

CODE OF CONDUCT
PT INTERMEDIA CAPITAL TBK
("Company")

I. Obligation of the Company

A. The Implementation of Fair Working Relationship

The Company has determined towards the implementation of working relationship that is equal and fair.

The development of the employees is always based on aptitude and performance.

The Company together with the employees shall create and provide working climates that are productive, innovative, fair and fun for the successful of the organization and also for the growth of career capability and the prosperity of all employees.

To take action against employees who reported the unfair implementation of working relationship, is prohibited.

B. Discrimination, Harassment and Intimidation

The diversity of employees is a critical thing in order to achieve the vision of the Company as a leader of integrated media Company. The Company committed to support the practices of non-discrimination and honor every religion and the employees obliged to practice and follow their religion.

The Company prohibits every form of harassment or intimidation, either conduct by or towards the superior, working partner, costumer, vendor and guests. The discrimination and harassment, either based on race, gender, disabilities, color of their skin, country of origin, nationality, age, marital status, sexual orientation, or social and economic status, are things that are not approved and not in accordance with the Company's culture in providing a working environment that is honorable, professional and dignified.

C. A Safe Working Environment and Free from Illegal Drugs and Alcohol

The Company obliged to maintain and developed a healthy and productive working environment as well as free from the influence of illegal drugs and alcohol beverages. To sell, circulate, use or under the influence of drugs and under the influence of alcohol illegally during the working hour, is prohibited.

II. The Obligation of the Employees

A. To Submit Complaint and Ethical Issues

Every party in the Company is responsible to maintain the ethical standard. The employees are expected to perform the work entrusted to them with full dedication, awareness, and responsibility to follow the ethical standard as the main element in every working process in the Company.

This Code of Conduct has the purpose to be a general guidelines in the working process, however in the event that the employees not assure in what they should do in certain situation, hence it is recommended to find additional direction and information from the superior or the HR Manager of the Company.

In the situation where the employee have suspicion concerning the violation towards the law, regulations and Company regulation, thus the employee shall inform his/her suspicion to his/her superior, HR Manager or use the suggestion of the whistleblowing system which applied in the Company

B. Conflict of Interest

The employees must avoid the conflict between his/her personal interest and duties and obligation to the Company and/or conflict between his/her personal interest and personal interest of his/her working partner by following all working ethics and code of conduct as well as any applied working guidelines in order to create an conducive environment, among others relate to the self-safety and his/her colleague safety as well as the safety of the work result.

In this matter, the Company shall rely on the employees commitment to uphold the ethical standard with professional behavior. Each business unit of the Subsidiaries is enable to have their own policy in order to anticipate the occurrence of conflict of interest in the business unit of the mentioned Subsidiaries.

C. The Relationship with the Third Party

1) Fairness

The Company is committed to act fairly towards the customers, suppliers, competitors and its employees.

2) Gifts and Rewards

In general, the employees are prohibit to received gifts, services, loans and special treatments from any parties, whether from the costumers or suppliers or other parties, as the form of rewards from past, present, or future business relationship with the Company.

The employees must report gifts and/or rewards which received in the form of gift and entertainment. If the gift received in the form of food and beverages, the gifts must be distributed to the other employees.

3) Relationship with the Suppliers

Every purchase of goods and service procurement shall be based on price, quality, availability, terms and conditions. In entering into agreement with the suppliers, thus the mentioned transaction and price shall be based upon wise market practices.

4) Good Reputation

During his/her term of service, the employee obliged to maintain the good reputation of the Company but not limited to maintain and keep confidential every form of information with respect to the Company that considered confidential which obtained due to his/her position, and social relation in the Company's premises.

D. Privacy

1) Information Confidentiality

Upon the termination of employment with the Company, the former employees shall remain maintaining the good reputation of the company and shall not disseminate the proprietary, non-public information and confidential information regarding the Company, as well as the suppliers and distributors.

2) Privacy towards Employee Information

The Company shall protect the privacy and confidentiality for every medical and personnel records of the employee. The mentioned records shall not be disseminated and discussed outside of the Company. The request upon the mentioned records from outside of the Company due to certain situation, required obtaining approval from the authorized party.