

PT AMYTHAS
PEDOMAN KEPATUHAN INTEGRITAS
Integrity Compliance Guidelines – ICG

Version 2.0

2018

INTEGRITY POLICY

- PT. AMYTHAS committed to conduct business in accordance with good ethics, values of honesty and integrity at every management level and at every stage of the business process.
- PT. AMYTHAS committed to obtain the consultancy assignment only through a correct and clean in accordance with the principles of good corporate governance.
- PT. AMYTHAS committed that in carrying out the consultancy assignment, PT. AMYTHAS will not tolerate in any forms of violation of the company's compliance program (corporate compliance program - CCP), nor violation to professional ethics, and fraudulence or misconduct in the execution of the contract.
- PT. AMYTHAS committed to ensure to all parties engage with the company in the accomplishment of the services to follow and adhere to the CCP applied.
- PT. AMYTHAS committed to facilitate to all parties related to the services accomplishment to report of any violations of the CCP for immediate follow-up.
- PT. AMYTHAS committed to establish in a conducive business environment in the consulting services sector, where are clean and can cooperate with the investigation agencies of corruption and / or collusion.

Jakarta, March 13, 2017

PT. AMYTHAS

Chief Commissioner

Commissioner

President Director

Operational Director

Finance Director

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PT AMYTHAS
PEDOMAN KEPATUHAN INTEGRITAS
Integrity Compliance Guidelines – ICG

In running a good business practice in today's complex business environment, PT AMYTHAS has taken steps to ensure that all parties act in a correct manner and in accordance with applicable laws.

One effective way, what is done by PT. AMYTHAS is applying the implement quality policy and integrity policy through the implementation of the Compliance Guidelines Integrity / Integrity Compliance Guidelines (ICG).

I. Prevention of Violation

I.1 The Purpose

The purpose of the application of the ICG for PT. AMYTHAS is to prevent and detect violations of company rules (fraud, corruption, collusion, coercion / blackmail) or a violation of law. With the ICG, all parties are expected to adhere to the policies and procedures established. If PT. AMYTHAS is aware of any violation of the policies / procedures of the company or the rule of law, then the management will investigate the matter and carry out corrective measures and conduct disciplinary action to prevent the recurrence of similar offenses in the future

I.2 Definition

a. Violation

is misconduct, improper, or unlawful motivated by the goal of deliberate or unintentional or with a lack of attention to the consequences of one's actions. Behavior that is not in accordance with the applicable standards or laws; professional negligence; which is regarded as immoral or unethical

b. Fraud

is defined as any act or omission, including a misnomer; that knowingly or recklessly mislead or attempt to mislead a party to obtain financial or other benefit or to avoid a particular obligation

c. Corruption

is the offering, giving, receiving or requested, directly or indirectly, anything of value to influence improperly the actions of others

d. Collusion

Is an agreement between two or more parties designed to achieve an improper purpose, including influencing improperly the actions of others

e. Coercion

is the act of damaging or harming, or threatening to impair or harm, directly or indirectly, to one party or the property of the party to influence improperly the actions of others.

f. Counterfeiting

is defined as actions designed to deceive or mislead intentionally or unintentionally provide false information or falsify a good description for a particular kepentikan or due to negligence, or pay attention to professional practice.

g. Gratuities

is defined as a prize in a broad sense (directly or indirectly), in kind or cash, and materials or electronic, which is given to a person for the privilege, advantage, which is intended to affect the ability of the recipient to act independently and objectively or to advantage of the giver

II. Principle of Integrity and Responsibility

II.1 Principle of Integrity

The Company in all its activities respects the spirit and the content of the Indonesia Law 28/1999 on the Implementation of a Clean and Free State of Corruption, Collusion and Nepotism (KKN) and Indonesia Law 20/2001 on Corruption Eradication, Limited Liability Company Law No. 40 of 2007 and Company Regulation 842 / AMT / DR / 2016 applicable at PT. AMYTHAS. The Company does not give or accept bribes, either directly or indirectly, or engaged in the practice of fraud, corruption, collusion and coercion / blackmail, and or other improper rewards aimed at companies or other advantages. The Company does not allow any employee to offer, give or receive a gift or payment is a bribe or able to be regarded as such.

Compliance with internal and external regulations serves to uphold the integrity of the company and its employees and other parties involved. This is achieved by setting up adequate legislation, raising awareness, detect violations as soon as possible, limit the consequences of losses due to violations, and encourage measures aimed to prevent losses in the future.

PT. AMYTHAS respects the law and want the employees and business partners to do the same. This policy will embrace some of the key principles that have adherence to and compliance with applicable laws.

a. Healthy competition

AMYTHAS truly committed to implement the principles of fair competition, especially for the observance and compliance with applicable laws.

b. Integrity in business practices

The practice of fraud, corruption, collusion and coercion / blackmail is not allowed.

c. Law enforcement

The provisions of all laws in the consulting business practices common concern.

d. Record-keeping and financial reporting

Recording and reporting of accurate and complete financial transparency. Supervision function must also be implemented to ensure that all transactions carried out the appropriate financial accounting system and must be made in full and correctly

e. Fair and respect the working conditions

All employees are expected to behave in a courteous, friendly, objective, fair and respectful to colleagues and third parties. Discrimination or harassment of any kind will not be tolerated.

f. Protecting intellectual property rights and respect for others

Confidential information should not be disclosed to third parties or made public. Employees must treat the intellectual property rights of other entities with the same reverence

- g. Separating personal interests with the interests of the company
All employees must always separate their personal interests with the interests of the company. Employee's relationship which is concerning business relationships with third parties must also be based on objectivity.

II.2 Responsibility

II.2.1. Leaderships

- a. BOC has agreed and recognize the need for all components of the company to ensure the integrity of the application so that the company can continue to contribute in business consulting services. Commissioners have the authority to define, enforce, monitor, evaluate and improve the implementation of the Integrity Compliance Guideline (ICG).
- b. The Board of Directors is responsible for ensuring the implementation of the ICG is applied properly in the company's operations
- c. The Board of Directors authorizes the Integrity Compliance Officer (ICO) as person in charge for monitoring, evaluating the implementation of the program, and identifying the necessary improvements and reporting to the Board of Directors annually

II.2.2. Individual Responsibility

- a. Every permanent employee non-permanent employee should be aware and obey the ICG and apply in their daily work activities
- b. Every permanent employee non-permanent employee will sign an integrity pact and will be updated every year
- c. Members of the consortium or sub-consultants also has to accept the presence of ICG as well as acknowledge and agree with the consequences of the implementation of the program

II.2.3. Compliance Function

To oversee and manage the implementation of the program of ICG in PT. AMYTHAS, has been appointed Responsible Compliance Program Integrity (Integrity Compliance Officer = ICO) which have autonomy and authority and sufficient resources to be able to plan, execute, monitor and report on the implementation of the ICG effectively.

III. Program Reviews

III.1. Program Initiation

These guidelines formulated a comprehensive review of all potential risks may arise based practice violation of international standards, professional ethics, code of ethics and regulations in order to establish a conducive business environment, clean and sustainable

III.2. Risk Assessment

The risk assessment is structured to establish comprehensive guidelines relating to the potential for fraud, corruption, collusion, extortion and / or other crimes that may occur in running a business that will be updated regularly and as needed to meet changing business circumstances and development consultancy services.

In consideration of the size of the business, the business sector, and the business location then a risk assessment is described in the following matrix :

Stage	Activity	Risk Events	Cause
I. Procurement of Goods and Services (Tender Process)	1. Pra-qualification	<ul style="list-style-type: none"> - Bidding arrangements with procurement committee - Propose / promise commitment in the form of money, goods, means or other - Organize / cooperate or pay a competitor to cancel PQ - Attempts to influence the committee in preparing the tender documents 	<ul style="list-style-type: none"> - Competition among bidders - Division of job packages with competitors - An increasingly difficult action requirement
	2. Proposal	<ul style="list-style-type: none"> - Give bad influence to procurement officer - Propose personnel who are incompetent or have bad behavior - Sending false proposals - Manipulation of company experience data - Manipulation of proposed personnel data - Obtain additional information from the committee - Offering incorrect charges - No requesting permission / confirmation of expert proposals - Cooperate with committees to complicate competitors - Working with the committee in appraisal of proposals - Slow down / speed up the appointment process 	<ul style="list-style-type: none"> - Unqualified qualification requirements - Selection of personnel without sufficient or insufficient reference - The time provided is not sufficient - Qualification, Competence and Experience are missing or insufficient - The experience of the proposed personnel is insufficient - Adjust cost proposals with the HPS committee - Have no supporting evidence of cost calculation - Not believe in your own ability - Less / does not meet the value of the proposal to be a winner - There is no certainty of appointment time
	3. Contract Making	<ul style="list-style-type: none"> - Payment of fee for client - Communication with the committee to determine the winner - Provide false documents on the underwriting process 	<ul style="list-style-type: none"> - Extortion by client - Cost of guarantee documents - The existence of collusion with the

Stage	Activity	Risk Events	Cause
		<ul style="list-style-type: none"> – Price validation 	<ul style="list-style-type: none"> committee in the mark up unit price
II. Project Implementation	1. Mobilization of Personnel	<ul style="list-style-type: none"> – No team consolidation meetings are held prior to mobilization – Mobilization of personnel is not the same as the proposal in the contract – Reimbursement of personnel without the employer's permission – Reduce the number of personnel – Lower qualified replacement personnel – Receive payments from contractors supervised in the form of money, goods, facilities and / or others – No Mobilizing Personnel As per the Contract – he number of personnel mobilized is not suitable as stated in the Contract 	<ul style="list-style-type: none"> – No attention to guidance in ICG – Affected to speed up the process – Performing recruitment of incorrect replacement Experts – The number of mobilized personnel is less – Collusion with employers
	2. Mobilization of materials	<ul style="list-style-type: none"> – Incorrect procurement of goods / materials – Sale and disposal of unused goods or materials 	<ul style="list-style-type: none"> – Procurement of goods / materials with quality that is not good / used – Incorrect in suppliers – Receive payment from suppliers in the form of money, goods, means or other – No good record keeping and monitoring
	3. Data Collection and Processing Process	<ul style="list-style-type: none"> – Data manipulation – Use of incorrect methodology 	<ul style="list-style-type: none"> – Data is personalized – False in analyzing data – False in interpreting expected job output
	4. Supervision Process / Workshop / Seminar / FGD	<ul style="list-style-type: none"> – Receive payments from contractors supervised in the form of money, goods, facilities and / or others 	<ul style="list-style-type: none"> – Influenced to speed up the monitoring process

Stage	Activity	Risk Events	Cause
		<ul style="list-style-type: none"> - Paying the honorarium of the participant / honorarium is not appropriate in the Contract RAB - Preparing the seminar / workshop / FGD accommodation is not in accordance with the specified 	<ul style="list-style-type: none"> - Reports are tailored to the requested contractor's request - No attention to guidance in ICG - Try to gain more profit without regard to rules
	5. Reporting	<ul style="list-style-type: none"> - Convey an incorrect report - Receive payments from contractors supervised in the form of money, goods, facilities and / or others 	<ul style="list-style-type: none"> - Report as per personal desires - Influenced to speed up the monitoring process
	6. Billing	<ul style="list-style-type: none"> - Claiming invoices for incorrect jobs - Creating an invalid supporting invoice document - Claiming unused charges - Claiming unused time - Paying clients to process bill payments 	<ul style="list-style-type: none"> - No validity of invoice validation - Extortion of clients - Use of client's job fund - Do not understand the procedure of payment - There is no validity of the completeness of the document invoice - Incomplete invoice support document - Incorrect cost allocation - Incorrect time allocation - Affects to speed up the payment process
	7. Handover of Works	<ul style="list-style-type: none"> - Provide fees to clients - Communication with clients to arrange the working handover that should not be completed.. - Giving money, goods, means or other to the client - Submitting goods purchase intems with conditions not good 	<ul style="list-style-type: none"> - Extortion by client - Collusion with employers - The condition of damaged goods is hidden
III. Company's Operational	1. Reception of employees	<ul style="list-style-type: none"> - False in selecting employees 	
	2. Financial Management	<ul style="list-style-type: none"> - Incorrect in presenting financial statements - No compliance with tax rules 	

Stage	Activity	Risk Events	Cause
		<ul style="list-style-type: none"> – There are no discount / rebate notes – Fake a current account – Paying salaries for non-existent personnel – Expenses for prizes, donations and sponsorship are not recorded 	
	3. Office Services	<ul style="list-style-type: none"> – Procurement of materials / goods not own property – Procurement of wrong goods – Incorrect use of vehicles, maintenance, fuel consumption and tolls – Submitting false insurance claims 	

The company's management monitors the implementation of the program, and also every review review compliance with the guidelines of this ICG was also conducted assessment of the adequacy and effectiveness in preventing, detecting, investigating and responding to all types of violations, including making improvements necessary documents for the completion of the program.

III.3. Marketing

- a. All employees are prohibited from offering or giving of gratuities, gifts, entertainment, travel expenses, hotel facilities, shopping vouchers or other forms in all activities.
- b. Making sure the company's management will only look for the task from the client in accordance with the capabilities and are committed to competing fairly.
- c. All employees are prohibited from communicating with procurement officers in addition to activities related to the bidding process conducted openly and publicly.
- d. All staff are prohibited from providing data that is not true, especially in the data of company's experience to all bidding document

III.4. Project Implementation (Technic)

- a. All employees are prohibited from offering or giving of gratuities, gifts, entertainment, travel expenses, hotel facilities, shopping vouchers or any other form in order to expedite the implementation of the project
- b. Management should ensure that a clause in the contract allows for the amendment of the contract. It is necessary to anticipate the conditions in which the contract can no longer be run entirely.
- c. Project Management Support (PMS) should ensure and clearly define the item costs in the contract, including the quantity, unit price, payment term and clearly distinguished between the "unit price" and "lump sum".
- d. Under no circumstances will not be allowed to use the cost of the contract that does not correspond to the actual implementation.
- e. Technic Manager make sure that the consultancy services provided does not have a conflict of interest, either with a previous job or the work being done, either by the company or by experts who carry out the project

- f. Make sure that the experts who are assigned not accept fees, gratuities, gifts from suppliers, sub-contractors, or contractors.
- g. Is prohibited from offering or giving money, goods, and other means to a client / work director responsible for overseeing the work

III.5. Administration

- a. All employees are prohibited from offering or giving of gratuities, gifts, entertainment, travel expenses, hotel facilities, shopping vouchers or other forms in all activities.
- b. Make sure the training document has been prepared effectively that is tailored to the needs, circumstances and responsibilities for all levels of employees and when required for business partners
- c. Chief of Administration make sure, new employees get recognition given at the ICG and training ISO 9001, OHSAS and SMK3 and updated in accordance with the revision and improvement of ICG document.
- d. Chief of Administration make sure to do refresher training to all employees who are there every once a year, and at the end of the training session all employees must sign an integrity pact renewal.
- e. Guidelines ICG is an integral part of the Integrity Policy, Quality Policy and Occupational Health and Safety, Quality Manual and the Company Regulations

III.6. Finance

- a. All employees are prohibited from offering or giving of gratuities, gifts, entertainment, travel expenses, hotel facilities, shopping vouchers or other forms in all activities.
- b. Chief of Finance make sure the implementation of the company's financial system run in accordance with the Standard Operations Procedures (SOPs) Financial System established
- c. Chief of Finance make sure all expenses incurred for the gift, entertainment, charity and sponsor purposes are recorded in separate posts

III.7. Information and Human Resources

- a. All employees are prohibited from offering or giving of gratuities, gifts, entertainment, travel expenses, hotel facilities, shopping vouchers or other forms in all activities.
- b. Be sure to do the selection process experts and project support personnel, the selection can be done at the beginning of the contract or proposal submission stage
- c. Manager Information make sure that the ICP program socialized before experts were mobilized to the field
- d. Manager Information make sure every expert who mobilized expressed willingness to implement the ICP in the form of a statement of fact integrity
- e. Manager Information make sure there are ICP guidelines in hardcopy and softcopy for potential partners or clients of the company which can be downloaded from the web company.
- f. Spread to public about the ICP program applied and statements and annual reports are made.

III.8. Billing (Financial Planning)

- a. All employees are prohibited from offering or giving of gratuities, gifts, entertainment, travel expenses, hotel facilities, shopping vouchers or other forms in all activities.
- b. Make sure that the invoice document is prepared in accordance with the Operating Standards and Procedures (SOP) Billing Process predetermined
- c. Head of Financial Planning make sure that the personnel involved in the project implementation is in accordance with the assignment of the contract and have the authority to make the expenses of the contract and has signed an integrity pact related validity of supporting documents which claimed
- d. Head of Financial Planning make sure that all cost items claimed to have been in accordance with the type of item cost and terms and conditions apply
- e. Head of Financial Planning make sure that the invoice document has been through internal verification process prior to formal submission to the client
- f. All staff is prohibited from offering or giving money, goods, and other means to the client in all activities

III.9. Secretariat

- a. All employees are prohibited from offering or giving of gratuities, gifts, entertainment, travel expenses, hotel facilities, shopping vouchers or other forms in all activities.

III.10. Office Services

- a. All employees are prohibited from offering or giving of gratuities, gifts, entertainment, travel expenses, hotel facilities, shopping vouchers or other forms in all activities.
- b. Make sure the procurement of goods / services is compatible with the terms of the contract.

III.11. Program Review and Improvement of Guidelines

- a. In order to make sure the implementation of integrity guidance to work effectively, the periodic monitoring and the suggestion and feedback's collection is done for improving the document.
- b. The ICO is responsible periodically in monitoring together with the responsible Director for doing the periodic review of ICG guidelines at least once a year.
- c. The objectives of the periodic review are: (i) to maintain the guidance updates and adjusting to the latest situation of risks and the possibility of happened violations, (ii) strengthen the integrity guidelines in the area where violations are frequently happened.
- d. The guidance improvements will be done in the meetings which are attended by: (i) ICO as the lead auditor (ii) Board of Directors as an executive of the company (iii) shareholder representatives.

IV. Internal Policy

This internal policy is a practical and effective program which clearly articulates values, policies and procedures that will be used to prevent, detect, investigate and fix any violations in all the activities under the control of the company.

IV.1. Employee Feasibility Test with Experts and Supporter's Employee

Doing a complete inspection to employees. The inspection that will be done to the employees with any authorities, including member of management and directors, it is done to determine whether they have been involved in any act that violate ICG's policy.

- a. The Company's management and the other Key's Personnel
 - In the administration selection of employee's enrollment, employees should attach a letter / work's references of previous companies and employees should write their name, address and telephone number of their direct supervisor or number from a person in the section of the institution which responsible for Human Resources.
 - Before doing the interview with a candidate of permanent employees, a tracking of record at least 1 (one) recent work references from the candidate of permanent employees will be done over the phone, or face to face meetings with the candidate's previous supervisor in order to see the reputation of the candidate and find any possibility of a record of ethical violations or the other violations.
 - In recruiting management positions (directors, managers, assistant managers), the candidates must attend an interview session, which will be attended by Integrity Compliance Officer, representatives of the Board of Directors and shareholders, in order to evaluate the candidate's working competence, moral integrity and their perceptions about the enforcement of ICG's policy. The decision to recruit prospective employees is stipulated by the Board of Directors.
 - The Candidate of employees must participate in the introduction sessions / training on guidelines of ICG, the ISO quality management, occupational health and safety management OHSAS and SMK3 and in the end of the session, candidates must sign in an integrity pact
 - The available permanent employees must attend a socialization session of integrity guidelines and refresher training in the next year, also at the end of the session, employees must sign in an integrity pact
- b. Non-Permanent Employee (Experts and Project Supports)
 - In the administration selection of employee's enrollment, employees should attach a letter / work's references of previous companies and employees should write their name, address and telephone number of their direct supervisor or number from a person in the section of the institution which responsible for Human Resources.
 - Before recruiting experts and support personnels, a tracking of record at least 1 (one) recent work references from the candidate of permanent employees will be done over the phone, or face to face meetings with the candidate's previous supervisor in order to see the reputation of the candidate and find any possibility of a record of ethical violations or the other violations. The previous works will be

seen in order to make sure that the candidates have the competency and relevant experience.

- At the time of signing the contract, experts and project support personnels must sign in an integrity pact
- The available experts and project supports should attend a socialization session of integrity guidelines and refresher training in the next year, also at the end of the session, they must sign in an integrity pact.

IV.2. Limiting the hiring of former public officials.

- a. If experts and supporters of the project which will going to be recruited are a former of civil servants / pensioners, then it must be confirmed that the person has been retired from their previous jobs for at least 1 (one) year, and in any case they will not be assigned or associated with the project or a service in institutions / latest workplace.
- b. Does not hiring or doing any other relationship with former public officials, by entities and persons related or associated with the former officials, after they resign or retire, and the jobs are directly related to the function of which is owned or controlled by a public officials during the period of their positions or functions where they still have an impact.

IV.3. Gifts, accommodation, entertainment, travel and shopping

Determine controls and procedures involving gifts, accommodation, entertainment, travel or the other expenditure to make sure that those expenditures are fair, which does not affect the outcome of business transactions, or result in inappropriate advantage.

- a. Management, employees, experts and project supporters are prohibited from offering or giving tip, gifts, entertainment, travel expenses, hotel facilities, shopping vouchers or in the other forms as said in article IV.3 point b.
- b. Gifts should only be given in the context of reasonable social relationships on certain things such as: (i) an invitation to attend the wedding party, (ii) the mourning ceremony attendance, (iii) hospital visits, and (iv) certain other conditions. In any condition, the cost of the gifts, bouquets, fruits, parcel and the similar things prices for each condition must not surpass: a maximum prize of Rp. 1.000.000, -, maximum entertainment Rp. 5.000.000, -, maximum shopping Rp. 1.000.000, -
- c. If the condition of emergency can not be avoided, It is allowed to provide assistance travel expenses for clients or directors such as work transportation allowance, buying tickets, as well as the cost of accommodation
In the official travel / site visit which can not be avoided, will be done with the client or directors of jobs, and also provide meal services.
All of the expenses for this kind of condition, should be reported separately at the time of reimbursement of the cost of the finance department of the company and ICO.

IV.4. Political Contribution

- a. PT AMYTHAS is an independent company and has no ties with any particular political party

- b. In any condition, the company will not taking a part into a political contribution or donation on behalf of the company, whether it is a direct action to political parties, political person or through non-governmental organizations / LSM that are known for their affiliation with a particular political party.
- c. A political activity of employees is a private matter which in any case can not be associated or correlated with the corporate entity.
- d. The management, employees and experts are prohibited for using political influence for the purpose of marketing of the company whether it is direct or indirect actions.

IV.5. Charity & sponsorship donations

- a. Each request of a charity donations from any foundation or institution will be reviewed by the management and ICO, the final decision will be taken by the Director and if it is accepted, the donation should be limited purely for charity donations with a social purpose and it is not related to the company's business. ICO ensures the donation receiver is correct.
- b. The request of sponsor of any foundations, professional associations or institutions will be reviewed by the management. The final decision will be taken by the Director, if it is decided to provide sponsorship, it will be given only for matters related to improving the competence of experts or development of services which related to the services company's environment. ICO ensures the sponsor receiver is correct.
- c. The promotion of company is only done in the following way:
 - The notice should be sent by mail to the person, company or organization related to the companies' services environment.
 - Coverage or information in a professional magazine
 - Giving brochure / company profile on the perspective of potential clients
- d. Promotional company materials - if any - is limited only to a company brochure, a desk or wall calendar, or simple and cheap office stationery such as (pen, USB, and the like).
- e. Expenses and charity donations or sponsorship will be separated by the finance department and if possible, the number and names of the one who receive the donations and sponsors will be tracked. ICO verify donations / sponsorship is the right party.

IV.6. Facilitating payments

- a. Management, employees, experts and supporters of banned projects to facilitate payments to government officials, representatives of the client and or relatives
- b. Facilitate the payment of such activities: provide ticketing, accommodation, local transportation, entertainment and other facilitation for the benefit of government officials, representatives of the client and or family
- c. In certain circumstances the conditions for socio-cultural reasons, can facilitate the payment of official meal or a client during a field trip together. Costs incurred for the activities under this condition will be reported separately in the company's financial
- d. The management, employees, experts and supporters of projects are not allowed to facilitate payments for government officials, representatives of the client and or

relatives to speed up the process, licensing and documents finalize that is the duty of public officials.

IV.7. Record keeping

- a. Record storage of ICG is in line with the implementation of ISO in the company, will be saved well and the record can be traced.
- b. Finance and accounting firms should also recording the track in a separate post of the spent costs for the purposes of gifts, entertainment, charity and sponsor as mentioned in article VI.3 and 6.
- c. The record that saved is consisted of the purpose, number of data, date of purchase / payment, person who buys, an individual or organization from spending who buys from of the company's fee, and the name and position of the person who has authorized in the expenditure

IV.8. Fraud, collusion and coercion / extortion

- a. The management, employees, experts and project supporters are prohibited from doing the fraud practices, collusion and coercion and other action that can be considered as a violation of ethics
- b. The Management, employees, experts and project supporters are prohibited from receiving or obtaining the benefits that promised by a second or third party for their work, whether it is direct or indirect action.
- c. The Management, employees, experts and project supports are required to report all forms of fraud, collusion, coercion and other ethical violations to the ICO

V. Partners

When choosing a partner both in terms of the tender or the other matters, it need to be considered and selected the right partner who has a good reputation and ready to implement the policies to prevent, detect corruption, collusion and other violences.

V.1. Feasibility test of Partners

- a. The filtering process / feasibility test for business partner is done by management and ICO before the cooperation start.
- b. Avoid the cooperation with the contractor, suppliers and other partners who are known to have a bad reputation or does not want to implement policies which aims to prevent, detect and corruption, collusion and other abuses

V.2. Informing Partners About Corporate Integrity Program

- a. Before creating a consortium agreement or sub-consultancy, A company's management will explain the guidelines for the company's integrity, including the integrity of policy to partners
- b. The willingness of the partners to apply these principles with the same integrity during the cooperation with PT. AMYTHAS is a pre-requirements of cooperation or sub-consultancy. This willingness surely will be set out in the consortium agreement or sub-consultancy

V.3. Reciprocal commitments

- a. When the prospective partners or sub-consultancy also have their own guidelines of their own integrity, PT. AMYTHAS also accept the application of the integrity

- guidelines to completing each other. This principle applies for both PT. AMYTHAS who appear as a Lead Firm or a member of a consortium or as a sub-consultancy.
- b. Guidelines for integrity documents of partners will be reviewed by ICO and signed by the Director.
- V.4. Appropriate Documentation
- a. The company will save the record exactly to the documentation of an involvement with the other entities in taking the project, such as the consortium statement / sub consultancy, consortium / sub-consultancy agreement, as well as the selection process of potential business partners.
 - b. Documents are stored and maintained with the appropriate rules defined in ISO quality manual.
- V.5. Appropriate remuneration
- a. In general, an experts and supporters of the project who works under a contract of PT. AMYTHAS will receive 40% - 60% (forty percent – sixty percent) from the level of remuneration applied and it will also be adjusted to the position of assignment and work experience, including taxes and benefits given.
 - b. In the case of consortium / cooperation operations, business partners are expected to apply the same rate range.
 - c. All remuneration payments must be done by bank transfer
- V.6. Monitoring / Surveillance
- a. In the consortium / cooperation, both PT. AMYTHAS as Lead Firm or its members, the Company will chose a Project Management Support act to as a representative company to a consortium that will carry out the monitoring / supervision of project implementation.
 - b. In the case of a sub consultancy, PT. AMYTHAS will assign a Project Management Support which is also responsible for monitoring / observing the sub-consultancy's performance in doing their works.
 - c. Project Management Supports must report to the Board of Directors for any suspicious matter or violences of the contract implementation guidelines for the integrity of money that previously had been agreed.

VI. Internal Control

VI.1. Finance

- a. PT. AMYTHAS establish, implement and maintain Standards of Operations and Procedures (SOP) Financial System which equipped with an effective internal control on financial reporting, accounting systems and recording of transactions.
- b. PT. AMYTHAS' financial system will be audited every one year by an independent auditor to provide an objective assurance on the financial system and implemented according to the regulations.
- c. Members of the consortium or sub-contractor must have a clear cooperation agreement, and they guarantee and also allow the project's financial records to open for further external audit. The same with the members of the consortium or sub-contractors who do the same thing to PT. AMYTHAS

VI.2. Contractual obligations

- a. In the case of PT. AMYTHAS becoming a member of a consortium or as a sub-contractor, should be clause clearly pointed rights in the agreement of PT. AMYTHAS to withdraw from the consortium or sub-jobs for a violences of PT. AMYTHAS against integrity guidelines. If this happens, it is necessary to take the right steps to protect the sustainability of the project and the matters and right of PT. AMYTHAS.
- b. Otherwise, in the case of PT. AMYTHAS it is applied as Lead Firm of consortium or as the main contractor, should be clearly pointed out the rights clause in the agreement of PT. AMYTHAS in order to remove members of the consortium or sub-contractor if it violates the integrity guideline of PT. AMYTHAS.
- c. Employment contract agreement of permanent employees or non-permanent employees, will set out the requirement that all employees to obey the guidelines of company integrity. Any proven violation of ICG will result in the jobtermination (PHK).
- d. In each case of the article VI.2 items a, b, c there is a violences of contract which is done by both parties, (companies, employees, experts and supporters of the project) will endure all of its risks and PT. AMYTHAS will not involved in the nextviolence consequences after the contract is terminated.
- e. In each case the article VI.2 items a, b, c, company, employees, experts and supporters of the project will be recorded in the Black List of Companies

VI.3. Process of Decision Making

- a. The decision to create a consortium or the involvement of any sub-contractors will be done at the level of the Board of Directors, after going through the filtering process of potential partners profiles
- b. The written reportsresults of the risk analysis which done by the consortium's Board of Directors will be recorded along with the statement of the consortium and the consortium contract agreement
- c. The decision to involve experts and supporting staff of the project can be decided directly by the Project Management Support (PMS). The selection can be done at the beginning of the contract or proposal submission stage.
- d. The decision taking in giving warnings or sanctions is applied gradually by considering the violence that has been done, the transaction value of large / small risks arising for PT. AMYTHAS.

VII. Training and Communication

- VII.1. The socialization program of ICG must be given to each of new employees. The introduction of ICG will be given during the training of ISO 9001, OHSAS and SMK3 company and updated according to the revision and improvement of document in ICG
- VII.2. Refresher training program for all employees should be done every year, at the end of the training session, all employees must sign in an integrity pact renewal.
- VII.3. ICP socialization program will be given to all business partners and will be provided a guidance of ICP company in a hardcopy and softcopy form, for the potential partners or clients of the company which can be downloaded from the company's website.
- VII.4. Guidelines of ICG is an integral part of the Integrity Policy, Quality Policy and Occupational Health and Safety, Quality Manual and the Company Regulations

VIII. Incentives

VIII.1. Positive incentives

- a. The implementation of effective ICG of the necessary support from all of employees of PT. AMYTHAS, therefore, to make sure that everyone gets a sense of being watched by others and to growing up a sense of concern on the implementation of the ICG will be set as the common goal, all employees are required to report any suspected violations of the ICG.
- b. Anonymous reports are delivered in ICO's email will be followed by Integrity Compliance Officer (ICO). Only valid and proven reports that can be identified will get a credit in the evaluation of employee performance.

VIII.2. Disciplinary action

- a. Each ICG violations that proved for members of the consortium or by sub-contract will lead to termination of contract
- b. If the violences is proven for the company leader of the consortium, in terms PT. AMYTHAS as a member of a consortium or sub-contract, then the PT. AMYTHAS will officially withdraw from the contract of agreement and release the portion of the work of PT. AMYTHAS to the remaining parties in the contract.
- c. Any proved ICG violations (whether it is permanent employees, including management and directors or experts and supporters of the project) will be punished in working termination (PHK).
- d. The name and the parties who found guilty for doing the violences, the points a.b.c above will be included in the Black List of Companies
- e. Serious violations is a criminal act or violation of the applicable law will be reported to the appropriate authority

IX. Reporting

IX.1. Obligation To Report

- a. After the socialization of this ICG's guidelines, all employees of PT. AMYTHAS have a duty and must report to the ICO for any violations of the ICG's report on an anonymous or identified form.
- b. In terms of project experts and supports who found ICG's guideline violations that done by permanent employees of the company, the experts and the project supports has the obligation to report such violations to the ICO's email.
- c. To protect the reporter of violations, the ICO and the company will guarantee the secrecy of reporter and they will not face any retaliation or vengeance from offenders or from the company.

IX.2. Advice

- a. The management of PT. AMYTHAS through Integrity Compliance Officer collect all suggestions submitted by each employee, experts and supports who have a contract with PT. AMYTHAS, members of the consortium or sub-contractor of PT. AMYTHAS as well as the other competent parties.

- b. If there any doubts and questions about ICG, it can be submitted by telephone 021-7654034 or dropbox or via email ico@amythas.com
- c. The management of PT. AMYTHAS will take an appropriate remedial action against the suggestions given.

IX.3. Whistleblowing/Hotline

- a. All those who know and understand about the ICG of PT. AMYTHAS is required to provide information about any violations that done by the Directors, Managers, Staff, Specialists and Support Project, members of the consortium or sub-contractor of PT. AMYTHAS.
- b. Information provided includes the time, date, place, subject, character of the violences or the alleged offense of violance, can be submitted via reports without names or with the reporter's identity. If possible the evidence of violences can be attached to the email so that it will effectively help ICO to do the follow up.
- c. Information can be submitted into with the ICO's dropbox sealed envelope or by email to ico@amythas.com / ico,amythas@gmail.com or by telephone 021-7654034
- d. Responses which taken to the next follow up will be given to reports that show the identity and the address' of the perpetrators.
- e. The company and management will provide a protection to reporters who work under their supervisor pressure, also for the reporters of the members of the consortium or sub-contractor PT. AMYTHAS.

IX.4. Periodic certification

- a. ICO is required to conduct an annual review of the implementation of the ICG, by involving all employees to evaluate and make sure that all employees (including directors) have obeying their obligations in the implementation of the ICG and expressed in written text.
- b. The annual compliance certification is done on an annual ICG refresher training sessions with the signing of an integrity pact update.

X. Recovery

X.1. Investigation procedures

- a. Within 5 (five) working days ICO will be registering any reports, subjects of violation of the ICG and make plans for the necessary investigation
- b. Depending on the character of the incident, enough evidence, and location of the offense in whistleblower reports, ICO will finish it within 1 (one) month.
- c. Based on the results of the investigation, the ICO will prepare a brief written report and give recommendations for further action submitted to the Board of Commissioners or Board of Directors are forwarded to the commissioner, according to the type of case.
- d. After the proceedings, the implementation of the follow-up recommendation should be made with the approval of Commissioner or the main Director, in accordance with the type of case

- e. Required notices to the parties who become the subject of warnings or sanctions for ICG's violations is done by ICO must be in writing and received well by the parties who become the subject to warnings or sanctions

X.2. Response

- a. Depending on the level of the violation, the response can be given a written warning to the working termination (PHK).
- b. Parties who receive a warning or reprimand, must make a written statement of the corrective actions taken and efforts to prevent similar violations in the future.
- c. To those who get a warning or a second warning, then the Company will terminate the contractual relationship, or in the case of permanent employees will be asked to voluntarily resign or retire early.
- d. in terms of the implementation of the Termination of Employment, it will be conducted in accordance with the rules and regulations applicable

XI. Collective Step

- XI.1. PT. AMYTHAS is open up to cooperate with UKMCompany / other entities that hasBusiness matter to share integrity guidance in both the preparation and executive stages.
- XI.2. PT. AMYTHAS also set ICO or Other employees of PT. AMYTHAS to master integrity guidelines as a free resource that will work voluntary for each workshop or seminar in program integrity and ICG for a company of consultants from Indonesia
- XI.3. These guidelines are the campaign of PT. AMYTHAS in implementation of integrity and corporate governance are correct and clean for other companies in the association of consultants, association profession, or other community organizations to create a conducive business environment which is free from corruption

ICG's Guidelines 2017 was created as a refinement of guidebooks Company Compliance Program which is effective from the date of enactment, and will be revised later in the day when there are corrections or improvements.

Set in Jakarta, on March, 2018