

Overview

PT Toba Pulp Lestari, Tbk. (TPL) is committed to sustainable development and live our core values of acting to conduct business with the highest integrity, ethical standards and uphold our business philosophy of creating benefits for Community, Country, Climate, Customers and Company. We comply with the Company Code of Conduct and Code of Procurement Ethics which describe the Company's commitment to be ethical and professional in business practices and comply with all applicable laws and regulatory requirements for the prevention of corruption, bribery and extortion in the countries where the Company operates with a zero tolerance approach against policy non-compliance in all business practices and the Company's partners. This approach uses the relevant guidelines set by the United Nations Conventions against Corruption.

This anti-corruption policy applies to the entire board of commissioners, directors, employees, suppliers and stakeholders of the Company.

Our believe

1. Toba Pulp Lestari believes that placing high priority in conducting business with integrity advocates good corporate governance, business ethics and business sustainability.
2. Toba Pulp Lestari has adopted a zero-tolerance in all forms corrupt practices and the main risk areas that may arise, including but not limited to:
 - Active bribery – giving, promising or offering of a bribes;
 - Passive bribery – the requesting, agreeing to receive, or accepting bribes;
 - Facilitation payments – paying or engaging a third party to pay unofficial gratuities to government officials or employees to secure or expedite routine administrative actions;
 - Improper increase in wealth - misusing Company assets, funds, or personnel including improper placement of funds for personal gain, unlawful, inappropriate, or unethical purposes;
 - Facilitating tax evasion - intentionally and dishonestly taking action to facilitate tax evasion;
 - Conflict of interest – using one's position in the Company to gain personal advantage from actions or decisions made in an official capacity;
 - Gifts and entertainment - offers, gifts, receiving commissions, rebates, fees, loans, gifts or entertainment (eg food, drinks and entertainment) that may affect or be seen to influence the ability to make objective business decisions;
 - Political contributions - making political contributions on behalf of the Company or may be misinterpreted as donations on behalf of the Company;
 - Unethical interactions with public and government officials – offering, giving or promising something of value to public and government officials with the intention of improperly influencing government officials.
3. This policy and its responsibilities extend to the Company's stakeholders (e.g. employees, suppliers, and all people related to the Company) regardless of race, religion, geographical factors, as well as personal or organizational relationships to maintain a high ethical culture in carrying out work or services related to internal and external parties. All employees or people related to the Company who are aware of fraud/violations are encouraged to report by contacting through available channels such as the Whistleblowing service for internal stakeholders or the Grievance Mechanism for external stakeholders.

Our Commitment

- ✪ Improve our processes continuously to prevent direct or indirect bribery, in order to safeguard and uphold our values.
- ✪ Commit to comply with prevailing laws and regulations regarding bribery and corruption in the countries where the Company operates and support the Government in eradicating corruption.
- ✪ Committed to upholding the Company's responsibility to conduct business ethically and with full integrity, transparency and honesty in all areas of the Company's operations by prohibiting all forms of bribery, corruption and extortion.
- ✪ Commit to conducting business ethically and professionally based on the value of integrity as guided by the Company's Code of Conduct and the Code of Procurement Ethics.
- ✪ Committed to upholding zero tolerance of all forms of bribery, corruption, extortion and violations of related laws and regulations
- ✪ Encourage our business partners and suppliers to share our zero-tolerance policy against corruption and bribery.
- ✪ Regularly discuss the importance of ethically and legally sound business practices with our employees, contractors, suppliers, consultant, agency staff and business partners.
- ✪ Adopt a zero tolerance for retaliation against anyone who raises concerns about a breach of the code or participates in an investigation.

Monitoring and Evaluation

All personnel are to receive training on this policy at induction and are encouraged to raise any genuine concern about a suspected breach of this policy. Personnel in senior positions or those responsible for conducting due diligence assessments of potential business partners will receive further training on this policy with periodic updates. Where appropriate, training will also be provided to certain business partners.

The company will take appropriate steps based on the evidence collected and objectively assessed if reports of allegations related to bribery, corruption or other violations under this policy are received from the available platform. If it is proven that there has been an incident of violation, action will be taken including review and revision of business relations, contracts with third parties, lawsuits, and/or disciplinary action, which may result in termination of employment.

This policy is enforced through regular monitoring and review and will form part of the Company's Internal Audit procedures to periodically assess its effectiveness. The achievements of the Company's commitment to ethical behavior and the prohibition of corruption will be reported in the Annual Report.

Sandeep Bhalla
Managing Director