

# CODE OF CONDUCT

## BASIC PRINCIPLES AND RESPONSIBILITY

All PT TÜV NORD Indonesia guidelines, in-house rules and instructions are based on the TÜV NORD group Code of Conduct.

Every employee who fails to observe the mandates of this Code of Conduct must expect to face appropriate consequences and/or sanctions.

## CASES OF DOUBT

Compliance with the Code of Conduct is one of the areas in which employees bear personal responsibility for their actions. If there are any queries or doubts as to the orientation or assessment of personal action, there are a number of persons who may be approached to discuss possible ethical or legal doubts or questions:

- Direct superior
- Board of Management Member(s) or general managers
- Compliance Officer
- Head of the Human Resources Department
- Governing Board
- Ombudsman

One measure of personal responsibility is that wherever possible, cases of doubt and questions are discussed in advance and in any event at the earliest possible opportunity.

## MARKET AND COMPETITION

PT TÜV NORD Indonesia is committed to help its customers be more successful worldwide. In doing so, we conduct our business activities fairly, with integrity and in accordance with all applicable laws and standards.

### ATTITUDE TOWARDS COMPETITORS

PT TÜV NORD Indonesia competes vigorously with its fellow service providers. Competitors will be treated fairly at all times. In particular, an effort must be made at all times to ensure that personal actions rule out violations of antitrust regulations.

### ADVERTISING

PT TÜV NORD Indonesia advertises its services and products responsibly. In doing so, it takes account of the cultural differences between its customers and markets worldwide. For instance, brand communication may not contain anything that might be considered offensive or demeaning to a sex, race, religion, culture or minority.

## CONFIDENTIALITY OF INFORMATION

### PROTECTION OF INTELLECTUAL PROPERTY

PT TÜV NORD Indonesia and all employees shall see to it that appropriate measures are taken to protect the proprietary and/or confidential information of customers, Group companies or third parties.

In the absence of permission from the proprietor, PT TÜV NORD Indonesia employees may not use any legally protected, copyrighted, licensed or confidential information of customers, Group companies or third parties for personal or other advantage.

All results of the work of PT TÜV NORD Indonesia employees created within the scope of their employment with the PT TÜV NORD Indonesia and/or TÜV NORD GROUP are the exclusive property of PT TÜV NORD Indonesia and/or TÜV NORD GROUP. PT TÜV NORD Indonesia expects its employees to protect and to help further develop the intellectual property of the company.

### DATA PROTECTION

The processing of data and information forms an integral part of TÜV NORD GROUP's business processes. In order to ensure that data is processed in a legal and secure manner and that the confidentiality of personal data is respected and protected, TÜV NORD GROUP and its employees undertake to comply with the relevant laws and provisions.

### INSIDER DEALING

The use of so-called insider information is prohibited worldwide. Employees of PT TÜV NORD Indonesia who have

acquired such information within the scope of their employment with the PT TÜV NORD Indonesia may not use this information to buy or sell securities of a customer or a third party. The same restrictions apply to the inadmissible disclosure of such information.

## BRAND

Within TÜV NORD Group, brands and company names are essential assets that set us apart from our competitors. Everything employees say and do must preserve and strengthen the name, brand identity, brand positioning and image of TÜV NORD GROUP.

This is accomplished particularly through a uniform, brand based worldwide presentation. Any third-party use of the brands must occur within the framework of applicable regulations. Employees are not permitted to use the brands of TÜV NORD GROUP for their own or third party purposes.

# PROTECTION OF ASSETS

## FINANCIAL INTEGRITY

PT TÜV NORD Indonesia are required to comply with the national or international provisions of law and generally accepted accounting principles, and with the Group's own relevant guidelines.

## PROTECTION OF ASSETS

All employees have an obligation to protect the tangible and intangible assets of PT TÜV NORD Indonesia with the greatest possible care, and to make use of them for lawful business purposes only.

# ATTITUDE TOWARDS CUSTOMERS

## TRANSPARENCY IN CASES OF CONFLICTS OF INTEREST

If, in connection with his or her work for PT. TÜV NORD Indonesia, an employee should find a conflict of interest arising between personal interests and the interests of the PT TÜV NORD Indonesia and/or Group, these conflicts must be made transparent. This is usually accomplished by reporting the conflict to one's direct superior. The superior will then decide the further measures to be taken. In cases of doubt (see above), there are contact persons available within the PT TÜV NORD Indonesia and/or Group who can help clarify matters.

## INVITATIONS AND GIFTS

PT TÜV NORD Indonesia accepts that, to improve business relationships, as a matter of principle it is appropriate to exchange token considerations.

These considerations entail entertainment and gifts that are appropriate and are connected to business activities of PT. TÜV NORD Indonesia. In this connection, the applicable laws and relevant internal guidelines (please refer to PT. TÜV NORD Indonesia internal guideline) must be observed. In no case will PT TÜV NORD Indonesia permit or tolerate corruption.

## RECEIPT OR PROVISION OF PAYMENT

PT TÜV NORD Indonesia employees are forbidden to receive, make, promise, offer or approve directly or indirectly any payments serving to facilitate the conclusion or continuation of any business deal. Any infringement of this item will lead to disciplinary measures.

## DEALINGS WITH OFFICE-HOLDERS AND GOVERNMENT ENTITIES

In nearly every country of the world, dealings with officeholders and government entities are subject to specific provisions of law. Usually, the legal consequences of infringement of these provisions are more severe than they are for dealings with other customers. In these cases, then, maintenance of transparency and compliance with consent requirements within the business relationship are of enormous importance.

## POLITICAL ACTIVITIES AND DONATIONS

PT TÜV NORD Indonesia supports its employees' private involvement in charitable activities. PT TÜV NORD Indonesia no takes part in political activities.

It is not permitted to make donations of any kind to political organizations or candidates out of PT TÜV NORD Indonesia funds. The use of the TÜV NORD GROUP brand to support political activities or events is forbidden. Use of TÜV NORD GROUP brands in support of a charitable organization or event shall be permissible only with the approval of the Board of Management of TÜV NORD AG.

## INDIVIDUAL CONDUCT

### PROFESSIONAL MANNER

PT TÜV NORD Indonesia recognizes its employees' rights to freedom of expression and to engage in political and

trade union activities. At the same time, when engaging in activities outside of the workplace, employees must

see to it that no harm is done to the interests of the PT. TÜV NORD Indonesia.

Employees should adopt a manner and appearance at their places of work and on business occasions that convey the basic principles of integrity, responsibility, and respect towards other persons.

### EQUALITY AND RESPECT

PT TÜV NORD Indonesia treats its employees and partners in a spirit of equality and in a setting free from discrimination and racism.

Any form of harassment by PT TÜV NORD Indonesia employees on grounds of sex, ethnic origin, age, nationality, disability, religion or sexual orientation is contrary to TÜV NORD GROUP's ethical standards and will not be tolerated.

## WORLDWIDE BUSINESS ACTIVITY

PT TÜV NORD Indonesia convinces its customers worldwide on the strength of a broad spectrum of future-oriented services. It is globally available and provides quality, safety and reliability.

### EXPORT CONTROL LAWS AND EMBARGOS

PT TÜV NORD Indonesia observes the applicable laws and regulations, both domestically and abroad, in connection

with the export of services and products. Within the scope of his or her activity, each individual employee has

a responsibility to make relevant facts transparent. This is usually accomplished by reporting the matter to one's

direct superior. The superior will then decide the further measures to be taken. In cases of doubt (see above), there are contact persons.

### WORK IN AREAS IN CRISIS

Given the worldwide business activities of TÜV NORD GROUP, it cannot be ruled out that employees may find

themselves in crisis areas in the course of their employment. The term 'areas in crisis' as used here refers to circumstances arising through war, terror, the forces of nature, catastrophes or comparable events. If employees

should find themselves in such areas as part of their work, PT TÜV NORD Indonesia shall take appropriate steps to

protect its employees from the adversities in which such crises result.

Adopted from  
TÜV NORD GROUP  
CODE OF CONDUCT  
TÜV NORD AG, Revision 10/2015inter

### RELATED DOCUMENTS:

1. Internal Guideline PT. TUV NORD Indonesia
2. Incentive Policy for Business Partner

Jakarta, 1 December 2017

  
ROBERT NAPITUPULU  
President Director  
PT. TÜV NORD Indonesia