



PT RADIANT
UTAMA
INTERINSO
Tbk

SISTEM PELAPORAN PELANGGARAN

SKB/005/RUI/XII/2022

WHISTLEBLOWING SYSTEM

2022
EDITION



LAMPIRAN / APPENDIX

	KEBIJAKAN PERUSAHAAN PT RADIANT UTAMA INTERINSKO Tbk	Nomor	: SKB/005/RUI/XII/2022
		Revisi ke	: 00
	SISTEM PELAPORAN PELANGGARAN WHISTLEBLOWING SYSTEM	Tanggal	: 9 Desember 2022
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**SURAT KEPUTUSAN BERSAMA DEWAN KOMISARIS DAN DIREKSI
PT RADIANT UTAMA INTERINSKO Tbk
NOMOR SKB/005/RUI/XII/2022
Tentang
SISTEM PELAPORAN PELANGGARAN (*WHISTLEBLOWING SYSTEM*)**


Dewan Komisaris dan Direksi PT Radiant Utama Interinsco Tbk

- Menimbang : 1. Bahwa dengan adanya restrukturisasi dokumen kebijakan PT Radiant Utama Interinsco Tbk, maka Kebijakan Perusahaan Nomor PK-018-RUI-2013 tentang Kode Etik perlu dilakukan perubahan dan penyesuaian pada bagian sistem pelaporan pelanggaran.
2. Bahwa PT Radiant Utama Interinsco Tbk menyadari bahwa penerapan Tata Kelola Perusahaan (*Good Corporate Governance*) akan meningkatkan posisi Perusahaan dalam persaingan bisnis, terutama dalam pengelolaan sumber daya manusia dan tata nilai Perusahaan yang akan meningkatkan nilai Perusahaan bagi seluruh pemegang saham dan pemangku kepentingan (*Stakeholder*).
3. Bahwa diperlukan media untuk menunjang dan menegakkan prinsip-prinsip *Good Corporate Governance* guna menciptakan situasi kerja yang bersih dan bertanggungjawab
4. Bahwa berdasarkan pertimbangan sebagaimana dimaksud dalam nomor 1, 2 dan 3 perlu diterapkannya Kebijakan Perusahaan tentang Sistem Pelaporan Pelanggaran (*Whistleblowing System*) di PT Radiant Utama Interinsco Tbk.
- Mengingat : 1. Anggaran Dasar PT Radiant Utama Interinsco Tbk Nomor 8 Tanggal 6 Agustus 2021.
2. Tata Kelola Perusahaan Yang Baik (*Good Corporate Governance*) PT Radiant Utama Interinsco Tbk.

MEMUTUSKAN:

- Menetapkan : SURAT KEPUTUSAN BERSAMA DEWAN KOMISARIS DAN DIREKSI TENTANG KEBIJAKAN SISTEM PELAPORAN PELANGGARAN (*WHISTLEBLOWING SYSTEM*) PT RADIANT UTAMA INTERINSKO Tbk.
- PERTAMA : Menetapkan Kebijakan Sistem Pelaporan Pelanggaran (*Whistleblowing System*) yang merupakan bagian yang tidak terpisahkan dari Surat Keputusan Bersama ini.



	KEBIJAKAN PERUSAHAAN PT RADIANT UTAMA INTERINSKO Tbk	Nomor	: SKB/005/RUI/XII/2022
		Revisi ke	: 00
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- KEDUA : Mencabut dan menyatakan tidak berlaku:
1. Peraturan Korporat 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



	KEBIJAKAN PERUSAHAAN	Nomor	: SKB/005/RUI/XII/2022
	PT RADIANT UTAMA INTERINSCO Tbk	Revisi ke	: 00
	SISTEM PELAPORAN PELANGGARAN	Tanggal	: 9 Desember 2022
	WHISTLEBLOWING SYSTEM	Halaman	: 3 dari 11

LEMBAR PENGESAHAN

1. Judul Kebijakan : Sistem Pelaporan Pelanggaran (*Whistleblowing System*)
2. Nomor Kebijakan : SKB/005/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


SOEWAN FARISYI
DIREKTUR UTAMA


MUHAMMAD HAMID
KOMISARIS


SOEHARTO NURCAHYONO
DIREKTUR


WINARNO ZAIN
KOMISARIS

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INTRODUCTION

A.OBJECTIVES AND PURPOSE

1. availability of the media as a channel for reporting issues, filing grievances, and providing vital information to the company.
2. availability of a system for providing early warnings to stop infringement.
3. as a way for stakeholders and the general public to observe or supervise the Company's operations, which discourages violations.
4. in order to handle and address issues that develop in the community and in the Company's Stakeholders' interests in order to prevent public complaints or disclosures.
5. the adoption of a system that embodies the concepts of information transparency, accountability, responsibility, independence, fairness, and fairness, while giving priority to the fundamental principles for operating the Company's operations.

B. SCOPE

1. The Violation Reporting System is a system that handles complaints/disclosures regarding illegal activity, unethical or improper behavior, violations of company laws and/or regulations, and actions or behaviors that may result in significant or immaterial losses, which include the following:
 - a. violation of the relevant rules and legislation;
 - b. violating the rules and policies of the company;
 - c. Misusing one's position for purposes unrelated to the company;
 - d. Extortion;
 - e. Dishonest behavior;
 - f. Conflict of Interest
 - g. Acts of gratification or bribery;
2. This scope excludes problems with workplace safety, health, and the environment (K3L), with labor disputes, and with business facilities.
3. Cases that occurred during the last 2 (two) years are given priority for follow-up on reports and disclosures.



B. TERMS

1. PT Radiant Utama Interinsco Tbk and all of its subsidiaries are referred to as companies with a capital P, whereas firms with a lowercase letter refer to businesses in general.
2. The General Meeting of Shareholders (GMS), the Board of Commissioners, and the Board of Directors are the three corporate bodies.
3. The Board of Commissioners consists of all members of the Boards of the Company and its subsidiaries, which function as a single Board (Board).
4. The Board of Directors is made up of all the directors of the company and its subsidiaries.
5. The members of the Board of Directors and those who help the Board of Directors in managing the Company are referred to as management.
6. RUIS personnel consists of the Board of Commissioners, the Directors, all contract and permanent workers of the Company, including those working for its subsidiaries and other agencies, as well as any other individuals doing direct work for and on behalf of the Company;
7. Parties with an interest in the Company, either directly or indirectly, are referred to as stakeholders. These parties include the government, creditors, consumers, suppliers, and workers, among others.
8. Business partners are people or organizations that form business relationships with the Company that are advantageous to both parties based on potential and practicality.
9. Whistleblowing System is a system that manages or regulates procedures for complaints/disclosures about illegal behavior, unethical or improper acts, violations of Company policies and/or regulations, actions or behaviors that can result in losses for the Company with the aim of maximizing the participation of Stakeholders and other parties in disclosing violations that occur within the Company.
10. Complaints/Disclosures are actions of reporting infractions or disclosing conduct that are illegal, go against company policies, are unethical or unlawful, or involve other actions that could be detrimental to the company.
11. All employees of the company, shareholders, and other stakeholders, such as the general public or other parties (individuals or institutions), who have a direct or indirect connection to the company's operations are considered whistleblowers and are expected to make complaints and disclosures in accordance with the whistleblowing system.
12. The Reported Party is any employee of the company, shareholder, or other stakeholder who is involved in illegal activity, unethical or improper behavior, a violation of company rules and regulations, or conduct that could result in financial losses for the company.



13. A conflict of interest is when a company employee who gains 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 in a way that could be detrimental to the company and impair the quality and performance that should be there.
14. Gratification or Acts of Bribery are activities in which Company Personnel engage in giving and/or receiving gifts/memorabilia and entertainment related to their authority/position in the Company so as to cause a conflict of interest that may affect their independence, objectivity, and professionalism.
15. Fraudulent acts are dishonest conduct undertaken by company personnel, including fraud, falsification, concealment, or omission of critical company papers or reports that may affect the company or third parties.
16. Early Indications are details from the complaint or disclosure that include, among other things, the following: who was involved, the nature and cause of the loss, as well as when and where it happened.
17. An investigation is a process used to track down witnesses or evidence linked to wrongdoings by the disclosed Party that have been disclosed via the whistleblowing system.
18. The Investigation Team was established to handle the responsibility of gathering information and proof regarding infractions.
19. External Investigators are individuals or organizations outside of the Company who the Company has designated to conduct in-depth inquiries into complaints or disclosures of alleged violations within the Company.
20. The Whistleblowing Committee was created with the express purpose of managing the Whistleblowing System inside the Company, including conducting an initial evaluation of complaints and disclosures of violations. This committee is accountable to the Board of Directors directly.
21. The company appoints a person to serve as the whistleblowing administration manager. This person has the authority to receive complaints and disclosures, to keep track of the implementation of follow-up measures for reporting violations, and to manage the company's whistleblowing system administratively in accordance with their area of expertise.



SYSTEM FOR REPORTING VIOLATIONS

D. LIMITATIONS AND DUTIES

1. The Company follows the following procedure for receiving and handling infraction reports:
 - a. The business must receive complaints of infractions from both internal and external parties;
 - b. The business must accept and process reports of violations from both reporters who identify themselves and those who do not;
 - c. Depending on the severity of the offense, the company offers 2 (two) different management reports, one through the Board of Directors and the other through the Board of Commissioners.
2. Based on the classification of the Reported Party, the following parties have the responsibility and ability to follow up on reports and disclosures:
 - a. If the Board of Directors, Board of Commissioners, and Supporting Organs are the reports, then the Board of Commissioners.
 - b. The Board of Directors, in the event that the reported individual is a Company Person who is not a member of the Board of Commissioners and the Board of Directors.
3. The Board of Commissioners is charged with the following duties and powers:
 - a. In accordance with this Decree's requirements, the Board of Commissioners is in charge of managing reporting on alleged violations by the Board of Directors, Board of Commissioners, and Supporting Organs of the Board of Commissioners;
 - b. Based on a decision made by the Board of Commissioners, the Board of Commissioners creates an Ethics Committee made up of members of the Audit Committee and additional parties as needed based on their competence and skill;
 - c. As mentioned in item 3.a above, the head of the audit committee is also the head of the ethics committee;
 - d. As mentioned in point 3.b above, the Ethics Committee is responsible with investigating violations by Company personnel, specifically the Board of Commissioners, Supporting Organs of the Board, and Directors who are not Company Employees.
4. The following are the duties and powers of the board of directors:
 - a. The implementation of reporting management of alleged violations by Company personnel other than the Board of Commissioners and Directors is the responsibility of the Board of Directors;
 - b. In accordance with a Directors Decree, the Board of Directors establishes an Ethics Committee, which consists of the heads of the Human Resources (HR & GA Services), Compliance, and Legal (Legal) Departments as well as other parties as necessary in line with their competence and knowledge;
 - c. As mentioned in point 4.b above, the head of the compliance department also serves as the chair of the ethics committee;
 - d. In addition to the Board of Commissioners, Supporting Organs of the Board, and Directors, the Ethics Committee is responsible with investigating infractions committed by Company personnel, including Company employees. This is noted in number 4.b above.



E. CONTROL OF REPORTS OF VIOLATIONS

CONTROL OF REPORTS OF VIOLATIONS

The business decides that the following procedures must be followed in the governance of reporting violations:

1. Receiving reports of violations

Reports of alleged infractions by Company staff are submitted in writing using the following procedure:

- a. Through the Governance menu on the business website, www.radiant.co.id;
- b. Sending a formal letter to the Board of Directors by mail or direct delivery to the business at the following address:

PT Radiant Utama Interinsco Tbk
Jl. Kapt. Tendean No. 24
Jakarta Selatan 12720

- c. using committee.etika@radiant-utama.com, a WBS email address.
- d. The Ethics Committee oversees the reporting of infractions in its entirety;
- e. The procedures for the violation reporting system go into more detail on the steps for receiving a report.

2. Handling of Reports of Violations

- a. All reports of violations that have been submitted are reviewed with the goal of gathering enough initial evidence, as far as is reasonably possible, to draw a conclusion as to whether the reports of violations are true or even the opposite; if insufficient evidence is found, it is forwarded to the special audit/investigation stage.
- b. The Ethics Committee determines whether or not to conduct a special audit/investigation of reports of violations received within a maximum of 20 (twenty) working days; this time limit may be extended if judged necessary for an additional 20 (twenty) working days.
- c. The report will not be processed further if the review's findings, as mentioned in 2.a, indicate that it is inaccurate and that there is no supporting documentation.
- d. The report is given to the Board of Commissioners/Directors in accordance with their jurisdiction to be followed up on by the Ethics Committee if the review's findings indicate infractions and are supported by adequate evidence.
- e. The process of conducting a special audit or investigation into a report must be done so while upholding the presumption of innocence and objectivity principles.
- f. The special audit/investigation procedure must be impartial and conducted without respect to the identities of those reporting or being reported.
- g. The reporting party must be given a thorough opportunity to explain the evidence discovered and, if required, to mount a defense.



3. Handling of Reports of Violations

- a. All reports of violations that have been submitted are reviewed with the goal of gathering enough initial evidence, as far as is reasonably possible, to draw a conclusion as to whether the reports of violations are true or even the opposite; if insufficient evidence is found, it is forwarded to the special audit/investigation stage.
- b. The Chair of the Ethics Committee conducts follow-up monitoring of allegations of infractions.

4. Providing Feedback

- a. The Company informs Stakeholders and/or representatives of Stakeholders who request an explanation from the Company on the reported breaches submitted by providing responses on the progress of the violation reporting settlement procedure through the Chairperson of the Ethics Committee.
- B. When reporting infractions anonymously, the Company responds to stakeholders and/or stakeholders' representatives who may need further explanation.

5. Publication and Promotion

- a. A minimum of once every three (three) months, the Main Director is notified by the Ethics Committee about how reports and disclosures are handled and if they may or cannot be followed up on.
- b. The business must distribute the Violation Reporting Management Guidelines to all PT Radiant Utama Interinsco Tbk workers and stakeholders using a variety of company media, including:
 - 1) Print and distribute this instruction manual.
 - 2) The corporate website.
 - 3) Internal forum for employees.
 - 4) WBS, or the Banner Whistle Blowing System.



SANCTIONS, PROTECTION, AND APPRECIATION

F.SAFEGUARDING REPORTERS AND RELATED PARTIES

1. The business will ensure the privacy of the whistleblower's identity and of those involved in reporting the infringement.
2. The Company promises to safeguard whistleblowers from any threats, intimidation, or unfavorable behavior on the part of any party.
3. The parties conducting the Investigation, as well as those supplying information connected to the complaint or disclosure, are also subject to the confidentiality of the identity and protection of the Complainant.
4. As long as the whistleblower upholds the confidentiality of the violation being reported to any party, in any way, form, or circumstance, and as long as it has not/has not become public knowledge either before or after the complaint/disclosure, the provisions on confidentiality and protection for the whistleblower will remain in effect.

G.REPORTING GRATITUDE

1. To protect the firm's assets and finances, the corporation can compensate the complainant for infractions that are proven to have occurred.
2. The Employee Reward Policy, which is based on a Board of Directors Decree, regulates the type of award issued by the Company.

H.SANCTIONS

1. The type of punishment for the Reported Party who has been found guilty of a violation will be decided in accordance with the policies and guidelines that are in effect within the Company.
2. Violations that are deemed illegal and/or to violate the relevant laws and regulations will be investigated and dealt with in accordance with the legal process.



CLOSING

I.CLOSING


1. Connected processes further govern 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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