

CODE OF CONDUCT OF
PT TRAFONDO PRIMA PERKASA Tbk
(the Company)

I. VISION OF COMPANY

Being a leading national and international company that excels in quality, reliability and customer service with competitive prices in the field of manufacturing of medium and high voltage electrical equipment as well as being the most complete company in its product variants.

II. MISSION OF COMPANY

As a company that producing products that meet customer requirements, with due regard to the impacts that might be raised on the occupational health and safety and environment of employees, constantly establishing, implementing and continuously improving the Quality Management System, Environmental Management System and Occupational Safety and Health Management System as outlined In ISO 9001, ISO 14001 and OHSAS 18001 standards, in order to achieve customer satisfaction, an environment free from pollution and the increase of the occupational health and safety factors for the employee to realize the company's vision.

III. PRINCIPALS OF CODE OF CONDUCT

1. Upholding integrity, honesty and work & business ethics in performing the tasks;

2. Comply and Abide the Laws.

All personnel of the Company shall comply and abide to the applicable laws including but not limited to the laws in areas such as the environment, product requirements, occupational safety and health.

3. Comply and Abide Company's Rules and Policies;

4. Avoidance of conflict of interest:

a. A conflict of interest is the difference interest between the economic interests of the Company and the personal economic interests of the members of the Board of Directors, members of the Board of Commissioners, Major Shareholders or employees who may harm the Company.

b. A potential conflict of interest should be reported to the Management of the Company Management.

5. Confidentiality.

All personnel of the Company shall ensure that confidential information which they may acknowledge due to their work shall be kept confidential.

6. Prudent.

Responsible in carrying out every task by adhering to the principle of careful and prudent.

7. Insider Information.

Personnel of the Company that have material and confidential information about the Company that are likely to affect the Company's stock price in the capital market are prohibited from disclosing such information to outside parties.

8. Prohibition to Receive Gifts

All employees are prohibited from receiving any money, goods, tips, commissions or other facilities, either directly or indirectly from suppliers or other parties that may potentially create conflict of interest.

9. Protection of Company Assets.

Each Company employee must ensure that the Company's assets are maintained, duly kept and utilized in accordance with the Company's interests.

10. Personal Effort.

Business-related activities should be avoided if they interfere with office work and potentially abuse the office facilities for personal gain.

11. Individual Rights.

Every employee must honor and respect the human rights of each individual, including:

- a. Respect differences of tribe, religion, race, gender;
- b. Does not conduct any harassment;

- c. Does not do coercion of will in physically or psychologically;
 - d. Does not make people feel bullying;
 - e. Polite in words and deeds.
12. Fair, Motivation and Inspiration
- Every Manager or leader in the Company must have spirit and passion to educate, guide, motivate and inspire his/her subordinates and always behaves and conduct fairly towards his/her subordinates.

IV. PRINCIPALS OF COMPANY'S CULTURE

1. Commitment.
Have commitment and dedication in realizing the Company's Vision and Mission.
2. Compliance.
Understand and adhere to sound business ethics and work ethic as well as comply with specified signs.
3. Productivity and Efficient.
Increasing productivity both quantitative and qualitative in order to achieve the Company's goals that have been established along with the increasing Human Resources (HR) and increasing market demands (customers).
4. Innovative and Creative.
Continuous improvement through training and skills upgrading and work reliability, both individually

and in groups, including in the field of hardware and software that can support the realization of the Company's Vision.

5. Deliberation for Consensus.

Growing and consolidating the tradition of deliberation for consensus as the communication forum to reach consensus in order to avoid, minimize and / or eliminate the possibility of differences of opinion that can lead to negative matters either for the Entrepreneur and the Worker or for the benefit of the general public.

6. Loving, Sharpening and Taking Care of One Another.

Growing a culture of loving, sharpening and taking care one another among the colleagues, and between employees with their leaders, and ensuring every human being in the company lives together and socialize harmoniously in diversity.

7. Team Work.

Work in group (team work) and develop competence of Human Resources (HR).

V. SOCIALIZATION OF CODE OF CONDUCT AND ENFORCEMENT EFFORT

The Code of Conduct is socialized to all employees and shall be set stated in the Company's Annual Report. The Code of Conduct is a code to conduct or guidance for behaving and acting in the performance of Company's

duties. Any violation of the Company's code of conduct and disciplinary provisions, which may directly or indirectly result in financial or non-financial loss to the Company, is disciplinary action that is reasonably sanctioned according to the level of violation under applicable rules of the Company.

VI. BASIC PRINCIPLES ON THE IMPLEMENTATION OF CODE OF CONDUCT

1. Code of Conduct shall apply to all members of the Board of Commissioners, Board of Directors and Employees of the Company.
2. The Board of Directors is responsible for ensuring that the Code of Conduct is communicated, understood and implemented by all personnel of the Company.
3. Employees may ask questions about things in the Code of Conduct that are dubious and not well understood to their respective superiors.