

**CODE OF ETHICS AND STANDARDS OF CONDUCT POLICY
PT GLOBAL DIGITAL NIAGA TBK**

The Code of Ethics and Standards of Conduct Policy of PT GLOBAL DIGITAL NIAGA Tbk (“**Company**”) standardizes the rules of organizational behavior in the Company. The Code of Ethics and Standards of Conduct Policy (“**Policy**”) aims to support the Company’s vision and mission and to serve as a guide in the efforts to build trust and integrity between the Company and employees, shareholders, stakeholders, and all parties related to the Company, and to create a good working environment and conducive business climate. This policy applies to the Company and all of the Company's subsidiaries (“**GDN Group**”).

This policy requires every individual in the GDN Group and all business activities involving the Company to comply with:

- a. All applicable laws and regulations; and
- b. All regulations and conditions related to the Company's business activities.

The Company applies strict consequences for violations of this Policy, from imposition of disciplinary sanctions to termination of employment as stipulated in the Company Regulations as well as criminal and civil sanctions in accordance with the applicable laws and regulations.

The following is a description of the Company's Code of Ethics and Standards of Conduct:

I. Individual Responsibilities

1. The Board of Directors, Board of Commissioners, employees, and all supporting organs of the Company are required to perform their duties in good faith, full of responsibility, and with prudence.
2. Every individual involved in the management or any operational activities of the Company has the responsibility to:
 - a. Know, understand and comply with the applicable Company Regulations and the relevant laws in the Company's business activities.
 - b. Know, understand and comply with all decisions of the management and superiors.
 - c. Ensure the compliance of third parties involved in the Company's business activities.

- d. Report all known deviations to the Department of People Operations and General Services, the Board of Directors, and the Audit Committee according to the occurring type and level of deviation.
3. Every employee is required to report to the Head of the Department of People Operations and General Services in case there are situations such as but not limited to the matters described below:
 - a. Any business practices that are contrary to this Policy and potentially harm the Company.
 - b. Any lack of clarity on conducts that are permissible or not permissible.
 - c. Deviations from the standards of conduct under certain conditions are regulated by approval of the Board of Commissioners/Directors.
 4. The Company's policy on the employees' responsibilities in using their authority and position in the Company include:
 - a. To use with full responsibility for the Company's benefit and not for personal or certain parties' interests.
 - b. To maintain and use all the company's data, information, assets and or facilities for the Company's benefit, not for personal or certain parties' interests.
 - c. To maintain the Company's good name in their attitudes and conduct, both outside and inside the Company.
 5. The Company's Confidential Information refers to documents and/or strategic information created and/or obtained by the Company that shall not be disclosed and given to outsiders with the consideration of maintaining the Company's competitive advantage and/or complying with agreements or laws and regulations that require the company to maintain the information confidentiality.

Information classified as confidential includes but is not limited to:

- a. Financial statements and/or material transactions not yet disclosed to public.
- b. The Company's Strategic plans.
- c. Information bound by a confidentiality agreement.
- d. The Company's products still in the development stage.
- e. Technology uniqueness.
- f. Material Information not yet available to the public.
- g. Other information deemed confidential.

Regarding the information mentioned above, all employees are responsible for maintaining confidentiality and prohibited from misusing the Company's Confidential Information.

GDN Group is committed to protecting personal privacy and consumers' data for which consumers will be notified and informed via the site, email, and/or mail regarding the use of such data by GDN Group. In this Policy, what is meant by 'Personal Data' is any personal data that identifies and refers to a person, identified from (a) those data, or (b) other data and/or information in our possession or which access to them we may possess, including data in our records that can be updated at any time.

Company Confidential Information obtained by the Company's employees must remain being kept confidential after the end of their tenure in the Company.

II. Management's Responsibilities

6. All members of GDN Group management are responsible for:
 - a. Giving information to employees on their obligations in running the business and directing employees to perform the obligations.
 - b. Implementing the processes and procedures to ensure that each employee complies with his obligations and that any cases of deviation can be detected, reported and followed-up.
 - c. Monitoring and ensuring the compliance of each employee with his obligations.
 - d. Resolving any act of non-compliance and taking the necessary disciplinary action against any violation.
 - e. Evaluating existing procedures and making changes if necessary.

III. Relation between the Company and Employees

7. The Company is committed to creating and supporting a conducive work environment and fair career opportunities, in which everyone is treated with respect and responsibility.
8. The Company is committed to constantly creating a work environment that allows and supports open communication among all individuals or parties involved in the Company's operations.

9. The Company rejects all forms of discrimination and/or harassment based on but not limited to matters such as race, nationality, religion, gender, and age.
10. The Company pays attention to and maintains a work environment that meets health and safety standards in accordance with Law no. 13 of 2003 on Manpower as updated from time to time along with its Implementing regulations.

IV. Relation between the Company and Stakeholders

11. The Company strictly prohibits all forms of corrupt practices, remuneration, bribery and/or gratuities within the Company. The Company also understands that the honesty and integrity of each individual is the key in matters relating to bribery and illegal donations in addition to the need for accountability and control mechanisms.
12. A conflict of interest occurs when there is a possibility that personal interests or the sharing of personal responsibility may hinder objective decision making. The Company understands that in running its business it cannot completely avoid any conflict of interest situations.

The situations include, but not limited to the following:

- a. The Company's business relation with companies owned directly by the Commissioners, Directors or Employees or companies in which the Commissioners, Directors or Employees have substantial control or companies owned by the families or friends of the Commissioners, Directors and Employees.
- b. Commissioners, Directors or Employees who have a financial interest in the Company's business unit suppliers or customers.
- c. The use of the Company's assets for personal interests.
- d. Commissioners, Directors or Employees who do business with the clients' companies for personal gain.

In responding to such situations, the Commissioners, Directors, and Employees are committed to prioritizing the Company's interests. This policy regulates:

- a. In case a conflict of interest situation cannot be avoided, the individual having the conflict of interest must not be involved in the decision making in matters containing the conflict of interest and must not influence the parties participating in the decision making.
- b. Employees in the Company are prohibited from diverting opportunities or potential for opportunities for personal gain.

13. Anti-Money Laundering and Counter-Terrorism Financing Policy

Money laundering is an attempt to hide or disguise the origin of assets resulting from criminal acts in various ways so that the assets resulting from criminal acts are difficult to trace by law enforcement officers so that they can freely use the assets for both legal and illegal activities, which is also regulated in Law Number 8 of 2010 on Prevention and Eradication of Money Laundering Crime as may be amended from time to time and its implementing regulations.

Terrorism Financing is any act in the context of providing, collecting, giving, or lending funds, either directly or indirectly, with the intention of being used and/or known to be used to conduct terrorist activities, terrorist organizations, or terrorisms, as referred to in Law Number 9 of 2013 on Prevention and Eradication of Terrorism Financing Crime as may be amended from time to time and its implementing regulations.

Anti-Money Laundering and Prevention of Terrorism Financing Policy is an effort to prevent and eradicate criminal acts of money laundering and terrorism financing. The implementation of this Policy within GDN Group includes the following: adequate knowledge of consumers and market targets; carrying out adequate analysis of consumers and market targets, products produced, and each entity; active supervision of the management, internal control, human resources and training that can be applied through screening procedures in the context of accepting new employees (pre employee screening), making identification and monitoring of employee profiles, and conducting continuous training to raise awareness of responsibilities in preventing and eradicating money laundering or terrorism financing.

14. Company Policy in Relation with Business Partners

The principles that the Company notes in carrying out the business relation with business partners are, but are not limited to:

- a. Based on similarity, equality, and mutual trust which is based on justice and social responsibility and does not discriminate ethnicity, religion, race and between groups.
- b. Maintaining the necessary confidentiality related to relation with business partners in accordance with applicable conditions and agreements and commitments mutually and formally agreed upon by the parties involved.
- c. Complying with applicable regulations.

- d. The Company's Commissioners, Directors and Employees must avoid conflicts of interest.
- e. The Company (including the Commissioners, Directors, and Employees) is not allowed to give to or receive from business partners, rewards or gifts that can influence decision making. This prohibition is intended so that there is objectivity in decision making based on existing regulations/stipulations in accordance with the authorities and responsibilities delegated to decision makers.

15. Company Policy in Relation with Affiliated Companies

Affiliated companies are companies having relationship of ownership with the Company, either directly or indirectly. The principle adopted by the Company in this regard is that together with and among affiliated companies, the Company builds cooperation to achieve synergies in various business and social activities both at central and branch levels in accordance with the applicable laws and regulations.

16. Protection of Customers

In establishing relationship with consumers, GDN Group has the policy as described below:

- a. To maintain customer confidentiality in accordance with applicable regulations.
- b. In order to maintain the good name of GDN Group, employees are obliged to protect all forms of customers' information. Employees are not entitled to disseminate the information before it is known/agreed formally by the parties involved, or based on commitments with other parties that must be kept confidential.
- c. GDN Group is obliged to serve consumers with a fair attitude and tries to understand the needs and finds alternative solutions to customer problems to the best possible and with due regard to the interests of GDN Group.
- d. Timeliness and time efficiency are factors that support quality services.

17. Prohibited Services and Products

In undertaking its business, GDN Group always produces quality services and products and always refers to Law Number 8 of 1999 on Consumer Protection as may be amended from time to time and its implementing regulations. GDN Group is committed not to produce, trade and offer prohibited services and products.

V. Violation of Policy

18. Any deviations, omission, and or violation of the Policy may be subject to sanctions in accordance with the applicable Company Regulations and may also be subject to sanctions based on applicable laws and regulations, both criminally and civilly. In the event of any serious violation of this Policy, the violating individual shall be willing to resign.