



**MERDEKA  
BATTERY**  
MATERIALS

# **PT MERDEKA BATTERY MATERIALS Tbk**

## **POLICY ANTI-BRIBERY MBM-POL-IR-06-00**

| PREPARED            | CHECKED                  |                      | APPROVED         |                    |
|---------------------|--------------------------|----------------------|------------------|--------------------|
|                     |                          |                      |                  |                    |
| Chairul Reza Faisal | Yanthi Sepriana Siagian  | Muhammad Reger Pohan | Titien Supeno    | Devin Antonio      |
| IR Superintendent   | HR Compliance Supervisor | IR Manager           | HR Director      | President Director |
| 01 December 2023    | 01 December 2023         | 01 December 2023     | 01 December 2023 | 01 December 2023   |

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**DOCUMENT CHANGE STATUS**

| Revision Number | Division/Department | Reason of Change | Revision By | Revision Date |
|-----------------|---------------------|------------------|-------------|---------------|
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**3 of 5****1. GENERAL**

The Anti-Bribery Policy 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 the practice of bribery.

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 Employee 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. Bribery is an unlawful act in the form of giving or promising money or goods or in other forms to a person with the intention of persuading/influencing that person to do something or not to do something in their duties, which is contrary to their authority or obligations concerning the public interest and the Company.
4. Facilitation Payment is an unofficial payment to a government official that is directed to facilitate or speed up routine work or services carried out by the government, so that they become bound to implement them.

### 5.2 General Standards

1. The Company is committed to avoiding all bribery practices in all of its business interactions.
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-bribery provisions according to the applicable laws and regulations.
3. Every act of bribery is categorized as a violation of the law and can be subject to penalties and sanctions in accordance with the applicable laws and regulations.

### 5.3 Giving or Accepting Bribes

1. The Company and each Employee are prohibited from paying, giving, or receiving things, as follows:
  - a. Something valuable. Anything valuable that is offered, promised, or received and includes cash, gifts, entertainment, travel accommodation, promotional business activities, employment opportunities, contributions to charities or political parties, and other similar items of high value.
  - b. For institutions or commercial entities or government officials for the sake of obtaining business benefits.
2. The Company and every Employee are prohibited from giving or receiving facilitation payments.
3. The Company and any Employee are prohibited from promising, offering, giving, requesting, or receiving anything of value, which may influence or appear to affect a bona fide/good relationship between the Company or the Employee and other parties.

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4. Every Employee is prohibited from giving anything of value to any Political Party for the public interest on behalf of the Company without prior written approval from the President Director.

#### **5.4 Giving or Accepting Gifts and/or Entertainment**

1. Giving or receiving gifts and/or entertainment is not categorized as bribery as long as it is within the limits of fairness as stipulated in a separate policy.
2. The gifts and/or entertainment in question include normal business meals or gifts of a certain value that are not in the form of cash.
3. The inappropriate value of a gift and/or entertainment can be categorized as a bribe and may be subject to penalties and sanctions in accordance with the applicable laws and regulations.