

# GUIDELINES FOR BUSINESS ETHICS AND WORK ETHICS

PT GARUDA INDONESIA (PERSERO) Tbk

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## STATEMENT OF COMMITMENT OF THE BOARD OF COMMISSIONERS AND BOARD OF DIRECTORS

### PT GARUDA INDONESIA (PERSERO) Tbk

Good Corporate Governance (GCG) aims to realize high (outstanding) company performance in an ethical and moral way and always obey the applicable provisions and laws.

The Guidelines for Business Ethics and Work Ethics regulate what should and should not be done by every Garuda Indonesia Employee in their relations with all stakeholders, both with Customers, Employees, Suppliers, *Agents*, Shareholders, and other stakeholders.

The paradigm in the formulation of the Guidelines for Business Ethics and Work Ethics is that the Company wants to keep Garuda Indonesia's personnel from slipping into unlawful acts, abuse *of power*, fraudulent acts that harm and degrade the Company's image, as well as conflicts *of interest* that are detrimental to themselves and the Company.

The Board of Commissioners and Board of Directors of PT Garuda Indonesia (Persero) Tbk are committed to ensuring the implementation of good Corporate Governance in accordance with the policies/guidelines/regulations that have been set, one of which is the Guidelines for Business Ethics and Work Ethics. The Business Ethics and Work Ethics Guidelines must be complied with and implemented by all Garuda personnel as a guide in behaving in order to always maintain actions in accordance with ethics to build Garuda Indonesia into a clean, dignified, law-abiding, high-performance company and upholding moral ethics according to the expectations of stakeholders. The Guidelines for Business Ethics and Work Ethics will be reviewed periodically to ensure their suitability if there are errors or changes in applicable laws and regulations.

## GLOSSARY

- **Affiliate** is a business entity in the form of a Limited Liability Company or other form of business entity, which is directly and/or indirectly controlled by Garuda Indonesia.
- **The Company's** assets are resources owned by Garuda Indonesia that are expected to provide profits.
- **Agent** is a business entity that assists the company in marketing and selling Garuda Indonesia products.
- **The Board of Commissioners** is an organ of the company consisting of the President Commissioner and members of the Commissioner who are tasked with supervising and advising the Board of Directors in carrying out the Company's management activities.
- **The Board of Directors** is an organ of the Company consisting of the President Director and other Directors who are responsible for the management of the Company for the benefit and purposes of the Company and represent the Company both in and out of court.
- **Gratification** is the giving or receiving in a broad sense which includes money, goods, commissions, rebates (*discounts*), interest-free loans, travel tickets, lodging facilities, tourist trips, free medical treatment and other facilities, both received domestically and abroad and carried out using electronic means or without electronic means.
- **A community** is a group of people who interact with each other and there is a close relationship between group members because of the common *interests* or *values*.
- **Garuda Indonesia's Business Ethics and Work Ethics Guidelines** are moral standards that arise from habits and contain a set of thinking and acting patterns owned by Garuda Indonesia personnel in their daily work activities to support the company's operational activities in order to realize Garuda Indonesia's vision and mission.
- **Material Information** is data and information that is important and affects the company.
- **Garuda Indonesia's personnel** consist of the Board of Directors, Board of Commissioners, and Company Employees who are legally bound by employment with the Company either directly or indirectly or who are assigned to the Company or other agencies.
- **Conflict of Interest** is the difference between the economic interests of the Company and the personal economic interests of members of the Board of Directors, members of the Board of Commissioners/Supervisory Board or shareholders that may be detrimental to the Company.

- **Mass Media** includes print and electronic media that function to provide information, education, promotion, social control and entertainment.
- **Mission** is a basic principle in running a business which contains elements of beliefs, values, and corporate identity in meeting the needs of all stakeholders.
- **A Partner** is a party that collaborates with the Company consisting of SOEs, SOE Subsidiaries, SOE Affiliated Companies, LPI, and/or other parties, other than Goods and Services Providers.
- **The Violation Reporting Guidelines** are guidelines and references for companies in handling violations reported by the company.
- **A Leadership Employee** is an employee who occupies a leadership position in a work unit and has the authority to make decisions as determined by the company.
- **An employee** is any individual who is legally bound in an employment relationship with the company.
- **Customers** are individuals or institutions who use Garuda Indonesia's products or enjoy Garuda Indonesia's services.
- **A supplier** is a business entity engaged in the provision of goods and or services needed by the company.
- **The government** is a state implementing institution and its apparatus, which includes the legislature, executive, judiciary and other institutions, both at the central and regional levels.
- **Garuda Indonesia** is PT Garuda Indonesia (Persero) Tbk.
- **A competitor** is a business entity engaged in the same or similar business field as the company.
- **A Subsidiary** is a business entity in the form of a Limited Liability Company whose shares or greater than 50% (fifty percent) of the shares are owned by Garuda Indonesia.
- **A Trade Union** is an organization formed from, by, and for Employees in the company, which is free, open, independent, democratic and accountable.
- **The Value System** is a set of principles that are believed by all Garuda Indonesia personnel as a guideline for thinking and acting patterns to realize the company's vision and mission.
- **A vision** is a general statement of the direction or ideals and goals that must be pursued in the future within a certain period of time



## I. INTRODUCTION

The Garuda Indonesia Business Ethics and Work Ethics Guidelines are a set of commitments consisting of Garuda Indonesia's business ethics and Garuda Indonesia's employee ethics which are the basic rules in conducting business relationships with stakeholders and professional working relationships.

Garuda Indonesia always supports compliance with Garuda Indonesia's Business Ethics and Work Ethics Guidelines and is committed to implementing them, as well as requiring all Board of Directors, Board of Commissioners and all employees at every level in the company to be responsible for ensuring that Garuda Indonesia's Business Ethics and Work Ethics Guidelines are complied with and implemented properly. Furthermore, every Garuda Indonesia employee is required to sign a commitment to comply with the Garuda Indonesia Business Ethics and Work Ethics Guidelines periodically every year.

Garuda Indonesia's Business Ethics and Work Ethics Guidelines will always be adjusted to the legal, social, norms, regulations and business developments of Garuda Indonesia, and it is necessary to implement internalization and socialization programs within Garuda Indonesia so that all elements can understand and actively support the implementation of the Business Ethics and Corporate Work Ethics Guidelines can run well.

Garuda Indonesia personnel can apply the Garuda Indonesia Business Ethics and Work Ethics Guidelines, so that the moral values adopted by the company can be reflected in attitudes, behaviors and deeds. Therefore, this guideline is equipped with examples of behavior that can and cannot be displayed by Garuda Indonesia personnel as in the attachment which is an integral part of the Guidelines for Work Ethics and Business Ethics.

All parties are expected to provide input on the development of the Business Ethics and Corporate Work Ethics Guidelines so that they are always in line and synergize with the values that already exist in Garuda Indonesia. The successful implementation of the Business Ethics and Corporate Work Ethics Guidelines is highly determined by the enthusiasm, communication and commitment of all elements to jointly implement them in daily work activities.

### I.1. Principles of Business Ethics and Work Ethics

The Garuda Indonesia Business Ethics and Work Ethics Guidelines explain the behaviors that must be displayed by Garuda Indonesia personnel and those that should not be displayed by Garuda Indonesia personnel as an elaboration of the implementation of GCG principles, namely:



### **Transparency**

Garuda Indonesia guarantees the disclosure of material and relevant information regarding performance, financial condition and other information in a clear, adequate and timely manner and easily accessible to stakeholders in accordance with their rights. This principle of disclosure does not reduce the obligation to protect confidential information about Garuda Indonesia and the Customer in accordance with applicable laws and regulations.

### **Accountability**

Garuda Indonesia ensures clarity on the functions, implementation and accountability of each of the company's organs (General Meeting of Shareholders, Board of Commissioners and Board of Directors) so that the company's management is carried out effectively. Accountability refers to the obligations of a person or an organ of the company related to the exercise of its authority and/or the implementation of the responsibilities imposed on it by Garuda Indonesia.

### **Accountability**

Garuda Indonesia ensures the conformity between the company's management with applicable laws and regulations and sound corporate principles, fulfillment of obligations to the Government in accordance with applicable regulations, active cooperation for mutual benefit and striving to be able to make a tangible contribution to society.

### **Independence**

Garuda Indonesia guarantees the management of the company professionally without conflicts of interest and influence/pressure from any party that is not in accordance with applicable laws and regulations and sound corporate principles.

### **Fairness**

Garuda Indonesia guarantees fairness and equality in fulfilling the rights of stakeholders arising under the applicable agreements and laws and regulations.

## **I.2. Responsibility for Compliance**

This Guidelines for Business Ethics and Work Ethics explain the standards of work ethics and business ethics that apply in general within Garuda Indonesia, as a system of moral values used to determine good and bad things, commendable and despicable things, and things that are appreciated and disrespected.

Garuda Indonesia upholds itself on honesty, integrity and fairness in running

its business, therefore Garuda Indonesia prohibits every Garuda Indonesia employee and other parties related to Garuda Indonesia from entering into any act that can be categorized as unlawful, unethical, immoral or contrary to the integrity of the company in carrying out its business activities.

#### **I.2.1. Responsibilities of Garuda Indonesia**

- a. Learn in detail the Guidelines for Business Ethics and Corporate Work Ethics related to the scope of work. Every Garuda Indonesia employee must understand the ethical standards outlined in this Code of Business Ethics and Company Work Ethics;
- b. Contact the direct supervisor or the *Corporate Secretary Unit* or the *Human Capital Management Unit* or the parties that have been determined by the Board of Directors, if Garuda Indonesia personnel have questions regarding the implementation of the Business Ethics and Corporate Work Ethics Guidelines;
- c. Immediately discuss with the parties that have been determined by the Board of Directors, whenever they find problems regarding possible violations of the Business Ethics and Company Work Ethics Guidelines;
- d. Understand the procedures used to notify or report possible violations of the Company's Code of Business Ethics and Work Ethics;
- e. Willing to cooperate in the investigation process of possible violations of the Code of Business Ethics and Corporate Work Ethics.

#### **I.2.2. Responsibilities of Garuda Indonesia Leadership Employees**

- a. Build and maintain a culture of compliance with the Guidelines for Business Ethics and Corporate Work Ethics through:
  - (a) Always provide guidance and encourage subordinates' compliance with the Business Ethics Guidelines and Company Work Ethics personally;
  - (b) Conducting regular supervision of programs aimed at encouraging the compliance of Garuda Indonesia personnel to implement the Business Ethics and Corporate Work Ethics Guidelines;
  - (c) Setting an example in the way of daily behaving and acting.

- b. Ensuring that every Garuda Indonesia employee understands that compliance with the Business Ethics and Corporate Work Ethics Guidelines is as important as achievement for work;
- c. Encouraging Garuda Indonesia personnel to ask questions about various integrity and business ethics issues;
- d. Considering the issue of compliance with the Business Ethics and Corporate Work Ethics Guidelines in evaluating and awarding Garuda Indonesia personnel;
- e. Prevent possible violations of the Code of Business Ethics and Corporate Work Ethics through the following efforts:
  - (a) Ensure that the risk of possible violations of the Business Ethics and Corporate Work Ethics Guidelines related to business processes can be identified early and systematically;
  - (b) Identify and report it based on the procedures established for the activities of subsidiaries, affiliates and partners that may cause possible violations of the Code of Business Ethics and Corporate Work Ethics;
  - (c) Ensuring the implementation of education and training on the Guidelines for Business Ethics and Corporate Work Ethics and conducting socialization to partners so that these parties understand and understand the Guidelines for Business Ethics and Corporate Work Ethics as a whole.
- f. Identify possible violations of the Business Ethics and Company Work Ethics Guidelines through:
  - (a) Implement supervision to minimize the risk of possible violations of the Code of Business Ethics and Corporate Work Ethics;
  - (b) Provide briefings to Garuda Indonesia personnel under the responsibility of their work units regarding the reporting system for possible violations of the applicable Business Ethics and Work Ethics Guidelines in the Company;
  - (c) Evaluate the implementation of the Business Ethics and Corporate Work Ethics Guidelines within their work units to assess the effectiveness of implementation and how to improve existing weaknesses.
- g. Follow up on the recommendations of audit results and reports on possible violations of the Code of Business Ethics and Corporate Work Ethics through:

- (a) Quickly correcting deficiencies found in the assessment of compliance with the implementation of the Business Ethics and Corporate Work Ethics Guidelines;
- (b) Provide disciplinary sanctions in accordance with applicable provisions for actions that are in accordance with the contribution of their work activities;
- (c) Consult with the unit in charge of legal affairs if violations of the Code of Business Ethics and Company Work Ethics that occur require the intervention of law enforcement or the authorities.

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## II. COMPANY IDENTITY

### II.1. Vision and Mission of Garuda Indonesia

- a. **Garuda Indonesia's vision** is *"To become a sustainable aviation group by connecting Indonesia and beyond while delivering Indonesian Hospitality"*.
- b. **Garuda Indonesia's mission** is *"Strengthening business fundamentals through strong revenue growth, cost leadership implementation, organization effectiveness and group synergy reinforcement while focusing on high standard of safety and customer-oriented services delivered by professional & passionate employees"*.

### II.2. Garuda Indonesia's Values

Garuda Indonesia has formulated a value system called AKHLAK which was inaugurated on October 14, 2020. The elaboration of the AKHLAK value system consists of the values **of Trust, Competent, Harmonious, Loyal, Adaptive, and Collaborative.**

The Company's values are further elaborated into 10 Main Behaviors, namely:

Cultural Values	Definition
Trust	We hold fast to the trust we have placed
Competent	We are constantly learning and developing capabilities
Harmonious	We care about each other and respect differences
Loyal	We are dedicated and prioritize the interests of the nation and the state
Adaptive	We continue to innovate and are enthusiastic in moving or facing change
Collaborative	We encourage synergistic cooperation

### II.3. The Main Behaviors of AKHLAK

The elaboration of the AKHLAK Values System into Main Behavior aims to ensure that every Garuda Indonesia person has a common perception in understanding these values.

The value system that serves as a guideline in thinking and acting patterns is described as the Main Behavior described in the Guidelines for Business Ethics

and Corporate Work Ethics that must be complied with by every Garuda Indonesia employee in carrying out daily work activities.

### **Trust**

The main behaviors of Amanah are:

1. Fulfilling promises and commitments.
2. Be responsible for tasks, decisions, and actions taken.
3. Adhere to moral and ethical values.

### **Competent**

The main behaviors of the Competent value are:

1. Improve self-competence to answer ever-changing challenges.
2. Helping others learn.
3. Complete tasks with the highest quality.

### **Harmonious**

The main behaviors of the Harmonic value are:

1. Respect everyone regardless of their background.
2. Loves to help others.
3. Building a conducive work environment.

### **Loyal**

The main behaviors of the Loyal value are:

1. Maintaining the good name of fellow employees, leaders, SOEs and the State.
2. Willing to sacrifice to achieve a greater goal.
3. Obey the leadership as long as it is not contrary to the law and ethics.

### **Adaptive**

The main behaviors of Adaptive values are:

1. Quickly adapt to get better.
2. Continuous improvements follow technological developments.
3. Act proactively.

### **Collaborative**

The main behaviors of the Collaborative value are:

1. Giving opportunities to various parties to contribute.
2. Open in working together to generate added value.
3. Driving the use of various resources for common goals.

## **II.4. Corporate Culture "The Garuda Way"**

Along with the Company's business restructuring and transformation process,

it is necessary to change the mindset, interaction patterns, and behaviors and habits applied by all Garuda Indonesia personnel through the Company's culture "*The Garuda Way*" which was officially launched on June 24, 2022.

"*The Garuda Way*" was formed as a guideline that includes values and principles of behavior for all Garuda Indonesia personnel in working and activities within the Company so that a conducive work atmosphere can be built in order to encourage optimal contribution to the Company.



### ***Because You Matter***

which means "**Because You Are Meaningful and Valuable**". All Garuda Indonesia employees always strive to provide the best experience for everyone they meet, be it passengers, business partners, team members, superiors, colleagues, and family.

### ***I Am in Charge***



which means "**I am Responsible and Accountable**". All Garuda Indonesia personnel are proactive in solving problems by taking actions and making decisions, as well as taking responsibility for everything done.

***I Am with You***

which means "**I'm Always With You**". All Garuda Indonesia employees are a unit that trusts, respects, supports and takes care of each other.

The three Corporate Cultures above are derived from the main values of "MORALS" and are described into 6 (six) Principles of Behavior that must be applied by all Garuda Indonesia Personnel, namely:

***1. Be Sincere and Share Things Openly***

It has the meaning of "**Honest, Sincere, and Open**", where all Garuda Indonesia personnel are obliged to act sincerely, without pretense and build open communication by conveying facts and truths in their entirety without changing, postponing, or covering up.

***2. Be Thoughtful and Caring***

It has the meaning of "**Tolerance and Care**", where all Garuda Indonesia personnel are obliged to respect each other and consider the feelings of others, as well as show care, attention and empathy in hosting and serving all related parties (*stakeholders*).

***3. Take Responsibility***

It has the meaning of "**Accountability**", where all Garuda Indonesia personnel are obliged to always be accountable for everything that has been done or conveyed, both in the form of speech, writing, and behavior.

***4. Be Bold and Make Decisions***

Having the meaning of "**Courage and Making Decisions**", where all Garuda Indonesia personnel are obliged to dare to take the right actions and decisions quickly in accordance with the best judgment and consideration for the Company, both in normal conditions and in the process of change.

***5. Discipline and Consistency in Everything***

It has the meaning of "**Discipline and Consistency in All Things**", where all Garuda Indonesia personnel are obliged to always comply with regulations and uphold the applicable moral and business ethics standards consistently and appropriately.

**6. *Create Great Things Together***

It has the meaning of "Contributing Together for Excellent Results", where all Garuda Indonesia personnel are obliged to give and complement each other in the team and organization to achieve common goals effectively and efficiently.

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### **III. COMMENDABLE CONDUCT AND ETHICAL STANDARDS TOWARDS STAKEHOLDERS**

#### **III.1. Relationship with Garuda Indonesia People**

Garuda Indonesia has an obligation to bring out the best performance of every Garuda Indonesia employee in order to achieve the Company's targets.

The best performance can be achieved through the creation of a conducive work environment, protecting and respecting their rights and helping to realize welfare in accordance with the Company's capabilities.

##### **III.1.1. Safety and comfort in the workplace**

Garuda Indonesia ensures the safety and comfort of employees by building facilities and implementing security systems that refer to applicable regulations and laws. Garuda Indonesia conducts continuous assessment and evaluation of the effectiveness of the occupational safety system.

A sense of safety and comfort in the workplace is a shared responsibility among employees at all levels of the organization.

##### **III.1.2. Occupational Safety and Health**

Garuda Indonesia ensures the fulfillment of the occupational safety and health of employees by building facilities, implementing occupational safety and health systems that refer to applicable regulations and laws. Garuda Indonesia conducts an ongoing assessment and evaluation of the effectiveness of the occupational safety and health system.

Employees are obliged to understand and implement various occupational safety and health requirements in accordance with the demands of their job.

##### **III.1.3. Giving Equal Opportunities to Employees to Get Jobs, Promotions, and Layoffs**

Garuda Indonesia upholds the principle of *Equal Employment Opportunity*, where Garuda Indonesia provides equal opportunities openly and objectively to all Garuda Indonesia employees to be able to develop their careers in an effort to improve their competencies, in accordance with the Garuda Indonesia Joint Work Regulations and applicable regulations in the *Human Capital Quality Manual* or other company rules, while still paying attention to the education, experience and competencies possessed by the employee concerned.

Garuda Indonesia always upholds employment equality, including the

prohibition against all forms of discrimination, be it related to gender issues, SARA including the prohibition of discrimination against whistleblowers of disciplinary actions that may be committed by the Company's employees or *whistleblowers* related to alleged violations of collective labor regulations including corruption, collusion and nepotism as well as bribery that occur within Garuda Indonesia. Garuda Indonesia provides equal and equal opportunities and fair treatment to all employees.

#### **III.1.4. Conducive Work Environment**

Harmonious relationships between employees are built on the basis of mutual respect, mutual trust, mutual encouragement and fostering cooperation in the implementation of their respective duties and responsibilities, as well as creating a conducive work atmosphere in their work environment.

A harmonious relationship between Lead Employees and Employees must always be built both formally and informally in an effort to achieve the success of the work unit and the company's overall goals.

#### **III.1.5. The Right to Association and Politics**

Garuda Indonesia guarantees the right of every employee to organize and channel their political aspirations as long as it does not conflict with the Company's applicable regulations and applicable laws.

### **III.2. Customer Relations**

Customers are the basic consideration of Garuda Indonesia's existence. All Garuda Indonesia resources are intended to meet the needs, desires and expectations of customers.

In principle, customer rights in accordance with applicable laws and regulations must be fulfilled. Therefore, customer rights in the form of safety, security and comfort are made the focus and top priority as a service program in all business and functional units of Garuda Indonesia.

### **III.3. Relationships with Partners**

Garuda Indonesia personnel must realize that to realize the company's goals and objectives, Garuda Indonesia cannot provide all the resources it needs on its own, but needs partners to meet these needs. Interdependence between Garuda Indonesia and other partners is inevitable. For this reason, Garuda Indonesia views that the partnership relationship must be based on mutual trust and mutual benefit.

### **III.3.1. Relationship with the Airport**

The airport is an important facility and infrastructure for the existence of Garuda Indonesia. In principle, Garuda Indonesia is obliged to meet and comply with all applicable regulations and regulations at the airport issued by the Airport in order to fulfill customer rights in the form of safety, security and comfort which are the focus and main priority of Garuda Indonesia as a service program in all business and functional units of Garuda Indonesia.

### **III.3.2. Relationship with Suppliers**

Garuda Indonesia develops partnerships with suppliers to procure goods and services that are in line with the costs incurred. Garuda Indonesia's personnel in making supplier criteria must be based on applicable regulations and laws.

To realize a relationship of mutual trust, Garuda Indonesia personnel must act fairly in providing opportunities and be transparent in conveying the same information to all suppliers who will cooperate with Garuda Indonesia.

*The Business Support Unit* evaluates Garuda Indonesia's routine needs and reviews the vendor list and makes revisions if necessary. The evaluation is carried out annually by considering the optimization of supplier quality with Garuda Indonesia's needs and is based on the applicable laws and regulations.

### **III.3.3. Relationship with Agents**

In order to meet customer needs, Garuda Indonesia needs a network (distribution) that is easily accessible and spread across strategic areas, including billing settlement administration services. To meet these needs, Garuda Indonesia establishes partnerships with agents based on mutually beneficial principles.

To realize a relationship of mutual trust, Garuda Indonesia personnel must act reasonably by providing equal opportunities and information to all agents in accordance with applicable regulations and laws.

### **III.4. Relationship with Shareholders**

In running the aviation services business, Garuda Indonesia requires capital, one of which is obtained from Shareholders. Therefore, Garuda Indonesia highly appreciates and upholds the existence of Shareholders, both minority Shareholders and Majority Shareholders in accordance with applicable laws and regulations.

Garuda Indonesia establishes a good relationship with its Shareholders based on good faith, mutual trust and mutual benefit based on mutually beneficial

business standards so that it can make an optimal contribution to the Shareholders.

### **III.5. Relationships with Competitors**

Garuda Indonesia believes and believes that healthy competition is a positive thing to spur Garuda Indonesia to produce the best and make continuous improvements.

Garuda Indonesia must be active and take the initiative to build a healthy competition climate, and therefore Garuda Indonesia strives to ensure that every policy taken in the management of Garuda Indonesia remains based on the principles of healthy business competition.

### **III.6. Relationship with Creditors**

Garuda Indonesia is committed to making the best efforts to fulfill obligations and provisions based on loan agreements with creditors but is not limited to obligations to pay principal/interest/debt yields. Every loan agreement between Garuda Indonesia and creditors must contain provisions that clearly govern the respective obligations and rights of Garuda Indonesia and creditors which are prepared based on the principles of *fairness*, openness, fairness, applicable regulations and laws. The implementation of loan agreements must be carried out in good faith and while still being guided by good corporate governance and the principle of prudence.

### **III.7. Relationships with Communities/Organizations**

Garuda Indonesia always actively supports and establishes good cooperation with the community/organization. The existence of a community is needed to share information and experiences for the benefit of the company. Garuda Indonesia is committed to respecting and caring for the community in order to create mutually beneficial relationships and to support and encourage Garuda Indonesia personnel to actively contribute to the professional community/organization as long as they do not neglect their duties and responsibilities in the Company.

### **III.8. Relationship with the Community**

Garuda Indonesia is committed to providing and maintaining relationships with the community within Garuda Indonesia. Garuda Indonesia actively contributes through the SOE Social and Environmental Responsibility Program (TJSL) as the company's commitment to sustainable development by providing benefits to the economy, social, environment, as well as law and governance with principles that are more integrated, directed, measurable in impact and accountable.

Garuda Indonesia always values and respects diversity through the provision of optimal assistance to the community regardless of ethnicity, religion, race, skin color and social status.

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## **IV. COMPLIANCE AT WORK**

### **IV.1. Transparency of Communication, Financial Information and Financial Statement Integrity**

Every Garuda Indonesia employee must have a good understanding of the scope, work process, and operational and financial performance in order to increase involvement and contribution to work and the delivery of transparent and accountable reporting. Good understanding must be aligned with Garuda Indonesia's strategy and policy in disclosing material and non-material information in accordance with the authority of the position.

Garuda Indonesia is committed to preparing reports, especially Financial Statements, using quality, credible and accountable data and information and done with appropriate methods. Financial Statements must be prepared and presented in accordance with the accounting standards applicable in Indonesia, namely the Financial Accounting Standard Statement (PSAK). In conducting the audit process of Financial Statements, it must be based on the references regulated in the Professional Standards of Public Accountants (SPAP). The President Director and Finance Director of Garuda are responsible for the preparation, presentation and internal control of the Financial Statements.

### **IV.2. Conflict of Interest Handling**

Garuda Indonesia realizes that every Garuda Indonesia employee has the right to take part in financial, business, socio-cultural, political and other legitimate activities outside the work of Garuda Indonesia employees while still paying attention to Garuda Indonesia's obligations to the company. These activities must be legal and free from conflicts of interest with their responsibilities as Garuda Indonesia personnel. Garuda Indonesia personnel must not abuse Garuda Indonesia's resources or influence in order to maintain Garuda Indonesia's good name and reputation.

Potential conflicts of interest that arise need to be managed with the aim of preventing an uncondusive work atmosphere and encouraging independent work spirit and prioritizing the interests of the company over the interests of individuals or certain groups or groups.

### **IV.3. Giving and Receiving Gratification**

Garuda Indonesia's gratuity policy is designed to maintain the company's reputation as a reliable airline that acts with integrity and bases every decision on law-abiding business considerations.

In principle, Garuda Indonesia prohibits any receipt of gratuities by Garuda Indonesia Personnel from any party and requires every Garuda Indonesia

Employee to refuse gratuities and/or report every receipt and rejection of gratuities. The policy regarding gratuities is subject to the provisions applicable in the Company.

#### **IV.4. Protection of Company Assets**

The protection of the company's assets, both tangible and intangible, is aimed at ensuring that all physical, financial, intellectual property and other assets are used and protected optimally.

#### **IV.5. Anti-Bribery, Anti-Corruption, Anti-Fraud, Anti-Money Laundering and Terrorism Financing**

The Company is fully committed to implementing anti-bribery, anti-corruption, anti-fraud, anti-money laundering and terrorism financing policies in relation to the implementation of the Company's business activities.

The Company expressly prohibits any act, whether direct or indirect, associated with giving, receiving, promising, or permitting, in any form or value to any government official or body or other individual for the purpose of a business, influencing business or governmental decision-making in connection with the Company's business activities, or attempting to persuade the recipient to abuse its power or position.

The Company expressly prohibits all actions related to receiving, placing, transferring, spending, paying, granting, entrusting, bringing abroad, changing forms, exchanging for currency or securities or other acts of Assets that are the result of money laundering crimes.

The Company also does not tolerate any act in order to provide, collect, provide, or lend funds, either directly or indirectly, with the intention to be used and/or known to be used to carry out terrorist activities, terrorist organizations, or terrorists.

The prohibition shall be construed broadly and apply to any person acting for and/or on behalf of the Company, including suppliers, distributors, contractors, consultants, and agents. The Company is committed to complying with and respecting the anti-corruption, anti-bribery, money laundering and terrorism financing laws applicable in the jurisdiction where the Company conducts business activities.

Although in many countries, the provision of remuneration for a service is common, but it can have an unethical impression that the Company prohibits such giving as an effort to maintain integrity and ethics in carrying out its business activities.

## **V. DATA AND INFORMATION SECURITY**

### **V.1 Protection of Company Secrets**

The policy to protect company secrets is designed to ensure the security of information data and the company's image and to ensure that the information that needs to be disclosed by Garuda Indonesia has been fairly and equitably conveyed to interested parties without any special treatment for certain parties.

Data and information that are considered confidential include the company's business plans and strategies, research and development results used in the production process, the company's operating standards and procedures, internal documents signed by the Company's Employees or Leaders, intellectual property rights or other important information that may affect the performance of the company's financial condition, reputation, or other negative impacts for Garuda Indonesia if disseminated, unless the information has been published or known by another party without violating the provisions or is required to be published based on the provisions of the law or applicable laws and regulations.

### **V.2 Protection of Intellectual Property**

Intellectual property is intangible wealth as a result of creativity, including patents, copyrights and trademarks. As a valuable asset, Garuda Indonesia's intellectual property rights must be protected and likewise Garuda Indonesia personnel must respect the intellectual property rights of other parties.

The Company encourages Garuda Indonesia Personnel to register every invention, innovation and development made with Intellectual Property Rights in the form of copyrights, trademarks, patents and other rights in accordance with applicable laws and regulations. The Company also has the right of preference for Intellectual Property Rights created by Garuda Indonesia personnel in carrying out the company's duties made using the company's assets or facilities.

Garuda Indonesia personnel must always pay attention to the applicable rules and regulations in creating, protecting and using the company's intellectual property rights and avoid violations of intellectual property rights.

Garuda Indonesia personnel must comply with the laws and regulations that regulate intellectual property rights.

## **VI. RESPONSIBILITIES OF GARUDA INDONESIA PERSONNEL**

### **VI.1. Responsibility to the Community**

Garuda Indonesia has a mission as an agent of national economic development where in carrying out its mission, the company has a responsibility to the communities where the company operates. The manifestation of corporate responsibility to the community is a corporate social responsibility that must be fulfilled in accordance with the applicable laws and regulations.

Garuda Indonesia personnel are required to succeed in the corporate social responsibility program to the community and by running the corporate social responsibility program in a sustainable manner, it is hoped that Garuda personnel will become dignified and responsible citizens.

### **VI.2. Responsibility to the Government**

Garuda Indonesia in running its business is required to comply with the applicable regulations and laws issued by the Government as a regulator. The government, in addition to being a regulator, is also a Shareholder, so Garuda Indonesia is obliged to maximize the value of Shareholders. Therefore, the company strives to build and foster a harmonious partnership relationship with the Government.

Garuda Indonesia personnel must be able to maximize their ability to assist the company in realizing the company's responsibilities to the Government.

Thus, Garuda Indonesia personnel must be able to maintain a harmonious relationship, and mutual respect in a good and reasonable manner between Garuda Indonesia and the Government in carrying out its business activities, so that the company's business can grow and develop smoothly and sustainably.

### **VI.3. Responsibility to the Environment**

Garuda Indonesia in running its business does not solely focus on the economic aspect, but also pays full attention to the environmental aspect. Environmental aspects that have an important impact are used as a starting point for Garuda Indonesia's environmental management. Garuda Indonesia formulates an environmental impact control strategy and policy.

Garuda Indonesia personnel have a responsibility to contribute to all programs and activities that are in line with Garuda Indonesia's strategy and policies in controlling environmental impacts. By being proactive and responsive to sustainable environmental impact control, Garuda Indonesia personnel are dignified and responsible citizens.

## VII. ENFORCEMENT OF BUSINESS ETHICS AND WORK ETHICS GUIDELINES

### VII.1. Violation Reporting

Every Garuda Indonesia employee is responsible for behaving in accordance with the Garuda Indonesia Business Ethics and Work Ethics Guidelines. If Garuda Indonesia personnel feel hesitant in assessing whether the action or decision to be taken is in accordance with the Garuda Indonesia Business Ethics and Work Ethics Guidelines, then Garuda Indonesia personnel can discuss the matter with their direct supervisors or the parties mentioned in this Garuda Indonesia Business Ethics and Work Ethics Guidelines.

#### VII.1.1. Guidelines for Reporting Violations

If Garuda Indonesia Personnel find that a decision or action is inconsistent with Garuda Indonesia's Business Ethics and Work Ethics Guidelines, Garuda Indonesia Personnel must immediately report the matter to their direct supervisors or parties mentioned in this Garuda Indonesia Business Ethics and Work Ethics Guidelines.

#### VII.1.2. Violations Found by the Internal Oversight Unit (SPI)

If in the process and development of the audit of an activity carried out by SPI it is found that there is a decision or action that is not in accordance with the Garuda Indonesia Business Ethics and Work Ethics Guidelines, then the direct supervisors or parties mentioned in the Garuda Indonesia Business Ethics and Work Ethics Guidelines must immediately follow up on SPI's recommendations in accordance with the mechanisms and provisions that have been set by the company.

#### VII.1.3. *Whistle Blowing System* (WBS)

Garuda Indonesia provides a medium or forum for the submission of any reporting of violations submitted by stakeholders including Garuda Indonesia personnel and/or representatives of Garuda Indonesia stakeholders in relation to violations of Garuda Indonesia's Business Ethics and Work Ethics Guidelines.

The completion of reporting violations is a form of increasing stakeholder protection in order to ensure the rights of stakeholders related to the company. Reporting violations by stakeholders that are not acted upon immediately has the potential to increase reputational risks for companies.

To complete the reporting of violations, Garuda Indonesia has established written policies and procedures which include:

- (1) Receipt of violation reporting;
- (2) Handling and settlement of violation reporting;
- (3) Whistleblower protection;
- (4) Monitoring, handling and completion of violation reporting.

Reporting violations are submitted by Garuda Indonesia personnel or the public ("Reporter") through the company's WBS, namely <http://whistleblower.garuda-indonesia.com/>. Reports that enter the WBS will be followed up by the WBS management unit, and if it is proven that there is a violation, it will be followed up by the Investigator. The complainant is entitled to legal protection from the company.

Further explanations and provisions are regulated in the Decree of the Board of Directors of Garuda Indonesia regarding *the Whistleblowing System*.

#### **Handling Violations Committed by Garuda Indonesia Personnel**

All reported violations of the Code of Business Ethics and Work Ethics will be adequately followed up through further assessment or examination for the process of proving and determining the weight of the violation as a consideration for the provision of disciplinary action or sanctions.

The provisions regarding the assessment of consultation and/or reporting violations of the Business Ethics and Work Ethics Guidelines and their handling are described as follows:

- a. To prevent violations of the Business Ethics and Work Ethics Guidelines, direct superiors or direct superiors from direct superiors should supervise and coach employees in their work units, especially employees who are proven to have violated the Business Ethics and Work Ethics Guidelines and provide an example in enforcing the Business Ethics and Work Ethics Guidelines.
- b. The direct supervisor or the direct supervisor of the direct supervisor shall as far as possible provide direct consultation answers, including reviewing and giving reprimands and/or warnings in accordance with the Collective Labor Agreement or applicable provisions, for Garuda Indonesia personnel who are proven to have violated, and if there are matters that cannot be answered or handled, immediately forward them to the unit in

- charge of the management of the Business Ethics and Work Ethics Guidelines and the unit in charge of Corporate Security.
- c. The Direct Supervisor or Supervisor of the Direct Supervisor is obliged to report on the consultation and its answer, including if it is proven that there is a violation and its handling (reprimand and/or warning) to the unit in charge of the management of the Business Ethics and Work Ethics Guidelines, the Internal Supervision Unit and the unit in charge of Company Security.
  - d. If from the reported problem there is a violation that has been given a warning and/or warning (I, II, or III) but is repeated, or is a serious violation, violation of the law or detrimental to the company, then a more in-depth investigation must be carried out by the unit in charge of Company Security.
  - e. The Board of Directors imposes sanctions on Garuda Indonesia personnel, including in the case of sanctions related to Termination of Employment (PHK), in accordance with the provisions of the Collective Labor Agreement and applicable laws.
  - f. In the event of violations related to general criminal acts, the Board of Directors may submit the matter to the authorities in accordance with applicable laws and regulations.

**Handling of Violations Committed by Members of the Board of Directors:**

- a. The President Director shall give answers directly as possible, and if there are matters that cannot be answered, immediately forward them to the Board of Commissioners.
- b. The President Director is obliged to report on the consultation including its answers to the Board of Commissioners.
- c. If from the matters consulted and/or reported there are indications of violations by the members of the Board of Directors, the Board of Commissioners will report it to the Shareholders, for a more in-depth study.

**VII.2. Sanctions for Violations**

For violations of Garuda Indonesia's Business Ethics and Work Ethics Guidelines, there are consequences:

- (1) Garuda Indonesia personnel who are proven to have violated the Garuda Indonesia Business Ethics and Work Ethics Guidelines may be subject to disciplinary action in the form of verbal and written reprimands, stern warnings with suspension until termination of



employment with reference to the provisions of the Collective Employment Agreement;

- (2) Garuda Indonesia Partners who are proven to have committed violations will be subject to sanctions in accordance with the regulations and policies set by the company;
- (3) If the existing conditions involve a violation of the law, the problem can be forwarded to the authorities.

### VII.3. Socialization

Socialization is an important stage in the implementation of Garuda Indonesia's Business Ethics and Work Ethics Guidelines. The *Human Capital Management* Unit together with the *Corporate Secretary* Unit carry out socialization effectively and thoroughly by paying attention to the following matters:

- (1) Socializing Garuda Indonesia's Business Ethics and Work Ethics Guidelines at the time of the issuance of this Business Ethics and Work Ethics Guidelines;
- (2) Socializing Garuda Indonesia's Business Ethics and Work Ethics Guidelines in Garuda Indonesia's Personnel Orientation program in accordance with the program organized by Garuda Indonesia;
- (3) Socializing regularly for all Garuda Indonesia personnel, including during the socialization of *Good Corporate Governance* (GCG). In supporting the process of socializing Garuda Indonesia's Business Ethics and Work Ethics Guidelines, Garuda Indonesia will conduct briefings and internalization, or indirectly, namely through Garuda Indonesia's internal communication media;
- (4) Building commitment for all Partners related to Garuda Indonesia;
- (5) Realizing the application of ethics as an integral part of business practices and performance assessment of all Garuda Indonesia personnel.
- (6) Contains the Garuda Indonesia Business Ethics and Work Ethics Guidelines on *the company's website* to make it easier for Garuda Indonesia personnel to access the guidelines.

### VII.4. Integrity Pact

Garuda Indonesia personnel are obliged to obey and implement the Garuda Indonesia Business Ethics and Work Ethics Guidelines set by Garuda Indonesia. As a form of compliance and commitment to carry out the Business Ethics and Work Ethics Guidelines, every Garuda Indonesia employee, including the Board of Directors and the Board of Commissioners

and their supporting organs, is required to sign an Integrity Pact (Statement of Compliance and Commitment to the Guidelines on Business Ethics and Work Ethics) and is carried out annually.

The pattern of thinking and acting in accordance with the Garuda Indonesia Business Ethics and Work Ethics Guidelines makes Garuda Indonesia personnel always maintain their dignity and dignity and avoid reprehensible acts that can damage Garuda Indonesia's self-image and reputation. Therefore, any violation of Garuda Indonesia's Business Ethics and Work Ethics Guidelines has strict sanction consequences.

#### **VII.5. Evaluation**

Periodic evaluation of the implementation of ethics enforcement:

- a. SPI and the Unit responsible for *the Whistleblowing System* once in 6 months, report to the Director of *Human Capital* with a copy to the *Human Capital Unit* and the *Corporate Secretary Unit*.
- b. The Director of Human Capital once a year, reports to the President Director.

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## VIII. CLOSING

The Garuda Indonesia Business Ethics and Work Ethics Guidelines within Garuda Indonesia are normative rules and are the minimum standards that must be complied with by every Garuda Indonesia employee in carrying out their daily duties and responsibilities.

This Garuda Indonesia Business Ethics and Work Ethics Guidelines can be implemented in parallel with other provisions applicable at Garuda Indonesia and/or applicable laws and regulations.

If in this Code of Business Ethics and Work Ethics there are provisions that are lower than other provisions that apply within Garuda Indonesia and/or other laws, then what is used is a higher level of provision.

Garuda Indonesia's Business Ethics and Work Ethics Guidelines can be amended according to Garuda Indonesia's needs. During the change process, Garuda Indonesia's Business Ethics and Work Ethics Guidelines remain valid until the changes are enforced.

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## IX. INTEGRITY PACT FORM

### IX.1 Example of the Integrity Pact of the Board of Commissioners/Board of Directors

#### STATEMENT LETTER

The undersigned :

Employee Name/Number : .....  
Address : .....  
Position : .....

In accordance with Article 25 of Law Number 19 of 2003 concerning State-Owned Enterprises jo. Article 20, Article 21, Article 22 of Government Regulation Number: 45 of 2005 concerning the Establishment, Management, Supervision, and Dissolution of State-Owned Enterprises jo. Regulation of the Minister of SOEs number: PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises Articles 4, 6, 16, 18, 67, 72 and paragraph (28) of the Articles of Association of PT Garuda Indonesia (Persero) Tbk, I hereby declare my commitment and statement that as of the date of this statement letter I made and so on during my duties and responsibilities at PT Garuda Indonesia (Persero) Tbk:

1. I do not have a conflict of interest and/or be involved in a transaction that has a conflict of interest with PT Garuda Indonesia (Persero) Tbk that could harm or reduce the Company's profits.
2. I have good morals, morals, and integrity and am capable of doing legal deeds.
3. I do not hold a dual position as:
  - a. Members of the Board of Directors in State-Owned Enterprises and other business entities;
  - b. Members of the Board of Commissioners and/or the Board of Supervisors in State-Owned Enterprises and other business entities;
  - c. Other structural and functional positions in central and/or regional government agencies/institutions;
  - d. Political party administrators, legislative members and/or regional heads, deputy regional heads;
  - e. Become a legislative candidate or candidate for regional head/deputy regional head;
  - f. Other positions that may cause a conflict of interest;
  - g. Other positions are in accordance with the provisions of laws and regulations.
4. I do not have a blood relationship up to the second degree, either according to a straight line or a sideways relationship (son-in-law or brother-in-law) with other members of the Board of Directors or with members of the Board of Commissioners of PT Garuda Indonesia (Persero) Tbk.
5. I do not have any relationship with any company or participant that may cause a *conflict of interest* in relation to the procurement/*General Affairs activities of* PT Garuda Indonesia (Persero) Tbk.

6. I will not give and/or receive gratuities of any kind to/from other parties in connection with my position at PT Garuda Indonesia (Persero) Tbk, which is contrary to my duties and obligations and which may affect decision-making and may cause a *conflict of interest*.
7. I am committed not to commit acts of Corruption, Collusion, and Nepotism (KKN), bribery practices, fraudulent practices, money laundering practices, terrorism financing and involvement in politics and other unethical acts that are contrary to my integrity as a Garuda Indonesia employee.
8. I will comply with all policies and ethics as best as stated in the Business Ethics and Work Ethics Guidelines of PT Garuda Indonesia (Persero) Tbk.
9. I will not excessively expose my luxurious lifestyle and/or ownership of luxury goods to social media, including avoiding any form of social activities that can raise suspicion of the source of wealth.
10. In the 5 (five) years prior to appointment and during my tenure, I have never:
  - a. Declared bankrupt;
  - b. Being a member of the Board of Directors and/or a member of the Board of Commissioners who is found guilty of causing a company, Subsidiary and/or other business entity to be declared bankrupt;
  - c. Punished for committing criminal acts that harm the finances of the state, SOEs, Subsidiaries, other business entities and/or related to the financial sector;
  - d. Be a member of the Board of Directors and/or a member of the Board of Commissioners who during their tenure:
    - i. Never held an Annual GMS;
    - ii. His responsibility as a member of the Board of Directors and/or a member of the Board of Commissioners has never been accepted or has never been accountable as a member of the Board of Directors and/or a member of the Board of Commissioners to the GMS;
    - iii. Has caused a company that has obtained a license, approval, or registration from the Financial Services Authority to not fulfill the obligation to submit annual reports and/or financial statements to the Financial Services Authority;
11. I am committed to complying with laws and regulations, including but not limited to the provisions of laws and regulations regarding Limited Liability Companies and the Capital Market;
12. I have knowledge and/or expertise in the field required by the Company;
13. I have fulfilled the requirements as a member of the Board of Commissioners/Board of Directors based on the provisions of the Limited Liability Company Law. Laws and regulations in the field of capital market and other applicable laws and regulations related to the Company's business activities;
14. I declare that during my 202X\*):
  - ☐ do not receive gratuities.
  - ☐ received gratuities and submitted a report in accordance with applicable regulations.

Thus I make this statement truly and to be used properly.

Jakarta

Name

Position

\*) select the appropriate one.

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## IX.2 Example of an Employee Integrity Pact

### STATEMENT OF COMPLIANCE AND COMMITMENT ON THE GUIDELINES OF BUSINESS ETHICS AND WORK ETHICS PT GARUDA INDONESIA (PERSERO) Tbk

I am the undersigned:

Employee Name/Number : .....

Work Unit : .....

Position : .....

It hereby states:

1. Know and understand the provisions stipulated in the Business Ethics and Work Ethics Guidelines of PT Garuda Indonesia (Persero) Tbk.
2. Will comply with the Guidelines for Business Ethics and Work Ethics as well as the Cultural Values and Codes of Conduct applicable at PT Garuda Indonesia (Persero) Tbk, including but not limited to:
  - a. Commitment not to abuse my position at PT Garuda Indonesia (Persero) Tbk beyond the authority given to me based on applicable internal regulations;
  - b. Respect every Garuda Indonesia person and maintain dignity as a clean and ethical individual;
  - c. Commitment not to commit acts of Corruption, Collusion, and Nepotism (KKN), bribery practices, fraudulent practices, money laundering practices, terrorism financing, involvement in politics and other unethical acts that are contrary to my integrity as a Garuda Indonesia employee;
  - d. Commitment to maintain the good name of PT Garuda Indonesia (Persero) Tbk includes not conveying information and/or responses about PT Garuda Indonesia (Persero) Tbk that may cause a negative image;
  - e. The commitment not to excessively show the luxurious lifestyle and/or ownership of luxury goods to social media, including avoiding all forms of social activities that can raise suspicion about the source of wealth of Garuda Indonesia personnel.
3. I declare that during my 202X\*):
  - ☐ do not receive gratuities.
  - ☐ received gratuities and submitted a report in accordance with applicable regulations.



4. If I violate this statement, I am willing to accept the consequences as stipulated in the Collective Employment Agreement of PT Garuda Indonesia (Persero) Tbk, and/or other applicable laws and regulations.

Thus, I make this statement truly, without any coercion from any party and to be used properly.

....., .....

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## X. ATTACHMENT

### Examples of Garuda Indonesia People's Behavior

#### X.1 Relationship with Garuda Indonesia Personnel

##### X.1.1. Safety and comfort in the workplace

Behaviors that must be displayed by Garuda Indonesia personnel:

- (1) Comply with all applicable provisions and policies in the company, including the security system that has been established and laws and regulations relevant to the company's operational activities.
- (2) Maintain and use all data, information, assets, facilities and work inventory items for the benefit of the Company in accordance with its functions, not for the benefit of personal interests or certain parties outside the Company.
- (3) Maintaining confidentiality, storage, use and dissemination of employee personal data that is used improperly such as names, home and office contact data, salary, training data, performance records and other data both to internal parties and to external parties.
- (4) Mutual respect, respect, encouragement and cooperation in carrying out their respective duties and responsibilities.
- (5) Avoid social activities that cause negative perceptions.

Behaviors that should not be displayed by Garuda Indonesia personnel:

- (1) Committing or not trying to prevent bullying , *harassment*, and *abusing acts* , including committing immoral acts in the work environment.
- (2) Acts that may endanger safety or interfere with work comfort, such as: eating and drinking at the desk, throwing garbage out of place and getting drunk at work.
- (3) Conducting buying and selling transactions at work for personal interests including but not limited to carrying personal belongings, entrusted goods, merchandise and/or belongings of others while carrying out duties with the aim of obtaining personal benefits and/or profits of other parties.
- (4) Violating the conditions of attendance/attendance, the provision of dress for work uniforms and their accessories as well as the use of identification marks.
- (5) Bringing firearms or dangerous weapons into the company environment unless they are authorized to carry them.

- (6) Acting inappropriately as an employee, making dirty remarks, acting disrespectfully to both superiors and fellow employees in the work environment.

#### **X.1.2. Occupational Safety and Health**

Behaviors that must be displayed by Garuda Indonesia personnel:

- (1) Comply with national and international laws and regulations regarding Occupational Safety and Health which are used as references/references by the Company.
- (2) Creating and maintaining a safe work environment and preventing workplace accidents, through:
  - (a) The use of various work equipment and equipment is in accordance with the demands of the occupational safety and health system.
  - (b) Maintain and maintain work safety equipment and equipment that are the company's inventory items.
  - (c) Report to the authorities for any incident that has the potential to cause a work accident (*hazard*).
- (3) Maintain health and fitness and carry out health checks according to work requirements.

Behavior that should not be displayed by Garuda Indonesia personnel

- (1) Failure to comply with procedures in performing work that has a direct impact on flight safety.
- (2) Gambling, getting drunk, drinking intoxicating liquor in the Company's work environment.
- (3) Smoking in the workspace (air-conditioned and enclosed space).
- (4) Working in poor or unhealthy conditions.
- (5) Joking around or not concentrating when doing high-risk work.
- (6) Doing work that is not in accordance with their functions and positions and/or not requested by their superiors/companies.
- (7) Refuse examination, treatment and treatment as well as other protection efforts in the health sector that the Company deems necessary and does not contradict the PKB and the law.
- (8) Not willing to undergo a medical examination related to efforts to prevent and control the use of drugs/psychotropics.
- (9) Acts committed related to NARCOTICS (Narcotics, Psychotropics and Addictive Substances) without the knowledge and supervision of a doctor such as being an addict, user, producer, dealer and/or assisting in trafficking.

- (10) Committing immoral acts, intentionally or with their consent become an object or model that contains pornographic content or pornographic acts both inside and outside the Company which may have an impact on damaging the Company's good name.

#### **X.1.3. Equal Opportunity for Employees to Get Jobs, Promotions, and Layoffs**

Behaviors that must be displayed by Garuda Indonesia personnel:

- (1) Respect the management's decision in mutation, promotion and demotion of employees.
- (2) Appreciate employees who undergo mutations, promotions and demotions.
- (3) Providing equal opportunity rights to all employees in terms of mutation and promotion needs on the condition that they must meet competencies and capabilities in accordance with the needs and provisions applicable in the Company.
- (4) Accepting employees with competencies who get more priority development opportunities.
- (5) Always improve competencies both through company programs and *self-learning*.
- (6) Providing training and development programs in an effort to improve the competence of Garuda Indonesia personnel.

Behaviors that should not be displayed by Garuda Indonesia personnel:

- (1) Obstructing/preventing other employees from mutation or promotion.
- (2) Discriminating employees that leads to forms of discrimination to get priority for mutation or promotion, outside of competency reasons.
- (3) Conducting *office politics* for mutation or promotion.
- (4) Rejecting/ignoring assignments where the task does not conflict with the company manual, PKB or law.
- (5) The superior does not foster and guide his subordinates in carrying out their duties and/or does not develop their careers.

#### **X.1.4. Conducive Work Environment**

Behaviors that must be displayed by Garuda Indonesia personnel:

- (1) Build communication and coordination to create a solid work team.
- (2) Giving appreciation for the success achieved by their colleagues.
- (3) Help each other and remind fellow colleagues to always work *innovatively* and *goal-oriented*.
- (4) Provide moral support to fellow colleagues who are experiencing

problems/disasters.

- (5) The Leadership Employee provides clear and understandable briefings and assignments in order to achieve the targets that have been set and provide an objective assessment of performance achievements.
- (6) Leadership Officers and Officers are able to build positive and productive cooperation, mutual acceptance and appreciation based on sincerity and good faith.
- (7) Leadership Employees act as role models, mentors and are responsible for the behavior and performance of employees in their ranks.
- (8) Employees are obliged to comply with the orders and/or directions of the Leading Employees for the benefit of the company (such as overtime work, assignment placement, official travel and others) as long as they do not conflict with ethics, morals and religion.
- (9) Employees are required to report to the Leadership Employee for incidents that have the potential to harm or damage the company's image.
- (10) Giving equal opportunities to employees to get jobs, promotions, and layoffs.
- (11) Employees are obliged to maintain the good name of the Company by not conveying information and/or responses about the Company that may cause a negative image of the Company.

Behaviors that should not be displayed by Garuda Indonesia personnel:

- (1) Defamation of co-workers.
- (2) Gossip or talk about things that are not sure of the truth.
- (3) To describe colleagues with SARA issues.
- (4) Not respecting coworkers.
- (5) Fighting with fellow coworkers.
- (6) Bullying or intimidating fellow coworkers.
- (7) Sexual harassment of fellow colleagues.
- (8) Employees reported that their performance was not in accordance with the facts.
- (9) The Lead Employee does not convey information about the development of Garuda Indonesia's performance and other important information to the Employee.
- (10) The Leadership Employee conveys incorrect information regarding the development of Garuda Indonesia's performance and other important information to the Employee.

- (11) The Lead Employee reveals the shortcomings of one of the Employees to the other Employees.
- (12) Employees disclose the shortcomings of Leadership Employees to fellow colleagues or to other Leadership Employees.
- (13) The Presiding Officer gives corrections or directions to the Officers unwisely.
- (14) Performing work that is not his duty that may harm or harm the Company or that is suspected of endangering him without a written order from his superiors.
- (15) Committing acts of corruption as regulated by the Anti-Corruption Law.
- (16) Commit fraud, theft, embezzlement, forgery, extortion and/or deprivation of goods and/or money belonging to fellow colleagues and/or the Company
- (17) Obstructing Employees who report suspected acts of corruption.

#### **X.1.5. Right to Association and Politics**

Behaviors that must be displayed by Garuda Indonesia personnel:

- (1) Always prioritize the interests of the Company.
- (2) In carrying out union and political activities, we must still consider and even improve the company's performance.
- (3) In forming and joining trade unions, professional associations both internal and external, non-governmental organizations, socio-economic organizations, social and community organizations, must notify their membership to the company through their direct supervisors.
- (4) In participating and channeling political aspirations, they must comply with all applicable provisions and regulations in the company.

Behaviors that should not be displayed by Garuda Indonesia personnel:

- (1) Become a political party administrator.
- (2) Utilize the company's facilities and resources for political activities.
- (3) On behalf of the company or contributing on behalf of Garuda Indonesia to Political Parties.
- (4) Become a candidate for Legislative, Executive and Judicial members.

#### **X.2. Relationship with Customers**

Behaviors that must be displayed by Garuda Indonesia personnel:

- (1) Fulfill all commitments that have been published to customers.
- (2) Providing optimal services by not discriminating for ethnicity, religion, race,

skin color and social status.

- (3) Provide easy access to booking and transaction of the company's flight services.
- (4) Providing convenience and convenience for customers in flight readiness reporting services.
- (5) Meet the accuracy of customers' flight schedules.
- (6) Protect the safety, security and comfort of passengers while on board.
- (7) Ensure passengers and their luggage are safe.
- (8) Ensuring the accuracy and completeness of customer freight transportation services.
- (9) Maintain the confidentiality of information about customers.
- (10) Provide relevant and accurate information to customers regarding Garuda Indonesia services.
- (11) Handle customer complaints by providing the best solutions.
- (12) Thank you for the customer's suggestions and criticisms.
- (13) Build good relationships with customers.
- (14) Utilize and manage *customer feedback*.

Behaviors that should not be displayed by Garuda Indonesia personnel:

- (1) Leverage important information about customers for personal gain.
- (2) Creating customers without clear and accurate information.
- (3) Not responding to the obstacles that customers are facing.
- (4) Do not report the receipt of gratuities either directly or indirectly from customers in accordance with the applicable provisions of the Company.
- (5) Receive gratuities from customers.
- (6) Sacrificing the interests of customers for the sake of personal, family and co-workers.
- (7) Being inappropriate, unprofessional, making dirty remarks, being disrespectful to customers.
- (8) Misuse of the Company's facilities such as selling and/or transferring to customers.
- (9) Working without heeding applicable work procedures that have an impact on material and immaterial losses on complaints submitted by customers.
- (10) Conducting joint activities with customers with the aim of personal gain or other parties, which directly or indirectly harm the Company.

### **X.3 Relationship with Partners**

#### **X.3.1 Relationship with the Airport**

Behaviors that must be displayed by Garuda Indonesia personnel:

- (1) Provide data and information on specifications, technicalities and other requirements set by the Airport accurately in accordance with applicable regulations.
- (2) Building and fostering a harmonious and harmonious relationship with the Airport.
- (3) Obey and comply with all regulations and regulations that have been set by the Airport.

Behaviors that should not be displayed by Garuda Indonesia personnel:

- (1) Violating the rules and regulations that have been set by the Airport Authority.
- (2) Providing gratuities to parties related to the airport either directly or indirectly that may influence the Airport to take an action that is contrary to its obligations or not to take an action that is its obligation, even though the given is carried out for the benefit of Garuda Indonesia.
- (3) Providing Garuda Indonesia data, information and documents required by the Airport in an incomplete or inaccurate manner and not in accordance with the applicable provisions in the company.
- (4) Being inappropriate, unprofessional, making profanity, acting disrespectfully.

#### **X.3.2. Relationship with Suppliers**

Behaviors that must be displayed by Garuda Indonesia personnel:

- (1) Provide data and information on the specifications of goods and services and other requirements that are set accurately according to the stages of the procurement process.
- (2) In the selection of suppliers, it is carried out openly for Goods and Services Providers who meet the requirements and is carried out through fair competition among equal Goods and Services Providers and meet certain conditions/criteria based on the stipulated conditions.
- (3) Provide equal treatment and opportunities to producers of micro, small, and medium enterprises and cooperatives, including subsidiaries, as suppliers as long as the quality, price, and purpose can be accounted for.
- (4) Conduct the procurement process professionally and *independently* and in accordance with applicable procurement regulations and GCG principles.



- (5) Avoid conflicts of interest and prohibit directing to suppliers whose owners and/or managers have an affiliate relationship with Garuda Indonesia.

Behaviors that should not be displayed by Garuda Indonesia personnel:

- (1) Not reporting the receipt of gratuities either directly or indirectly from suppliers in accordance with the applicable provisions in the company.
- (2) Receive gratuities from suppliers.
- (3) Provide confidential company data and/or information, as well as "personal data" to suppliers.
- (4) Communicate with one or all of the tender participants outside of the one set by Garuda Indonesia.
- (5) Disclosing supplier data or information to other suppliers.
- (6) Hindering the process of fulfilling supplier rights.
- (7) Levy illegally/unlawfully in any form for the purpose of obtaining personal benefits or other parties.
- (8) Acting inappropriately, unprofessionally, making dirty remarks, acting disrespectfully.

### **X.3.3. Relationship with the Agent**

Behaviors that must be displayed by Garuda Indonesia personnel:

- (1) Provide access and disclosure of the same data and information to agents.
- (2) Maintain the confidentiality of confidential data and/or company information as well as "personal data" to agents.
- (3) Avoid conflicts of interest and prohibit directing to agents whose owners and/or managers have an affiliation with Garuda Indonesia.
- (4) Fostering good relationships with agents to increase the company's revenue.

Behaviors that should not be displayed by Garuda Indonesia personnel:

- (1) Determining agents by not paying attention to the criteria and procedures set by the company.
- (2) Not reporting the receipt of gratuities either directly or indirectly from agents in accordance with the applicable provisions in the Company.
- (3) Receive gratuities from agents.
- (4) Providing confidential company data and/or information, as well as "personal data" to agents.

- (5) Communicate with any or all of the agents outside of those designated by the company.
- (6) Disclosing agent data or information to other agents.
- (7) Hindering the process of fulfilling agent rights.
- (8) Levy illegally/unlawfully in any form to agents for personal or other party gains.
- (9) Carrying out joint activities with superiors, colleagues, subordinates or other parties in order to maintain good relations with agents but have a detrimental impact on the Company both directly and indirectly.
- (10) Acting inappropriately, unprofessionally, making dirty remarks, acting disrespectfully.

#### **X.4. Relationship with Shareholders**

Behaviors that must be displayed by Garuda Indonesia personnel:

- (1) Fulfilling the right of each Shareholder to receive fair and reasonable treatment in accordance with laws and regulations.
- (2) Fulfilling the right of each Shareholder to cast his vote in accordance with the classification and number of shares he owns.
- (3) To provide each Shareholder with complete and accurate material information regarding Garuda Indonesia, through various available channels.
- (4) Guarantee open sale and purchase transactions in accordance with the applicable market mechanism.
- (5) Protect the rights of minority shareholders to the dominance of majority shareholders.
- (6) Ensuring optimal performance achievement and building Garuda Indonesia's image in order to provide added value for Shareholders.
- (7) Ensure that every reporting, statement, and disclosure of information to investors must be transparent, clear, accurate, complete and does not contain things that can be misinterpreted except for information, because the Board of Directors has a justifiable reason for not providing it;
- (8) Ensuring that the determination of dividends is decided by shareholders at the General Meeting of Shareholders, based on the interests of Garuda Indonesia, by looking at various matters such as business continuity, strategies that will and are being implemented and investment plans.

Behaviors that should not be displayed by Garuda Indonesia personnel:

- (1) Allowing Shareholders to intervene in the company's operational activities that are the responsibility of the Board of Directors in accordance with the provisions of the Articles of Association of Garuda Indonesia and applicable laws and regulations.
- (2) Disseminate inaccurate or incomplete Garuda Indonesia information or data required by Shareholders.
- (3) Violating regulations issued by the OJK, and the Indonesia Stock Exchange.
- (4) Buying/selling Garuda Indonesia securities or company securities transacted with Garuda Indonesia conducted by insiders (*insider trading*).
- (5) Influencing others to buy or sell Garuda Indonesia securities.
- (6) Providing insider information to any party who is reasonably suspected of using the information to buy or sell securities (this is referred to as insider information).
- (7) Conducting transactions to buy and sell Garuda Indonesia securities with fellow Garuda Indonesia employees.

#### **X.5. Relationship with Competitors**

Behaviors that must be displayed by Garuda Indonesia personnel:

- (1) Build a market that is open to trading and investing.
- (2) Encourage healthy and socially beneficial competition and respectful behavior between competitors.
- (3) Respect the copyright and intellectual works of competitors.
- (4) Comply with applicable laws and regulations, especially regarding the prohibition of monopolies and unfair business competition.

Behaviors that should not be displayed by Garuda Indonesia personnel:

- (1) Winning the competition in an unethical or illegal way.
- (2) Committing conspiracy in the implementation of procurement of goods and services.
- (3) Making unhealthy or fraudulent payments just to win the competition.
- (4) Engage in dishonest/illegal or unethical ways to obtain commercial information from competitors.
- (5) Conducting a "*Black Campaign*" to competitors.
- (6) Committing illegal and prohibited actions based on the provisions of the Business Competition Law.
- (7) Discriminating against other business actors.

- (8) Carrying out a conspiracy in the form of a cartel and determining the components of production costs and setting prices together.

#### **X.6. Relationship with Creditors**

Behaviors that must be displayed by Garuda Indonesia personnel:

- (1) Committed to making the best efforts to meet the obligations and conditions under the loan agreement.
- (2) Implementing funding strategies from the creditor *onboarding* process, negotiation process and the implementation of loan agreement provisions based on good faith while still guided by good corporate governance and prudential principles.
- (3) Establish good communication and relationships with creditors in the implementation of credit agreements guided by good corporate governance and prudential principles.
- (4) Provide disclosure of information in the implementation of funding strategies to creditors with the principle of prudence and based on accountable information.

Behaviors that should not be displayed by Garuda Indonesia personnel:

- (1) Not making maximum efforts to fulfill obligations and conditions based on the loan agreement.
- (2) Implementing funding strategies from the creditor *onboarding* process, negotiation process and the implementation of the terms of the loan agreement without being based on good faith and not guided by good corporate governance.
- (3) Have poor relationships and communication with creditors.
- (4) Ignoring the principle of prudence in the disclosure of information, by providing misleading information and unaccountable information to creditors.

#### **X.7. Relationship with Community/Organization**

Behaviors that must be displayed by Garuda Indonesia personnel:

- (1) Actively contribute to the community/organization as long as they do not neglect their duties and responsibilities in the Company
- (2) Maintain good relationships with communities/organizations to create harmonious relationships.
- (3) Establish cooperation with communities/organizations to increase insights/*hardskills/soft skills*.

- (4) Uphold equality towards fellow members of the community/organization.
- (5) Appreciate every form of cooperation with the community/organization to improve social value and the Company's image.

Behaviors that should not be displayed by Garuda Indonesia personnel:

- (1) Committing violence, intimidation, *bullying* and harassment of community members both physically and verbally.
- (2) Disclose material information without permission that could cause harm to the company and could violate any law or regulation.
- (3) Committing acts that lead to discrimination that violate the principles of justice and equality.
- (4) Conducting discussions and decision-making in situations where there is a conflict of interest.
- (5) Engaging in unethical acts that violate applicable regulations.

#### **X.8. Transparency of Communication, Financial Information and Integrity of Financial Statements**

Behaviors that must be displayed by Garuda Indonesia personnel:

- (1) Disclose company information prudently and in accordance with the authority it has.
- (2) Respect and uphold honesty, sincerity, and openness while still paying attention to the principle of prudence.
- (3) Comply with the standards for financial information disclosure and the preparation of financial statements that have been regulated in the applicable laws and regulations.
- (4) It must always provide information and record in a complete, fair, accurate, timely and understandable manner in the form of reports and documents archived by Garuda Indonesia, or submitted to stakeholders.
- (5) Make financial information as a tool to control activities.
- (6) Report various kinds of information that have an important impact on the company's image and reputation to direct supervisors or authorized Work Units.
- (7) Always maintain the distribution of material company information from potential leaks.
- (8) Administer data and/or documents neatly and orderly.

Behaviors that should not be displayed by Garuda Indonesia personnel:

- (1) Providing opinions through various forums, print, electronic media and other information technology media regarding the company's performance and prospects to external parties, in addition to being submitted by the company's appointed parties.
- (2) Discuss various information that has an important impact on the company in addition to information that has been officially issued by the company, to spouses, relatives, and other non-interested parties.
- (3) Conveying misleading information.
- (4) Discussing sensitive matters related to Garuda Indonesia in *the Public Area*.
- (5) Modifying/denying the recording of financial statements that aim to make errors and/or misrepresent information in the presentation of financial statements and other accounting activities.
- (6) Perform double accounting recording.
- (7) Concealing the Company's data and documents during his tenure and/or after the person concerned completes his term of office and position.

#### **X.9. Conflict of Interest Handling**

Behaviors that must be displayed by Garuda Indonesia personnel:

- (1) Always maintain personal integrity so that the image of the profession and Garuda Indonesia can be well maintained.
- (2) Report business activities or all relationships that may cause potential conflicts of interest through the mechanism for handling conflicts of interest that apply in the company.
- (3) Avoid actions or relationships that may give rise to a conflict of interest with Garuda Indonesia's work or interests.
- (4) Obtain approval from a direct supervisor prior to accepting a position as an officer on the board of a Non-Governmental Organization, where Garuda Indonesia may have a business relationship with the agency or has the expectation of obtaining financial or other assistance from Garuda Indonesia.
- (5) The Board of Directors and the Board of Commissioners make annual statements related to conflicts of interest.
- (6) Garuda Indonesia personnel revealed the potential for a conflict of interest in the implementation of their work.

Behaviors that should not be displayed by Garuda Indonesia personnel:

- (1) Utilizing various company resources, information about the company, intellectual property rights, time and facilities of Garuda Indonesia including office equipment such as telephones, facsimiles, emails, computers and others for personal or certain groups/groups.
- (2) Doing business or part-time work outside the company, where Garuda Indonesia personnel may be encouraged to do such work during active working hours at Garuda Indonesia or using Garuda Indonesia's equipment or materials.
- (3) Utilize business opportunities with all partners related to the company's business for personal gain.
- (4) Receive something in any form from a third party that has a business relationship with Garuda Indonesia.
- (5) Abusing authority and position in various business activities of the company for personal or group interests.
- (6) Allowing Garuda Indonesia personnel who have a conflict of interest in the discussion and decision-making process.
- (7) Conducting stock transactions from other companies, even though the Garuda Indonesia employee in carrying out his work is related to that company.
- (8) Have special preferences in hiring or making promotion decisions regarding wife, family or close friends.
- (9) Abuse of authority and position that is detrimental to the Company for personal gain and other parties.
- (10) Being an employee or working for another company with the same core business or the same type of business owned by the Company and directly harming the Company.
- (11) Directly or indirectly have capital participation in other companies whose business activities are within the scope of their authority and can determine the implementation or running of the Company's policies and harm the Company either directly or indirectly.

#### **X.10. Giving and Receiving Gratification**

Behaviors that must be displayed by Garuda Indonesia personnel

- (1) To refuse gratuities given in any form from third parties related to the position of Garuda Indonesia Personnel.
- (2) In providing gratuities on behalf of Garuda Indonesia, it must refer to the policies that apply in the Company and the granting does not conflict with the obligations, duties, and functions of the position and is not addressed to state administrators.



- (3) In making donations on behalf of the company for social purposes or for other purposes that do not conflict with the applicable laws and regulations, must refer to the policies that apply in the Company.
- (4) Make a *disclosure* report on every receipt, rejection, and/or gratuity in accordance with the procedures set by the company.

Behaviors that should not be displayed by Garuda Indonesia personnel:

- (1) Offering or directing others to give gratuities.
- (2) Accept any form of gratuity from any party.
- (3) Providing gratuities to third parties either directly or indirectly that may influence the gratuity recipient to carry out an action that is contrary to his obligations, even though the given is for the benefit of Garuda Indonesia.
- (4) Giving a donation with a vested interest or motive that intends to (negatively) affect another party and/or may cause a conflict of interest.
- (5) Receiving money or equivalent, gifts or gifts in a certain form and format, where it is known or reasonably suspected that the gift is given in relation to the work or position of the Garuda Indonesia personnel concerned. The prohibition of receiving money or equalized is exempt if it is given within the limits of reasonableness / propriety in the context of donations when hit by a disaster and/or certain celebrations/events according to local customs.
- (6) Receive a gratuity from a third party related to the position and do not report the receipt in accordance with the procedures set by the Company.

#### **X.11. Protection of Company Assets**

Behaviors that must be displayed by Garuda Indonesia personnel

- (1) Follow generally accepted accounting and reporting standards in recording and reporting company assets.
- (2) Use, manage, and maintain corporate asset documents and corporate assets optimally, effectively, and efficiently to achieve corporate goals.
- (3) All company assets, both physical, financial and otherwise, must be protected from unauthorized uses such as *embezzlement* and *fraud*.
- (4) Optimizing the company's *intangible assets* by conducting knowledge *management* appropriately in order to increase the company's capabilities.
- (5) Using the Company's assets only for the benefit of the Company and preventing assets from abuse of authority and/or collusion by personnel or groups, to other parties that may cause losses to the Company.
- (6) Implement effective and efficient control processes over the use of company assets to avoid losses that may occur.



- (7) Report indications or occurrences of *fraud* within the Company early, to direct superiors or through the Company's *Whistle Blowing System* mechanism or parties appointed by the Board of Directors.
- (8) Actively involved in the supervision of the Company's assets by reporting any indication of misuse of the Company's assets by any other party to the Company.

Behavior that should not be displayed by Garuda Indonesia personnel

- (1) Use of the Company's assets other than for the Company's benefit.
- (2) Physical assets or other resources that are overused, transferred or erased illegally.
- (3) Releasing a new product or service by not registering Intellectual Property Rights in accordance with the provisions on copyright, trademark, patent and other rights.
- (4) Do not report the results of inventions related to the Company's business and produced during or outside business hours.
- (5) Use the Company's inventory for personal use without the Company's written permission.
- (6) Carelessly or deliberately committing acts that may damage the Company's assets which may cause losses to the Company.
- (7) Possessing, misuse, giving, selling, pawning, pledge, granting, renting, lending goods, money, securities belonging to the Company and/or Third Parties that are being illegally controlled by the Company.

#### **X.12. Anti-Bribery, Anti-Corruption, Anti-Fraud, Anti-Money Laundering and Terrorism Financing**

Behaviors that must be displayed by Garuda Indonesia personnel

- (1) Not make payments, either directly or indirectly through a third party, if they know or believe that such payments are likely to be used to influence government officials or other individuals in decision-making.
- (2) Reporting potential bribery and suspicious financial transactions through the Company's applicable reporting media.
- (3) Comply with anti-corruption, anti-bribery, anti-fraud, money laundering and terrorism financing laws and conventions applicable in every country where the Company has business activities.
- (4) Conducting risk-based anti-bribery *due diligence* to third parties who will cooperate with the Company.

Behavior that should not be displayed by Garuda Indonesia personnel

- (1) Offer, promise, or provide any form of payment to government officials or other third parties, contrary to law, for the purpose of obtaining business profits.
- (2) Instruct, authorize, or allow third parties to make prohibited payments on behalf of the Company.

### **X.13. Protection of Company Secrets**

Behaviors that must be displayed by Garuda Indonesia personnel:

- (1) Protect confidential company data, information and documents.
- (2) Using confidential company data, information and documents in accordance with the limits of authority that have been set.
- (3) Report immediately to the Leadership when aware of the misuse of confidential company data, information and documents.
- (4) Protect the interests of Shareholders who are potentially harmed by trading actions carried out by insiders (*insider trading*).
- (5) Maintain the confidentiality of other companies' information and comply with all laws and regulations related to information confidentiality.
- (6) Efforts to collect information from other companies in the context of carrying out work that is the scope of work must be carried out with the knowledge of the direct supervisor or *the Corporate Secretary Work Unit*.
- (7) Contact the *Corporate Secretary Work Unit*, if there are any doubts or problems that arise in relation to information issues or confidentiality of Garuda Indonesia's information.

Behaviors that should not be displayed by Garuda Indonesia personnel:

- (1) Disclose orally or in writing all confidential data, information and documents of Garuda Indonesia outside of its duties, responsibilities and authority, including disclosing material information that may affect the company.
- (2) Access, duplicate, reproduce data or information and documents of a confidential nature of the company directly or indirectly, except in carrying out duties and work for the company.
- (3) Storing confidential company data, information and documents on personal computers or other media that do not belong to Garuda Indonesia with the intention of unlawful dissemination of them, unless otherwise specified and/or with the permission of the direct superior.
- (4) Talk about "material information" about the company to anyone. This prohibition includes husband or wife, colleagues at home, relatives, relatives

of colleagues at home, brokers and other Garuda Indonesia personnel (except colleagues within Garuda Indonesia who need to know about it).

- (5) Conduct a transaction in the company's shares if the person concerned has information that can affect the price of the Garuda Indonesia shares.
- (6) Using the company's confidential information in an unauthorized or unlawful manner or providing confidential company documents to an external party without the knowledge of the *Corporate Secretary's* Work Unit.
- (7) Obtain confidential information before leaving the company. All documents that have been made by the relevant Garuda Indonesia personnel while doing work in the work environment, become the full property of the company. Before leaving the company, Garuda Indonesia personnel are not allowed to bring any documents unless they are needed in the context of carrying out work outside the company's environment.
- (8) Collecting external information that is done illegally, such as spying, stealing information, or by falsifying one's identity.
- (9) Committing identity forgery or by using the name Garuda Indonesia to obtain confidential information from other companies.
- (10) Leaking and utilizing the Company's secrets and/or documents known due to position for personal or other parties that may be detrimental to the Company except for matters related to corruption.

#### **X.15. Protection of Intellectual Property**

Behaviors that must be displayed by Garuda Indonesia personnel:

- (1) To know the obligations regarding the ownership and confidentiality of Garuda Indonesia's intellectual property.
- (2) Actively participate in protecting Garuda Indonesia's Intellectual Property Rights or those of others.
- (3) Inform the results of the work produced in relation to Garuda Indonesia's business or operations, both during and outside working hours, and both those who use/do not use Garuda Indonesia's facilities and data/information in the manufacturing process.
- (4) Report to the Legal *Unit* in the company if it becomes known that any party is using Garuda Indonesia's intellectual property rights without consent or without rights.

Behaviors that should not be displayed by Garuda Indonesia personnel:

- (1) Using illegal products that violate laws and regulations.

- (2) Committing infringement, misuse, or actions that are prohibited under laws and regulations regarding intellectual property rights.

#### **X.16. Responsibility to the Community**

Behaviors that must be displayed by Garuda Indonesia personnel:

- (1) Always uphold the commitment that wherever the work unit operates, good relations and the development of the surrounding community are the main cornerstones for Garuda Indonesia's long-term success.
- (2) Appreciate every partnership activity that contributes to society and enhances Garuda Indonesia's social value and image.
- (3) Build and foster harmonious and harmonious relationships and benefit the community.
- (4) Helping people affected by disasters and natural disasters.
- (5) Sincere and responsible when carrying out the social responsibility of the community.
- (6) Participate in building dignity and dignity in accordance with the social and cultural conditions of the local community.
- (7) Become a role model for the surrounding community.

Behaviors that should not be displayed by Garuda Indonesia personnel:

- (1) Insensitive to the problems experienced by the community around the company's operations.
- (2) Taking benefits for personal interests when carrying out the task of distributing aid funds for victims of disasters and disasters.
- (3) Carrying out social activities that can cause negative perceptions of the public and/or raise suspicion of the source of wealth of Garuda Indonesia personnel.
- (4) Displaying a luxurious lifestyle and/or ownership of luxury goods to social media excessively.

#### **X.17. Responsibility to the Government**

Behaviors that must be displayed by Garuda Indonesia personnel:

- (1) Obey and comply with all applicable laws and regulations.
- (2) Establish harmonious, transparent and constructive relations with Government Agencies.
- (3) Supporting and succeeding Government programs, especially in the fields of tourism, culture, education and social society.

Behaviors that should not be displayed by Garuda Indonesia personnel:

- (1) Not complying with applicable laws and regulations, including but not limited to laws and regulations related to the prohibition of giving gifts and other gifts to Government Officials/state administrators.
- (2) Providing Garuda Indonesia data, information and documents required by the Government in an incomplete or inaccurate manner, and not in accordance with the applicable provisions of the company.

#### **X.18. Responsibility to the Environment**

Behaviors that must be displayed by Garuda Indonesia personnel:

- (1) Operating production equipment according to procedures that do not conflict with regulations and regulations regarding the environment, especially exhaust gas emissions and noise.
- (2) Responsible and actively participating in environmental conservation programs both at the national and international levels.
- (3) Striving for various creativity to produce services and services that provide added value to the economy and business ecosystem.

Behaviors that should not be displayed by Garuda Indonesia personnel:

- (1) Not performing periodic maintenance of the production equipment used and having an impact on increasing noise.
- (2) In carrying out work, it causes environmental damage both directly and indirectly.

