

Disclaimer: This is an unofficial translation of the Indonesian version of the Anti-Corruption Policy, and is provided for reference only.



PT SUMMARECON AGUNG Tbk.

ANTI-CORRUPTION POLICY

PT Summarecon Agung Tbk. and its subsidiaries (hereinafter referred to as "**Summarecon**") committed to and comply with the applicable laws and regulations as well as support the Indonesian Government to eradicate corruption. Therefore, to ensure Summarecon's activities and business are protected from acts that could cause any harm, and then Summarecon establishes an Anti-Corruption Policy that applies in the environment of Summarecon by involving all employees, suppliers, work partners, and Government agencies related to Summarecon. This is in line with Summarecon values which promotes integrity and always acts according to applicable ethical standards.

The purpose of implementing the Anti-Corruption Policy

1. To prevent both material and immaterial losses that could interfere Summarecon business continuity.
2. As a guideline for understanding, tackling, and/or preventing implementation acceptance of gratuities that fall into the category of bribery and are reasonably suspected of detrimental to Summarecon business continuity.
3. To increase Summarecon obedience and discipline towards the law, regulations and ethics as well as support Government programs in order to prevent corruption in Indonesia.
4. To increase awareness of high ethical culture in implementing work activities related to external parties, which are work partners and Government agencies related to Summarecon.
5. Realizing corporate governance that is clean and free from all forms of corruption, collusion and nepotism ("korupsi, kolusi, dan nepotisme" or "KKN" in Bahasa).

Scope

This policy applies and is binding on all employees, management, contractors, and partners without exception.

Types of actions that are categorized as corruption

Every employees of Summarecon (including the Board of Directors and Board of Commissioners) either individual or group that deliberately violates the laws, regulations and policies of Summarecon by committing acts of enriching oneself or another person or group that may harm Summarecon's finances in the following ways:

1. Misusing the authority, opportunity or means available to him/her because of his/her title or position.
2. Giving, receiving and/or promising something to an official or work partner both internally and externally with the intention of tell him/her to do something or to do not do anything in his/her position that is contrary to his/her obligations.
3. Embezzling stored money or securities because of title or position, or allow money or securities to be taken or embezzled by other parties, or helping and assisting in committing the acts.
4. Giving and/or receiving gifts or promises to/from either internal or external party by considering the power or authority attached to his/her title or position.
5. Violating the provisions of laws which expressly state that violation to the provisions of laws is an act of corruption.
6. Attempts to assist or conspire to commit corruption acts.
7. Providing assistance, opportunities, facilities, or information for actions to occur corruption.

Summarecon Commitment

Every individual and/or working unit of Summarecon, both at the head office and at the business location will strive and compete with all of their might, to obtain all opportunities for cooperation or business in a fair and lawful manner and will negotiate contracts fairly and openly, regardless of the pressure exerted by external parties.

Summarecon will conduct business and/or work in a lawful, ethical, honest and professional and in line with the Summarecon's code of ethics and vision and mission. This practice will be applied to every activities carried out by Summarecon.

In addition, Summarecon will routinely carry out dissemination and outreach to the Summarecon's code of ethics and vision and mission.

Sanctions if identified as having committed acts of corruption

Summarecon will give strict punishment or consequence to violators of Summarecon policies either as in individual or in groups by:

1. Disrespectfully dismissing.
2. Criminalize the person concerned to the realm of laws applicable in the territory of the Republic of Indonesia.

Participation of employees and external parties

Employees and external parties could play role and help to prevent and eradicate corruption by informing Summarecon via email: corp_secretary@summarecon.com that there is an act of corruption involving Summarecon.

Summarecon appreciates each employee and external party who has contributed on helping efforts to prevent, eradicate, or disclose acts of corruption in accordance with Summarecon's policy.

**Set in Jakarta
Board of Directors**