



**MERDEKA
BATTERY**
MATERIALS

PT MERDEKA BATTERY MATERIALS Tbk

POLICY CONFLICT OF INTEREST MBM-POL-IR-09-00

PREPARED	CHECKED	APPROVED
Chairul Reza Faisal	Yanthi Sepriana Siagian	Muhammad Regan Pohan
IR Superintendent	HR Compliance Supervisor	IR Manager
01 December 2023	01 December 2023	01 December 2023

Titien Supeno	Devin Antonio
HR Director	President Director
01 December 2023	01 December 2023

Head Office:

Treasury Tower 69th Floor District 8 SCBD Lot. 28,
Jl. Jend. Sudirman Kav. 52-53, Senayan, Kebayoran Baru,
Kota Adm. Jakarta Selatan, DKI Jakarta - 12190

Phone : (+62-21) 3952 5581

Fax : (+62-21) 3952 5582

Website : www.merdekabattery.com



CONFLICT OF INTEREST

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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 Conflicts of Interest is developed, implemented, and managed for the benefit of PT Merdeka Battery Materials Tbk and its subsidiaries to provide boundaries for situations where conflicts of interest may arise in the Company's business activities. Suppose, in the course of implementation, non-conformities are found that are not covered in their 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 their policy.

And suppose there is a difference in interpretation between their 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 their policy, it must obtain prior approval from the President Director.

2. PURPOSE

The purpose of their policy is as a guideline so that in carrying out every business activity the Company avoids conflicts of interest that may arise from any cause.

3. SCOPE

Their 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, and ensure that subordinate staff is 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. Conflict of interest is a situation when the personal, friend, or family interests of the Employee intersect with the interests of the Company and affect the way or results even appear to affect the interests of the Company.


5.2 General Standards

1. Each Employee has their respective duties and responsibilities in each of their jobs, but the Company is committed to carrying out all business activities that are legal and free from conflicts of interest.
2. Every Employee is obliged to inform their supervisors or parties appointed by the Company to obtain the necessary approval if, in one or more of the Company's business activities, there will be a conflict of interest or even a possible conflict of interest for himself or one or more Employee.

5.3 Avoiding Conflicts of Interest

1. Conflict of interest due to a particular position or relationship:
 - a. Everyone must avoid situations that can create a conflict of interest between their interests and the interests of the Company;
 - b. No one is allowed to take advantage of their position in the Company for personal gain, friends, or family, making it difficult to carry out work objectively and effectively or affect judgment during work;
 - c. Everyone should avoid running and/or doing business with other parties owned or controlled by himself, their family members, or close friends. Avoid personal relationships with other people directly or indirectly, where such relationships can cause a loss of trust and confidence in objectivity.
2. Conflict of interest of an Investment:
 - a. Everyone should avoid making personal investments in companies that are competitors or business partners of the Company, especially where such investments may result in losses for the Company;
 - b. In determining that a personal investment may cause a conflict of interest, the following matters may be considered:
 - i. There is an overlapping role between their role in the Company and the business in which he/she invests;
 - ii. The size and degree of significance of the investment;
 - iii. Percentage of ownership in investment companies;

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- iv. The level of control and control in investment companies.
- 3. Conflict of interest due to work activities outside the Company:
 - a. Everyone must separate their work activities for the Company from any activities outside the Company such as side work or self-employment (including consulting), bona fide charitable organizations, educational organizations, or other non-profit activities;
 - b. Activities outside the Company must not affect its performance or ability to perform its obligations to the Company.
- 4. Conflict of interest due to business opportunities:
 - a. Everyone should avoid taking advantage of business opportunities and competition with the Company in any way, including any business opportunity when the Company has an interest in and uses information that is not intended for the public, for personal gain, or others (including the purchase or sale of shares, etc.);
 - b. Any business opportunity found through their work that belongs to the Company unless approved by the President Director.
- 5. Use of Company assets:
 - a. Everyone should avoid using Company funds, facilities, equipment, methods, or personnel for other business or personal endeavors, personal gain, or the benefit of a particular party;
 - b. Using the Company's assets outside of the Company's needs must obtain a President Director.
- 6. Giving or receiving benefits and/or gifts:
 - a. Everyone should avoid giving or receiving (directly or indirectly) anything of value from or to another party, especially if the purpose is (or could be perceived as) to influence a business decision or relationship improperly;
 - b. Giving or receiving unfair benefits and/or gifts can be categorized as bribery and may be subject to penalties and sanctions.