



ANTI-BRIBERY AND
CORRUPTION POLICY

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Article 1

Purpose

PT Ciputra Development Tbk and its subsidiaries (hereinafter referred as “Ciputra”) are committed to conduct business by always prioritizing ethics, honesty and compliance with the applicable laws and regulations. Therefore, Ciputra will act professionally, fairly and with full of integrity in carrying out agreements and business relationships with partners and suppliers without giving tolerance to all forms of bribery or acts of corruption, either directly or indirectly which involves all of Ciputra’s stakeholders.

Ciputra is committed to increase the awareness of high ethics culture, obedience and discipline towards laws/regulations in carrying out work activities by not tolerating someone offering, paying, or receiving payments, gifts or other benefits from and to third parties to influence business results or other personal interests.

Article 2

Forms of Bribery and Corruption

All of Ciputra’s employee, either an individual or a group of people who intentionally violates Ciputra’s laws/regulations/policies by committing the acts of enriching themselves or other people or groups that can inflict a financial loss to Ciputra in the following ways:

1. Misusing the authority, opportunity or means available to the respective person due to their title or position.
2. Giving and/or promising something to an inappropriate Government or Private official, regardless of the size or purpose, including facilitation payments, with the intention of securing or expediting services.
3. Giving and/or receiving gifts, entertainment, bribes/kickbacks to/from someone both internally and externally by considering the power or authority regarding to their title or position.
4. Violating the provisions of the law which states that violation on the provisions of the law is an act of corruption.
5. Providing assistance, opportunity, means or conspiracy to create acts of corruption.

Article 3

Prohibition of Bribery and Corruption

Ciputra strictly prohibits and do not tolerate bribery and corruption in all of Ciputra's activities. In the event of any failure to comply with the regulation, Ciputra will require that the situation be remedied as quickly as possible and any employee who violate the regulation will be imposed with sanctions and

disciplinary action, including termination of employment in accordance with this policy and the Code of Conduct.

Article 4

Preventive Strategy

1. Role of Employees and External Parties

Employees and external parties are able to participate and help to prevent and eradicate the acts of bribery and corruption by informing Ciputra through the Whistle Blowing Policy via email, QR code and WhatsApp Number about the acts of bribery and corruption which involves Ciputra's stakeholders.

Ciputra appreciates and maintains the confidentiality of every employee's identity and external party who has contributed to prevent, eradicate or disclose the acts of bribery and corruption in accordance with Ciputra's policy.

2. Monitoring

Ciputra will periodically evaluate the anti-bribery and corruption policy, including its reporting system, so that this policy can be implemented effectively.

Article 5

Dealing with Violations

Ciputra will give punishments or consequences to the violators of Ciputra's policies, especially anti-bribery and corruption policies, either individuals or groups of people (perpetrators) by:

1. Dismissing/requesting the resignation of the perpetrator;
2. Convict the perpetrators to the laws which are applicable in the local area.

DISCLAIMER

This document constitutes an English translation of Anti-Bribery and Corruption 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.