



HARTADINATA ABADI

# Supplier Code of Conduct

DATE  
31 May 2024

PT Hartadinata Abadi Tbk





## DOCUMENT DETAILS

The details entered below are automatically shown on the cover and the main page footer. PLEASE NOTE: This table must NOT be removed from this document.

DOCUMENT TITLE	Supplier Code of Conduct
DOCUMENT SUBTITLE	PT Hartadinata Abadi Tbk
Date	31 May 2024
Version	02
Company name	PT Hartadinata Abadi Tbk

PT Hartadinata Abadi Tbk.,



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## 1. INTRODUCTION

### 1.1 BACKGROUND

The Board of Directors (the "Board") of PT. Hartadinata Abadi, Tbk. ('HRTA'/ the 'Company') has adopted this Supplier Code of Conduct ("the Code"), which applies to all of HRTA's suppliers, including suppliers of our affiliate, PT. Emas Murni Abadi ("EMA"), serving as the basis for evaluating supplier performance. This code includes measures for engaging with third parties and principles of Anti-Bribery and Corruption.

The goal of the Code is to provide HRTA's suppliers with clear guidelines on acceptable conduct and actions when interacting with third parties, facilitating the resolution of difficult decisions.

This Code applies to the Supplier and all its employees, directors, and officers, including agents and persons performing functions for the supplier. Violation of this Code may result in putting the supplier or HRTA at risk and may lead to suspension and/or termination of the work agreement. Suppliers are responsible for familiarizing themselves with the principles of this Code and observing not only the wordings but also the spirit of this Code. Implementation details are stipulated in HRTA's Company Policy/Regulation.

### 1.2 CORPORATE VISION

HRTA's vision is to be at the forefront in terms of quality, design, and services, prioritizing perfection for goodness.

### 1.3 CORPORATE MISSION

HRTA has two main missions:

- Being a leading gold jewelry company in Indonesia which offers quality jewelry products with optimal service for its customers' satisfaction.
- Contribution to society through their professionalism and concern for the environment.

### 1.4 CORPORATE CORE VALUE

HRTA has four main values and cultures:

- Professionalism
- Innovation
- Concern for the Environment
- Togetherness



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## 2. CODE OF CONDUCT

### 2.1 COMPLIANCE WITH LAWS

1. HRTA's suppliers must comply with applicable laws and prevailing regulations and international conventions and standards consistently.
2. Suppliers should avoid actions leading to violations of the law and decency.
3. Fraud or activities related to fraud or dishonesty in any form are prohibited.
4. Suppliers should promote settlement through deliberation and consensus and respect ongoing legal processes and decisions.
5. Suppliers must avoid involvement in criminal activities in financial and operational fields.

### 2.2 ENVIRONMENTAL PROTECTION

1. Suppliers shall commit to address the environmental impacts of its activity by applying mitigation hierarchy (avoid, minimize, restore/mitigate, offset).
2. Suppliers shall promote environmentally safe practices or best industry practices in operations such as mining, product development, manufacturing, transport, and disposal of materials.
3. Efficient resource use and application of environmentally friendly technologies are encouraged.
4. Suppliers must minimize waste generation and reduce air and *Greenhouse Gas* (GHG) emissions, wastewater, and soil-contaminating waste.
5. Suppliers should minimize negative impacts on biodiversity, climate change, and water scarcity.
6. Supplier shall commit to address the environmental impacts of its activity on biodiversity with the aim of achieving no net loss.
7. Sustainable land use is promoted, and unlawful taking of land, forests, waters, and other resources is prohibited.
8. Suppliers are encouraged to develop to develop plans for the decarbonization of their operations, more specifically reducing the carbon footprint of their products and associated handling and transportation that are in line with the goals of the Paris Agreement.

### 2.3 HUMAN RIGHTS

1. Suppliers must ensure employees comprehend their rights as regulated by Indonesian laws.



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2. Suppliers must respect all the internationally recognized human rights of its personnel, third parties, host communities and other stakeholders in accordance with the United Nations (UN) Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) Fundamental Conventions and the UN Declaration on the Rights of Indigenous People United Nations Universal Declaration of Human Rights.
3. Human rights principles should be promoted in dealing with conflicts involving the public, employees, and other stakeholders.
4. Cooperation with government, NGOs, and other relevant stakeholders is encouraged to avoid rights violations.
5. Suppliers should manage adverse impacts of operations on the welfare of surrounding communities.
6. Good relationships with employees, communities, government, NGOs, and other stakeholders should be maintained.
7. Violation of third-party ownership rights within the surrounding community must be avoided.
8. Cultural and indigenous communities' rights must be respected.
9. Use of force to resolve labor or community issues should be limited.
10. Child labor is prohibited, as per Labor Law No. 13 of 2003.
11. Forced labor, including modern slavery and human trafficking, is strictly prohibited.
12. Suppliers must avoid direct or indirect financing of third-parties or organisations that have a track record of being involved in terrorist activities.

## 2.4 FAIR LABOR AND RESPECTFUL WORKPLACE STANDARD

1. Compliance with applicable labor regulations, including freedom of association, is mandatory.
2. Decisions regarding employee recruitment, training, promotion, dismissal, and compensation should be fair and based on merit.
3. A work environment free from harassment must be maintained.
4. Employee data privacy must be respected as per applicable regulations.

## 2.5 GIFT AND ENTERTAINMENT

1. Supplier selection must be based on price, quality, and services offered.
2. Acceptance of free or discounted goods/services influencing business decisions is prohibited without prior written approval.
3. Acceptance/provision of food/beverages during business activities is permitted.
4. Tokens of appreciation or gifts may be provided, subject to prior written approval.



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### 2.5.1 ANTI BRIBERY, CORRUPTION, AND MONEY LAUNDERING

1. Suppliers are obliged to not engage in practices which may lead to penal liability due to fraud or embezzlement, bribery<sup>1</sup>, acceptance of bribes, or other corruption crimes on the part of persons employed by the supplier or other third parties.
2. Bribery, whether offered or accepted, directly or indirectly, is strictly prohibited.
3. All HRTA suppliers must adhere to anti bribery provision set forth in the Letter of Commitment for Bribery Prevention.
4. All HRTA suppliers must prohibit all types of corruption.
5. HRTA's supplier must take the necessary steps to identify and rectify any cases or risks of money laundering arising because of its business operations and the business operations of its third parties and establish suitable preventive measures for this purpose.
6. In the event of violation of the above, HRTA has the right to immediately withdraw from or terminate all legal transactions existing with the supplier and the right to cancel all negotiations.

### 2.6 ARTISANAL AND SMALL-SCALE GOLD MINING (ASGM) MANAGEMENT

1. Suppliers engaging with ASGM partners must have formal agreements with the ASGM partners, including permit verification.
2. ASGM partners must minimize environmental impact and avoid the use of mercury.
3. Human rights principles in labor and conflict management must be promoted.
4. Yearly screening of ASGM partners' permit status and operations is required.

### 2.7 INDIGENOUS PEOPLE MANAGEMENT

1. Respect for indigenous peoples' rights, social, and cultural heritage is required.
2. Adverse impacts on the health, safety, and living conditions of indigenous peoples must be minimized.
3. Unlawful or forced relocation of indigenous peoples is prohibited.
4. Free, Prior, and Informed Consent (FPIC) principles must be applied if significant damage occurs.

<sup>1</sup> HRTA defines "bribery" as the provision of tangible goods, services, or monetary offerings aimed at securing preferential treatment.





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## 2.8 WAIVERS, ASSESSMENTS, AND NON-COMPLIANCE OF THIS CODE OF CONDUCT

1. Any waiver or any change to this Code will be made only by HRTA and will be promptly disclosed as required by law or appropriate regulation.
2. HRTA reserves the right to conduct audits or assessments to ensure the suppliers compliance and will take appropriate steps regarding the relationship with the supplier if there is a reason for concern.
3. If there is an identified case of non-compliance by the supplier, HRTA reserves the right to investigate regarding the matter, and determine the appropriate next steps with the supplier based on the severity of the non-compliance case.
4. HRTA reserves the right to discontinue any relationship with the supplier for cases such as non-adherence to international principles, failure to correct violations, or displaying patterns of non-compliance with these standards.