

## **Whistleblowing System**

### **INTRODUCTION**

In order to improve the effectiveness of the implementation of the control system of fraud and the implementation of Good Corporate Governance by focusing on the disclosure of complaints, it is necessary to formulate a whistleblowing system policy that is clear, easy to understand and can be implemented effectively in order to give impetus and awareness to employees and leaders of TRAFINDO to report any fraud and violation against the law, company regulations, code of conduct, and the conflict of interest that occurred in TRAFINDO.

### **I. DEFINITIONS**

#### **A. Whistleblowing System.**

The whistleblowing system is a means of communication for internal parties to report actions / behavior / events related to fraud, violation against the law, company regulations, code of conduct, and the conflicts of interest committed by actors within the internal of the company.

Complaint must be based on good faith and not a personal complaint or based on bad will / defamation.

#### **B. Fraud**

Fraud is a deliberate act or omission committed to deceive, delude, or manipulate any company, customer, supplier, employee, management or other party, taking place in the corporate environment.

The types of action classified as fraud are:

- Cheating;
- Fraud; embezzlement
- Embezzlement of assets; and
- Information leakage.

**C. Code of Conduct.**

Is an elaboration of the corporate culture that has been formulated based on positive values that grow and develop within the entire company, in order to achieve common goals and also as a reference for every members of the company to make decisions and to conduct.

**D. Conflict of Interest**

Conflict of Interest is a condition in which the employee of the company in carrying out its duties and obligations has interests outside the interests of the office, whether it concerns to the personal interests, the family, or the interests of other parties so that the company may lose its objectivity in making decisions and policies according to the

authority that has been awarded by the company to person.

## **II. OBJECTIVES OF WHISTLEBLOWING SYSTEM**

- As the media for the informants complainants to report any act of fraud, violations against the law, company regulations, code of ethics, and conflicts of interest without fear or worry cause its confidentiality is guaranteed.
- In order that the occurred fraud can be detected the prevented as early as possible.

## **III. MEDIA FOR COMPLAINTS**

The following are the media and addresses that can be used by the complainant to submit their complaint.

| <b>MEDIA</b>                | <b>ADDRESS</b> |
|-----------------------------|----------------|
| E-mail                      |                |
| Short Message Service (SMS) |                |
| Telephone                   |                |
| Letter                      |                |

Note \*) This number can only be used for SMS

## **IV. THINGS MUST BE FULFILLED BY THE COMPLAINANT**

To facilitate and accelerate the follow-up process, the following are the matters that must be fulfilled by the complainant in submitting his/her complaint.

A. Provide information about the identity of the complainant in order to facilitate communication with the complainant, which shall be at least:

- name of the complainant (allowed to be anonymous);
- phone number / e-mail address that can be contacted.

B. Must provide a reliable preliminary indication (3W & 1H) which includes:

- Issue being reported (What)
- Relevant party involved (Who)
- Time of the incident (When)
- How it is occurred (How)

C. Reports being submitted must relate to the followings:

- Fraud;
- Violation against law;
- Violation against the company regulations;
- Violation against Code of Conduct;
- Violation against the conflict of interest;
- Other things that can be compared to the above matters.

**V. PROTECTION FOR THE COMPLAINANT**

On a verifiable report, TRAFINDO will provide protection against the complainant. Protection of the complainant shall include:

- guarantee over the identity of the complainant as well as the contents of the report being submitted;
- guarantee over the protection against the harmful treatment of the complainant;
- guarantee over the protection against the possible threats, intimidation, punishment or unpleasant acts of the complainant.

**V. IMPOSING SANCTIONS**

If based on the result of the investigation, it is proven that the person being reported has committed fraud/violation, then the adjudicator officer shall impose sanctions in accordance with the applicable provisions.