

PT MULTITREND INDO TBK'S CODE OF CONDUCT

A. INTRODUCTION

PT Multitrend Indo Tbk's Code of Conduct sets out the principles and standards that guide us to the way we do business by ways of ensuring we are consistently and instinctively do the right thing. Our business oblige us to comply with the law, adherence to our own policies and principles, exercise good stewardship of our assets and the environment, and behave safely and ethically at all times.

All employees must follow this Code of Conduct. By doing so, we will ensure that our activities strengthen the business and support the Core Values. Failure to comply with Code of Conduct, the company is determined to take seriously and would lead to disciplinary action that could be resulted up to employment dismissal and/or settling the cases through legal actions.

B. VISION AND MISSION

PT Multitrend Indo Tbk's Vision:

- To inspire and enrich life's journeys.

PT Multitrend Indo Tbk's Mission:

- We strive to grow a high-performance organization with world class infrastructure that serves as a springboard for our brands.
- We commit to understand our customers, their needs and exceed expectations at all levels.
- We provide a best-in-class seamless omni-channel experience and accessibility to our products and services.
- We deliver leading brands to our customers through relentless innovation and search for excellence.
- We attract, develop and retain the best talent to deliver outstanding service.

C. CORE VALUES

All employees are required to implement the PT Multitrend Indo Tbk's Core Values (iGROW) as following in order to realize the achievement of an appropriate and ethical behavior model.

1st: Integrity and Passion

We act with integrity! We follow through on our promises and value heartfelt commitment. We approach life with zest and energy.

2nd: Gracious and Humble

We respect each other and act with humility. We collaborate and value opinions.

3rd: Recognition and Kindness

We value every contribution and recognize that everyone has potential to make a difference.

4th: Optimism and Excellence

We believe in the best and perform at the highest level! We demonstrate domain expertise and professionalism in everything we do.

5th: We are Family (1st)

We celebrate our many families as a core of our life's journey.

D. CODE OF CONDUCT

Several important aspects considered to be regulated in the PT Multitrend Indo Tbk's Code of Conduct in dealing with its internal and external stakeholders must include the following:

1. Compliance with the Law

- We must always obey and enforce the laws and regulations prevailing in the Republic of Indonesia.
- All employees must observe and comply with the applicable laws and company guidelines.
- All employees understand, respect and implement PT Multitrend Indo Tbk's core values (refer to PT Multitrend Indo Tbk Core Values) and norms in society, so that all actions and decisions to be taken are based on our responsibility to company and the community at large.

2. Fraud

Fraud is any dishonest conduct (abuse of position/position or deviation) aimed at extracting funds/property/resources of another person/organization through logic, deceit, deception, cunning, disappearance, wrong suggestion, concealment or method. Other deliberate actions by a person/some who result in losses of the organization/ others and/or profits the fraudster.

All employees are forbidden to commit fraud, including but not limited to the following:

a. Fraudulent Statements

- Fictitious Revenue
- Timing Difference
- Concealing Liabilities and Assets
- Improper Disclosures
- Improper Asset Valuation

b. Asset Misappropriation

- Cash Fraud
 - o Cash Larceny
 - o Skimming/Off-Book Fraud
 - o Fraudulent Disbursements
 - Billing Schemes
 - Payroll Schemes
 - Expense Reimbursement Schemes
 - Check Tampering
 - Register Disbursement
- Inventory and All Other Assets
 - o Inventory Larceny Scheme
 - o Asset Requisition and Transfer Scheme
 - o False Billing and Purchasing and Receiving Scheme
 - o False Shipping Scheme

c. Corruption

- We refrain from illegal gratification, bribery, economic extortion and any form of corruption.
- We always act in the interest of PT Multitrend Indo Tbk on the basis of applicable laws and regulations and avoid conflicts of interest.

3. Proprietary Information

- All employees must keep the confidentiality of company's proprietary information to protect our financial and intellectual investments.
- All employees are not permitted to provide confidential data and information to other parties, for certain interests and interests of other third parties, except with written permission (consent), which is made under a written non-disclosure agreement approved by Board of Directors/Management.
- The company's proprietary information may include but are not limited to the following categories:
 - a. customer, sales, marketing and other corporate databases;
 - b. supplier information and pricing;
 - c. marketing plan;
 - d. financial plans and forecasts;
 - e. sales performance or margin;
 - f. employee personal records;
 - g. research and technical data;
 - h. business ideas, processes, proposals or strategies;
 - i. corporate purchased or developed software;
 - j. trade secrets;
 - k. actual or potential patents, copyrights and trademarks, etc.

4. Human Right

- Our commitment to behaving responsibly as a good corporate citizen is accomplished by running our business with great respect for human rights.
- We are guided by the United Nations Universal Declaration of Human Rights (www.un.org) and Human Right regulation applicable in Republic of Indonesia.

5. Health and Safety

- We shall ensure that there are systems in the work place to detect, assess, avoid and respond to potential threats to the health and safety.
- We shall take effective measures to prevent workers from having accidents, injuries or illnesses.

6. Child Labor

- PT Multitrend Indo Tbk respects The UN Convention Concerning A Child's Rights.
- The minimum age for general employees at PT Multitrend Indo Tbk is 18 years old.

7. Respect Local Country Culture

Although PT Multitrend Indo Tbk products are a global brand, each brand's principal and its employees should respect the culture of the local country. It is also applies to all PT Multitrend Indo Tbk local and expatriate employees who work locally in Indonesia or visit the brand's principal office in their domicile country.

8. Business Ethics (refer to PT Multitrend Indo Tbk's Business Ethics)

PT Multitrend Indo Tbk supports and respects business ethic in the workplace including stakeholder's interaction.

9. Discrimination (refer to PT Multitrend Indo Tbk's Work Ethics)

- PT Multitrend Indo Tbk is committed to keep the working environment which is free from discrimination and abuse.
- PT Multitrend Indo Tbk would never allow any discrimination against anyone based on ethnicity, race, nationality, religion, gender, age, disability, sexual orientation or other reasons.

E. BUSINESS ETHICS

1. Sales Practices

- When selling the products, our communication must be truthful and accurate. When we say something about our products, we must be able to substantiate it.
- We should sell the quality in a truthful manner.
- We should not disrespect our competitors.

2. Purchasing Process

- We should be fair and ethical while making purchasing decisions.

- The Company's interests should come first.
 - The Company's competitive bidding policy should be complied with.
 - Unfair buying tactics should be avoided.
 - A Vendor should not be taken advantage of through manipulation, concealment, misrepresentation of material facts or through any other unfair practice.
3. Public Relation
- All information disclosed outside of the company must be accurate, complete, consistent, and disseminated in accordance with the policy.
 - Social media should not be used to post negative comments about the Company, superior and colleagues.

E. WORK ETHICS

1. Acts consistently, in the workplace, according to basic values of openness, honesty and avoid any kind of defamation.
2. Courage to raise difficult issues to reach a decision and take the responsibility for the outcome.
3. Acts to promote good working relationships among coworkers regardless of personal likes or dislikes.
4. Builds good morale and cooperation within the team, including creating symbols of group identity or other actions to build cohesiveness and avoid blaming others.
5. Acts on a mutual respect, being considerate and empathy, maintains sound good working relationships with others and give a proper regard for the dignity of a person or position.
6. The ability to adapt to and work effectively within a variety of situations and with diversity individuals or groups.
7. Continually self-assesses and seeks feedback from others to identify strengths and weaknesses and ways of improving.
8. Demonstrates a willingness to change ideas or perceptions based on new information or contrary evidence.

G. WHISTLEBLOWING POLICY

For the purpose of the company's objective to apply professional conduct within the company, all employees that sees, hears, and/or knows unlawful business practices, acts or violations of this Code of Conduct must report it through lapor@kanmogroup.com.

PT Multitrend Indo Tbk vouch for a safe and fear-free environment for everyone who will report any case related to a violation of Code of Conduct. Therefore any incoming reports, as well as investigations of reports will be treated wisely and confidentially.