


**COMMITMENT PT PETROKIMIA GRESIK  
ANTI-BRIBERY MANAGEMENT SYSTEM IMPLEMENTATION**

In order to apply SNI ISO 37001 : 2016 concerning Anti-Bribery Management System, to create a clean and integrity PT Petrokimia Gresik and to support efforts to prevent corruption, we hereby convey the commitment of PT Petrokimia Gresik :

1. Running a business above the value of integrity, based on the code of ethics and the 4 NO's principle, namely :
  - a. **No Bribery** (No bribery, kickbacks and extortion)
  - b. **No Kickback** (No, commissions, money tips and money sharing)
  - c. **No Gift** (No unreasonable gifts)
  - d. **No Luxurious Hospitality** (No excessive banquets)
2. Always strive to improve and improve every business process in line with the principles of integrity.
3. Implement the principle of zero tolerance for actions relating to violations of laws and regulations relating to criminal acts of corruption and the 4 NO's principle.
4. Not allowing PT Petrokimia Gresik personnel and stake holders / business partners of PT Petrokimia Gresik to violate PT Petrokimia Gresik's code of ethics and the principle of 4 NO's related to their duties at PT Petrokimia Gresik.
5. Managing conflicts of interest of each Petrokimia Gresik personnel and any conflicts of interest that have the potential to create risks must be declared.
6. Providing regular outreach (socialization) and training on corruption prevention, 4 NO's principles and improving business integrity on a regular basis to all Petrokimia Gresik personnel and stakeholders / business partners of PT Petrokimia Gresik.
7. Supervise the implementation of this commitment and any violation of the code of ethics and the 4 NO's principle will be subject to sanctions in accordance with applicable regulations.

Gresik, 22<sup>nd</sup> March 2024

**Directors**

Digna Jatningsih  
Operation and Production  
Director



Dwi Satriyo Annurogo  
President Director



Robby Setiabudi Madjid  
Finance and General Affairs  
Director

**Commissioners**


Bin Nuhadi  
Commissioner



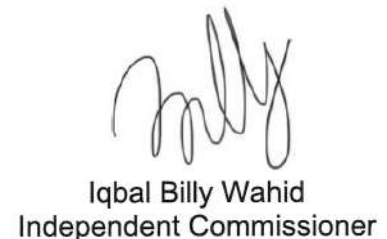
T Nugroho Purwanto  
President Commissioner



Noer Fajrieansyah  
Commissioner



Cecep Herawan  
Commissioner



Iqbal Billy Wahid  
Independent Commissioner





**PETROKIMIA  
GRESIK**

## **ANTI-BRIBERY POLICIES AND COMMITMENTS**

The Board of Directors of PT Petrokimia Gresik has established a policy to run a company that is free from bribery by implementing an Anti-Bribery Management System (SMAP).

To support this policy, the Board of Directors is committed to :

1. Setting objectives for the Anti-Bribery Management System (SMAP).
2. Assign the duties, responsibilities and authorities of the Anti-Bribery Compliance Function (FKAP (Fungsi Kepatuhan Anti Penyuapan)).
3. Obey with all applicable anti-bribery laws and regulations.
4. Communicate anti-bribery policy authorities.
5. Ensuring the availability of human resources, budget and information technology support.
6. Ensure that each work unit carries out an assessment and control of bribery risk.
7. Encourage each work unit leader to prevent and detect bribery that occurs in his work unit.
8. Promote an anti-bribery culture.
9. Provide a reporting system for indications of bribery.
10. Ensuring the implementation of Internal Audit on the implementation of the Anti-bribery Management System (SMAP).
11. Periodically review the effectiveness of the application of the Anti-bribery Management System (SMAP) for continuous improvement.
12. Ensure that the Company's anti-bribery strategy and policies are in line.

Gresik, 22<sup>nd</sup> March 2024

**Dwi Satriyo Annurogo**  
**President Director**