

ANTI-CORRUPTION POLICY

1. Purpose

PT Transcend Solusi (hereafter referred to as "the Company") is committed to conducting its business with integrity and in compliance with all applicable laws and regulations. Corruption in any form undermines this commitment and is strictly prohibited by the Company. This Anti-Corruption Policy outlines the standards and procedures to prevent corruption and bribery in all aspects of our operations.

2. Scope

This policy applies to all employees, officers, directors, contractors, agents, and representatives of the Company, regardless of their position or level within the organization. It also extends to any third parties acting on behalf of the Company.

3. Prohibited Conduct

The following actions are strictly prohibited:

- a. Offering, promising, giving, or accepting bribes, kickbacks, or any other improper payments, directly or indirectly, to or from any individual, company, or government entity.
- b. Soliciting or accepting gifts, entertainment, or hospitality that could reasonably be perceived as an attempt to gain improper advantage or influence business decisions.
- c. Engaging in any form of corruption, including extortion, embezzlement, fraud, or money laundering.
- d. Participating in any transaction or business arrangement that violates anti-corruption laws or regulations in any jurisdiction where the Company operates.

4. Compliance with Laws

Employees must familiarize themselves with and comply with all anti-corruption laws and regulations applicable to the Company's operations, including but not limited to the Indonesian Anti-Corruption Law.

5. Reporting

Employees are encouraged to report any suspected violations of this policy promptly. Reports can be made to the [Compliance Officer \(hr@transcend.com.sg\)](mailto:hr@transcend.com.sg) or directly to the Company Director. The Company will investigate all reports thoroughly and take appropriate disciplinary action against any individual found to have violated this policy.

6. Training and Awareness

The Company provides half-yearly training and awareness programs to ensure that all employees understand their obligations under this policy and are equipped to recognize and prevent corruption in the course of their duties.

7. Enforcement and Accountability

All employees are responsible for upholding the principles of this policy and are accountable for their actions. Failure to comply with this policy may result in disciplinary action, up to and including termination of employment, as well as civil or criminal penalties for individuals involved in corrupt activities.

8. Review and Update

This policy will be reviewed periodically to ensure its effectiveness and compliance with evolving legal and regulatory requirements. Amendments may be made as necessary with the approval of senior management.

Conclusion

PT Transcend Solusi is committed to maintaining the highest standards of ethical conduct in all aspects of its business. This Anti-Corruption Policy reflects our dedication to transparency, integrity, and accountability, and all employees are expected to adhere to its principles in their daily activities.

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