



CORPORATE CODE OF CONDUCT

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

Telkom has a code of conduct that is stipulated through the Board of Directors Regulation No.PD.201.01/2014 regarding Business Ethics within the TelkomGroup and Human Capital Management Director Regulation No.PR.209.05/r.01/HK250/COP-A4000000/2020 regarding Employee Discipline. In addition to complying with applicable policies, the implementation of Telkom's code of conduct refers to Sarbanes-Oxley Act (SOA) 2002 section 406.

Members of the Board of Directors, members of the Board of Commissioners, and extended families of Telkom employees are required to implement this code of conduct. Telkom's code of conduct regulates business ethics for the external environment (customers, suppliers, contractors, and other external parties) as well as employee work ethics for the internal environment (applies to fellow Telkom personnel).

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 conduct 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

Every Telkom employee who violates the code of conduct will have the potential to receive sanctions after going through the investigation process and various considerations. The following table presents Telkom's code of conduct which regulates provisions related to sanctions for each type of violation:

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. Window Dressing	Integrity Committee Decision
		4. Gratification	Employee Discipline Committee Decision



EFFORTS TO DISSEMINATION OF CODE OF CONDUCT

Telkom's management routinely sends informational materials on ethics to all employee in TelkomGroup. These materials cover the topics of GCG, Business Ethics, Integrity Pact, Fraud, Risk Management, Internal Control (SOA), Whistleblowing, Prohibition of Gratification, IT Governance, Information Security, and other matters related to Corporate Governance practices. Apart from this, Telkom also consistently disseminates business ethics through various media, including through e-learning.

Efforts to disseminate this code of conduct are also demonstrated through the obligation of every employee to make an Integrity Pact that is signed and must be followed by all employees every year as long as they are employees of TelkomGroup. The table below presents information on efforts to disseminate Telkom's code of conduct during 2021.

Table of Code of Conduct Socialization 2021

No.	Oncoming	Amount Reached
1.	E-learning	10,019
2.	Face to face (training, communication forum/workshop)	9,272
3.	Socialization material through the intranet portal	10,019

REPORT ON RESULTS OF APPLICATION OF CODE OF CONDUCT

During 2021, violations of code of conducts for Employee Discipline Violations at Telkom were recorded in 16 cases consisting of 7 cases decided with 14 perpetrators and 9 cases in process with 95 people. This number increased compared to the previous period, which was 10 cases and consisted of 22 perpetrators. Judging from the information, Telkom still needs to continue to improve the quality of supervision (internal control) so that violations of the code of ethics can be reduced every year.

The following table presents data related to violations of code of conducts that processed during 2021.

Results of Code of Conduct in 2021

No.	Forms of Code Violation	Number of Code Violations in 2021	Sanctions Given in 2021
1.	Misuse of Goods/Assets/Money/Authority-Position	12 cases	Disciplinary Punishment: Minor : 3 Medium : 1 Severe : 5 On Progress : 95
2.	Absenteeism	2 cases	Dismissal : 1 Acquitted : 1
3.	Criminal Case	1 cases	Severe : 1
4.	Violations of Moral Norms	1 cases	Severe : 2