



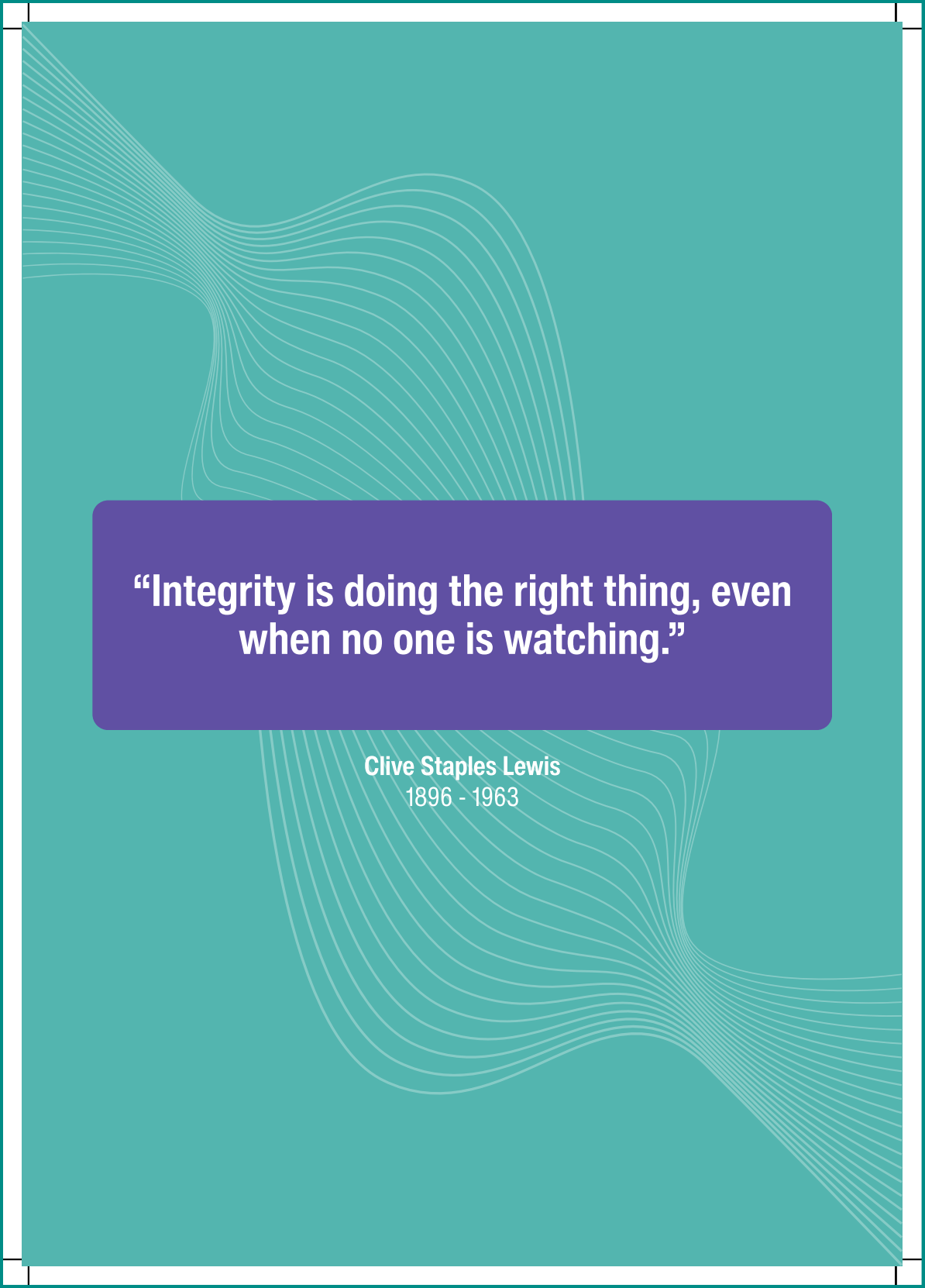
OUR WAY IN ENERGY



ETHICS AND CORPORATE GOVERNANCE HANDBOOK

PT INDO TAMBANGRAYA MEGAH TBK

CG Communication Pack
2025 Edition

The background is a solid teal color. Overlaid on this are several thin, white, wavy lines that flow from the top left towards the bottom right, creating a sense of movement and depth. These lines are more densely packed in some areas and more spread out in others, resembling a stylized wave or a series of concentric, flowing curves.

**“Integrity is doing the right thing, even
when no one is watching.”**

Clive Staples Lewis
1896 - 1963

MESSAGE FROM THE BOARD

To all ITM employees, business partners, and our esteemed stakeholders,

We believe that a sustainable business must be built upon a foundation of clean and integrity-driven governance. Integrity is our foremost asset, enabling us to grow and thrive together. Without integrity, business sustainability cannot be achieved. Therefore, this handbook reaffirms ITM's absolute commitment to the Principles of Good Corporate Governance (GCG), particularly regarding anti-corruption, anti-bribery, and the enforcement of ITM's Code of Ethics.

You may use this handbook as a guide to report code of conduct violations through the Company's whistleblowing system or to submit complaints and feedback via the voisitmg.com.

The Company is fully committed to safeguarding whistleblowers, maintaining the confidentiality of reports, and ensuring transparency of the reporting process.

We greatly value your cooperation in upholding good governance. Every piece of feedback and report you provide is part of our ongoing effort to continuously improve performance, ensuring that our business can grow and thrive together in a sustainable manner.

Thank you for your dedication and commitment.

Sustainably yours,



Mulianto

President Director
PT Indo Tambangraya Megah Tbk

GCG POLICY

Good Corporate Governance (GCG) Policy serves as ITM's guiding framework for maintaining transparency, accountability, ethics, and integrity.

The implementation of good corporate governance ensures the optimal organization benefits in line with ethical conduct.

Scan the QR code below to download ITM's Good Corporate Governance Policy



CODE OF CONDUCT

In conducting business and operations that are increasingly complex and dynamic, ITM reaffirms its commitment to ethical conduct, social responsibility, and environmental sustainability.

The principles set forth in the Code of Conduct serve as daily guidelines for ethical behavior to create long-term value for all stakeholders.

These principles apply to all employees, the Board of Directors, the Board of Commissioners, and all individuals working for ITM and its subsidiaries.

Violations of the Code of Conduct can be reported through the Independent Whistle Blowing Center (IWBC) channel.

Scan the QR code below to download ITM's Code of Conduct



Violation of ITM's Code of Conduct

The Code of Conduct (CoC), is a policy that provides guidelines for ITM personnel on how to conduct their activities or interact with stakeholders. Any actions not in accordance with the CoC policy constitute violations that may be reported through the IWBC.

ITM's Code of Conduct (CoC) violation include the following:

Conflict of Interest

Any actions that prioritize personal interests over the Company's interests.

Ethical Violations

Any actions that breach generally accepted norms and constitute abuse of the trust reposed in authority.

Misuse of Company Asstes

Any actions that may diminish the value of the Company's assets for personal gain.

Misuse of Company Information

Any actions involving the handling of Company information that could yield personal gain, such as disclosing Company information to external parties to influence the Company's share price.

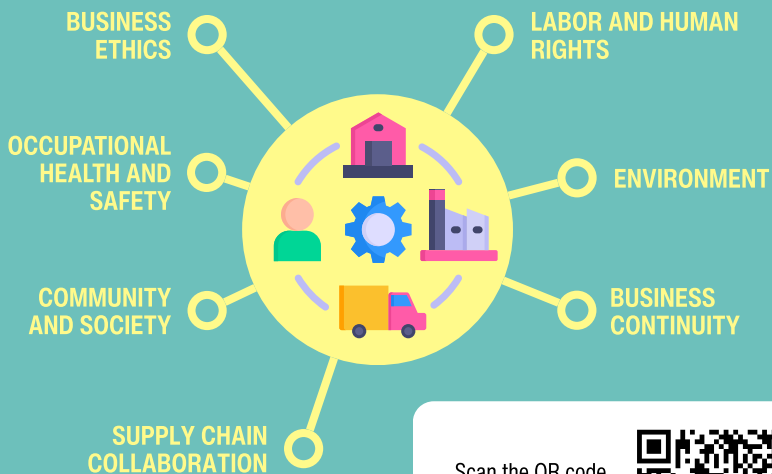
SUPPLIERS CODE OF CONDUCT

ITM is committed to creating sustainable value for all stakeholders, with an emphasis on environmental and social stewardship.

To achieve the Company's mission, engagement with suppliers who conduct business ethically and uphold social and environmental responsibility is one of our top priorities.

ITM has established the Supplier Code of Conduct as a reference to ensure that all business partners implement standards aligned with its requirements.

Mitra usaha ITM wajib mematuhi Kode Etik Pemasok yang mencakup tujuh aspek utama:



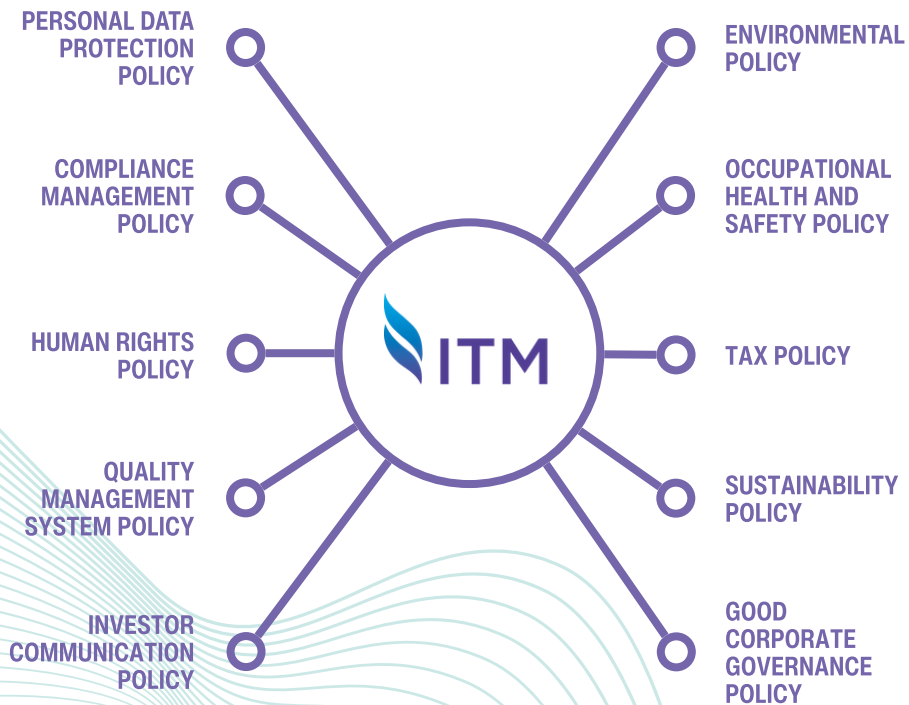
Scan the QR code
to download ITM's
Supplier Code of
Conduct



OTHER POLICIES

As a guide for conducting business activities, ITM has various policies to ensure that all business and operational processes are conducted in accordance with ethical principles, legal compliance, and sustainability practices.

These policies include:



Scan the QR code to download the applicable policies across ITM Group:



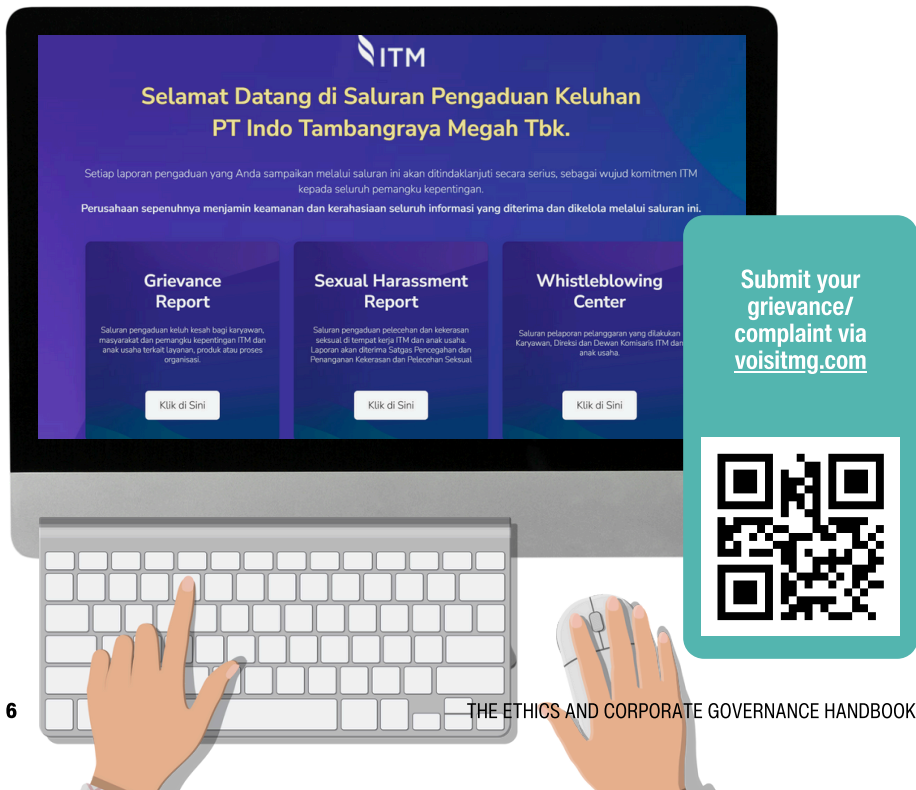
GRIEVANCE MECHANISM

ITM provides a grievance/complaint channel for all stakeholders, both internal (employees) and external (the public, business partners, and other parties).

Complaints may cover a wide range of topics, such as services, products, organizational processes, environmental, and Occupational Health and Safety (OHS).

All complaints will be received and addressed by the Grievance Committee, (which consist of: Corporate Secretary & Legal Head, Internal Audit Head, and Human Resources Head), with direct accountability to ITM's Board of Directors.

During the process, reporters have an option to submit complaints anonymously or provide their contact details to receive updates on the complaint resolution status.



INDEPENDENT WHISTLE BLOWING CENTER (IWBC)

IWBC is a reporting channel for ethical and legal violations and also serves as an oversight mechanism for the Company's Good Corporate Governance practices.

WHO CAN REPORT
AND WHO CAN BE
REPORTED...?

WHAT CATEGORIES
CAN BE REPORTED
THROUGH IWBC...?

WHAT ARE THE IWBC
PRINCIPLES...?



Understanding Reporting Violations Through Independent Whistle Blowing Center (IWBC)

IWBC has been developed specifically to securely accommodate reports of violations, with particular emphasis on protecting the reporter's identity and safeguarding against retaliation. The Company prioritizes on the substance of the report and allow whistleblowers the option to report anonymously.



Who can report?

- All ITM employees and subsidiaries.
- Business partners (contractors, vendors, consultants, suppliers), customers and others third parties
- Community, public and others stakeholders.

Who can be reported

All ITM employees and subsidiaries, including the Board of Directors and the Board of Commissioners.

Categories of Violations through IWBC

Violations that can be reported through IWBC are wide-ranging. ITM has defined the following categories to classify the types of violations within IWBC:



Acts that may endanger occupational safety

Violations of ITM regulations and procedures

Violations of ITM's Code of Conduct

Actions that constitute violations of financial reporting

Legal Violations

Acts intended to mislead, whether financially or non-financially

Corruption, fraud, dishonesty, bribery

Violations of tax regulations

Security and Confidentiality in Reporting Violations through IWBC

IWBC can comprehensively facilitate the Company's whistleblowing function due to several unique features, especially when compared with conventional whistleblowing mechanisms.

Data Verification Security

The reporter may report anonymously (without personal information) or with their identity verified.

However, even if an employee performs identity verification, the reporter's identity will not be disclosed to the report recipient.

Layered Security

With its IT-based system, IWBC is free from fraud or human administrative errors.

Equipped with 256-bit encryption and data centers standardized to US-EU Safe Harbor standards, information within IWBC is highly resistant to hacking.

Secure Communication with the System

The reporter may opt to be contacted again via email by the Ombudsman on an opt-in basis. In this feature, communications will be fully facilitated by IWBC.

Minimization of Human Involvement.

The IWBC system is designed to operate with a high degree of automation, thereby being free from the potential for fraud or data leakage in its processes.

To safeguard its autonomy, the operational aspects of IWBC are managed by an independent party, and, in broad terms, it has been designed to minimize human involvement in its management.



Technology-based IWBC: Minimal Human Involvement, Guaranteed Confidentiality



START

Reports involving the Ombudsman will be forwarded directly to the Audit Committee/AROC. The AROC will conduct independent investigations as appropriate.

The relevant management takes corrective action based on the Investigation Committee's findings and recommendations

The reporter submits a violation report through **voisitmg.com** after first verifying their email address.

The system validates the reports and forwards them to the Ombudsman.

The Ombudsman receives the reports and determines whether additional information is required, forwarding the report to the Investigation Committee when it is complete.

The Ombudsman consists of an Independent Commissioner, President Director and Corporate Secretary.

The Investigation Committee follows up by forming an Investigation Team.

The Investigation Committee consists of the Audit Committee/AROC Chairman, Head of Internal Audit and Corporate Secretary.

IWBC Principles

SECURE

A reporting platform with an **independent system and minimal human involvement**, thereby free from potential fraud and data leakage. It is equipped with data centers that conform to US-EU Safe Harbor standards.

CONFIDENTIAL

Reports may be **submitted anonymously** (without disclosing personal information). **Communications are fully facilitated by the system.**

TRANSPARENT

Through a verified email address, the reporter **will receive updates** on the status of their report.

Easy Steps of Reporting Violations through IWBC

Since 2011, ITM has operated the Independent Whistle Blowing Center (IWBC) to facilitate all employees and stakeholders in reporting violations. This process is streamlined into seven simple steps.



STATEMENT OF INTEGRITY

As part of ITM's commitment to implementing transparent, ethical, and sustainable corporate governance, every business partner is required to understand and comply with all applicable company policies. This statement embodies the commitment and responsibility of business partners to support business practices that uphold integrity, honesty, and compliance with laws and regulations.

Through this document, the business partners declare their willingness to conduct business with ITM professionally, without conflicts of interest, and free from corruption, bribery, and other forms of ethical breaches.

This statement also serves as the foundation for building a working relationship based on mutual respect, sustainability, and a positive contribution to the Company's reputation and core values.

As a demonstration of our mutual commitment, please complete and sign the Integrity Statement by accessing the QR Code below.



TRANSPARENCY CENTER

Transparency Center is ITM's digital platform dedicated to all ITM employees and its subsidiary entities. This platform serves as a channel for reporting the receiving or giving of gifts, as well as suspected or actual conflicts of interest that may arise in day-to-day business activities.

Its purpose is to ensure that all transactions and interactions with external parties are conducted transparently and in accordance with the Code of Conduct.

ITM employees and its subsidiaries are required to report to the Company through the Transparency Center if they encounter situations such as:



Receiving gifts or shipments from ITM's business partners, or door prizes from events organized by business partners.

Receiving invitations to attend events where all accommodations are sponsored by the business partner.

Giving gifts or extending hospitality to business partners.

Receiving hospitality from ITM's business partners.

There is a conflict of interest with the ongoing business activities.

Employees may use the Transparency Center platform through the ITM Plaza website.

Q&A

What is meant by reporting violations in a business context?

Reporting violations is the process of conveying information by internal or external parties of the Company regarding alleged unethical actions, such as corruption, bribery, data manipulation, or violations of Company policies.

Why is reporting violations important for the Company?

Because reporting wrongdoing helps the Company uphold integrity, prevent losses, and reinforce a culture of transparency and accountability in business operations.

What channels are available to report suspected violations?

The Company provides the platform **voisitmg.com** as a channel to submit complaints or report suspected violations, ensuring the reporter's identity remains confidential.

Will reporters receive protection?

Yes, reporters will be protected from retaliation, discrimination, or intimidation in accordance with the Company's policies and applicable laws and regulations.

How does the Company follow up on violation reports?

Each report will be verified, analyzed, and acted upon through an objective and professional investigation process. The outcome may include corrective actions, sanctions, or improvements to the system.

What is bribery?

Bribery is the giving or receiving of something of value to influence business decisions in an unlawful manner.

How can employees report concerns about the work environment or ethical violations?

Employees may report through internal mechanisms to a direct superior or the Human Resources Department or via the **voisitmg.com** reporting platform. All complaints will be handled fairly and confidentially.

What is the Integrity Statement and who must sign it?

The Integrity Statement is a document of commitment to comply with ethical principles and corporate governance. This document must be signed by all business partners and third parties collaborating with the Company.

Does the Company provide training on integrity and reporting violations?

Yes, the Company regularly conducts training and awareness programs to enhance understanding and awareness among all relevant parties regarding the importance of integrity and responsible reporting.

How does the Company ensure the effectiveness of the reporting system and policies?

Through periodic evaluations, internal audits, reporter satisfaction surveys, and policy updates based on feedback and applicable regulatory developments.

Should you have any further questions,
please email us at:

corsecitm@banpuindo.co.id



www.itmg.co.id