



PT RADIANT
UTAMA
INTERINSKO
Tbk

PEDOMAN ANTI SUAP DAN KORUPSI

SKB/004/RUI/XII/2022

ANTI-BRIBERY AND CORRUPTION

2022
EDITION



LAMPIRAN / APPENDIX

	KEBIJAKAN PERUSAHAAN	Nomor	: SKB/004/RUI/XII/2022
	PT RADIANT UTAMA INTERINSKO Tbk	Revisi ke	: 00
	ANTI SUAP DAN KORUPSI	Tanggal	: 9 Desember 2022
	ANTI BRIBERY AND CORRUPTION	Halaman	: 1 dari 11

**SURAT KEPUTUSAN BERSAMA DEWAN KOMISARIS DAN DIREKSI
PT RADIANT UTAMA INTERINSKO Tbk
NOMOR SKB/004/RUI/XII/2022**

Tentang
ANTI SUAP DAN KORUPSI (ANTI BRIBERY AND CORRUPTION)

Dewan Komisaris dan Direksi PT Radiant Utama Interinsco Tbk

- Menimbang : 1. Bahwa PT Radiant Utama Interinsco Tbk bertekad untuk selalu mentaati seluruh ketentuan peraturan perundang-undangan yang berlaku.
2. Bahwa seluruh Insan Perusahaan PT Radiant Utama Interinsco Tbk selalu bekerja secara profesional dan bertekad mempertahankan standar etika kerja sesuai nilai-nilai Perusahaan.
3. Bahwa dalam rangka pencegahan untuk menghindari kerugian bagi Perusahaan diperlukan pengendalian, peningkatan pemahaman dan kesadaran praktik etika dan Tata Kelola Perusahaan sesuai prinsip-prinsip *Good Corporate Governance*.
4. Bahwa dengan adanya restrukturisasi dokumen kebijakan PT Radiant Utama Interinsco Tbk, maka Surat Keputusan Direksi Korporat Nomor SKDK-001-RUI-2013 tentang Kebijakan Anti Penyuapan dan Korupsi perlu dilakukan perubahan.
5. Bahwa berdasarkan pertimbangan sebagaimana dimaksud dalam nomor 1, 2, 3 dan 4 perlu diterapkannya Kebijakan Perusahaan tentang Anti Suap dan Korupsi di PT Radiant Utama Interinsco Tbk.
- Mengingat : 1. Undang-Undang Republik Indonesia Nomor 28 Tahun 1999 tentang Penyelenggara Negara yang Bersih dan Bebas dari Korupsi, Kolusi, dan Nepotisme (Lembaran Negara Republik Indonesia Tahun 1999 Nomor 75, Tambahan Lembaran Negara Republik Indonesia Nomor 3851)
2. Undang-Undang Republik Indonesia Nomor 20 Tahun 2001 tentang Perubahan Atas Undang-Undang Nomor 31 Tahun 1999 Tentang Pemberantasan Tindak Pidana Korupsi.
3. Undang-Undang Republik Indonesia Nomor 8 Tahun 2010 tentang Pencegahan dan Pemberantasan Tindak Pidana Korupsi.
4. Peraturan Mahkamah Agung Republik Indonesia Nomor 13 Tahun 2016 tentang Tata Cara Penanganan Perkara Tindak Pidana oleh Korporasi.
5. Peraturan Otoritas Jasa Keuangan Nomor 21/POJK.04/2015 tentang Penerapan Pedoman Tata Kelola Perusahaan Terbuka.

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6. Surat Edaran Otoritas Jasa Keuangan Nomor 32/SEOJK.04/2015 tentang Pedoman Tata Kelola Perusahaan Terbuka, Lampiran huruf D, prinsip 7, rekomendasi 7.2 bahwa Perusahaan Terbuka harus memiliki Kebijakan Anti Korupsi dan Anti-Fraud.
7. Anggaran Dasar PT Radiant Utama Interinsco Tbk Nomor 8 Tanggal 6 Agustus 2021.
8. Tata Kelola Perusahaan (*Good Corporate Governance*) PT Radiant Utama Interinsco Tbk.

MEMUTUSKAN:

- Menetapkan : SURAT KEPUTUSAN BERSAMA DEWAN KOMISARIS DAN DIREKSI TENTANG KEBIJAKAN ANTI SUAP DAN KORUPSI (*ANTI BRIBERY AND CORRUPTION*) PT RADIANT UTAMA INTERINSCO Tbk.
- PERTAMA : Menetapkan Kebijakan Anti Suap dan Korupsi yang merupakan bagian yang tidak terpisahkan dari Surat Keputusan Bersama ini.
- KEDUA : Mencabut dan menyatakan tidak berlaku:
1. Peraturan Korporat PT Radiant Utama Interinsco Tbk Nomor PK-018-RUI-2013 tentang Kode Etik.
 2. Surat Keputusan Direksi Korporat Nomor SKDK-001-RUI-2013 tentang Anti Penyuapan dan Korupsi.
- KETIGA : Surat Keputusan Bersama ini mulai berlaku sejak tanggal ditetapkan, dengan catatan apabila terdapat kekeliruan, maka akan diadakan perbaikan sebagaimana mestinya.

Ditetapkan di : JAKARTA
Pada Tanggal : 9 Desember 2022

AN DEWAN KOMISARIS



AMIRA GANIS
KOMISARIS UTAMA

AN DIREKSI


SOFWAN FARISYI
DIREKTUR UTAMA

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LEMBAR PENGESAHAN

1. Judul Kebijakan : Pedoman Anti Suap Dan Korupsi
2. Nomor Kebijakan : SKB/004/RUI/XII/2022
3. Revisi : 00
4. Tanggal Berlaku : 9 Desember 2022
5. Berlaku di :
 1. PT Radiant Utama Interinsco Tbk
 2. PT Supraco Indonesia
 3. PT Supraco Lines
 4. PT Supraco Daya Wisesa

Ditetapkan di:
Pada Tanggal:

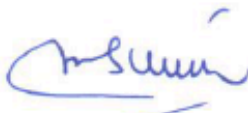
JAKARTA
9 DESEMBER 2022



AMIRA GANIS
KOMISARIS UTAMA



SOFWAN FARISYI
DIREKTUR UTAMA



MUHAMMAD HAMID
KOMISARIS



SOEHARTO NURCAHYONO
DIREKTUR



WINARNO ZAIN
KOMISARIS

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PRELIMINARY

A. PURPOSE AND OBJECTIVES

1. In order to fulfill its commitment to implementing GCG in its business environment, PT Radiant Utama Interinsco Tbk, hereinafter referred to as the Company, intends to create anti-bribery and corruption policies for the Board of Commissioners, Directors, Employees (hereinafter referred to as Company Personnel), and stakeholders.
2. Implementing the Company's anti-bribery and corruption policy has the following goals :
 - a. To avoid losses that could harm the company's ability to conduct business without interruption, both real and imagined.
 - b. to tighten up the company's compliance with laws, rules, and ethical standards and aid with government initiatives aimed at preventing corruption in Indonesia.
 - c. to raise awareness of the importance of having a high ethical standard when conducting business with outside parties, in this case, business partners and relevant governmental organizations

B. SCOPE

1. Gift and Entertainment
2. Giving and Receiving gift
3. Cost Recording
4. Dealing with the government
5. Gift, travel and hospitality for government officials

C. DEFINITION

1. PT Radiant Utama Interinsco Tbk and all of its Subsidiaries make up the business.
2. The Board of Commissioners, the Directors, all contract and permanent workers of the company, including those allocated to subsidiaries and other agencies, as well as any persons who directly support and work for the company, are all considered to be Company Personnel.
3. Employees are those who perform work in exchange for compensation from the Company.



4. Stakeholders are parties with an interest in the Company, either directly or indirectly. These parties include the government, creditors, employees, suppliers, customers, and business partners.
5. Business partners are people or organizations who decide to collaborate commercially with the Company based on their viability and potential.
6. The Whistleblowing System is a system that oversees or controls complaints/disclosures of unlawful behavior, unethical or improper activities, violations of Company policies and/or regulations, and actions or behavior that may result in losses for the Company, with the objective of maximizing stakeholder and third-party involvement in reporting infractions that occur within the Company.
7. The act of corruption involves something immoral, rotten in nature, and concerns the position of a government agency or apparatus. It also involves the abuse of power in office due to gifts, the transportation of economic and political factors, and the placement of families or groups into officialdom while exercising office power. (P.T. Ministry of Education and Culture, R.I. Director General of Higher Education, Anti-Corruption Education for P.T., page 24)
8. Giving or accepting presents or promises in exchange for favors is known as bribery, which is a kind of corruption.
9. A conflict of interest is when a company employee who has been given power and authority is either known to have, or is suspected of having, a personal or group interest in how they use that power and authority, which could be detrimental to the company and impair the quality and performance it should have.
10. Acts of gratification or bribery include activities such as giving and/or receiving gifts, souvenirs, and entertainment by company employees that are related to their authority or position within the company and may result in a conflict of interest that compromises their independence, objectivity, and professionalism.
11. Fraudulent acts are dishonest behaviors, such as those conducted by company employees that could be harmful to the company or other parties. These behaviors include fraud, falsification, concealment, or omission of critical company records or reports.



D. GIFT AND ENTERTAINMENT

The following actions are not permitted by RUIS Group personnel or anybody acting on their behalf :

1. Offering bribes to consumers, suppliers, or other parties as well as third parties.
2. Theft and forgery of expensive documents, including cheques or giro slips from a company.
3. When a gift or other benefit is dependent upon or directly tied to giving the employer or employee a commercial advantage, offer it to the customer or vendor.
4. Offer or grant benefits to others if doing so would be against the recipient's code of ethics, organization policies, any relevant laws, or regulations. Anything of worth can be given as a gift or as amusement. The following categories are included in the RUIS Group's definition of gifts and entertainment :
 - a. Banquets are meals and beverages served in association with professional events like meetings or business travel.
 - b. Anything of value that we provide or receive from outside sources would be a gift, includes promotional products, holiday gifts, free promotional vacations, job offers, donations to charities, favors, loans, price breaks, sweepstakes or prize competitions, and presents for our family members.
 - c. Entertainment is an activity that usually involves both participants (recipient and provider). For instance, invites to sporting events, theatrical productions, field excursions, and any connected meals and beverages. Corporate entertainment events, such as those with restricted admittance to athletic events, as well as golf and adventure activities that attract plenty of outside guests and typically involve several companies.
5. Employees are prohibited from giving or receiving gifts, bonuses, reimbursements, or entertainment to or from third parties under the RUIS Code of Ethics. The following situations are exempt from this rule :
 - a. Calendars, agendas, and banquets related to business that are viewed as inconsequential as prizes (value below IDR 500,000).
 - b. Items provided as samples to businesses or employees that have no monetary value or any other negligible value (below IDR 500,000).
 - c. If the cost of a business meal, gift, or entertainment exceeds IDR500,000, the Director of each Directorate must approve it. In every instance, RUIS Group will only cover these costs if they are realistic in value, acceptable for a commercial partnership, and don't give the impression that they aren't.



6. Gifts, straightforward promotional products like:
 - a. Flash drives, calendars, pens, and notebooks are among the incentives for making purchases of products and services.
 - b. Meals, banquets, or beverages that aren't luxurious.
 - c. Entertainment, regular social gatherings like sports or cultural ones.

A hidden agenda during the event must be avoided so that no one will believe it is unjustly influencing their ability to make commercial decisions.
7. No matter how expensive, the following presents and entertainment are unacceptable :
 - a. Illegal
 - b. Unethical
 - c. Conflict of Interest
 - d. Financial Gain
 - e. "quid pro quo" or compensation offered in exchange for something else
 - f. Personal expenses to evade RUIS Group policy.
8. Providing entertainment and gifts includes:
 - a. The Company's standards and procedures, including the Purchase and Payment Consent Policy, must be followed when making payments for gifts, meals, travel, entertainment, and other related expenses.
 - b. The Company has controlled the provisions for the Procurement of Goods and Services in the Board of Directors' Decree.

E. RECORDING OF GIVING AND RECEIVING GIFTS

1. You must record gifts in the Declaration Form according to chronology and report them to the Ethics Committee through the Compliance function or HR & GA Services function. You can also send an email to komite-etika@radiant-utama.com with this information if you give and receive gifts in the form of goods or services from other parties who have a work relationship or are related to work (reporting forms can be downloaded via www.radiant.co.id or in the M-Files).
2. Any employee who accepts or offers one of the prohibited gifts or entertainment as listed above is breaking the law and will face disciplinary action in accordance with company policy, the law in question, and any other relevant rules.



F. COST RECORDING

1. In accordance with the Account Payable Procedure, all payments and expense reimbursements must be accurately recorded in the company's books and records. This criterion places a high priority on obtaining accurate records of all fees and payments made to cover those expenses.
2. Employees must accurately record payments or reimbursements of expenses, including the nature and amount of costs as well as the names and positions of participants, according to accounting and finance personnel.
3. It is forbidden to modify the company's books or financial statements for personal or other reasons, including by selling or giving away any of the company's equipment, securities, or other assets.

G. DEALING WITH GOVERNMENT

1. As a Company Employee, it is your responsibility to make sure that whatever information you give to lawmakers or government officials is correct and true in order to safeguard the RUIS Group's entire range of lawful commercial interests.
2. Any employee who accepts or offers one of the prohibited gifts or entertainment as listed above is breaking the law and will face disciplinary action in accordance with company policy, the law in question, and any other relevant rules.
 - a. Kindly assist officers conducting inspections or inquiries;
 - b. Ensure that any documents and information necessary for any government investigations or prosecutions are kept up to date.
 - c. Avoid misleading regulators, government agents, or investigators.
 - d. Avoid hiding, altering, or destroying any documents, information, or data that relate to formal judicial proceedings, lawsuits, inquiries, or exams.
 - e. You really shouldn't try to prevent workers from delivering accurate information.
 - f. Avoid taking revenge on anyone who assists law enforcement or regulatory organizations.
3. Make sure the value provided complies with any applicable government regulations or a written agreement that has been approved in writing by the Client before paying for a government official's trip or agreeing to pay a daily charge associated with their trip.



H. GIFTS, TRAVEL AND HOSPITALITY FOR GOVERNMENT OFFICIALS

1. According to the Corporate Regulations regarding the Procurement of Goods and Services and the Corporate Regulations regarding the Limits of Authority for Submissions, Approvals, and Signatures, each Department within the RUIS Group shall always maintain written files that have been approved in accordance with their terms. For government officials, all gifts, trips, and hospitality must :
 - a. Based on an acceptable commercial objective.
 - b. The price is appropriate and fair.
 - c. Accepted by the process owner in accordance with the corporate regulations on the scope of the process owner's authority.
 - d. Is prohibited if it appears to be an improper gesture or to be a bribe.
 - e. Adheres to all applicable rules and legislation.
2. All gifts given to public officials must be kept to a minimum amount in cash. It is prohibited to give gifts in cash or its equivalent (such as a loan or gift card). The RUIS Group applicant must submit a Request Form that is fully filled out and in accordance with the relevant procedures in order to receive initial approval.
3. The RUIS Group has controlled the requirements governing the Limits of Authority for Submissions, Approvals, and Signatures as well as the provisions for the Procurement of Goods and Services in the Corporate Regulations.
4. In some cases, the RUIS Group may pay for government officials' travel and lodging when they visit project sites or get together to do business or advertise RUIS Group goods and services.
5. All RUIS Group Company assets that are utilized for business transactions with government officials must be handled legally, including the requirement to protect and guarantee that Company assets are used effectively.
6. Travel-related expenses paid for by government representatives:
 - a. Based on an acceptable commercial objective.
 - b. Given the circumstances surrounding the travel and the level of seniority of government officials, it must be acceptable. The cost of such trip will be borne in full by Government Officials.
 - c. Excludes friends, partners, and other relatives of government officials. The cost of such trip will be borne in full by Government Officials.
 - d. No detours are permitted. Travel provided to government officials that is not directly related to business is referred to as a "side excursion."
 - e. It should, whenever possible, be paid directly to the vendor (ie, airline, hotel, car rental company, etc.). If direct payment is not feasible, RUIS Group may only reimburse the charge in accordance with the terms of the applicable government regulations and/or the proof of receipt provided by the official government, as confirmed in writing by the client. Government officials will get expense reimbursement, which cannot be made in cash without the process owner's consent.



- f. "Daily allowance" may not be included unless it has first been approved by the process owner, gone through a review procedure to ensure compliance with any applicable government regulations, and/or received the client's written approval.
- 7. In specific and appropriate situations, RUIS Group personnel can feed and entertain government officials. Examples include providing lunch to a representative performing an on-site inspection and treating staff from a government client company to supper following a long day of meetings.
- 8. When providing food or other entertainment to government officials, at least one RUIS Group employee must be present. The RUIS Group will take whatever action it deems necessary, including refusing to reimburse employees for such payments or benefits, if an employee authorizes or provides gifts, meals, travel, or related entertainment expenses or benefits to a government official without the required prior approval, or fails to send the required notification for expenses that do not require prior approval.



FINALE

I. FINALE


1. Related procedures further regulate the process provisions related to the application of this Policy.
2. Since it was established, this policy is still in effect.





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