

Anti-Bribery and Anti-Corruption Policy		
1	Purpose	Sustainable Development Services (SDS) is committed to conduct the business in accordance with all applicable laws, rules and regulations and the highest ethical standards, and this commitment is embodied in SDS' Code of Conduct. The purpose of this Anti-Bribery and Anti-Corruption Policy is to reiterate SDS' commitment to full compliance by the Organization.
2	Scope	This Policy is applicable to every employee of SDS, including the Director. This Policy is intended to supplement all applicable laws, rules, and other Organization policies. It is not intended to supplant any local laws.
3	Definition	Corruption is the misuse of public power for private profit, or the misuse of entrusted power for private gain. Bribery is the offer, promise, or payment of cash, gifts, or even excessive entertainment, or an inducement of any kind offered or given to a person in a position of trust to influence that person's views or conduct or to obtain an improper advantage. Example: (1) Auditor receives an envelope from the client containing the money which is not related with any expenses for the operational of the audit; (2) Auditor is provided by client a 5-start hotel with the full service; (3) Client promise to the certifier that they will send a gift if the certification decision taken is positive without settlement of the non-compliance; etc.
4	Policy requirements	SDS personnel are strictly prohibited from receiving or from the offering, promising, or authorizing: <ul style="list-style-type: none"> • any payment or other thing of value; • to any person; • directly or indirectly through or to a third party; • for the purpose of (i.e., in exchange for); <ul style="list-style-type: none"> o causing the person to act or fail to act in violation of a legal duty; o causing the person to abuse or misuse their position; or o securing an improper advantage, contract or concession;
5	Interaction with other Organization policies	Other SDS policies impacted by, and which should be construed consistent with this Policy.
6	Waiver	There is no permitted deviation or waiver from this Policy.
7	Reporting mechanism	Any organization or individual (including SDS personnel) wishing to report a suspected incident of corruption or bribery should send an email to the Director of SDS at misnawi@sdsindonesia.com or address to the office of SDS, PT. SDS Indonesia, Jl. Srikoyo No. 117, Patrang, Jember . The sender may send the report anonymously as long as the reports are supported by accurate information and data. All reports will be treated confidentially and in accordance with the principles of whistleblower protection.

8	Investigation procedure	<p>8.1 Once SDS detects or receives a report about bribery or corruption which is involving personnel of SDS, without neglecting presumption of innocent, SDS informs the scheme owner immediately and investigates the case.</p> <p>8.2 SDS Director assesses the preliminary evidences or the report, if necessary contacts the informant to ask further evidence or clarify the reports.</p> <p>8.3 After the evidence is complete, SDS Director assesses it and if necessary, he will crosscheck with all related parties separately to ensure the objectivity and respecting the principles of the whistleblower protection.</p> <p>8.4 After suspected incident of corruption or bribery is confirmed occurred, then SDS Director summarizes it in a report detailing the evidences of incident of corruption or bribery as well as the decision made by him on which disciplinary action applies (refer to chapter 9. Disciplinary action).</p>
9	Disciplinary action	<p>Any employee who violates the terms of this Policy will be subject to disciplinary action. Any employee who has direct knowledge of potential violations of this Policy but fails to follow or report such potential violations to Organization’s management will be subject to disciplinary action. Any employee who misleads or hinders investigators inquiring into potential violations of this Policy will be subject to disciplinary action.</p> <p>Disciplinary actions for any violation of this policy:</p> <p><u>1st case:</u> Written warning with suspension from audit & certification activities for 3 months</p> <p><u>2nd case:</u> Written warning with suspension from audit & certification activities for 6 months</p> <p><u>3rd case:</u> Termination of employment and/or if necessary report to the authority</p> <p>These progressive actions applied if the subject of the 1st, 2nd and 3rd case is the same person. Stricter or strictest disciplinary action can be applied directly considering the severity of the case and clearly damage the image of the organization.</p>
10	Follow up measures	<p>10.1. After the steps in chapter 8 – 9 are done, SDS contacts the client and affirms that SDS is committed on anti-bribery and anti-corruption; if necessary returning the related goods or money to the client;</p> <p>10.2. SDS will also ask the client’s feedback if they want to continue the service or cancel;</p> <p>10.3. If the client decides to discontinue, the contract is cancelled and if the payment of the service fee has been made, it will be returned in full amount;</p> <p>10.4. If the client decides to continue, the contract remains valid including the service fee but all the cost for repeating the service e.g. expenses for transport and accommodation are covered by SDS;</p> <p>10.5. For the purpose of repeating the service, SDS will assign different auditor and /or certifier.</p>