## CORPORATE CODE OF CONDUCT

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

Based on the Sarbanes-Oxley Act (SOA) 2002 section 406, Telkom has a code of ethics regulated in Directors Regulation No. PD.201.01/r.00/PS150/COP-B0400000/2014 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.

Telkom's code of ethics regulates business ethics for the external environment (customers, suppliers, contractors, and other external parties) as well as employee work ethics for the internal environment, which applies to all members of the Board of Directors, members of the Board of Commissioners and the extended family of Telkom employees. Telkom requires all internal parties to sign an Integrity Pact, which contains a commitment from employees and management not to violate the established integrity and code of ethics. this integrity Pact is stated in Resolution of the Board of Directors No. KD.36/HK290/COP-D0053000/2009.

#### CODE OF CONDUCT'S PRINCIPLES

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

- 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 Telkom, management, and its employees to interact with the surrounding business environment.

## DISSEMINATION OF THE CODE OF ETHICS AND ITS EFFORTS TO ENFORCEMENT

Any code of ethics violation will be subject to sanctions after going through an investigation process and various considerations. The following table presents the sanctions provisions for each type of violation.

No.	Main Thing	Type of Violation	Penalty	
1.	Employee Work Ethics	1. Misdemeanor Light Discipline Punishment		
		2. Moderate Violation	Moderate Discipline Punishment	
		3. Serious Violation	Severe Discipline 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. Do gratuities	Employee Discipline Committee Decision	

### EFFORTS TO DISSEMINATION OF CODE OF CONDUCT

Every year, Telkom management sends outreach materials to all employees at TelkomGroup regarding understanding of GCG, Business Ethics, Integrity Pact, Fraud, Risk Management, Internal Control (SOA), Whistleblowing, Prohibition of Gratification, IT Governance, Information Security, Anti-Bribery Management System and other matters. Others related to ethics and corporate governance practices.

Telkom implements an obligation for every employee to create an Integrity Pact, which is filled out and signed by all employees every year as long as they are still employees of TelkomGroup. Telkom also carries out business ethics outreach through various media and e-learning, which also includes awareness of the implementation of SNI ISO 37001:2016 Anti-Bribery Management System (SMAP).

#### **Table of Code of Conduct Socialization 2023**

No.	Oncoming	Amount Reached	
1.	E-learning	9,543/9,543	
2.	Face to face (training, communication forum/workshop)	244/9,543	
3.	Socialization material through the intranet portal 9,543/9,543		

### REPORT ON RESULTS OF APPLICATION OF CODE OF CONDUCT

Violations of Employee Discipline that will be processed at Telkom in 2023 are as many as 17 cases, consisting of 3 cases that have been decided with 26 perpetrators and 14 cases still in process with 75 people. This number increased compared to the previous year, with 13 cases with 143 perpetrators. Judging from the information, Telkom still needs to improve the quality of internal control so that the number of code of ethics violations can continue to be reduced.

#### **Results of Code of Conduct in 2023**

No.	Form of Code Violation	Number of Code Violations	Sanctions Given	
1.	Misuse of Goods/Assets/Money/	16 case	Disciplinary Punishment:	
	Authority-Position		Minor	:3
			Medium	:2
			Severe	: 4
			Acquitted	:16
			On progress	: 75
2.	Absenteeism	0 case	Dismissal	:-
			Acquitted	:-
3.	Criminal Case	0 case	Severe	:-
4.	Violations of Moral Norms	0 case	Severe	:-
5.	Others	1 case	Disciplinary Punishment:	
			Minor	: -
			Medium	:-
			Severe	:-
			Acquitted	:1
			On progress	: -