



ANTI-BRIBERY & ANTI-CORRUPTION POLICY

At PT. ODG Indonesia, we are committed to conducting our business with integrity, transparency, and in compliance with all applicable laws and regulations. As part of this commitment, we adopt a zero-tolerance approach to bribery and corruption in any form. This Anti-Bribery & Anti-Corruption Policy outlines our standards and procedures to prevent bribery and corruption ensure compliance with the requirements of ISO 37001:2016.

Therefore, PT ODG Indonesia is dedicated and committed to building a trustworthy business through these principles:

- 1. Zero Tolerance: PT. ODG Indonesia prohibits bribery and corruption in all its forms and will not tolerate any form of bribery, whether directly or through third parties.
- 2. **Compliance with Laws**: We will comply with all applicable anti-bribery laws and regulations, including but not limited to the ISO 37001:2016 standard.
- 3. **Risk Assessment**: We will conduct periodic risk assessments to identify and mitigate bribery & corruption risks associated with our operations and business relationships.
- 4. **Due Diligence**: We will conduct due diligence on third parties, including agents, contractors, and business partners, to ensure they adhere to our anti-bribery standards.
- 5. Training and Awareness: We will provide training and raise awareness among our employees and relevant third parties about anti-bribery & anti-corruption laws, policies, and procedures.
- 6. **Reporting and Investigation**: We encourage employees to report any suspected or actual incidents of bribery or corruption promptly and without fear of retaliation. All reports will be thoroughly investigated, and appropriate action will be taken.
- 7. **Monitoring and Review**: We will regularly monitor and review the effectiveness of our anti-bribery policies and procedures and make improvements as necessary.

Violations of this policy will result in disciplinary action, up to and including termination of employment or contractual relationship. Violations may also result in civil or criminal penalties for individuals and the company.

This policy applies to all directors, officers, employees, contractors, consultants, and agents of PT ODG Indonesia, including all subsidiaries and affiliates.

This policy is subject to periodic review and may be updated as necessary to ensure its effectiveness and compliance with applicable laws and regulations.

Chris Evans

President Director

Anggara K. Suryawan

Commissioner

Date of Endorsement: 1st Mar 2024 | Date of Policy Review: 28th Feb 2027









