

WHISTLEBLOWING SYSTEM POLICY PT GLOBAL DIGITAL NIAGA Tbk

2022

WHISTLEBLOWING SYSTEM POLICY
PT GLOBAL DIGITAL NIAGA, Tbk.
(The “Company”)

The Company is committed to implementing the principles of Good Corporate Governance (GCG) consistently in order to create a clean and responsible work situation. To improve compliance level within the Company and the Group, which covers all individuals, whether the employees, members of the Board of Directors, or Board of Commissioners, the Company enacts this Whistleblowing System Policy to be implemented within the environs of the Company and the Group. It is expected to serve as a system that contains, processes, and follows up on suspicions of a violation of the principles of GCG, Code of Ethics and Behavioral Standard Policy, Articles of Association of the Company, Policies, and Regulations of the Company, or applicable laws and regulations that occur within the environs of Company.

Reports obtained from the Violation Reporting System (Whistleblowing System) shall be followed up by further investigations. If a violation is proven to have occurred, then the sanction or punishment to be imposed on the reported person/violator shall be determined in such a way that it causes a deterrent effect to the violator.

A consistently implemented and performed Whistleblowing System within the environs of the Company is expected to create a conducive working climate, maintain the image of the Company, minimize the losses of the Company, and ensure that the individuals within the Company have integrity, a sense of belonging, compliant to applicable laws and regulations, and respect societal norms and good ethics. The System makes it easy for the Management to handle the reported violations effectively, and it guarantees the safety of the reporting person by maintaining the confidentiality of the reporting person’s identity as well as building the necessary policies and infrastructures to protect the reporting person.

Violations can be reported according to suspicion of the following:

1. Non-compliance with the Code of Ethics, Behavioral Standard Policy, or Regulations of the Company;
2. Corruption/embezzlement;
3. Theft;
4. Fraud;
5. Bribery;
6. Conflict of interest;
7. Violations of applicable laws and regulations in Indonesia; and/or
8. Violations of ethics and other deviations.

To ensure the effectiveness of its implementation, the Company will continuously socialize the mechanisms of the Whistleblowing System through internal bulletins, posters, or socializing events to the Company and Group.

Reports to the Whistleblowing System may be made by telephone, e-mail, or post to the following:

E-mail : employee.relations@gdn-commerce.com
Telephone : xxx
Address : Gedung Sarana Jaya
Jl. Budi Kemuliaan I No. 1
Gambir, Central Jakarta 10110

The reporting mechanism considers the following:

1. The reporting person may include their identity clearly, by providing the brief personal data of the reporting person that the Whistleblowing System Team can contact;
2. The reporting person may restrict their identity when reporting. However, in either case, they must provide proof of the violations they are reporting;
3. No sanction shall be imposed on the reporting person if the violation is proven to have occurred, unless the reporting person is also involved in the violation of ethics and/or the report is untrue or slanderous;
4. The confidentiality of the reporting person ('s identity) shall be strictly kept, unless:
 - a. It is required in relation to the revealing of the reports or investigation performed by authorities or other third parties; and
 - b. It is required to maintain the position of the Company and the Group before the law; and
5. The above mechanism is not meant as a mechanism to submit personal complaints with.

The Company guarantees the protection of the reporting person in relation to possible threats/acts of revenge caused by their reporting of violations. It keeps the confidentiality of the reporting person who becomes a witness of any violations and crimes within the environs of the Company and provides proper protection for them. Protection of reporting persons also applies to the managers of the Whistleblowing System, investigators, or anyone who provides information relating to the complaint.