



## **WHISTLEBLOWING SYSTEM POLICY**

---

**PT CITA MINERAL INVESTINDO Tbk**

---

# **WHISTLEBLOWING SYSTEM POLICY**

## **INTRODUCTION**

### **A. BACKGROUND**

PT Cita Mineral Investindo Tbk or "Company" as a public company is aware that the implementation of Good Corporate Governance will improve the Company's position in business competition, especially in the management of human resources and corporate values that will increase the value of the Company for all shareholders and stakeholders. In fulfilling this, the implementation of the principles of Good Corporate Governance is carried out in accordance with the Company's vision and mission. Implementation of the Company's duties and supervision is always carried out proactively based on the Company's Articles of Association and other relevant laws and regulations.

By implementing the principles of Good Corporate Governance consistently and continuously in carrying out the management of the Company, it is hoped that any violations of the principles of Good Corporate Governance, ethical values, and the prevailing laws and regulations in the Company can be avoided. Therefore, as one of the Company's media to support and maintain the principles of Good Corporate Governance, the Company therefore provides and implements a system in the form of "Violation Reporting System" in order to create a clean and responsible work situation.

### **B. BASIS OF PREPARATION**

The Violation Reporting System was formed in order to provide opportunities especially to all stakeholders of the Company and the community in general to be able to monitor and submit reports or complaints regarding alleged violations on the principles of Good Corporate Governance, as well as ethical values that apply in the Company, especially those relating to integrity and transparency, based on evidence that can be accounted for as well as in good faith for the interests of the Company and is expected to prevent and detect potential violations in the Company.

### **C. PURPOSE AND OBJECTIVE**

1. The availability of media as a means of delivering reports, complaints, important and critical information for the Company.
2. The availability of an early warning system as a means of preventing violations.

3. As a tool to monitor the Company's activities by stakeholders and the community, resulting in reluctance to commit violations.
4. As a good way to facilitate the interests of the Company's Stakeholders and the community to deal with and resolve problems that arise, with the aim of avoiding public disclosures / complaints.
5. Encouraging the Company towards a better direction by prioritizing basic principles for managing the Company's business through the implementation of a system that reflects the principles of information disclosure, accountability, responsibility, independence, fairness and equity.

#### **D. SCOPE**

Violation Reporting System is a system that manages Complaints / Disclosures regarding unlawful behavior, unethical / improper conduct, violations of Company policies and / or regulations, actions or behaviors that can cause both material and immaterial harm, which include matters as follows:

1. Deviations from the applicable laws and regulations;
2. Violations of Company policies and regulations;
3. Abuse of position for other interests outside the Company;
4. Blackmail;
5. Fraudulent acts;
6. Conflict of Interests;
7. Acts of Gratuity or Bribery;

### **VIOLATION REPORTING SYSTEM MANAGEMENT**

#### **A. VIOLATION REPORTING SYSTEM PROCEDURES**

Disclosures by Reporting Party must pay attention to matters as follows:

1. Reporting Party must provide initial indications that can be accounted for, including:
  - 1.1. Reported violation, including the amount of loss (if it can be determined). 1 (one) Complaint / Disclosure should only be for 1 (one) violation to ensure a more focused handling.
  - 1.2. Parties involved, namely who should be responsible for the violation, including witnesses and those who benefit or are harmed by the violation.
  - 1.3. Location of the violation, which includes the name, place, or function of the violation.

- 1.4. Time of the violation, which is the period of the violation in the form of day, week, month, year or certain date when the violation occurred.
  - 1.5. How the violation occurred and whether there is supporting evidence of the violation occurrence.
  - 1.6. Has the violation been reported to other parties.
  - 1.7. Has the violation happened before.
2. To speed up and simplify the process of following up on Complaint / Disclosure, the Reporting Party is recommended to provide personal information, of which to contain at least address / telephone / mobile / facsimile / email.

## **B. REPORTING FACILITY / MEDIA**

The Reporting Party submits Complaint / Disclosure of violation to the Violation Report Administration Manager through specific facility / media that has been provided by the Company and is intended for the Violation Management System. Any Complaints / Disclosures to be addressed to the Complaint Box / *Whistle Blowing System* through the email address: [wbs@citamineral.com](mailto:wbs@citamineral.com) or phone number 08119436663.

## **C. MANAGEMENT PROCEDURE**

1. Reporting Party makes a report on Complaint / Disclosure of violations and sends them through the facility / email [wbs@citamineral.com](mailto:wbs@citamineral.com) or phone number 08119436663.
2. The Violation Report Administration Manager receives and filters reports on received Complaint / Disclosure of violations to identify if there is an Initial Indication or in line with the reporting criteria of the Violation Reporting System and can be further processed.
3. The Violation Reporting Commission receives a report from the Violation Report Administrative Manager and conducts an initial investigation on the Complaint / Disclosure. The results of the initial investigation are reported to the Board of Directors.
4. From the report of the Violation Reporting Commission, the Board of Directors determines whether or not a further investigation will be carried out by the Investigation Team (Internal and / or External).

5. The Investigation Team conducts further investigations on Complaint / Disclosure and reports the results to the Board of Directors.
6. From the follow-up investigation report by the Investigation Team, the Board of Directors set recommendations for further action. If it is not proven or finished, the Complaint / Disclosure report will be closed. If the Complaint / Disclosure is proven or requires further action, it will be subject to sanctions in accordance with applicable regulations.
7. The entire Investigation process for Complaint / Disclosure must be made in form of Minutes which the format is showed in the Appendix of Minutes of Initial Investigation Results and Minutes of Further Investigation Results.
8. The management procedure for Complaint / Disclosure through the Violation Reporting System is carried out in accordance with the flowchart as shown in the Flow Chart Appendix.
9. The whole Violation Reporting System process must be well documented and reliable (can be accounted for).

#### **D. SANCTION**

The form of sanctions against Reported Party that has been proven to have committed any violation will be determined in accordance with the applicable rules and regulations in the Company. Violations that are categorized as being against the law and / or violating the applicable laws and regulations will be followed up and processed in accordance with the legal standards.

#### **E. PROTECTION OF REPORTING OR RELATED PARTIES**

1. The Company will guarantee the confidentiality on the identity of the Reporting Party, as well as those who are related to the reported violations.
2. The Company guarantees the protection of Reporting Party from all forms of threats, intimidations or unpleasant actions from any party.
3. Confidentiality of the identity and protection of the Reporting Party also applies to the parties conducting the Investigation as well as those who provide information related to the Complaint / Disclosure.
4. Provisions regarding confidentiality and protection of Reporting Party will continue to apply as long as the Reporting Party maintains the confidentiality of violations that

are reported to any party, in any way, form and condition, and does not / have not become public consumption either before or after the complaint / disclosure.

#### **F. AUTHORITY ON REPORT HANDLING**

1. Complaint / Disclosure of violations related to and or committed by the Violation Reporting Commission and the Investigation Team will be followed up by the Board of Directors.
2. Complaint/ Disclosure of violations relating to and / or committed by partners or stakeholders will be subject to the provisions as stated in the contract. If it is related to any crime, then it will be forwarded to the authorities.
3. Complaint / Disclosure of violations related to and or committed by the Directors will be followed up by the Board of Directors or Commissioners.
4. Complaint / disclosure of violations related to or committed by the Board of Commissioners will be followed up by the Board of Directors.

#### **G. VIOLATION REPORTING COMMISSION REPORT**

The Violation Reporting Commission is required to make periodic reports, which include the number of Complaints / Disclosures, the category of Complaints / Disclosures as well as the media used by Reporting Parties and their submission to the Directors.

**WHISTLE BLOWING SYSTEM FLOWCHART**

No	Procedure	Reporting Party	Administration Manager*	Violation Reporting Commission*	Board of Directors	Internal Investigation Team	External Investigation Team
1	Reporting Party makes a report on Complaint / Disclosure of violations and sends them through the facility / email or other media.	Report ↓ 1					
2	The Violation Report Administration Manager receives and filters reports on received Complaint / Disclosure of violations to identify if there is an Initial Indication or in line with the reporting criteria of the Violation Reporting System and can be further processed? If YES, the Complaint / Disclosure report is forwarded to the Violation Reporting Commission, if NO, the Violation Reporting System process is closed.		2 ↓ 2 No Yes	Report			
3	The Violation Reporting Commission receives a report from the Violation Report Administrative Manager and conducts an initial investigation on the Complaint / Disclosure. The results of the initial investigation are reported to the Board of Directors.			3 ↓ Report			
4	From the report of the Violation Reporting Commission, the Board of Directors determines whether or not a further investigation will be carried out by the Investigation Team (Internal and / or External).			Completed	2 No Yes Establishment		

No	Procedure	Reporting Party	Administration Manager*	Violation Reporting Commission*	Board of Directors	Internal Investigation Team	External Investigation Team
5	The Investigation Team conducts further investigations on Complaint / Disclosure and reports the results to the Board of Directors.						
6	From the follow-up investigation report by the Investigation Team, the Board of Directors set recommendations for further action. If it is not proven or finished, the Complaint / Disclosure report will be closed. If the Complaint / Disclosure is proven, it will be subject to sanctions in accordance with applicable regulations.						



**Minutes of Initial Investigation Results**

Appendix 1.  
**MINUTES OF INITIAL INVESTIGATION RESULTS**

**MINUTES**

Number: .....

**REGARDING  
VIOLATION REPORTING SYSTEM  
INITIAL INVESTIGATION RESULTS  
PT CITA MINERAL INVESTINDO Tbk**

Today, ..... on date.....month.....year.....have  
been reported the Results of Initial Investigation of the Violation Reporting  
System for the complaint of:

.....  
.....  
.....

Based on the submission of the Initial Investigation Report, the Disclosure  
Report on the complaint has / does not \* fit the criteria to be followed up with  
further investigation. The investigation will be carried out by the Investigation  
Team.

Board of Directors,

Signature  
Full Name

Violation Reporting Commission:

- 1. ....
- 2. ....
- 3. ....
- 4. ....

*\*cross out inapplicable option*

Minutes of Further Investigation Results

Appendix 2.  
MINUTES OF FURTHER INVESTIGATION RESULTS

**MINUTES**

Number: .....

**REGARDING  
VIOLATION REPORTING SYSTEM  
FURTHER INVESTIGATION RESULTS  
PT CITA MINERAL INVESTINDO Tbk**

Today, ..... on date.....month.....year.....have  
been reported the Results of Further Investigation by the Violation Reporting  
System Investigation Team for the complaint of:

.....  
.....  
.....  
.....

Based on the submission of the Further Investigation Report, the Complaint /  
Disclosure Report Number ..... is **proven / not  
proven** \*.

Board of Directors,

Signature  
Full Name

Violation Reporting Commission:

- 1. ....
- 2. ....
- 3. ....
- 4. ....

*\*cross out inapplicable option*

---

# APPROVAL SHEET

---

Approved on behalf of the Boards of Directors and Commissioners of  
PT Cita Mineral Investindo Tbk  
in Jakarta, 2 August 2020

## Board of Commissioners



Lim Gunawan Hariyanto  
President Commissioner



James Gregory Baxter  
Commissioner



A. Ibrahim Saleh  
Independent Commissioner



Darjoto Setyawan  
Independent Commissioner

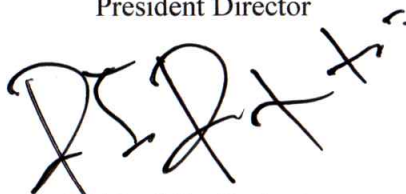
## Board of Directors



Harry Kesuma Tanoto  
President Director



Ferry Kadi  
Director



Robby Irfan Rafianto  
Director



Yusak Lumba Pardede  
Director