



WHISTLEBLOWER POLICY

Table of Contents

Table of Contents	1
Whistleblower Policy	2
1. Expressing Opinions, Providing Inputs and Reporting Negligence and Violation	2
2. The Company to Respond Timely	3
3. Maintaining the Confidentiality of the Reports on Code of Conduct Violations	3
4. Avoiding the Conduct of Retaliation against the Informer	3
Disclaimer	4

Whistleblower Policy

The aspirations of each Employee aimed to improve the performance of the Company for the sake of mutual interests and progressions (the Management and the Employees) deserve to be delivered to the authorized Leaders of the Company through the applicable procedures, including among others are expressing opinions, providing inputs, and reporting matters relating to the implementation of the Code of Conduct.

1. Expressing Opinions, Providing Inputs and Reporting Negligence and Violation

The Management or the Employees who have concerns and questions or indicate or know that his/her colleague may or has violated the Code of Conduct and/or the Company Policies and/or the state law, he/she shall immediately report such violations or potential violations to its respective supervisor or HRD Manager or higher Authority/Leadership in connection to such violations.

Matters that shall be reported are as following:

- a. Indicating or knowing that the Corporate Culture, the Code of Conduct, or the Company Policies are not enforced.
- b. Indicating or knowing of a violation or potential violation of the law, the regulations, or the licensing requirements.
- c. Indicating or knowing of the irregularities in audit or non-compliance accounting.
- d. Indicating or knowing of a conduct of thievery, falsification, or abuse of authority.

The Employees are discouraged to express negative criticisms directed to the Company or the Company Leaders publicly, inciting other Employees to criticize the Company policies. Constructive criticisms and suggestions for improvement from the Employees may be directed through the following procedures:

- a. The Employees may express the criticisms/suggestions to the Supervisor/ Business Units HRD Manager /Highest Leader in the Projects concerned (General Manager)/HRD of the Group/Board of Directors, by taking into account several matters such as: the problems to be conveyed, the time required to handle such problems, the confidence of the Employees concerned in the certainty whether a follow up will be taken towards the criticisms/suggestions expressed for the sake of the progressions of the Company.
- b. The criticisms/suggestions may be delivered in speech or in writing and comprises: the topic of the problems, the conditions faced/the background of the problems, criticisms/suggestions delivered, and the expected impacts/results. Such reports shall be supported with adequate data analysis and proofs.

The Company will pay attention to all problem reports and protect each Individual making the report, and the Individual concerned may ask for its name to be undisclosed. All Management and Employees are required to be cooperative during the investigation process.

The Employees making false complaints, spreading lies, threatening others, or damaging the reputation of others will be imposed sanctions of up to and including the termination of employment.

2. The Company to Respond Timely

The Company will respond opinions/inputs and reports on the violation of the Code of Conducts and/or the Company Policies and Regulations, and/or the state law, illegal activities, security issues, financial misconduct or health, safety and environment (HSE) issues, by forming an investigation team.

Should a violation is found, the Company will take action and subsequently the Company will make changes so that such problems will not be repeated.

3. Maintaining the Confidentiality of the Reports on Code of Conduct Violations

The Company limits only certain people to need to know the violation report in order to ensure that the action is taken timely and accurately. The Company shall protect the confidentiality of the individuals reporting the violations of law, Company Policies or Code of Conduct.

4. Avoiding the Conduct of Retaliation against the Informer

The Employees are encouraged to not ever be hesitated to contact the Supervisor/ Business Units HRD Manager /Highest Leader in the Projects concerned (General Manager)/HRD of the Group/Board of Directors should the Employees feeling threatened after making a report. Parties who make a threat will be imposed disciplinary sanction up to the termination of employment. The Company takes matters on conduct of retaliation seriously. Allegations of retaliation will be investigated and taken action where appropriate.

The Company provides options and mechanisms for all parties to file complaints on irregularities and/or violations through SMS hotline at +62819-0101-2017 or email to ***audit@ciputra.co.id***.

Disclaimer

This document constitutes an English translation of Whistleblower Policy of PT Ciputra Development Tbk, originally drafted, published and authenticated in Indonesian. While reasonable efforts are made to provide accurate information, portions may be incorrect and PT Ciputra Development Tbk cannot take responsibility for any errors. In case of a discrepancy, the Indonesian original will prevail.