Ispat Indo Group (Ispat) Ethical Code of Conduct:- Vendors & Suppliers (V&S)

V&S of Ispat are chosen in consideration of objective criteria, based on quality, reliability, price, utility and performance or service. V&S are treated justly, fairly and honestly.

Ispat Supplier should uphold the highest standards of fair Business Practices and ethics, like:

A. Integrity

- Ispat has a reputation for honesty and integrity in its management practices and in all its business transactions. It is vital, for Ispat, including each subsidiary, and for each one of us,
- Ispat preserve its reputation and maintain the relationship of trust that must exist with all the individuals and companies with whom we have dealings.
- Ispat V&S shall maintain high standard of integrity, that gifts in cash or in kind, pleasure trips
 or vacations, special privileges or living accommodations or lodgings or any gesture with
 deemed mala fide intention to influence decision making, with the exception of promotional
 items of normal value, is forbidden to be made to Ispat employees.
- Ispat V&S shall comply with anti-corruption laws and regulations of the country in which they
 operate, and anti-corruption regulations in Indonesia and will avoid all acts which are
 considered illegal.
- Ispat V&S will immediately bring it to the notice of Ispat top management, on direct e-mail (<u>info@mittelsteel.com</u>) or by letter, for any inappropriate favor asked by any of Ispat employee.

B. Confidential Information

- Ispat V&S shall treat the Data, information and documents pertaining to Ispat as strictly for the performance of the V&S and shall not be disclosed or communicated to persons outside their organization.
- Information in B.1 includes, in addition to the technology used by Ispat, intellectual property, business and financial information relating to sales, earnings, balance sheet items, business forecasts, business plans, acquisition strategies and any other information of a confidential nature.

C. Property of Ispat

Ispat V&S shall maintain and use the information on technology and know-how in such a way that intellectual property rights of Ispat is adequately protected.

D. Compliance on Local Laws:

Ispat V&S shall be compliant with all the relevant local laws and regulations.

E. Respect for the Environment

Respecting and protecting the environment is an important value to which Ispat subscribes & expect that Ispat V&S shall respect & comply with all applicable local environment rules and regulations.

Signature with company stamp:

Name : GUNADI Position : DIRECTOR

Date : Februari 24th, 2021