



**MERDEKA
BATTERY**
MATERIALS

PT MERDEKA BATTERY MATERIALS Tbk

POLICY ANTI-CORRUPTION MBM-POL-IR-05-00

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01 December 2023	01 December 2023	01 December 2023	01 December 2023	01 December 2023

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**ANTI-CORRUPTION**

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DOCUMENT CHANGE STATUS

Revision Number	Division/Department	Reason of Change	Revision By	Revision Date

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1. GENERAL

Policy regarding Anti-Corruption is developed, implemented, and managed for the benefit of PT Merdeka Battery Materials Tbk and its subsidiaries in building a relationship or business interaction with other parties without any corrupt practices.

Suppose, in the course of implementation, non-conformities are found that are not covered in this document and are considered essential for one reason or another. In that case, the non-conformities will be further reviewed, and if they are to continue to be applied, they will be made into an addendum to this policy.

And suppose there is a difference in interpretation between this policy's Indonesian and English versions. In that case, the Indonesian version is the prevailing version. It will be used, and in the event of a request for discretion on implementing this policy, it must obtain prior approval from the President Director.

2. PURPOSE

The purpose of this policy is as a guideline so that every person in charge who conducts business interactions and builds a relationship, both with the government and with the Company's partners, is carried out professionally, fairly, with high integrity and obeys the law which can ultimately prevent material and immaterial losses that can disrupt the continuity of operations Company.

3. SCOPE

This policy applies to all Employees at PT Merdeka Battery Materials Tbk and its subsidiaries.

4. RESPONSIBILITY

4.1 Top Management


The Top Management must approve and sign all quality management system documents including Company Policies, Procedures, Work Instructions, Forms and other documents.

4.2 Management Representative

The HR department must cooperate with other departments to prepare and revise all documents including Company Policies, Procedures, Work Instructions, Forms and other documents.

4.3 Head of Department or Department Manager

The Department Head or Department Manager must review the relevant documented information, ensure that subordinate staff are aware of any changes or updates or updates to the document.

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5. POLICY

5.1 Definition


1. The Company is PT Merdeka Battery Materials Tbk or its subsidiaries.
2. Employee is a person who works at PT Merdeka Battery Materials Tbk or its subsidiaries.
3. Partners of the Company are customers, buyers, consultants, advisors, sub-contractors, vendors, suppliers, and other third parties of the Company and/or its subsidiaries.
4. Corruption is an act that violates the law in the form of misappropriation or misuse of money and/or Company assets for personal gain/interest or certain parties which can increase the Company's cost burden in conducting its business and can damage the Company's business reputation.

5.2 General Standards

1. The Company is committed to avoiding corrupt practices in establishing a relationship with the Government and/or business interactions conducted with the Company's Partners.
2. Every Employee is prohibited from using funds/money, Company assets, or personal for any unethical or illegal purposes and always prevents all activities, either directly or indirectly that may violate this policy or anti-corruption provisions according to the applicable laws and regulations.
3. Every act of corruption is categorized as a violation of the law and can be subject to punishment and sanctions in accordance with the applicable laws and regulations.

5.3 Corruption Act

1. Every Employee and/or Company's Partner, either individually or in groups, is prohibited from committing, participating in, or engaging in practices categorized as acts of corruption, as follows:
 - a. Providing assistance, opportunities, facilities, information or malicious conspiracies both with government officials and with other parties so that acts of corruption occur which ultimately harm the Company's finances or even the state;
 - b. Bribing with government officials or with other parties or partners of the Company for the sake of obtaining profits or taking personal benefits or certain parties;
 - c. Abuse of authority over the position he holds for personal gain or certain parties;

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- d. Committing an act of extortion by forcing someone to give something, pay or receive a discount, or do something for him or herself;
 - e. Doing fraudulent acts that are detrimental to the Company;
 - f. Carrying out business activities that are not legal and are not free from conflicts of interest;
 - g. Carry out gratification practices.
2. Acts that are also related and can be categorized as acts of corruption, include:
- a. Obstructing/obstructing the process of examining corruption cases;
 - b. Do not provide information or provide information that is not true;
 - c. Does not provide information on the account of the perpetrators of corruption;
 - d. Witnesses or experts who do not provide true information or provide false information;
 - e. A person who holds a secret position and does not provide information or provide false information;
 - f. Witness who reveals the identity of the whistleblower.