



THE CODE OF CONDUCT PT TOTAL BANGUN PERSADA Tbk 2015 EDITION



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Glossary

1. **The Company**, with the letter C in uppercase, is PT TOTAL BANGUN PERSADA Tbk, meanwhile company or companies with the letter c in lower case refers to company in general.
2. **Board of Commissioners** is the entire members of the Board of Commissioner as a Board.
3. **Member of Board of Commissioners** is a member of Board of Commissioners in reference to an individual (not a Board).
4. **Board of Directors** is the entire members of the Board of Directors as a Board.
5. **Member of Board of Directors** is a member of Board of Directors in reference to an individual (not a Board).
6. **Employee** is the workforce or people who work to receive Earnings from the Company.
7. **Manusia TOTAL** or **TOTAL People** are all members of Board of Directors and Employees of the Company.
8. **The Management** consists of the Board of Directors and structural officials in accordance with the organization structure whose functions are to conduct activities in line with the predetermined authority limitations.
9. **Stakeholders** are parties who have interests with the Company, both directly and indirectly, namely the Employees, Suppliers, Customers, Business Partners, Creditors, and the government as well as other interested parties.
10. **Business Partners** are individuals or companies that establish mutually beneficial business cooperation with the Company based on their potential and worthiness.
11. **Good Corporate Governance (GCG)** is a system utilized to direct and control a company's business activities. GCG regulates the division of duties, rights, and obligations of parties having an interest in the business of the company, including the shareholders, Management Board, managers, and all members of stakeholders having no shares of the company.
12. **Corporate Values** are the moral foundation for achieving the Company's vision and mission.
13. **Ethics** is a system of values or norms believed by all TOTAL People as a standard of behavior in the Company.
14. **Business Ethics** is a system of values or norms believed by all TOTAL People in carrying out business activities including in interacting with the Stakeholders.
15. **Work Ethics** is a system of values or norms believed by all TOTAL People in carrying out their duties, including ethics of relations between the Employees and the Company.
16. **Code of Conduct** is a set of commitments consisting of the Company's business ethics and Company Employees' work ethics that are structured to shape, regulate, and conform behaviors; hence, a consistent output can be achieved in line with the culture of the Company in achieving its vision and mission.
17. **Conflict of interest** is a situation where there is a conflict between the Company's economic interests and personal economic interests.

CODE OF CONDUCT

PT TOTAL BANGUN PERSADA Tbk

FIRST SECTION

INTRODUCTION

I. Background and Systematics of Code of Conduct

PT Total Bangun Persada Tbk, hereinafter shall be referred to as “the Company” is committed to implementing Good Corporate Governance (GCG) in which the Company’s Vision is essentially to provide added values to stakeholders. One of the main keys that support the company’s vision is the implementation of GCG principles in a consistent manner, and to transform it into a work culture that is applicable in the Company. Such understanding underlies the Company’s commitment to implementing good governance in each business activity in order to achieve sustainable long-term business goals.

Trusts from the stakeholders, such as Employees, Communities, Business Partners, and other stakeholders, are the crucial factor for the development and business continuity of the Company. The loss of stakeholders’ trust can cause the Company to lose business opportunities which may threaten business continuity. The Company’s credibility and trust are closely related to the Company’s behavior in interacting with stakeholders. Therefore, the management of the Company is required to follow the applicable laws and regulations, and to uphold ethical norms and values. Awareness of all parties to implement good ethics will enhance and strengthen the Company’s positive image.

Based on such considerations, the Company prepares a Policy of Company Ethics, hereinafter shall be referred to as the “Code of Conduct” or “COC” which regulates the policies of values or norms stated explicitly as a standard of behavior that must be complied with by all TOTAL People.

COC is a set of commitments consisting of the Company’s business ethics and Company Employees’ work ethics that are structured to shape, regulate and conform behaviors; thus, a consistent output can be achieved in line with the culture of the Company in achieving its vision and mission.

In preparing this COC, the Company always takes into account the prevailing laws and regulations, as well as the vision, mission, goals, and values adopted by the Company, the best practices at the Company’s internal and external, and the Code of Corporate Governance (COCG).

As a dynamic policy, this COC will be reviewed regularly and continuously in accordance with the changing aspects of business environment that occur. Nevertheless, in every change, the Company will not sacrifice the existing values merely for a short-term profit.

II. Basis of Code of Conduct Preparation

The preparation of the Company's COC is based on the following manners:

1. Prioritizing compliance with the prevailing laws and regulations and taking into account the norms applicable in the community in which the Company operates.
2. Avoiding actions, behaviors or conducts that can cause a conflict of interest and always prioritizing the interests of the Company above personal, family, group, or class interests.
3. Recognizing that the Company is required to grow and develop in accordance with the dynamics and development of the market as well as the expectations of Stakeholders.
4. Prioritizing occupational health and safety for Employees and the community in which the Company operates.
5. Implementing the principles of transparency, accountability, responsibility, independency, and fairness in managing the Company.

III. Company Values

1. Performance

- a. Committed to quality and excellence
- b. Committed to customer
- c. Doing ordinary things extraordinarily
- d. Continuously improving

2. Character

- a. High integrity
- b. Trustworthy and reliable
- c. Fair towards everyone
- d. Committed to promises

3. Spirit

- a. Cooperative and to value each result and effort done by colleagues and partners
- b. Adaptive to the changing world
- c. Future-oriented
- d. Proud of profession and results

IV. Purposes, Objectives and Benefits of Code of Conduct

1. Purposes of the implementation of Code of Conduct for the Company are as follows:
 - a. Each TOTAL People understands that all activities of the Company are based on the principles of good corporate governance;
 - b. To encourage all TOTAL People to behave in a good and positive manner in carrying out all activities of the Company;
 - c. To create healthy and comfortable work atmosphere within the Company;
 - d. To minimize opportunities for irregularities that can affect the Company's image.
2. Objectives of the implementation of Code of Conduct for the Company are as follows:
 - a. To become a joint commitment to realize the vision and carry out the mission of the Company professionally with proper business ethics;
 - b. To serve as a behavior guide for all TOTAL People that must be complied with in carrying out all activities of the Company;
 - c. To avoid conflict of interest in carrying out all activities of the Company;
 - d. To create a harmonious relationship with the Stakeholders.
3. The Company strives to implement Code of Conduct in a consistent manner so as to be able to provide long-term benefits for:
 - a. The Company
 - To encourage the Company's operational activities so as to be more effective and efficient.
 - To increase the values of the Company by providing certainty and protection to the Stakeholders in dealing with the Company, resulting in a good reputation which, ultimately, will realize long-term business success.
 - b. Shareholders

To strengthen the trust that the Company is managed in a trustworthy, prudent, efficient, transparent, accountable, and fair manner in order to achieve the level of profitability expected by the Shareholders while continuously takes into account other stakeholders of the Company.
 - c. TOTAL People
 - To provide understanding for every TOTAL People regarding the behavior that is required or prohibited by the Company.

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- To create work environment that supports the values of honesty, ethics, and openness, so as to be able to improve the overall performance and productivity of every TOTAL People.

d. Community and other related parties

To create harmonious and mutually beneficial relationship with the Company.

V. Targets of Code of Conduct

Parties obliged to comply with and implement the COC are:

1. All TOTAL People.
2. Subsidiaries.
3. Shareholders.
4. Business Partners such as consultants, suppliers, work partners and so on.

VI. Responsibilities of TOTAL People

1. To understand and implement the ethical standards outlined in the COC which are related to their work.
2. To contact direct supervisors and parties that have been determined by the Board of Directors if they have questions regarding the implementation of COC.
3. To understand the reporting procedures and report any indication of violations of COC to the parties that have been determined by the Board of Directors.
4. To cooperate readily in the investigation process of possible violations of COC.

VII. Responsibilities of the Leaders of the Company

1. To nurture and maintain the culture of compliance with the COC through:
 - a. Personal encouragement of compliance with the COC;
 - b. Regular monitoring on the programs that aim to support the compliance of TOTAL People with the COC;
 - c. Provision of proper example of how to behave or conduct their daily routines.
2. To ensure that every TOTAL People understands that compliance with the COC is as significant as achieving positive performance.
3. To consider the issues of compliance with the COC in evaluating and rewarding TOTAL People.

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4. To prevent possible violations of COC by:
 - a. Ensuring that the risk of possible violations of COC relating to business process can be identified as early as possible and in a systematical manner;
 - b. Conducting identification and submitting report in accordance with the established procedures for the activities of Subsidiaries, Affiliates, and Business Partners, that may cause possible violations of COC;
 - c. Ensuring the implementation of educational and training activities on COC for all TOTAL People, Subsidiaries, and Affiliates, and conducting dissemination to Business Partners so that these parties understand COC thoroughly.
 5. To detect possible violations of COC by:
 - a. Implementing an inherent supervision to minimize the risk of possible violations of COC;
 - b. Creating a reporting system that is appropriate for possible violations of COC in order to protect the confidentiality of the TOTAL People who report the violations;
 - c. Ensuring the availability of regular evaluation on the implementation of COC to understand the effectiveness of the implementation as well as the method to improve existing weaknesses.
 6. To follow-up the reports of possible violations of COC by:
 - a. Improving the weaknesses found in the evaluation of compliance with COC in a proper manner;
 - b. Providing the appropriate disciplinary actions;
 - c. Coordinating with the General Affairs (GA) Work Unit if the violation of COC that occurs requires the intervention of law enforcers of the authorities.

SECOND SECTION

BUSINESS ETHICS OF THE COMPANY

Ethics in the COC are the moral values and norms that serve as a guide for an individual or a group in regulating their behaviors.

Business Ethics of the Company is an explanation of how the Company, as a business entity, behaves ethically and acts in an effort to balance the Company's interests with those of the Stakeholders, in accordance with GCG principles and sound corporate values while maintaining the Company's profitability.

I. Compliance with the Laws and Regulations

Regulations are legal products that must be adhered to and become guidelines. Hence, compliance with the laws is a standard of ethics that must be carried out. One significant relationship that must be maintained by the Company is the relationship with regulators. This understanding underlies the Company's commitment to developing relationships with all government institutions and officials (regulators) based on the prevailing laws and regulations.

The laws and regulations applicable in all activities must be well-understood and internalized in each of the Company's business operations. Compliance with the laws and regulations serves as a vital element that must be maintained in every action conducted by every TOTAL People. Further provisions can refer to the applicable Company's regulations.

II. Provision and Reception of Gifts and Others

The provision and/or reception of Gifts, Souvenirs, and Business Meals is carried out in the framework of social interaction and to foster good relations between the Company and Partners in a healthy and reasonable manner, and can be accounted for without causing conflicts of interest that may influence decision-making process in running the Company's business.

III. Concern for Occupational Health and Safety and Environment (OHSE)

The OHSE commitment of the Company is to create **safe** and **healthy** conditions at the workplace and to prevent damage/pollution to the **environment** due to the impact of the Company's work operations.

The application and maintenance of behaviors that can realize OHSE is a joint responsibility of all TOTAL People.

IV. Provision of Equal Opportunities for Employees to Obtain Work, Promotion, and Work Termination

1. The Company provides equal opportunities and fair treatment for all employees of the Company.
2. The Company implements Company's regulations consistently without prejudice to the race, gender, religion, and position.
3. Complying with the prevailing manpower regulations.

V. Ethical Standards in the Relationship with Stakeholders

Trust is an essential element to improve the loyalty of both the Customers and other parties related to the Company. In addition to trust, the improvement of services shall provide added values for the Company. To create harmony as well as trusted business climate, the Company always acts professionally, honestly, fairly, and consistently in carrying out its business activities and in providing services to the Stakeholders.

The Company's foundation in developing relationships with the Stakeholders is stipulated below:

A. Relationship with TOTAL People

The behavior of TOTAL People is a specific response of every TOTAL People to the daily work situation in the field, which results in the achievement of organizational vision and positive business performance. In order to create high-quality and fair relationship and to encourage the intensity and quality of participation of TOTAL People, the Company always treats TOTAL People as the Company's members in a fair manner as follows:

1. Respecting the rights of TOTAL People and involving them in determining Employee management policies in accordance with the prevailing laws and regulations.
2. Disseminating all regulations to all TOTAL People, especially new regulations related to the Employees.
3. Implementing recruitment, promotion, and career development systems in a fair and consistent manner based on competency in accordance with the needs of the Company.
4. Creating equal work opportunities for all TOTAL People regardless of ethnicity, race, gender, and religion.
5. Providing healthy, comfortable, and safe work environment, and maintaining the health and safety of its Employees.
6. Paying attention to the welfare of TOTAL People in a fair, decent, and transparent manner.
7. Providing assessment, rewards, and remuneration payments according to the performance and competencies of the Employees, in terms of corporate, work teams, and individuals.
8. Respecting the creativity, innovation, and initiative of the Employees which provide added values to the Company.
9. Complying with and respecting the provisions contained in the Collective Labor Agreement.

B. Relationship with the Government (Regulator)

The Company is committed to maintaining and developing good and communicative relationship with all government institutions and officials (regulators) that are related with the Company's business activities.

C. Relationship with Shareholders

The Company ensures that the shareholders have the right to receive equal treatment in accordance with the class and proportion of shares owned, and can exercise their rights in accordance with the Company's Articles of Association as well as the prevailing laws and regulations.

TOTAL People are committed to always carrying out their best efforts so that the Company can grow sustainably based on the mutually beneficial business standards so as to be able to provide optimum contribution for the Shareholders.

D. Relationship with Customers

The Company's success depends on the establishment of productive relationships with customers in accordance with the culture of the Company.

The Company is committed to developing high quality services where the Company consistently strives to meet customer expectations and establish long-term mutually beneficial relationships.

E. Relationship with Business Partners

The Company deals with prospective Business Partners in a professional, fair, and equal manner, as well as under the principle of mutual benefit, by complying with the following terms:

1. Prioritizing the principle of benefit by selecting partners that provide the best synergy to the Company.
2. Avoiding cooperation with Business Partners that conduct unethical business practices.
3. Maintaining good relationship with Business Partners in an equal and transparent manner as well as under the principle of mutual benefit.
4. Carrying out work relations in accordance with ethical values and within the limits of tolerance permitted by the laws.
5. Meeting the respective rights and obligations in accordance with the contract.
6. Business partners must comply with all applicable provisions in the Company.

F. Relationship with Competitors

Pursuant to the Law No. 5 of 1999 regarding Prohibition of Monopolistic Practice and Unfair Business Competition, the Company promotes fair and healthy business competition climate within the construction industry in each of its business activity, including:

1. Carrying out business by taking into account the principles of fair and ethical competition pursuant to the prevailing laws and regulations.
2. Respecting and maintaining healthy relationship with competitors.
3. Prohibiting agreements with competitors related to the issue of not involving itself in business activities that can violate the laws and regulations that are related to monopolistic practice and unfair business competition.

G. Relationship with Creditors

1. Providing actual and accurate information for prospective Creditors.
2. Selecting Creditors with good credibility and requirements that are profitable for the Company, by upholding the prudent, selective, competitive, and fair principles.
3. Providing information in a transparent manner on the use of funds in accordance with the credit agreement to improve creditor's trust.

H. Relationship with Suppliers

1. Giving equal treatment to all suppliers or partners in accordance with the applicable procedures.
2. Ensuring that the Company's procurement process for Suppliers must be free of Corruption, Collusion, and Nepotism (KKN).
3. Not influencing each other, either directly or indirectly, which results in unfair competition as well as a decrease in the quality of procurement process and results of work.
4. Preventing conflicts of interest among parties involved, either directly or indirectly, in the procurement process.
5. Carrying out the procurement process in a transparent, competitive, and fair manner to obtain Suppliers who meet the qualifications of work requirements and prices that can be accounted for.
6. Ensuring that transactions conducted with Suppliers always meet the Suppliers' rights in accordance with the agreement that has been mutually approved.
7. Establishing good communication with goods and services providers by giving information on the opportunity to procure goods and services in the Company, including following up complaints and objections.

I. Relationship with the Community and Surrounding Environment

1. Creating a harmonious relationship with the environment based on the values, norms, and culture of the community.
2. Implementing Corporate Social Responsibility (CSR) programs in accordance with the applicable provisions.
3. Participating in the efforts to maintain environmental preservation and cleanliness.

J. Relationship with Mass Media

1. Providing information on the Company in a transparent and responsible manner in order to build a positive image of the Company while continuously respecting the journalistic code of ethics.
2. Providing correct and educational information to the public so that they can understand the Company's business activities.

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3. Receiving and following up constructive criticisms and public complaints conveyed through the mass media.

K. Relationship with Subsidiaries

1. Establishing good relationship with the Subsidiaries in an effort to build synergies and improve the image of the Company and its business groups.
2. Each relationship with a Subsidiary is carried out within the framework of a fair and mutually beneficial business relationship.

VI. Ethical Standards of the Management and the Employees

The sustainability of the Company is highly determined by its performance and image. Meanwhile, such performance and image is largely determined by two factors, namely the abilities (capacity and competence) and behaviors of each TOTAL People as the driving force of the organization.

Therefore, it is vital for the Company to regulate ethical behavior in carrying out daily activities and in working.

A. Behavior as a superior to subordinates

1. Set an example for self-development.
2. Receive feedback openly and use it for improvement.
3. Identify the strengths and area of development for each subordinate.
4. Provide positive feedback to subordinates when they complete the task in accordance with/above the standard.
5. Provide constructive feedbacks to subordinates when their work results are below the standards.
6. Guide subordinates so that they are able to complete tasks according to the standards.
7. Provide opportunities and challenges to subordinates for self-development.
8. Be ready to share experience and expertise with subordinates.
9. Provide encouragement to subordinates to provide the best work results.
10. Create pleasant work environment and relationship.
11. Meet employees to find out and understand the dynamics on the field.
12. Encourage a culture of compliance with the Company's Code of Conduct and policies.
13. Make corrections or reprimands to subordinates in a constructive and fair manner without breaking their work spirit.
14. Respond to any reports regarding disciplinary violations and conduct a follow-up action fairly and transparently in accordance with the Company's regulations.
15. Do not engage in intimidation or pressure, humiliation, and harassment of subordinates.

B. Behavior as a subordinate to superiors

1. Carry out their duties in an honest, professional, and responsible manner.
2. Act and behave politely towards the superiors and fellow TOTAL People.
3. Always strive to improve the ability, knowledge, and professionalism in carrying out duties.
4. Provide positive suggestions and input to superiors.
5. Be brave and free to express opinions politely in discussing the policies of superiors that are not in accordance with the rules and/or objectives of the Company, and to submit suggestions for improvement.
6. Do not discuss the policy of superiors with fellow subordinates negatively, which may potentially defame and be counter-productive to the Company's performance.
7. Comply with the Company's regulations and inform the leaders if there are indications of irregularities.
8. Comply with the laws, policies, and Standard Operating Procedures (SOP) that have been determined.
9. Do not take actions that are beyond their authority.

C. Behavior as a Work Partner

1. Work closely and respect the work of each work partner and the results.
2. Interact openly and respect each other.
3. Listen and try to understand the perspectives of other people.
4. Listen to others without interrupting.
5. Communicate the main points clearly and concisely.
6. Make an effort to know work partners personally.
7. Maintain polite behavior, both inside and outside of work.
8. Develop the ability and skills to work in groups for the progress of the Company.
9. Be ready to share knowledge and skills with other work partners without fear of competition.
10. Possess a high spirit of cooperation and always be ready to help work partners or other work units for the progress of the Company.
11. Respect other people and do not underestimate and discriminate one another.
12. Receive every input and advice given for self-improvement and performance improvement.
13. Create information disclosure among work partners and between work units to support good cooperation and coordination for the progress of the Company, by not

violating the Collective Labor Agreement between the Company and the Employees; namely, to keep the Company's secrets and/or position secrets as well as possible.

14. Be open, sympathetic, and helpful to fellow work partners, respect each other and opinions of others, and be capable of accepting differences of opinion properly.
15. Possess a healthy spirit of competition to optimize work performance.
16. Avoid actions and speech that contain elements of intimidation, harassment, humiliation, ridicule, defamation and demeaning of friends, as well as discrimination of fellow work partners.
17. Work in harmony based on mutual dedication and trust to achieve common goals.

VII. Intellectual Right

1. The Company is required to respect the intellectual rights of other parties.
2. All TOTAL People must actively participate in protecting the intellectual rights of the Company.
3. TOTAL People participating/working in the development of a process or product to be used by the Company, or TOTAL People who has the rights to the work results, must treat information related to the process or product as the Company's property, both during the work period and after no longer working for the Company.
4. All TOTAL People must inform the results of their work both during and outside working hours, if the work is related to the business or operations of the Company.

THIRD SECTION CODE OF CONDUCT OF TOTAL PEOPLE

I. Commitment of TOTAL People

In order to realize the Company's commitment to Stakeholders, all TOTAL People are committed to:

1. Prioritizing the interests of the Company above personal and/or group interests so as to be able to provide the best for the Company.
2. Carrying out duties in a professional and fully responsible manner, and upholding integrity, honesty, and the spirit of togetherness.
3. Immediately following up customer complaints.
4. Preparing a work plan properly in accordance with the scope of their duties.
5. Understanding the work objectives and the measurement of their success.
6. Completing duties in accordance with the targeted time in an effective and efficient manner.
7. Possessing strong motivation to develop themselves and expand knowledge.
8. Complying with all provisions and values of the Company to maintain the image and reputation of the Company.
9. Complying with and respecting the provisions contained in the Collective Labor Agreement.

II. Maintaining the Good Name of the Company

1. All TOTAL People are required to always maintain polite behavior, both during and outside of work.
2. Improving self-competence in line with the developments occurring on any field.
3. Always caring for and maintaining the good name and reputation of the Company.
4. Understanding and complying with the Company's business and work ethics.

III. Maintaining Good Relationship among TOTAL People

1. All TOTAL People are required to always maintain polite behavior among themselves.
2. Showing respect among TOTAL People by not underestimating and discriminating one another.
3. Being ready to share knowledge and skills, and helping other work partners for the flow and success of the Company's business activities.
4. Always being honest and thinking positively among TOTAL People.

IV. Maintaining Confidentiality of the Company

One of the most significant responsibilities of the Company is to maintain the trust of Stakeholders (Business Partners, Customers and Suppliers) and to ensure that information related to Stakeholders' business issues is kept confidential at all times.

The Company is obliged to maintain the confidentiality of information obtained in each business activity. Respecting the privacy of Stakeholders is as crucial as protecting the Company's assets.

TOTAL people are obliged to treat confidential information of the Company that they obtain, in carrying out their duties by taking into account the following provisions:

1. Protection of confidential information, which is applicable not only to the actively working TOTAL People but also to the TOTAL People who have not worked for a certain period of time in accordance with the prevailing laws and regulations.
2. Access to information, is the arrangement regarding the authority and scope of duties of TOTAL People that can access the required Company's information, both general and specific.
3. Information Dissemination, serves as an explanation regarding the disclosure or use of confidential information of the Company in the form of speech or writing to or by any party, whether individuals, companies, associations, or other legal entities, which can only be carried out by officials appointed by the Company.

The obligation to maintain this confidentiality is excluded for:

- a. Taxation purposes;
- b. Legal proceedings purposes for criminal cases;
- c. Written request that has been approved by the Stakeholders to the Company.

V. Maintaining and Using the Assets of the Company

Assets are resources owned by the Company to be used in the efforts to achieve the Company's objectives. Maintenance and use of assets are part of the Company's efforts to maintain its business continuity.

With regard to the Company's assets, every TOTAL People is obliged to:

1. Ensure that the use of the Company's assets is carried out for the purpose of creating values for the Company in accordance with the social, economic, and financial principles that can be accounted for by considering the related business risks.
2. Be prohibited from keeping the Company's property outside the place specified by the Company.
3. Maintain, preserve, secure, and save the Company's assets in accordance with the prevailing regulations.
4. Use the assets according to their position, authority and scope of work being conducted.

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5. Not use the Company's assets for personal or group interests, and/or political and other third parties' activities.
 6. Use the assets according to their designation and maintain their integrity and function.
 7. Use the generally accepted accounting standards in every recording and reporting of the use of Company's assets.

VI. Maintaining the Occupational Health and Safety and the Environment

The management of occupational health and safety is crucial for the success of the Company's business activities. Implementing and maintaining behaviors that can realize occupational health and safety is a key requirement. Hence, in conducting their work, every TOTAL People has to:

1. Comply with all laws and regulations and/or standards regarding occupational health and safety.
2. Master and understand the situations and conditions of work environment by complying with the implementation of the laws and regulations concerning occupational health and safety, and the environment.
3. Prioritize preventive measures which can avoid accidents from occurring.
4. Avoid any actions that can harm itself or others, and can disrupt health, such as alcoholic drinks, illegal drugs consumption, and so on, in accordance with the regulations of the Company.

VII. Immoral Behaviors, Narcotics, Illegal Drugs, Gambling and Smoking

Healthy behavior based on the moral values of every TOTAL People is believed to be able to influence the performance contribution given to the Company, as well as the formation of the Company's image. To that end, every TOTAL People:

1. Is prohibited from conducting any form of action that violates moral values such as harassment, humiliation, slander, and behavior that leads to sexuality harassment.
2. Is prohibited from using, distributing and selling items related to narcotics and other illegal drugs and liquor.
3. Is prohibited from storing and distributing matters related to any form of pornography.
4. Is prohibited from gambling in any form.
5. Is prohibited from smoking at public places except the areas that have been provided by the Company.
6. Is prohibited from carrying sharp weapons and firearms, or other weapons into the Company.
7. Is prohibited from bringing any pets into the Company.

VIII. Conducting Data Registration of the Company and Preparing Reports

Every TOTAL People shall support the implementation of data management in a neat, orderly, thorough, accurate and timely manner by:

1. Providing only the data that can be accounted for.
2. Recording data and compiling reports based on correct sources that can be accounted for and of which the accuracy can be verified.
3. Delivering reports in a proper, complete, concise, clear, precise, and timely manner, and that are relevant for the decision-making process.
4. Not hiding the Company's data and documents, either when serving or after completing their term of office/position.
5. Not allowing incorrect records or unlawful transactions.
6. Keeping all documents, reports, and files of the Company in an orderly manner so that they are always easy to find and use at any time by all interested parties.
7. Every TOTAL People is prohibited from falsifying records, documents, and information of the Company.
8. The use/dissemination and destruction of records, documents, and information must be approved by the authorized official.
9. The company does not justify the existence of an individual who, due to their position or profession or business relationship with the Company, uses the records, documents, and information of the Company for their personal interests which can potentially harm the Company and other Stakeholders.

IX. Insider Trading

TOTAL people who have access to material information must not abuse their position and work in disclosing material information that can influence the Investor's decision.

Material information is information that has not been widely publicized and can encourage an individual to buy, sell, or hold the shares of the Company.

X. Provision and Reception of Gifts, Bribe and Others

Behaviors of TOTAL People that should be implemented in regard to giving and/or receiving gifts:

1. Reception of Gifts, Souvenirs, Business Meals or other facilities that can influence decision-making process and violate existing provisions is not allowed.
2. Business Meals with Business Partners and/or other stakeholders are allowed as long as they are carried out for the purpose and interest of the Company, at a cost that can be accounted for and carried out within reasonable limits in a respectable place that does not cause a negative image against the Company. Business meals that can be received/given by TOTAL

People in the context of business activities are the means to establish cooperation with Business Partners.

3. Gifts and Souvenirs that are allowed to be accepted within the limits of fairness are only in the framework of:
 - a. Marriage;
 - b. Circumcision;
 - c. Disaster;
 - d. Award from the Company for the achievement of the relevant Employees;
 - e. Souvenirs from other companies in the forms of, among others pens, agendas, calendars, and other similar items.

XI. Conflict of Interest

Conflict of interest is a situation where there is a conflict between the economic interests of the Company and the personal economic interests of the shareholders and TOTAL People.

Regarding conflict of interest conditions, then:

1. In carrying out their duties and obligations, TOTAL People must always prioritize the economic interests of the Company above their personal or family economic interests, as well as those of other parties.
2. TOTAL people are prohibited from abusing their positions for personal, family and other parties interests or profits.
3. Should there be discussion and decision making which contain any element of conflict of interest, the parties concerned are not allowed to participate in the decision-making process.
4. Shareholders who have a conflict of interest must cast their votes in the General Meeting of Shareholders (GMS) in accordance with the decisions taken by shareholders who do not have any conflict of interest.
5. TOTAL People shall not conduct business activities that are directly related to the Company's activities.
6. TOTAL people shall not hold any position at other companies/institutions that want and/or have business relationship with the Company, or that want and/or are competing with the Company.
7. TOTAL people shall not have other work or profession outside the Company during working hours and shall always disclose and report any interests and/or activities outside the Company during working hours to their superiors hierarchically to obtain permission.
8. TOTAL people shall not utilize the confidential information and business data of the Company for interests outside the Company.

XII. Political Activities

The Company ensures that all TOTAL People are able to exercise their right in regard with the opportunity to channel their political aspirations. The Company does not make political contributions and is not affiliated with any political party.

Regarding political activities, all TOTAL People:

1. Shall not use the name, assets and potential of the Company for certain political purposes.
2. Shall not act or provide contribution on behalf of the Company to any political party.
3. Shall not give understanding, involvement, or statements, either directly or indirectly, that can indicate that the Company has an attachment to any political party.
4. Must conduct the activities to channel their political aspirations outside working hours and not use the Company's attributes.
5. Shall not carry out political activities within the Company, either directly or indirectly.
6. Are prohibited from using the attributes of any party or social organization within the Company's work environment.

FOURTH SECTION ENFORCEMENT AND REPORTING

I. Commitment of Code of Conduct

1. The Board of Directors is obliged to sign an Integrity Pact which is a commitment of TOTAL People to implementing the COC.
2. The Board of Directors is responsible for the implementation of the Code of Conduct for all TOTAL People.
3. Each TOTAL People receives a copy of the Integrity Pact and signs the Integrity Pact form stating that they have received, understood and committed to complying with the COC. The Integrity Pact is then documented by the party determined by the Board of Directors.
4. The Code of Conduct must be disseminated and understood by all TOTAL People.
5. The Management of the Company is responsible for and exemplifies the subordinates for the implementation of the COC.

II. Dissemination and Internalization

In order to enforce the COC, all leaders of each level within the Company, as well as Parties established by the Board of Directors to manage GCG in the Company, are responsible for ensuring that COC has been disseminated.

The objectives of the dissemination are as follows:

1. To realize the awareness of all Employees to implement the COC.
2. To enhance Employees' knowledge and insight regarding the importance of COC for the Company's business continuity.
3. To provide awareness to Employees that the COC is an integral part of business practices and evaluation of the performance of all Company Employees.

III. Violation

Violations of the COC are actions that break the Company's discipline and will be handled by Parties determined by the Board of Directors to manage Good Corporate Governance (GCG). Every TOTAL People who is aware of the occurrence of a COC violation must report it to the Party that has been determined by the Board of Directors to manage GCG, or to the direct supervisor. The party is responsible for:

1. Monitoring compliance with the Code of Conduct.
2. Recording all types of alleged violations.
3. Processing violations that occur.
4. Reporting violations to the Board of Directors.

Every TOTAL People who reports the violation of Code of Conduct does not need to be worried as further investigations based on the report will be conducted in full confidentiality.

Sanctions will be imposed for the violation of COC in accordance with the regulations and provisions that prevail in the Company.

IV. Mechanism of Violation Reporting

1. The implementation of COC is the commitment and responsibility of all TOTAL People. In the event of a violation or deviation, TOTAL People are obliged to report the violation through:
 - a. Direct Supervisor;
 - b. Parties specifically appointed by the Company;
 - c. Complaint Box/Whistle Blowing System via e-mail address at whistleblower@totalbp.com or other media determined by the Company.
2. Disclosure must be conducted in good faith and not be a personal complaint or based on bad faith/slander.
3. All TOTAL People and external parties of the Company (Customers, Business Partners, and Communities) can report COC violations and the Company is obliged to follow-up the reports that have the potential to materially harm and damage the Company's image, which, among others, can result from irregularities, manipulation, and so on.
4. The Reporting Party is obliged to clearly state their identity in the prepared report, accompanied by the relevant supporting evidence. The recipient of the report must keep the identity of the reporting party confidential.
5. The Company is obliged to follow-up every report received, in accordance with the applicable procedures and mechanisms.
6. The Company will also provide legal protection as stipulated in the prevailing laws and regulations.

V. Sanction for Violation

1. Every TOTAL People proven to have committed violation of the COC will be given sanctions in accordance with the applicable policies and prevailing laws and regulations.
2. Sanctions for Employees who commit violations are determined by the Board of Directors after receiving reports from the Direct Supervisors of the concerned Employees.
3. The Board of Directors decides on the provision of coaching actions, disciplinary sanctions and/or other actions, as well as the prevention that must be carried out by Direct Supervisors in their respective environments.
4. Sanctions for members of Board of Directors who commit violations are decided by the Board of Commissioners.

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5. In the event the Business Partners or other Stakeholders commit a violation, the provisions as stated in the contract will be imposed. If the violation is related to criminal acts, it can be forwarded to the authorities.

VI. Reward for Compliance with the Code of Conduct

All TOTAL people who comply with the COC will be rewarded in accordance with the policy of the Company. This aims to enhance the motivation of all TOTAL People to behave in accordance with the COC of the Company.

**INTEGRITY PACT
IMPLEMENTATION OF GOOD CORPORATE GOVERNANCE
PT TOTAL BANGUN PERSADA Tbk**

In order to enforce Good Corporate Governance at PT Total Bangun Persada Tbk, we, the Board of Directors of the Company, hereby declare that:

1. We will carry out our duties and obligations in a clean and professional manner in accordance with the principles of Good Corporate Governance by mobilizing and optimizing all of our capabilities and resources to provide our best performance for the Company.
2. We have read and understood, and are willing to carry out the Code of Corporate Governance and the Code of Conduct of the Company to the best of our abilities in order to achieve Good Corporate Governance.
3. We instruct all Employees within PT Total Bangun Persada Tbk to carry out the Integrity Pact in a consistent and responsible manner according to the stages of implementation.
4. We will disclose all potential conflicts of interest.
5. We shall not make decisions and/or give orders aimed at utilizing the Company, either directly or indirectly, to benefit us personally, our family, and/or certain groups.
6. Violation of this Integrity Pact has consequences pursuant to the prevailing laws and regulations.

Jakarta, October 28, 2015
PT Total Bangun Persada Tbk

BOARD OF DIRECTORS

<i>(signed)</i>	<i>(signed)</i>	<i>(signed)</i>
<u>Janti Komadjaja, MSc</u> President Director	<u>Dipl. Ing Akam Wiranjaya</u> Independent Director	<u>Ir. Handoyo Rusli, MT</u> Director
<i>(signed)</i>	<i>(signed)</i>	<i>(signed)</i>
<u>Ir. Lio Sudarto, MM</u> Director	<u>Ir. Moeljati Soetrisno</u> Director	<u>Ir. Saleh, MM</u> Director
<i>(signed)</i>	<i>(signed)</i>	<i>(signed)</i>
<u>Ir. Dedet Syafinal Sy, MM</u> Director	<u>Ir. Teddy Budjamin</u> Director	<u>Ir. Mozes Tuanakotta</u> Associate Director

**INTEGRITY PACT
IMPLEMENTATION OF GOOD CORPORATE GOVERNANCE
PT TOTAL BANGUN PERSADA Tbk**

In order to enforce Good Corporate Governance at PT Total Bangun Persada Tbk, I hereby declare that:

1. I will carry out the duties and obligations in a clean, transparent, and professional manner in accordance with the principles of Good Corporate Governance by mobilizing and optimizing all the capabilities and resources to provide the best performance for the Company.
2. I have read, understood, and agreed to carry out the Code of Corporate Governance and the Code of Conduct of the Company to the best of my abilities in order to achieve Good Corporate Governance.
3. Employees in my work environment are my responsibility to implement the Integrity Pact in a consistent and responsible manner.
4. Violation of this Integrity Pact has consequences pursuant to the prevailing laws and regulations.

Jakarta,

Acknowledged by (*)

Stated by

Name
Position

Name
Position

Description (*):

1. For the levels of Dept. Head, Project Manager and General Manager, the acknowledging party is the Director in charge of the work unit of the party who gives the statement;
2. For the levels below Dept. Head and Project Manager, the acknowledging party is the Dept. Head and Project Manager who supervise the Work Unit of the party who gives the statement.

Appendix III:

**INTEGRITY PACT
IMPLEMENTATION OF GOOD CORPORATE GOVERNANCE
PT TOTAL BANGUN PERSADA Tbk**

I hereby declare that I will implement and carry out the basic principles of Good Corporate Governance consistently in performing my duties as an employee of PT Total Bangun Persada Tbk.

I have read, understood and agreed to carry out the Code of Corporate Governance and the Code of Conduct of the Company to the best of my abilities in order to achieve good Corporate Governance.

This statement is made truthfully, to be used properly.

Acknowledged by

Name
Dept. Head/Project Manager
(*)

Jakarta,

Stated by

Name
NIK

Description (*):
The Head of Work Unit of the party who gives the statement

PT TOTAL BANGUN PERSADA Tbk

Jl. Letjend S. Parman Kav 106, Jakarta 11440, Indonesia

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