COP-M4000000/2020 dated June 18, 2020.

In addition to code of conduct, Telkom requires employees, Directors, and the Board of Commissioners to sign an Integrity Pact. The Integrity Pact contains the commitment of employees and Directors not to violate the integrity and established code of ethics which includes Resolution of the Board of Directors Number KD.36/HK290/COP-D0053000/2009.

CODE OF CONDUCT'S PRINCIPLES

The Telkom Code of Conduct, which applies, among others, regulates the main matters concerning:

1. Employee Ethics

The system of values or norms that are used by all employees and leaders in the daily work.

2. Business Ethics

The system of values or norms that are upheld by the Company as guidelines for the Company, management, and its employees to interact with the surrounding business environment.

CODE OF CONDUCT'S SOCIALIZATION AND EFFORTS TO ENFORCE THEM

Violation of the code of conduct will potentially lead to sanctions determined after going through an investigation and various considerations. Telkom's code of conduct has set the provisions related to sanctions for each type of violation as follows:

No.	Main Ethics	Type of Violation	Penalty
1.	Employee Work Ethics	1. Minor Abuse	Minor Disciplinary Punishment
		2. Medium Violation	Medium Disciplinary Punishment
		3. Severe Offense	Severe Disciplinary Punishment
2.	Business Ethics	1. Insider Trading	Integrity Committee Decision
		2. Conflict of Interest	Employee Discipline Committee Decision
		3. Windows Dressing	Integrity Committee Decision
		4. Gratifying	Employee Discipline Committee Decision

EFFORTS TO DISSEMINATION OF CODE OF CONDUCT

In order to socialize Telkom's Code of Conduct, routinely, Telkom management sends outreach materials related to Code of Conduct to employees which also covers topics on GCG, business ethics, integrity pacts, fraud, risk management, internal control (SOA), whistleblowing, prohibition of gratification, IT governance, information security, and other matters related to good and ethical corporate governance practices. Telkom is consistent in disseminating business ethics through various media, including e-learning.

In addition, another approach to socialized is through the obligation to make a statement in the form of an integrity pact signed and compiled by all employees every year as long as they are employee of Telkom.

In 2020, efforts to disseminate Telkom's Code of Conduct can be seen in the following table.

Table of Code of Conduct Socialization in 2020

No.	Oncoming	Amount Reached
1.	E-learning	All employees
2.	Face to face (training, communication forum/workshop)	All employees
3.	Socialization material through the intranet portal	All employees

REPORT ON RESULTS OF APPLICATION OF CODE OF CONDUCT

Telkom recorded a total number of violations of the code of ethics in 2020 of 10 (ten) cases consisting of 22 (twenty two) perpetrators of violation. This total number is higher than the previous year of 2 (two) cases consisting of 18 (eighteen) perpetrators of violations. In general, the trend in the quality of the adoption of the code of ethics was need improvement throughout 2020 as seen from the number of cases that increase in 2020.

The following table provides data on the form of violations of the code of ethics, the number of violations and sanctions provided in 2020.

Results of Code of Conduct in 2020

No.	Forms of Code Violation	Number of Code Violations in 2020	Sanctions Given in 2020								
1.	Misuse of goods/assets/money/ position authority	6 cases	Disciplinary Punishment: <table border="1"> <tr> <td>Minor</td> <td>: 2 Peoples</td> </tr> <tr> <td>Medium</td> <td>: 5 Peoples</td> </tr> <tr> <td>Severe</td> <td>: 8 Peoples</td> </tr> <tr> <td>On Progress</td> <td>: 3 Peoples</td> </tr> </table>	Minor	: 2 Peoples	Medium	: 5 Peoples	Severe	: 8 Peoples	On Progress	: 3 Peoples
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Medium	: 5 Peoples										
Severe	: 8 Peoples										
On Progress	: 3 Peoples										
2.	Absenteeism	2 cases	Dismissal : 2 Peoples								
3.	Criminal Case	2 cases	Scorsing : 1 Person Dismissal : 1 Person								