



## **Wira Surya Mandiri, PT (WSM)**

### **Code of Conduct**

WSM is committed to the highest standards of social and environmental responsibility and ethical conduct. WSM are required to provide safe working conditions, treat workers with dignity and respect, act fairly and ethically, and use environmentally responsible. WSM requires to operate in accordance with the principles in this Code of Conduct "code" and in full compliance with all applicable laws and regulations. This Code goes beyond mere compliance with the law by drawing upon internationally recognized standards to advance social and environmental responsibility. This Code outlines WSM expectations for conduct regarding labor and human rights, health and safety, environmental protection, ethics, and management practices. WSM will compliance with this Code, and any violations of this Code may jeopardize business relationship with WSM, up to and including termination. This Code applies to WSM workers, WSMs and their subsidiaries, affiliates, and subcontractors providing goods or services to WSM, or for use in or with WSM products. Additionally, WSM maintains detailed standards that explicitly define our expectations for compliance with this Code.

### **Labor and Human Rights**

WSM believes all workers deserve a fair and ethical workplace. Workers must be treated with the utmost dignity and respect, shall uphold the highest standards of human rights.

### **Antidiscrimination**

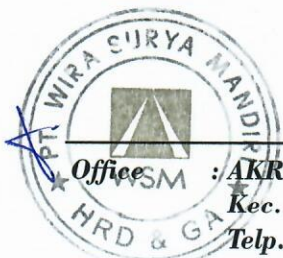
WSM shall not discriminate against any worker based on age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, or union membership, in hiring and other employment practices. WSM shall not require pregnancy or medical tests, except where required by applicable laws or regulations or prudent for workplace safety, and shall not improperly discriminate based on test results.

### **Anti-Harassment and Abuse**

WSM shall commit to a workplace free of harassment and abuse. WSM shall not threaten workers with, or subject them to, harsh or inhumane treatment, including but not limited to verbal abuse and harassment, psychological harassment, mental and physical coercion, and sexual harassment.

### **Prevention of Involuntary Labor and Human Trafficking**

WSM shall ensure that all work is voluntary. WSM shall not traffic persons or use any form of slave, forced, bonded, indentured, or prison labor. Involuntary labor includes the transportation, harboring, recruitment, transfer, receipt, or employment of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation. WSM shall not withhold workers original government-issued identification and travel documents. WSM shall ensure that workers contracts clearly convey the conditions of employment in a language understood by the workers. WSM shall not impose unreasonable restrictions on movement within the workplace or upon entering or exiting company-provided facilities. WSM shall ensure that the third-party recruitment agencies it uses are compliant with the provisions of this Code and the law. WSM recruiting foreign contract workers either directly or through third party agencies shall be responsible for payment of all fees and expenses in excess of one month of the workers anticipated net wages.



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### **Prevention of Underage Labor**

WSM shall employ only workers who are at least 15 years of age or the applicable minimum legal age, whichever is higher. WSM may provide legitimate workplace apprenticeship programs for educational benefit that are consistent with Article 6 of ILO Minimum Age Convention No. 138 or light work consistent with Article 7 of ILO Minimum Age Convention No. 138.

### **Juvenile Worker Protections**

WSM may employ juveniles who are older than the applicable legal minimum age but are younger than 18 years of age, provided they do not perform work that might jeopardize their health, safety, or morals, consistent with ILO Minimum Age Convention No. 138. WSM shall not require juvenile workers to work overtime or perform night work.

### **Student Worker Protections**

WSM shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. WSM shall provide appropriate support and training to all student workers.

### **Working Hours**

A workweek shall be restricted to 60 hours, including overtime, and workers shall take at least one day off every seven days except in emergencies or unusual situations. WSM shall follow all applicable laws and regulations with respect to working hours and days of rest, and all overtime must be voluntary.

### **Wages and Benefits**

WSM shall ensure that all workers receive at least the legally mandated minimum wages and benefits. WSM shall offer vacation time, leave periods, and time off for legally recognized holidays. WSM shall compensate workers for overtime hours at the legal premium rate. WSM shall communicate pay structure and pay periods to all workers. WSM shall pay accurate wages in a timely manner, and wage deductions shall not be used as a disciplinary measure.

### **Freedom of Association and Collective Bargaining**

As legally permitted, WSM shall freely allow workers to associate with others, form, and join (or refrain from joining) organizations of their choice, and bargain collectively, without interference, discrimination, retaliation, or harassment. In the absence of formal representation, WSM shall ensure that workers have a mechanism to report grievances and that facilitates open communication between management and workers.

### **Health and Safety**

Worker health, safety, and well-being is important to WSM. WSM shall provide and maintain a safe work environment and integrate sound health and safety management practices into its business. Workers shall have the right to refuse unsafe work and to report unhealthy working conditions.

### **Occupational Health, Safety, and Hazard Prevention**

WSM shall identify, evaluate, and manage occupational health and safety hazards through a prioritized process of hazard elimination, engineering controls, and/or administrative controls. WSM shall provide workers with job-related, appropriately maintained personal protective equipment and instruction on its proper use.



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### **Emergency Prevention, Preparedness, and Response**

WSM shall identify and assess potential emergency situations. For each situation, WSM shall develop and implement emergency plans and response procedures that minimize harm to life, environment, and property. To the extent that WSM transports goods for PT. WSM into the Indonesia, WSM shall comply with the C-TPAT (Customs-Trade Partnership Against Terrorism) security procedures

### **Incident Management**

WSM shall have a system for workers to report health and safety incidents and near-misses, as well as a system to investigate, track, and manage such reports. WSM shall implement corrective action plans to mitigate risks, provide necessary medical treatment, and facilitate workers' return to work.

### **Ergonomics**

WSM shall identify, evaluate, and control worker exposure to tasks that pose ergonomic risk such as excessive force, improper lifting positions, or repetitiveness. WSM shall integrate this process into the qualification of all new or modified production lines, equipment, tools, and workstations.

### **Working and Living Conditions**

WSM shall provide workers with reasonably accessible and clean toilet facilities and potable water. WSM-provided dining, food preparation, and storage facilities shall be sanitary. Worker dormitories provided by WSM or a third party shall be clean and safe and provide reasonable living space.

### **Health and Safety Communication**

WSM shall provide workers with appropriate workplace health and safety training in their primary language. Health and safety related information shall be clearly posted in the facility.

### **Worker Health and Safety Committees**

WSM is encouraged to initiate and support worker health and safety committees to enhance ongoing health and safety education and to encourage worker input on, and participation in, health and safety issues in the workplace.

### **Environment**

WSM is committed to protecting the environment, and environmental responsibility is at the core of how we operate. WSM shall develop, implement, and maintain environmentally responsible business practices.

### **Hazardous Substance Management and Restriction**

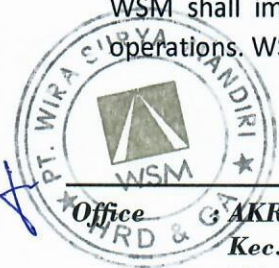
WSM shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle hazardous substances. WSM shall comply with Regulated Substances Specification for all goods it manufactures.

### **Non-Hazardous Waste Management**

WSM shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle non-hazardous waste.

### **Wastewater Management**

WSM shall implement a systematic approach to identify, control, and reduce wastewater produced by its operations. WSM shall conduct routine monitoring of the performance of its wastewater treatment systems.



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### **Stormwater Management**

WSM shall implement a systematic approach to prevent contamination of stormwater runoff. WSM shall prevent illegal discharges and spills from entering storm drains.

### **Air Emissions Management**

WSM shall identify, manage, reduce, and responsibly control air emissions emanating from its operations that pose a hazard to the environment. WSM shall conduct routine monitoring of the performance of its air emission control systems.

### **Boundary Noise**

WSM shall identify, control, monitor, and reduce noise generated by the facility that affects boundary noise levels. Environmental Permits and Reporting WSM shall obtain, keep current, and comply with all required environmental permits. WSM shall comply with the reporting requirements of applicable permits and regulations.

### **Pollution Prevention and Resource Reduction**

WSM shall reduce energy, water, and natural resource consumption by implementing conservation and substitution measures. WSM shall minimize hazardous substances consumption by implementing reduction and substitution measures.

### **Ethics**

WSM expects the highest standards of ethical conduct in all of our endeavors. WSM shall always be ethical in every aspect of its business, including relationships, practices, sourcing, and operations.

### **Business Integrity**

WSM shall not engage in corruption, extortion, embezzlement, or bribery to obtain an unfair or improper advantage. WSM shall abide by all applicable anti-corruption laws and regulations of the countries in which it operates, including the Foreign Corrupt Practices Act (FCPA) and applicable international anti-corruption conventions.

### **Disclosure of Information**

WSM shall accurately record information regarding its business activities, labor, health and safety, and environmental practices and shall disclose such information, without falsification or misrepresentation, to all appropriate parties.

### **Protection of Intellectual Property**

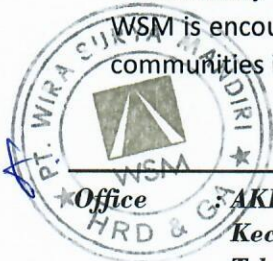
WSM shall respect intellectual property rights and safeguard customer information. WSM shall manage technology and know-how in a manner that protects intellectual property rights.

### **Whistleblower Protection and Anonymous Complaints**

WSM shall provide an anonymous complaint mechanism for managers and workers to report workplace grievances. WSM shall protect whistleblower confidentiality and prohibit retaliation.

### **Community Engagement**

WSM is encouraged to help foster social and economic development and contribute to the sustainability of the communities in which it operates.



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### **Management Commitment**

WSM believes that sound management systems and commitment are key to enriching the social and environmental well-being of our supply chain. WSM shall implement or maintain, as applicable, a management system that facilitates compliance with this Code and the law, identifies and mitigates related operational risks, and facilitates continuous improvement.

### **Company Statement**

WSM shall develop a company statement affirming its commitment to high standards of social and environmental responsibility, ethical conduct, and continuous improvement. WSM shall post this statement in the primary local language at all of its facilities.

### **Management Accountability and Responsibility**

WSM shall identify company representatives responsible for ensuring implementation and periodic review of its management systems. WSM shall have a Corporate Social Responsibility (CSR) or Sustainability representative that reports directly to executive management and has the responsibility and authority to manage social and environmental compliance requirements for the business.

### **Risk Assessment and Management**

WSM shall develop and maintain a process to identify labor and human rights, health and safety, environmental, business ethics, and legal compliance risks associated with its operations; determine the relative significance of each risk; and implement appropriate procedures and controls to control the identified risks.

### **Performance Objectives with Implementation Plans and Measures**

WSM shall have written standards, performance objectives, targets, and implementation plans, including periodic assessments of the performance against those objectives.

### **Audits and Assessments**

WSM shall perform periodic evaluations of its facilities and operations, and the facilities and operations of its subcontractors and next-tier WSMs to ensure compliance with this Code and the law.

### **Documentation and Records**

WSM shall have processes to identify, understand, and implement applicable laws and regulations and requirements of this Code. WSMs shall maintain documents and records to ensure regulatory compliance.

### **Training and Communication**

WSM shall develop and maintain management and worker training programs to facilitate proper implementation of its policies and procedures and to fulfill WSM's continuous improvement objectives. WSM shall have a process for communicating clear and accurate information about its performance, practices, policies, and expectations to its workers, next-tier WSM, and customers. WSM shall have an ongoing process to obtain feedback on its practices related to this Code and to foster continuous improvement.



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### **Corrective Action Process**

WSM shall have a process for timely correction of any deficiencies or violations identified by an internal or external audit, assessment, inspection, investigation, or review.

This Code references internationally accepted principles such as the Electronic Industry Code of Conduct, Ethical Trading Initiative, International Labor Organization's (ILO) International Labor Standards, Social Accountability International, SA 8000, ILO Code of Practice in Safety and Health, National Fire Protection Association, OECD Guidelines for Multinational Enterprises, and OHSAS 18001. This Code is not intended to create new or additional rights for any third party



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