



## 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 |