

**ENACTMENT SHEET
OF
CODE OF ETHIC AND CONDUCT**

PT ABM INVESTAMA Tbk. realizes the importance of Good Corporate Governance (“GCG”) implementation as one of tools to increase the value and growth of long term business continuously not only for Shareholders but also for all stakeholders. In order to accomplish consistent implementation of GCG, on this day, June 30, 2017, the Board of Commissioners & the Board of Directors of PT ABM INVESTAMA Tbk. (“ABM”) is renewing the previous Code of Ethic and Conduct (“COEC”) that was issued on January 31, 2013 by making adjustments to the current situation and condition of GCG. Therefore, the Board of Commissioners and the Board of Directors enforces the latest COEC as part of the Good Corporate Governance Charter (GCG Charter) and as a form of ABM’s commitment in the GCG implementation.

Rachmat Mulyana Hamami
(President Commissioner)

Achmad Ananda Djajanegara
(President Director)

Mivida Hamami
(Commissioner)

Syahnan Poerba
(Director)

Arief Tarunakarya Surowidjojo
(Independent Commissioner)

Adrian Erlangga
(Director)

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I . INTRODUCTION

I . 1 . Rationale

PT ABM INVESTAMA Tbk, hereinafter referred to as “ABM” or “Company” realizes the importance of Good Corporate Governance (“GCG”) implementation as one of tools to increase the value and growth of long term business continuously not only for Shareholders but also for all stakeholders. For that reason, ABM is committed to implementing the GCG consistently and approves the Company’s Vision, Mission and Values by issuing the Good Corporate Governance Charter (GCG Charter), one of which was conducted by means of applying the “Code of Ethic and Conduct (COEC)”.

COEC applies to all individuals who are under ABM both the Board of Commissioners, the Board of Directors, Supporting Organs of the Board of Commissioners and employees (hereinafter referred to collectively as “ABM Members”), the Board of Commissioners, the Board of Directors, Supporting Organs of the Board of Commissioners and employees of subsidiaries and affiliates under the control of ABM (hereinafter jointly

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with ABM is referred to as “ABM Group”), Shareholders and all stakeholders or partners.

COEC is a set of commitments that consist of ABM business ethic and work ethic of ABM Members that is complied to affect, form, arrange and adapt the conducts so that consistent output is achieved that complies with ABM culture in achieving the Company’s vision and missions.

ABM always encourages compliance with the code of ethic and is committed to implementing it, and requires all leaders of every level in the Company to be responsible to ensure that the code of conduct is complied with and performed properly in their respective lineup.

As a form of such a commitment, COEC is enacted and signed by all members of the Board of Commissioners and the Board of Directors. Furthermore, all ABM Members are required to sign personal commitment on annual basis.

In order to encourage proper implementation of COEC, it is necessary to implement the internalization and socialization programs throughout the operating areas of the Company. COEC is always adapted to the legal, social, norm, regulatory development and business operation of ABM. All parties are expected to give inputs to COEC development in order to be alligned and synergized with

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the existing values in ABM. The success in implementation of COEC is strongly supported by the mutual spirit, communication and commitment to implement it in daily operational activities.

I . 2 . ABM Commitments

1. In carrying on its business, ABM is committed to achieving the highest level of implementation of business values and ethics. In order to achieve this, then:
 - a. All ABM Members shall not commit in any actions contrary to the religious and moral norms;
 - b. All ABM Members shall uphold and behave in accordance with values as specified in the COEC;
 - c. All of ABM's customers, suppliers and partners (including consultants, contractors and counterparties) must understand and comply with COEC-related provisions;
 - d. All of ABM Members including the Board of Commissioners and the Board of Directors will re-sign the COEC personal commitment at least on annual basis.

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2. Principles in COEC enforcement efforts are as follows:

a. Obedience

Every ABM Member shall adhere to statutory regulations and ABM provisions/policies.

b. Honesty

Every ABM Member shall uphold the ethic principles and conformance between words and actions on consistent, measurable, and reliable basis.

c. Harmony

Every ABM Member shall anticipate conflicts of interest that may affect the independent assessment and decision making.

d. Corporate Image

Every ABM Member shall always maintain ABM's corporate image in order to maintain the level of public confidence in the existence of ABM.

II. CODE OF ETHIC

All ABM Members without exception must:

1. Always obey, comply with and perform the corporate regulations and the prevailing statutory regulations effectively and efficiently with due regard to security, safety, health and the environment;
2. Make decisions and take actions in accordance with the code of ethic, code of conduct, the company regulations, the prevailing statutory regulations and provisions of the articles of association of the Company;
3. Act professionally and uphold integrity in taking actions and in any relationships on behalf of ABM and/or ABM Group by means of neither misusing knowledge, authority, position, directly nor involved directly and indirectly in any criminal action either individually or corporately, nor assisting in nor committing in fraud in any form or kind (fraud), that harm ABM and/or ABMGroup;
4. Always implement the GCG principles, namely; transparency, accountability, responsibility, independence and fairness in performing any and all tasks

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on behalf of ABM and/or ABM Group;

5. Prevent and avoid personal conflict of interest, or potential conflict of interest with ABM and/or ABM Group and ABM stakeholders;
6. Mutually respect and promote harmonious relationship, uphold the social noble values among colleagues, subordinates, superiors, shareholders and stakeholders;
7. Immediately report any violation that occurs and/or that may occur against the code of ethic, code of conduct, company regulations, the prevailing statutory regulations and policies as procedures that are set by ABM to the Board of Directors or other parties appointed by ABM;
8. Be ready to be held liable for any breaches of COEC that entail to legal sanctions including but not limited to termination of employment and settlement by legal proceedings in accordance with the prevailing statutory regulations.

III. CODE OF CONDUCT

Some critical aspects that are deemed necessary to be regulated in the COEC as a code of conduct for ABM Members include the following:

III.1. CODE OF CONDUCT ON RELATIONSHIP AMONG ABM GROUP MEMBERS

A. Relationship among ABM Members

1. Every ABM Member is entitled to a comfortable work environment;
2. Every ABM Member is prohibited from making coercion or intimidation against co-workers, superiors or subordinates for certain interests, both for personal or another party's benefit, both internal and external;
3. Every ABM Member is prohibited from committing in any hostility and/or making any threats both physically and verbally against his/her coworkers, superiors or subordinates;
4. Every ABM Member is prohibited from taking any action and/or using any words which can be interpreted as humiliation, abusive words, obscene

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to his co-workers, superiors or subordinates or to other parties;

5. Every ABM Member is prohibited from taking any action and/or using any words that contain harassment on matters relating to ethnic, religious, racial, customs, physical circumstances, difference of sex (including sexual harassment) and things that relate to the decency and politeness norms;
6. Every ABM Member is prohibited from utilizing his/her position or capacity to force and provoke his or her co-workers, superiors or subordinates for certain interests or other interests that are believed and deemed to be harmful to the Company;
7. Every ABM Member in developing his/her career is obliged to keep away from, avoid and prevent any unfair competition means.

B. Relationship with Subsidiary/Joint Venture Company

1. ABM Members shall maintain that any business relationship with Subsidiaries or Joint Ventures (if any) is exercised within the framework of reasonable business relationship as is the case with business relationship that is developed with unaffiliated parties (arm's length relationship);

2. Mutually respect the interests of each party through a mutually beneficial cooperation agreements.

III.2. CODE OF CONDUCT ON RELATIONSHIP WITH STAKEHOLDERS

A. Relationship with Shareholders

1. That the communication process with Shareholders shall be sought through one door (*one door policy*);
2. Any reporting, statement, and disclosure of information to Shareholders must be transparent, clear, accurate, complete and contain no ambiguity except for information in which the Board of Directors has reasonable reason for not to disclose;
3. Shareholders shall be subject to ABM regulations and all resolutions legally adopted in General Meetings of Shareholders (GMS);
4. The Company has technical method or procedures of voting both openly and secretly, which promotes independence and interest of shareholders.
5. The Company shall give equal (fair) treatment to Shareholders to be able to exercise their rights in accordance with prevailing provisions and regulations;

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6. In order to maintain clarity of accountability and independence, Shareholders are prohibited from intervening the Company's operational activities which are responsibility of the Board of Directors in accordance with provisions in the ABM regulations and the prevailing statutory regulations.
7. All members of the Board of Directors and members of the Board of Commissioners of Public Listed Companies shall be present at the Annual GMS.

B. Relationships with Customers, Suppliers, Partners and Creditors

1. ABM Members shall always build constructive open communication;
2. ABM Members shall always work hard to provide the best services through grievance resolution process effectively;
3. ABM Members shall always promote professional service standards with the proper quantity, timely, precise information and on target principles;
4. ABM Members shall always pay attention to and evaluate the needs and continuously monitor, improve services, through improvement of systemized work standards supported by adequate technologies;

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5. ABM Members shall always provide facilitated and quick access to information;
6. ABM Members shall not discriminate in providing services to customers, suppliers and/or partners by promoting proactive, friendly, empathetic attitudes and based on of decency values.
7. ABM Members will only employ suppliers, make business with customers and/or establish cooperation with partners who meet qualifications/standards as prescribed by ABM who are consistently able of meeting the expected quality standards, cost standards and professional standards;
8. Every customer, supplier, partner and/or creditor shall obey and comply with the prevailing statutory regulations and the additional requirements of ABM, particularly those pertaining to labor, environment, health and safety, intellectual property rights and unreasonable payments, when making purchases, procurement of goods or services that are required and when making cooperation.
9. ABM Members shall always promote the achievement of optimal outcomes in accordance with the applicable standards;

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10. ABM Members shall always build intensive communication with suppliers, customers, partners and creditors to find the best solution in the framework of performance improvement;
11. ABM Members shall always apply the same work ethic standards to every supplier, customer, partner and/or creditor and within the tolerance limits that are permitted by law;
12. ABM Members shall always support any functions performed by suppliers, customers, partners and/or creditors in relation to the Company's business process.

C. Relationship with the Government

1. ABM Members shall always comply with the prevailing statutory regulations pertaining to relationship with the Government;
2. ABM Members shall always build harmonious relationship with the Government;
3. ABM Members shall always be honest and transparent in dealing with all Government agencies and officials;

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4. Any reporting, statement, certification and application that is addressed to the Government shall be conducted transparently, clearly, accurately, completely and shall contain no ambiguity.

D. Partnership with the Surrounding Community

1. ABM Members shall always enforce the commitment that wherever the Company's working unit is in operation, good relationship with and development of the surrounding community is a fundamental basis for long-term success of the Company;
2. ABM Members shall always appreciate any partnership activities that contribute to the community and enhance social value and image of the Company;
3. ABM Members shall always cooperate with community organizations and agencies, to achieve mutual commitment on partnership programs based on mutual trust and in line with the openness principle;
4. ABM Members shall always develop and promote dialogue mechanisms with the surrounding institutions, in the hope of able to formulate a more rational and effective policy.

E. Company Representatives

Without prior approval of the Board of Directors, the ABM Member is prohibited from conducting interviews with media, speeches, publications, public appearances and statements and other matters relating to public/media in relation to business interest of ABM and/or ABM Group. The aforesaid actions may only be conducted by Directors or another parties appointed by the Board of Directors. All queries or questions relating to ABM and/or ABM Group must be submitted to the Corporate Secretary and/or another party appointed by the Board of Directors.

III.3. CODE OF CONDUCT ON WORK SAFETY HEALTH SAFETY AND ENVIRONMENT

A. Work Health and Safety

1. Work health and safety within ABM auspice is of the essence. ABM and ABM Members shall keep and maintain healthy and conducive work environment in supporting the productivity.
2. ABM Members are prohibited from selling, making, distributing, possessing illegal substances and drugs in the workplace.
3. ABM Members are strictly prohibited from drinking

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intoxicating liquors or alcoholic beverages during working, being on or near the Company's goods/properties.

4. ABM Members are prohibited from storing/using firearms or other dangerous weapons during the working hours in the workplace unless having obtained approval from the Board of Directors and constituting part of the work.

B. Environment

ABM Members are committed to make the best and optimal efforts in order to protect the environment and to direct management and to minimize the possible environmental damage and pollution in accordance with the prevailing statutory regulations.

III.4. CODE OF CONDUCT ON PROTECTION OF COMPANY ASSETS

A. Supervision and Use of Assets

1. ABM Members are responsible for maintaining the work environment, including ABM's assets and data, and ABM business transactions including from embezzlement and fraud and shall comply with the applicable provisions and regulations;

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2. ABM Members are prohibited from using ABM's assets other than for benefit of ABM. Any use of all assets of ABM shall be made effectively and efficiently to achieve the objectives of the Company;
3. ABM Members are obliged to report any indicated and actual frauds within the Company's environment early, to the Board of Directors or any parties appointed by the Board of Directors.

B. Confidentiality of Information

1. Information that is considered as confidential includes business plans and strategies of ABM and/or ABM Group relating to both finance, technologies, personnel and other data that are believed and deemed to be harmful to the Company including the Company's business plans and strategies, outcomes of research and development that are used in the Company's production processes, the Company's standards and operating procedures, internal documents signed by the competent authorities, intellectual property rights, information management system, business processes and management quality, data of active and non-active employees, business activities with business partners and ABM Group or

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other important information that may affect the Company's performance if disclosed outside ABM, unless such information have been published;

2. Every ABM Member is not allowed to disclose any data and information that are confidential in nature to any other party;
3. Every ABM Member is not allowed to use data and information that are deemed as Company confidentiality for certain interests and interest and for the interests of other third parties, except with approval of the Board of Directors or the appointed officer.
4. ABM Members and any third party are prohibited from taking information that is deemed as the Company confidentiality. All documents that have been made by them, shall become the property of the Company fully. Prior to leaving the Company, ABM Members are not allowed to carry any documents belonging to ABM Group and are required to sign a confidentiality statement and are not allowed to distribute any confidential information belonging to ABM Group;
5. ABM Members shall respect the proprietary information of other companies and require ABM

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Members to comply with all statutory regulations relating to the proprietary information matters;

6. ABM Members are allowed to collect information about other companies as long as such information are obtained from legitimate sources, such as mass media or press releases of the relevant companies;
7. Every ABM Member who is still in employment with ABM is strictly prohibited from collecting external information that are acquired unlawfully, such as spying, stealing information, or falsifying the identity.

C. Intellectual Property Rights (IPR)

1. ABM Members shall respect the intellectual property rights of other parties because any unauthorized use of intellectual property of other person may result in ABM sustaining legal claims for civil and compensation;
2. Every ABM Member shall actively participate in the protection of ABM's intellectual property rights;
3. ABM Members who participate/work in development of a process or product to be used by ABM, or ABM Members who possess the work result, shall treat the

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information relating to such process or product as belonging to ABM both during their employment and after the ABM Lineup have ceased from working for ABM;

4. Every ABM Member shall inform his/her work results both during or outside the working hours, if such work results relate with ABM's business or operation. ABM is entitled to all benefits (exclusive benefits) of patents, and other matters relating to the work results as referred to above;

D. Equal Employment Opportunity

1. Ability, qualification criteria (such as education, experience, competence and so on) and other criteria relating to job are the basis for all decisions related to the recruitment of prospective ABM Members;
2. Labor recruitment, training, promotion, dismissal, compensation and other reward or punishment criteria are given and/or stipulated fairly regardless the religious/belief background, race/ethnicity, personal relationship (friendship and kinship), skin color, nationality, gender (including pregnancy), sexual preference, age, disability, veteran status

or other characteristics that are protected by law;

3. ABM Members shall always create a work environment that is free from harassment, such as harassment against someone due to his/her religious /belief background, race/ethnicity, skin color, nationality, gender (including pregnancy), age, disability, veteran status or other characteristics that are protected by law;

III.5. CODE OF CONDUCT RELATED TO CONFLICT OF INTEREST AND GRATIFICATION

A. Conflict of Interest

1. Conflict of interest is a condition in which ABM Member is unable to perform his/her duties and responsibilities in making decisions objectively as the authority possessed by him/her in ABM. Such a condition may provide benefits him(herself, his/her family or other persons beyond ABM, which adversely affects ABM because ABM does not have the maximum choice or result;
2. ABM Members shall be obliged to prioritize the interests of ABM and/or ABM Group at every available opportunity;

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3. ABM Members shall always notify of its activities outside ABM or any other businesses or any relationships that may result in a conflict of interest with ABM (including business activities undertaken by their family members). ABM Members shall be obliged, immediately or when found any potential conflict of interest, to give all information of the same in written explanation to the superior, the Human Resources Department and/or the Corporate Secretary;
4. Any ABM Member who has conflict of interest is prohibited from participating in any discussion and decision-making processes pertaining to such conflict of interest transactions. Violation of this provision may result in annulment of the transaction by ABM at any time;
5. ABM members are not allowed to commit in abuse of ABM resources, name, address, connections, intellectual property rights, logos, times and facilities of ABM including office equipments such as telephones, facsimile, email, computer and soon;
6. ABM Member shall obtain written approval from the Board of Directors, the Board of Commissioners or

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the Human Resources Department (based on their position) before accepting position to be an officer in a Non-Governmental Organization, legal entity or other business entities;

7. ABM Member is prohibited from taking double position as political party management, candidate for officer or member in any executive, judicative or legislative body;
8. ABM Members shall make an annual statement of commitment relating to the aforesaid matters that will be managed by the Human Resources Department.

B. Giving and Receiving (Gratification)

1. Gratification is a gift in the broad sense, namely including the giving of money, goods, discounts, commissions, interest-free loans, travel tickets, lodging facilities, tour traveling, free medication, and other facilities that are received in the home country and abroad that is conducted using electronic means or without electronic means;
2. ABM Member is prohibited from giving or promising, either directly or indirectly, any prize or the like to parties having relation with the Company, in

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which such price is known or reasonably suspected as a bribe that is used to influence or induce those parties to do or omit from doing something within his/her position in contrary to his/her obligations;

3. ABM Member is prohibited from receiving any prize gifts or the like from or to any party, that is known and reasonably suspected that such a prize is given to induce him/her to do or omit from doing something within his/her position in contrary to his/her obligations;
4. ABM Member is prohibited from deducting or taking a part of amount of payment to third party in return for performance of his/her duties and obligations;
5. ABM Member may give donations/contributions related to ABM's responsibilities to the surrounding environment as long as such donations do not relate with political interests nor to influence ABM, after obtaining authorization from the Board of Directors;
6. If ABM Member receives Gratification from a third party and/or business partner, he/she is obliged to report it to the Board of Directors or another party appointed by ABM within 2 x 24 hours as of the receipt of such a Gratification. The Board of

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Directors or the appointed party will decide a proper treatment on such a Gratification;

7. In addition to those specified above, ABM Members shall immediately report any form of event invitation and/or Gratification which, in opinion of the ABM Member, does not fall within this article, to the Board of Directors or another party appointed by ABM for proper and timely follow-up. In relation to amount/value, form of Gratification, and event will be regulated later separately as in the attached format. (Appendix 1)

III.6. GENERAL CODE OF CONDUCT

A. Compliance

1. ABM Members shall, without exception, always obey, comply with and perform the prevailing laws and regulations and the articles of association of the Company.
2. ABM Members shall comply with ABM regulations and policies in carrying on their business activities in accordance with the articles of association of the Company.
3. ABM Members will cooperate fully with internal and

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external parties who carry out investigations based on legitimate authority.

4. ABM Members shall understand, respect and implement the ABM core values and the norms applicable in the community, so that all actions to be taken and decisions to be made are based on our responsibility to ABM and the public Community.

B. Equality of and Respect to Human Rights

ABM Members shall always promote principles and develop attitudes of respecting the human rights with all of ABM stakeholders;

C. Miscellaneous

1. None of provisions in this COEC are intended to rigidly bind the ABM Members in the framework of implementing the company's core values.
2. Provisions in Article III.5 above may be waived if obtaining approval in accordance with the Limit of Authority set by the company.

IV . IMPLEMENTATION GUIDE

IV . 1 . Violation Grievance

IV . 1 . a . Violation

Violation is an attitude, action or behavior that deviates from the COEC.

IV . 1 . b . Consultation and Grievance on Problems Relating to COEC

If an ABM Member finds that an decision or action is inconsistent with the code of ethic as specified in the COEC or the ABM Member is in doubt of an action or decision to take or the ABM Member feels have an idea what to do under certain circumstances, then, he/she must immediately notify or consult the same as soon as possible to his/her immediate superior.

If the ABM Member is unable to carry out any of the aforesaid things, he/she may discuss the matter with the following parties:

- 1 . Superior of his/her immediate superior;
- 2 . Human Resources (HR) Department;
- 3 . Legal Department;

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4. Member of the Board of Directors; or
5. Member of the Board of Commissioners.

Responsibility of every ABM Member pertains to his/her ability and willingness to report any action he/she believes to be a breach of the COEC.

IV.1.c. Whistleblowing System

1. ABM shall resolve any violation grievances raised by stakeholders (including ABM Members) and/or their representatives in relation to violation of COEC;
2. Violation grievance resolution is one of forms of stakeholder protection improvement in order to secure the rights of stakeholders related to ABM;
3. Violation grievance shall be submitted in writing to the Whistleblowing System Team that has been established by the Board of Commissioners;
4. ABM guarantees the confidentiality of identities of the reporting party and the data of Violation grievance;
5. Parties participating in the violation grievance have the rights to receive legal protection from ABM;

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6. Parties who have been meritorious in saving ABM by revealing cases that are materially and immaterially detrimental are entitled to award from ABM;
7. Detailed description and provisions on COEC violation grievance are specified in the ABM Whistleblowing Management Policy (whistleblowing policy) which includes among others:
 - a. Violation reporting mechanisms;
 - b. Policy on the reporter;
 - c. Wistleblowing system management structure;
 - d. Appointment of WBS manager;
 - e. Monitoring of program effectiveness and improvement; and
 - f. Rules of implementation.

IV.2. Reward and Punishment

IV.2.a. Reward

ABM may provide reward to parties it deemed as has provided a model in the COEC implementation.

IV.2.b. Punishments

Consequences of violation of the COEC are as follows:

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1. ABM Partners who are proven committed in a violation will be subjected to punishments in accordance with the Company regulation and decision;
2. If clearly proven to have committed in a violation of the COEC of ABM, any ABM Member of any level will be subjected to sanctions in accordance with the prevailing provision.
3. Any ABM member who is proven committed in a violation of the COEC (including giving false/slanderos report) may be subject to disciplinary actions in the forms of oral and written reprimands, strict warnings with suspension up to termination of employment as specified in the Company regulation;
4. If the existing condition involves a breach of law, such a case may be referred to the competent authority;

IV. 3. Socialization

Socialization is an important stage of COEC implementation. ABM is committed to conducting socialization effectively and comprehensively by paying attention to the following:

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1. Building commitment to all stakeholders related to ABM;
2. Socializing COEC in the orientation programs that are implemented by ABM and periodic refreshing for all of ABM Members;
3. Relating the implementation of ethics as an integral part of business practice and performance assessment of all ABM Members;
4. Developing COEC and, if necessary, able to elaborate it further in various policies and regulations of the Company;
5. Completing the Company regulation with punishment for violations and building a system to monitor the COEC implementation.

IV. 4 . Closing Remark

This COEC is Business Ethic and Work Ethic policy to be implemented by all of ABM Members. On reliance that there are still many weaknesses and shortcomings in this COEC, it is therefore still possible to be improved or evaluated in future as necessary.

V. DECLARATION OF COMMITMENT

DECLARATION OF COMMITMENT/LETTER OF UNDERTAKING OF ABM MEMBER

I, the undersigned, do hereby to declare:

1. I have read and understood contents of the Company's Code of Ethic and Conduct (COEC).
2. I will comply with the COEC in the effort of improving and maximizing the work results for the Company's advancement and undertake to accept consequences of my actions that conflict with the COEC.
3. I am not being and will not take double positionas:
 - a. Management board of political party and/or legislative, judicative or executive member, including to be regional head/ regional vice head (from the highest level to the lowest level of regional head, namely village head);
 - b. Director, Commissioner or corporate leader elsewhere, other than those already notified to and permitted by the Board of

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Directors, the Board of Commissioners and/or the Human Resources Department.

- 4 . I will always maintain high integrity and avoid any conflict of interest that affects the managerial function and operational supervision activity functions of the Company and/or ABM Group.
- 5 . I will always act and will be independent for the best interest of ABM and/or ABM Group without violating the COEC and other regulations prevailing in the company and the prevailing statutory regulations.

If I have any problems that potentially breach or constitute a violation of the COEC, I will notify the competent authority as regulated by the Company or the prevailing statutory regulations.

....., 20....

Name:

APPENDIX 1

AMOUNT OF GRATIFICATION AND EVENTS THAT MUST BE REPORTED

The gratification to be reported is gratification of any kind and any amount.

Gratification in amount of exceeding IDR 200.000,- or its equivalent in other currencies either in one or more occasions within 1 fiscal year shall be submitted to the Board of Directors or another party appointed by ABM for further decision.

Events that enroll or involve ABM Member with a party who has interest or will have interest in ABM and/or ABM Group and shall be reported include but not limited to the following:

- 1 . Charity events;
- 2 . Condolence event;
- 3 . Sport matches;
- 4 . Anniversary of company or individual;
- 5 . Entertainment;
- 6 . Work visit;
- 7 . Family celebration;
- 8 . Religious celebrations or religious festival days;

ABM Member shall ask for clarification on matters he/she deems not yet set forth above to the Board of Directors or a party appointed by ABM.