



# Third Party Code of Conduct

A Part of Xurya Third Party Framework

No: XPL.MGM.SOP.2024.12.06.003  
Version: V.1.0.0  
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## Introduction

Xurya is committed to high standards of business integrity and compliance with all applicable laws and regulations. This means that we avoid all forms of corruption or unethical behaviour, including bribery, fraud, collusion or unfair competition.

Xurya works with a range of consultants, advisors, contractors, sub-contractors and suppliers, together known as Third Parties. These include - but are not limited to - EPC contractors, logistics and security providers, marketing partners and permit consultants. They also include other consultants, advisors or service providers who deal with government officials on Xurya's behalf such as lawyers, customs consultants and tax consultants; as well as suppliers of materials that are central to our business offering, including photovoltaic modules, inverters and batteries.

We require the same business integrity commitment from the Third Parties with whom we work at different stages of our operations, as well as any subcontractors or external parties that they may themselves employ. This Code sets out our expectations.

Environmental and Social guidelines, including HSE requirements, will be found in a separate document.

## 1. Lawful and ethical business conduct

We are committed to the highest standards of professionalism wherever we operate. In line with this commitment, we require all our Third Parties to abide by all applicable laws and regulations, and to avoid all forms of corruption or unethical behaviour, including fraud, collusion or unfair competition.

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### Xurya Head Office

Sequis Center Lt. 10 #08 Jl. Jend. Sudirman No. 71, Jakarta Selatan 12190, Indonesia



[www.xurya.com](http://www.xurya.com)



[contact@xurya.com](mailto:contact@xurya.com)



021-3950-6637



@energixurya



Xurya Daya Indonesia



## 2. No bribes

Xurya does not pay bribes to anyone, whether they represent a public agency or a private company. We understand bribery to include any inducement to secure a commercial or other advantage that is incompatible with the bribe receiver's duties and responsibilities. We expect the same standard from our Third Parties that we require from our employees. This means that:

- They may not offer or accept bribes in any form, including financial payments, inappropriate gifts, offers of employment or other favours.
- They may not offer "facilitation payments" or "grease payments" (*uang pelicin*) to individual government officers to speed up official processes.
- They may offer and accept reasonable gifts and hospitality as a means of building up relationships in the normal course of business. However, in all cases they must ensure that the gift or benefit is offered as an expression of goodwill and not in expectation of a favour in return. A gift that is intended to influence an official or business decision would qualify as a bribe.

In some circumstances, demands or requests for bribes may be accompanied by a form of pressure such as the threat of lost business or even physical harm. We request Third Parties to inform us if they believe that they are under pressure to pay a bribe or engage in any other form of unethical practice while working on Xurya's behalf.

## 3. Conflict of interest

Our Third Parties must inform us if there is an actual or apparent conflict of interest that may affect the integrity or impartiality of our business relationship. An example would be a situation where a subcontractor's relative is working in a Xurya team that is to decide on a contract with their company. Transparency is essential. If we know about a potential conflict, we may be able to find a means of addressing it.

## 4. Confidentiality

Our Third Parties must respect the confidentiality of all commercial or technical information acquired while working for us. They may not use any such information for their own commercial advantage, for example, by sharing it with a competitor or another supplier.


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## 5. Raising questions and concerns

If Xurya's Third Parties have questions on any aspects of this Code, we encourage them to consult their main Xurya contact, the Xurya Business Integrity Manager.

## 6. Compliance

If a Third Party fails to follow our integrity standards as summarised in this Code, we reserve the right to withdraw from the business relationship.

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## CHANGE LOG

Version	Date	Changes
V.1.0.0	6 Dec 2024	<ul style="list-style-type: none"><li>• First version</li></ul>

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