

# Corporate Code of Conduct

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

Based on the Sarbanes-Oxley Act (SOX) 2002 section 406, Telkom has a code of ethics regulated in the Board of Directors Regulation No. PD.201.01/r.00/PS150/COP-B0400000/2014 regarding Business Ethics within the TelkomGroup and the Regulation of the Director of Human Capital Management No. PR.209.05/r.02/HK250/COP-A4000000/2024 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 that 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 the commitment of employees and management not to violate the integrity and code of ethics set. This Integrity Pact is stated in the 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 matters regarding:

**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.

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

Every Telkom employee who violates the code of ethics will potentially receive sanctions after going through an investigation process and various considerations. The following table presents Telkom's code of ethics, which regulates provisions related to sanctions 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 (SOX), 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 2024**

No.	Oncoming	Amount Reached
1.	E-learning	6,414/6,414
2.	Face to face (training, communication forum/workshop)	66/6,414
3.	Socialization material through the intranet portal	6,414/6,414

## REPORT ON RESULTS OF APPLICATION OF CODE OF CONDUCT

In 2024, Telkom will process as many as 21 cases of violations of the code of ethics and employee discipline involving 131 perpetrators. Of these, 16 cases have been decided while 5 other cases are still in process. The employees who have received the decision are as many as 104 perpetrators while 27 other perpetrators are still in process. This number shows a significant increase in case settlement compared to the previous year, where from 17 cases with 101 perpetrators there are still 14 cases involving 75 employees who are still in process. Therefore, Telkom continues to make various efforts to improve the quality of internal control to reduce the number of violations of the code of ethics in the future.