



PT HARTADINATA ABADI, Tbk  
• JEWELLERY MANUFACTURER •

**PT HARTADINATA ABADI, TBK**

**Nomor 01/DIR-KOM/HA-WBS/IV/23**



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**ABOUT**

**WHISTLEBLOWING SYSTEM POLICY**

***(Whistleblowing System)***



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## I. GENERAL

For the sake of creating Good Corporate Governance (GCG) consistently, PT Hartadinata Abadi, Tbk has the desire and commitment to implement the Code of Conduct within the Company. Creating an optimal work environment and performance with various supporting factors including upholding ethics is a guideline in doing business and in living life in the daily work environment.

It is expected that with the Code of Conduct above, all personnel of PT Hartadinata Abadi, Tbk can carry out their duties and functions responsibly and professionally. If in the application of the Code of Conduct there are violations and / or fraud, PT Hartadinata Abadi, Tbk will not tolerate because it will damage the reputation of PT Hartadinata Abadi, Tbk

Whistleblowing System is a reporting mechanism, more clearly that the Whistleblowing System is a reporting system if there is a violation and / or fraud committed by PT Hartadinata Abadi, Tbk personnel, it allows every employee of PT Hartadinata Abadi, Tbk who sees or knows to submit a clear report of violations and / or fraud committed by PT Hartadinata Abadi, Tbk personnel as long as it can be proven.

By prioritizing the principle of Transparency, the Company expects a good corporate governance system, one of which is by creating a Whistleblowing System, violations or fraud committed by PT Hartadinata Abadi, Tbk personnel against the Company can be overcome. To monitor this, management needs other parties to contribute to the achievement of this goal. Not only Internal Parties (Company Employees) but External Parties (Society) are allowed to report whenever there is a violation or fraud of PT Hartadinata Abadi, Tbk. External Parties are allowed to report due to the possibility of violations by Company personnel planned outside the company environment, so to prevent



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or report such actions, External Parties are given access to the Whistleblowing System.

PT Hartadinata Abadi, Tbk will process and follow up every report received if the violation in question is a violation, applicable legal regulations and provisions and has an impact on the company's losses which are accompanied by strong evidence and do not aim to bring down or slander the reported person.

PT Hartadinata Abadi, Tbk will guarantee the confidentiality of the whistleblower's identity and will also provide protection for the whistleblower so that PT Hartadinata Abadi, Tbk personnel dare to submit reports of violations and/or fraud.

The management expects that with the whistleblowing system policy, all personnel of PT Hartadinata Abadi, Tbk will be more aware to be able to work professionally in carrying out their duties without having to commit fraud or violate the law.

## **II. LEGAL BASIS**

- a. Law of the Republic of Indonesia No. 40 of 2007 concerning Limited Liability Companies;
- b. Law of the Republic of Indonesia No. 40 of 2011 concerning the Financial Services Authority;
- c. Financial Services Authority Regulation No. 1/POJK.07/2013 concerning Consumer Protection in the Financial Services Sector jo. Financial Services Authority Regulation No. 18/POJK.07/2018 concerning Consumer Complaint Services in the Financial Services Sector;



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- d. Government Regulation Number 57 of 2003 concerning Special Protection Procedures for Whistleblowers and Witnesses of Money Laundering Crimes.
- e. Law Number 13 of 2006 concerning the Protection of Witnesses and Victims.
- f. The Company's Articles of Association, which have been amended several times;
- g. Good Corporate Governance Guidelines;
- h. Board Manual;
- i. Code of Conduct
- j. Company Regulations.

### **III. TYPES OF VIOLATIONS OR ACTS INDICATING VIOLATIONS THAT CAN BE REPORTED**

Acts that can be considered inconsistent with the Code of Conduct and/or violate the law are, including but not limited to:

- a. Corruption, Corruption and Nepotism (KKN);
- b. Fraud;
- c. Acts violating applicable laws and regulations including but not limited to the use of violence against employees or leaders, extortion, harassment, drug use and other criminal acts;
- d. Violation of company ethics that has been regulated in the Code of Business Ethics and Work Ethics (Code of Conduct) of PT Hartadinata Abadi, Tbk or generally applicable norms of politeness;
- e. Violations that endanger the security, safety and occupational health of the company or other personnel of PT Hartadinata Abadi, Tbk
- f. Violation of the company's Standard Operational Procedure (SOP), including but not limited to reinsurance business acceptance procedures, claims, procurement of goods and services and other procedures.



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#### IV. REPORTING AND ANALYSIS PROCEDURES

Reporters who know of actions that have indications of violations or fraud that occur in the company can submit reports of violations or fraud. The reporter can submit their report through:

- a. In writing in a sealed envelope with writing on the envelope "confidential" addressed to the President Director;
- b. By phone number: 022-5402326
- c. By Email to: [corsec@hartadinataabadi.co.id](mailto:corsec@hartadinataabadi.co.id)

By including a description of the following:

- a. Identity of the complainant;
- b. Place and time of occurrence;
- c. Personal data reported; and
- d. Evidence supporting the report.

Reporters who submit violation reports with the means specified as mentioned above can obtain progress information on the handling of follow-up on violation information submitted in the WBS.

The Company will provide legal protection in accordance with the provisions of applicable laws and regulations. The Company will protect the whistleblower by keeping the whistleblower's identity confidential. In the event that the whistleblower is known to be him, the Company provides protection within the scope of work and in the Company's operational area.

In the event that the whistleblower does not submit a complete report and/or lacks supporting evidence, the official responsible for managing the whistleblowing system report has the right to request complete information from the reporter.



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If the report is complete and meets the requirements, the officer responsible will carry out further processing of the incoming report by searching for complete information, conducting research, analysis and review of the incoming report.

The authority may summon the whistleblower and other witnesses (if any) to ensure and verify that the whistleblower is really aware of any violations or fraud committed by the reported person.

Furthermore, the authorized official summons the reported person to conduct interrogation to obtain certainty of the occurrence of violations or fraud and obtain background on the causes of violations or fraud.

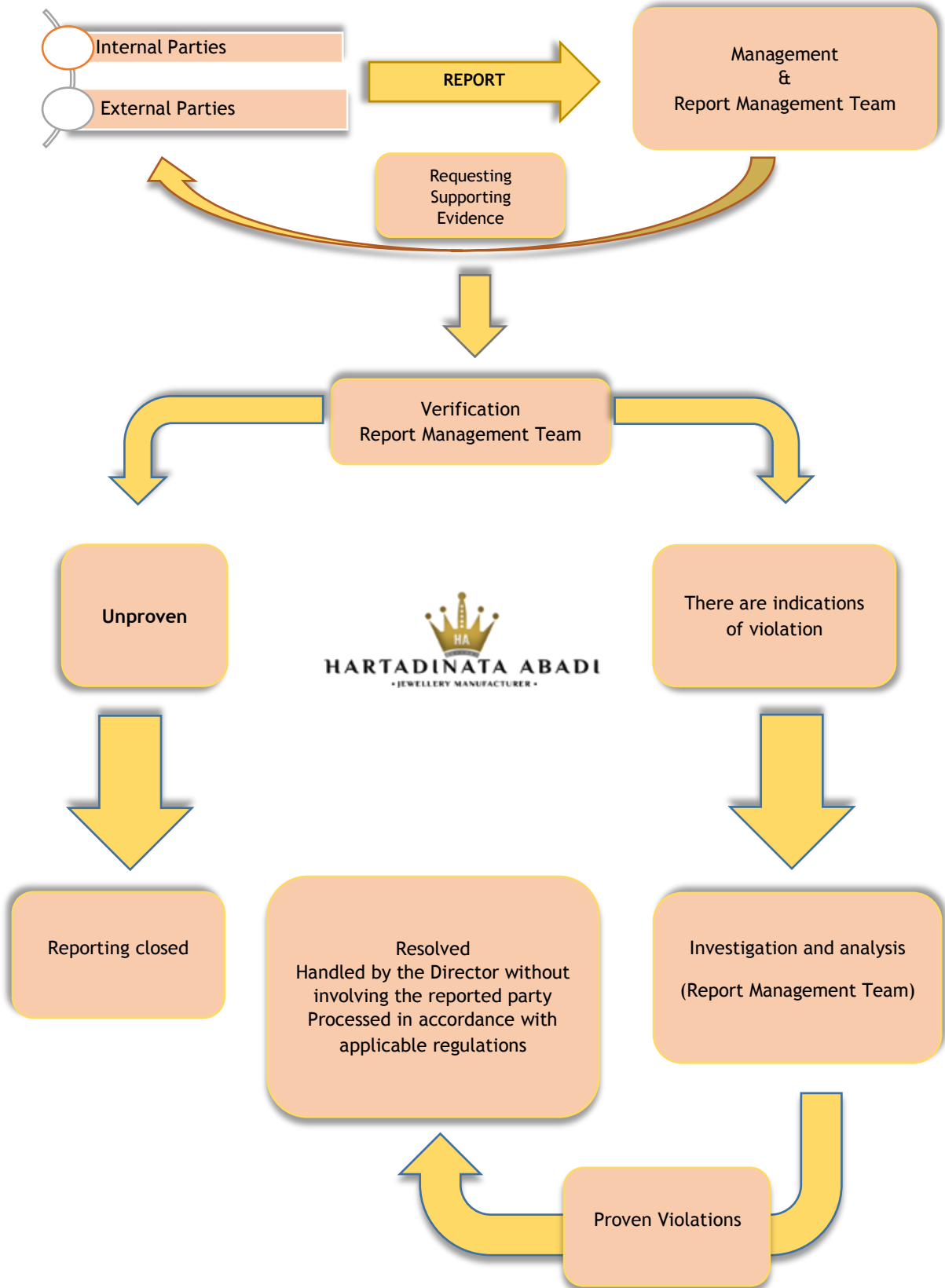
The results of the analysis can be:

- a. It is true that there has been a violation or fraud; or
- b. It is not true that there was a violation or fraud.

The results of the analysis will be submitted by the authorized official to the President Director for follow-up directions.



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## V. FOLLOW-UP

Follow-up on the results of the analysis of the authorized officers and after receiving recommendations from the Board of Directors, it is carried out:

- a. If the reported person is proven to have committed violations and/or fraud, the authorized official provides recommendations to the HR, Training & PK Division to carry out the sanction process in accordance with company regulations and applicable laws and regulations, ranging from light sanctions to termination of employment (PHK).
- b. If the reported person is proven not to have committed a violation, his good name will be rehabilitated and returned to his Division/Work Unit.

Thus this work policy was made, to be used as a means of monitoring, controlling and evaluating the work behavior of PT Hartadinata Abadi, Tbk personnel.

Bandung, 25 April 2023