

**CODE OF BUSINESS ETHICS & WORK ETHICS
PT GARUDA INDONESIA (PERSERO) Tbk**



“The Code of Business Ethics and Work Ethics guide the working relationships among us and the business relationships with our Stakeholders.”

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REMARKS BY THE BOARD OF COMMISSIONERS

Good Corporate Governance (GCG) aims to realize outstanding corporate performance in an ethical and moral manner while always complying with prevailing laws and regulations.

The Code of Business Ethics and Work Ethics regulates what is appropriate and inappropriate for every Garuda Indonesia personnel to do in their relationships with all stakeholders, including customers, employees, suppliers, agents, shareholders and other stakeholders.

The Board of Commissioners, in carrying out its function of supervising the management of the Company, welcomes this Code of Business Ethics and Work Ethics, as it is expected to be used as an effort to prevent fraudulent acts or actions that harm and degrade the Company's image, as well as to prevent conflicts of interest in the management of the Company.

Each of us has an important role to play in upholding ethics in our beloved Garuda Indonesia by complying with them and reporting any ethical violations through the means provided by the Company, namely the Whistle Blowing System (WBS). The Company will provide protection for whistleblowers and guarantee the confidentiality of their identity.

With the Code of Business Ethics and Work Ethics, which has been equipped with the WBS as a tool for management to control ethical violations, as well as the active participation of every Garuda Indonesia personnel to report any violations that occur, it is hoped that in the long run a clean mindset and behavior will be formed in every Garuda Indonesia personnel.

Therefore, let us work together optimally to uphold the Code of Business Ethics and Work Ethics within the Company. The Board of Commissioners of Garuda Indonesia is committed to continuing to oversee our long journey in realizing a clean, dignified, law-abiding and high-performing Garuda Indonesia in line with the expectations of our stakeholders.

PT GARUDA INDONESIA (PERSERO) Tbk

BOARD OF COMMISSIONERS

REMARKS BY THE BOARD OF DIRECTORS

Garuda Indonesia has a set of company values and the process of internalizing these values has been, is, and will continue to be carried out consistently throughout the organization. The Company's values are further elaborated into appropriate and inappropriate behaviors for Garuda Indonesia personnel in their relationships with customers, employees, shareholders, partners, creditors, the community and other stakeholders. These behavioral guidelines are compiled in the Code of Business Ethics and Work Ethics.

The paradigm behind the formulation of the Code of Business Ethics and Work Ethics is that the Company wants to ensure that Garuda Indonesia personnel do not engage in unlawful behavior, abuse of power, and conflicts of interest that are detrimental to themselves and the Company. The Company seeks to identify and recognize a number of behaviors that, if done consciously and repeatedly, could potentially lead to actions that could harm ourselves and the Company.

Therefore, let us together enforce the Code of Business Ethics and Work Ethics with full awareness and patience. Let us make this Code of Business Ethics and Work Ethics a guide to our behavior along our journey to realize the Company's vision, so we can build Garuda Indonesia into a company that is high-performing, always compliant with the law, and upholds high moral ethics.

PT GARUDA INDONESIA (PERSERO) Tbk

BOARD OF DIRECTORS

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LIST OF TERMS (GLOSSARY)

- Affiliate is a business entity in the form of a Limited Liability Company or other form of business entity, which is directly and/or indirectly controlled by Garuda Indonesia.
- Company Assets are resources owned by Garuda Indonesia that are expected to generate profits.
- Agent is a business entity that assists the Company in marketing and selling Garuda Indonesia products.
- Board of Commissioners is a company organ consisting of the President Commissioner and members of the Board of Commissioners.
- Board of Directors is a company organ consisting of the President Director and other Directors. Gratuities are gifts or receipts in the broadest sense, including money, goods, commissions, rebates (discounts), interest-free loans, travel tickets, lodging facilities, tourist trips, free medical treatment and other facilities, whether received domestically or abroad and conducted using electronic means or without electronic means.
- Garuda Indonesia Code of Business Ethics and Work Ethics is a moral standard that arises from habits and contains a set of patterns of thinking and acting that are owned by Garuda Indonesia personnel in their daily work activities to support the Company's operational activities in order to realize Garuda Indonesia's vision and mission.
- Material Information is data and information that is important and affects the Company.
- Garuda Indonesia personnel consist of the Board of Commissioners, Board of Directors, supporting organs of the Board of Commissioners, Leadership Staff and Garuda Indonesia employees with permanent or contract status.
- Conflict of Interest is a situation or condition where there is a difference of interest between Garuda Indonesia, on the one hand, and the interests of Garuda Indonesia personnel, on the other hand, either individually or in groups, which has the potential to abuse one's position and/or affect the quality and objectivity of the tasks performed or decisions taken, which could harm the Company.
- Mass Media includes print and electronic media that function to provide information, education, promotion, social control and entertainment.
- Mission is a basic rule in running a business which contains elements of beliefs, values, and company identity in meeting the needs of all stakeholders.
- Working Partner is a person or business entity that cooperates with the company in order to achieve the company's goals and objectives.
- Whistleblowing Guidelines are guidelines and references for companies in handling whistleblowing reports received by the company;
- Leadership Staff is an employee who occupies a leadership position over a work unit and has the authority to make decisions as determined by the company.
- Employee is any individual who is legally bound in an employment relationship with the company.
- Customer is an individual or institution that uses Garuda Indonesia's products or enjoys its services.
- Supplier is a business entity engaged in providing goods and or services required by the Company.

- Government is a state implementing institution and its apparatus, which includes legislative, executive, judicial and other institutions, both at the central and regional levels.
- Garuda Indonesia is PT Garuda Indonesia (Persero) Tbk.
- Competitor is a business entity engaged in the same or similar line of business as the Company.
- Subsidiary is a business entity in the form of a Limited Liability Company, all or more than 50% (fifty percent) of whose shares are owned by Garuda Indonesia.
- Trade Union is an organization formed from, by, and for employees in the company, which is free, open, independent, democratic and responsible.
- Values are a set of principles that are believed by all Garuda Indonesia personnel as guidelines for thinking and acting in order to realize the Company's vision and mission.
- Vision is a general statement about the direction or ideals and goals to be pursued in the future within a certain period of time.

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I. INTRODUCTION

The Garuda Indonesia Code of Business Ethics and Work Ethics is a set of commitments consisting of Garuda Indonesia's business ethics and the work ethics of Garuda Indonesia personnel, which are the basic rules for conducting business relationships with stakeholders and professional working relationships.

Garuda Indonesia always supports compliance with the Garuda Indonesia Code of Business Ethics and Work Ethics and is committed to its implementation, and requires all Leadership Staff from all levels within the Company to be responsible for ensuring that the Garuda Indonesia Code of Business Ethics and Work Ethics is complied with and properly implemented by all elements of Garuda Indonesia. Furthermore, every Garuda Indonesia personnel is required to sign a commitment to comply with the Code of Business Ethics and Work Ethics on an annual basis.

The Garuda Indonesia Code of Business Ethics and Work Ethics will always be adjusted in line with legal, social, normative, regulatory and business developments, and an internalization and socialization program needs to be carried out within Garuda Indonesia so all elements can understand and actively support the implementation of the Company's Code of Business Ethics and Work Ethics.

Garuda Indonesia personnel are expected to apply the Company's Code of Business Ethics and Work Ethics so as to reflect the Company's moral values in their attitudes, behaviors and actions. This code is therefore supplemented with examples of the behaviors that Garuda Indonesia personnel may and may not display, as shown in the appendices, which are an integral part of the Code of Business Ethics and Work Ethics.

All parties are expected to provide input into the development of the Company's Code of Business Ethics and Work Ethics to ensure that it is in line with and synergizes with Garuda Indonesia's existing values. The successful implementation of the Company's Code of Business Ethics and Work Ethics is determined by the spirit, communication and commitment of all elements to jointly implement it in their daily work activities.

I.1 Principles in Code of Business Ethics and Work Ethics

The Garuda Indonesia Code of Business Ethics and Work Ethics describes the behaviors that Garuda Indonesia personnel must display and those that they must not display as an elaboration of the implementation of the GCG principles, namely:

Transparency

Garuda Indonesia guarantees the disclosure of material and relevant information regarding performance, financial condition and other information in a clear, adequate and timely manner and is easily accessible to stakeholders in accordance with their rights. This principle of transparency is without prejudice to the obligation to protect confidential information about Garuda Indonesia and its Customers in accordance with the prevailing laws and regulations;

Accountability

Garuda Indonesia ensures clarity of function, implementation and accountability of each organ of the Company (General Meeting of Shareholders, Board of Commissioners and Board of Directors) to ensure effective management of the Company. Accountability refers to the obligations of a person or organ of the company in relation to the exercise of their authority and/or the execution of the responsibilities imposed on them by Garuda Indonesia.

Responsibility

Garuda Indonesia ensures that the management of the Company complies with the prevailing laws and regulations and sound corporate principles, fulfills its obligations to the Government in accordance with prevailing regulations, cooperates actively for mutual benefit and strives to make a tangible contribution to society.

Independence

Garuda Indonesia guarantees professional management of the Company without conflict of interest and influence/pressure from any party that is not in accordance with the prevailing laws and regulations and sound corporate principles.

Fairness

Garuda Indonesia guarantees fairness and equality in fulfilling the rights of stakeholders arising from agreements and prevailing laws and regulations.

I.2 Responsibilities of Compliance

This Code of Business Ethics and Work Ethics explains the standards of Work Ethics and Business Ethics that apply generally within Garuda Indonesia, as a system of moral values used to determine what is good and what is bad, what is commendable and what is reprehensible, and what is valued and what is not valued.

Garuda Indonesia upholds honesty, integrity and fairness in conducting its business, therefore Garuda Indonesia prohibits all Garuda Indonesia personnel and other parties associated with Garuda Indonesia from engaging in any act that could be categorized as unlawful, unethical, immoral or contrary to the integrity of the Company in carrying out its business activities.

I.2.1 Responsibilities of Garuda Indonesia Personnel

- a. Studying in detail the Company's Code of Business Ethics and Work Ethics related to their scope of work. Every Garuda Indonesia personnel must understand the ethical standards outlined in the Company's Code of Business Ethics and Work Ethics;

- b. Contacting his/her immediate supervisor or the Corporate Secretary Unit or Human Capital Management Unit or any other party designated by the Board of Directors, should any Garuda Indonesia personnel have any questions regarding the implementation of the Company's Code of Business Ethics and Work Ethics;
- c. Immediately discussing with the parties designated by the Board of Directors any issues concerning possible violations of the Company's Code of Business Ethics and Work Ethics;
- d. Understanding the procedures used to notify or report possible violations of the Company's Code of Business Ethics and Work Ethics;
- e. Willing to cooperate in the investigation process of possible violations of the Company's Code of Business Ethics and Work Ethics.

I.2.2 Responsibilities of Garuda Indonesia's Leadership Staff

- a. Building and maintaining a culture of compliance with the Company's Code of Business Ethics and Work Ethics through:
 - (a) Providing guidance and encouraging subordinates' personal compliance with the Company's Code of Business Ethics and Work Ethics;
 - (b) Conducting regular supervision of programs aimed at encouraging the compliance of Garuda Indonesia personnel with the Company's Code of Business Ethics and Work Ethics;
 - (c) Setting an example in the way we behave and act on a daily basis.
- b. Ensuring that every Garuda Indonesia personnel understands that compliance with the Company's Code of Business Ethics and Work Ethics is as important as the achievement of performance;
- c. Encouraging Garuda Indonesia personnel to raise questions on various integrity and business ethics issues;
- d. Considering issues of compliance with the Company's Code of Business Ethics and Work Ethics in evaluating and rewarding Garuda Indonesia personnel;
- e. Preventing possible violations of the Company's Code of Business Ethics and Work Ethics through the following efforts:
 - (a) Ensuring that risks of possible violations of the Company's Code of Business Ethics and Work Ethics related to business processes are identified early and systematically;
 - (b) Identifying and reporting based on established procedures on the activities of subsidiaries, affiliates and partners that may lead to possible violations of the Company's Code of Business Ethics and Work Ethics;
 - (c) Ensuring the implementation of education and training on the Company's Code of Business Ethics and Work Ethics and conducting socialization to work partners to ensure that they understand and comprehend the Company's Code of Business Ethics and Work Ethics thoroughly.
- f. Identifying possible violations of the Company's Code of Business Ethics and Work Ethics through:

- (a) Implementing supervision to minimize the risk of possible violations of the Company's Code of Business Ethics and Work Ethics;
 - (b) Providing guidance to Garuda Indonesia personnel under the responsibility of their work units regarding the reporting system for possible violations of the Company's Code of Business Ethics and Work Ethics.
 - (c) Evaluating the implementation of the Company's Code of Business Ethics and Work Ethics within his/her work unit to assess the effectiveness of the implementation and how to correct any weaknesses.
- g. Following up on audit recommendations and reports of possible violations of the Company's Code of Business Ethics and Work Ethics by:
- (a) Quickly correcting deficiencies found in the assessment of compliance with the implementation of the Company's Code of Business Ethics and Work Ethics;
 - (b) Providing disciplinary sanctions in accordance with applicable regulations for actions that are in accordance with the contribution of work activities;
 - (c) Consulting with the Unit in charge of legal if violations of the Company's Code of Business Ethics and Work Ethics that occur require the intervention of law enforcement or the authorities.

II. COMPANY IDENTITY

II.1 Garuda Indonesia's Vision and Mission

- a. Garuda Indonesia's vision is "To become a sustainable aviation group by connecting Indonesia and beyond while delivering Indonesian Hospitality".
- b. Garuda Indonesia's mission is "Strengthening business fundamentals through strong revenue growth, cost leadership implementation, organization effectiveness and group synergy reinforcement while focusing on high standards of safety and customer-oriented services delivered by professional & passionate employees."

II.2 Garuda Indonesia's Values

Garuda Indonesia has formulated a set of values called AKHLAK which was inaugurated on October 14, 2020. The AKHLAK values consist of *Amanah*/Trustworthy, *Kompeten*/Competent, *Harmonis*/Harmonious, *Loyal*/Loyal, *Adaptif*/Adaptive, and *Kolaboratif*/Collaborative values.

The Company's values are further elaborated into 10 Key Behaviors, namely:

Culture Values	Defintion
Amanah (Trustworthy)	We uphold the trust given
Kompeten(Competent)	We continue to learn and develop capabilities

Harmonis (Harmonious)	We care for each other and respect differences
Loyal (Loyal)	We are dedicated and prioritize the interests of the nation and state
Adaptif (Adaptive)	We continue to innovate and be enthusiastic in driving or facing change.
Kolaboratif (Collaborative)	We encourage synergistic cooperation

II.3 Key Behavior AKHLAK

The elaboration of the AKHLAK values into Key Behaviors aims to ensure that all Garuda Indonesia personnel have a common perception in understanding these values.

The values, which serve as guidelines for thinking and acting, are elaborated into Key Behaviors, which are outlined in the Company's Code of Business Ethics and Work Ethics that must be complied with by all Garuda Indonesia personnel in carrying out their daily work activities.

Amanah (Trustworthy)

The main behaviors of Amanah are:

1. Fulfilling promises and commitments
2. Responsible for tasks, decisions, and actions taken
3. Adhering to moral and ethical values

Kompeten(Competent)

The main behaviors of the Competent value are:

1. Improving one's competence to respond to ever-changing challenges
2. Helping others learn.
3. Completing tasks with the best quality

Harmonis (Harmonious)

The main behaviors of the Harmonious value are:

1. Respect everyone regardless of their background.
2. Like to help others.
3. Building a conducive work environment

Loyal (Loyal)

The main behaviors of the Loyal value are:

1. Maintaining the good name of fellow employees, leaders, SOEs and the State
2. Willing to sacrifice to achieve greater goals.
3. Obeying the leadership as long as it does not conflict with the law and ethics.

Adaptif (Adaptive)

The main behaviors of the Adaptive value are:

1. Quickly adapting to be better.
2. Continuously making improvements to keep up with technological developments.
3. Acting proactively.

Kolaboratif (Collaborative)

The main behaviors of the Collaborative value are:

1. Providing opportunities for various parties to contribute.
2. Open in working together to produce added value.
3. Mobilize the utilization of various resources for a common goal.

II.4 Company Culture “The Garuda Way”

Along with the restructuring and transformation process of the Company's business, it is necessary to change the mindset, interaction pattern, as well as the behavior and habits applied by all Garuda Indonesia personnel through the corporate culture of "The Garuda Way" which was officially launched on June 24, 2022.

"The Garuda Way" was established as a guideline that encompasses the values and principles of behavior for all Garuda Indonesia personnel in their work and activities within the Company to create a conducive work environment in order to encourage optimal contribution to the Company.



Because You Matter

which means "Because You Matter and are Valuable". All Garuda Indonesia personnel always strive to provide the best experience for everyone they meet, be it passengers, business partners, team members, superiors, coworkers, and family.

I Am in Charge

which means "I Am Responsible and Accountable". All Garuda Indonesia personnel proactively solve problems by taking action and making decisions, and are accountable for everything they do.

I Am with You

which means "I am always with you". All Garuda Indonesia personnel are one unit that trusts, respects, supports and looks after each other.

The three Company Cultures above are derived from the core values of "AKHLAK" and are translated into 6 (six) Principles of Behavior that must be applied by all Garuda Indonesia personnel, namely:

1. Be Sincere and Share Things Openly

It means "Honest, Sincere, and Open", where all Garuda Indonesia personnel are required to act sincerely, without pretense and build open communication by conveying the facts & truth in full without changing, delaying, or covering up.

2. Be Thoughtful and Caring

"Thoughtful and Caring" means that all Garuda Indonesia personnel must respect and consider the feelings of others, and show care, concern and empathy in entertaining and serving all stakeholders.

3. Take Accountability

"Take Accountability" means that all Garuda Indonesia personnel must always be accountable for everything they do or say, whether in the form of speech, writing, or behavior.

4. Be Bold and Make Decisions

It means "Be Bold and Make Decisions", whereby all Garuda Indonesia personnel must be bold in taking the right actions and decisions quickly in accordance with the best judgment and consideration for the Company, both in normal conditions and in the process of change.

5. Discipline and Consistent in Everything

It means "Discipline and Consistent in Everything", whereby all Garuda Indonesia personnel must always comply with regulations and uphold the prevailing moral standards and business ethics consistently and appropriately.

6. Create Great Things Together

It means "Contributing Together for Excellent Results", where all Garuda Indonesia personnel are obliged to give and complement each other in teams and organizations to achieve common goals effectively and efficiently.

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III. COMMENDABLE AND ETHICAL STANDARDS IN DEALING WITH STAKEHOLDERS

III.1 Relationship with Garuda Indonesia personnel

Garuda Indonesia has an obligation to bring out the best performance of all Garuda Indonesia personnel in order to achieve the Company's goals.

The best performance can be achieved through, among other things, creating a conducive working environment, protecting and respecting their rights, and helping them realize their welfare in accordance with the Company's capabilities.

III.1.1 Safety and comfort in the workplace

Garuda Indonesia ensures the safety and comfort of its employees by building facilities and implementing security systems that refer to the prevailing laws and regulations. Garuda Indonesia assesses and evaluates the effectiveness of the security system on an ongoing basis.

Feeling safe and comfortable in the workplace is a shared responsibility among employees at all levels of the organization.

III.1.2 Occupational Health and Safety

Garuda Indonesia ensures the fulfillment of the occupational safety and health of its employees by building facilities, implementing an occupational safety and health system that refers to the prevailing laws and regulations. Garuda Indonesia assesses and evaluates the effectiveness of the occupational safety and health system on an ongoing basis.

Employees are obliged to understand and implement various occupational safety and health requirements in accordance with the demands of their work.

III.1.3 Providing Employees with Equal Opportunities for Employment, Promotion, and Dismissal

Garuda Indonesia upholds the principle of Equal Employment Opportunity, whereby Garuda Indonesia provides equal opportunities in an open and objective manner to all Garuda Indonesia employees to be able to develop their careers in an effort to improve their competencies, in accordance with the Garuda Indonesia Collective Labor Regulations and applicable regulations in the Human Capital Quality Manual or other company rules, while taking into account the education, experience and competencies possessed by the employee concerned.

Garuda Indonesia always upholds work equality, including the prohibition against all forms of discrimination, whether it is related to gender, SARA, including the prohibition of discrimination against whistleblowers or whistleblowers related to alleged violations of the Collective Labor Regulations, including corruption, collusion and nepotism as well as bribery that occurs within Garuda Indonesia. Garuda Indonesia provides equal opportunities and fair treatment to all employees.

III.1.4 Conducive Working Environment

Harmonious relationships between employees are built on the basis of mutual respect, mutual trust, mutual encouragement and fostering cooperation in the implementation of their respective duties and responsibilities, as well as creating a conducive work atmosphere. implementation of their respective duties and responsibilities, as well as creating a conducive working atmosphere in their work environment.

Harmonious relationships between Leadership Staff and employees must always be built both formally and informally in an effort to achieve the success of the work unit and the company's overall goals.

III.1.5 Right of Association and Politics

Garuda Indonesia guarantees the right of every employee to associate and channel their political aspirations as long as it does not conflict with the Company's regulations and the prevailing laws and regulations.

III.2 Relationship with Customers

Customers are the fundamental consideration for the existence of Garuda Indonesia. All of Garuda Indonesia's resources are aimed at meeting the needs, wants and expectations of customers.

In principle, customer rights in accordance with applicable laws and regulations must be fulfilled. Therefore, customer rights in the form of safety, security and comfort are made the focus and top priority as a service program in all business and functional units of Garuda Indonesia.

III.3 Relationship with Partners

Garuda Indonesia personnel must realize that in order to realize the Company's goals and targets, Garuda Indonesia cannot provide all the resources it needs on its own, but requires partners to fulfill these needs. The interdependency between Garuda Indonesia and its partners is unavoidable. For this reason, Garuda Indonesia considers that partnership relationships must be based on mutual trust and mutual benefit.

III.3.1 Relationship with Airport Authorities

Airports are important facilities and infrastructure for the existence of Garuda Indonesia. In principle, Garuda Indonesia is obliged to meet and comply with all applicable rules and regulations at the airport issued by the Airport Authority in order to fulfill customer rights in the form of safety, security and comfort which are the main focus and priority of Garuda Indonesia as a service program in all business and functional units of Garuda Indonesia.

III.3.2 Relationship with Suppliers

Garuda Indonesia develops partnerships with suppliers to obtain goods and services that are cost-effective. Garuda Indonesia personnel, in establishing supplier criteria, shall be guided by the prevailing laws and regulations.

To achieve a relationship of mutual trust, Garuda Indonesia personnel must act fairly in providing opportunities and transparently convey the same information to all suppliers that will cooperate with Garuda Indonesia.

The Business Support Unit evaluates Garuda Indonesia's routine requirements and reviews the vendor list and revises it as necessary. The evaluation is conducted annually by considering the optimization of supplier quality with Garuda Indonesia's needs and based on the prevailing laws and regulations.

III.3.3 Relationship with Agents

In order to meet customer needs, Garuda Indonesia requires a network (distribution) that is easily accessible and spread across strategic areas including bill settlement administration services. To fulfill this need, Garuda Indonesia establishes partnerships with agents based on the principle of mutual benefit.

To realize a relationship of mutual trust, Garuda Indonesia personnel must act reasonably by providing equal opportunities and information to all agents in accordance with the prevailing laws and regulations.

III.4 Relationship with Shareholders

In running the aviation services business, Garuda Indonesia requires capital, one of which is obtained from the Shareholders. Therefore, Garuda Indonesia highly values and upholds the existence of Shareholders, both minority Shareholders and majority Shareholders in accordance with the prevailing laws and regulations.

Garuda Indonesia maintains good relations with its Shareholders based on good faith, mutual trust and mutual benefit based on mutually beneficial business standards so as to provide optimal contributions to Shareholders.

III.5 Relationship with Competitors

Garuda Indonesia believes that healthy competition is a positive thing to spur Garuda Indonesia to produce the best and make continuous improvements.

Garuda Indonesia must be active and take the initiative to build a climate of healthy competition, and therefore Garuda Indonesia strives to ensure that every policy taken in the management of Garuda Indonesia remains based on the principles of fair business competition.

III.6 Relationship with Creditors

Garuda Indonesia is committed to providing the best efforts to fulfill the obligations and conditions based on loan agreements with creditors, but not limited to the obligation to pay principal/interest/yield. Each loan agreement between Garuda Indonesia and creditors must contain provisions that clearly regulate the respective obligations and rights of Garuda Indonesia and creditors, which are prepared based on the principles of fairness, openness, reasonableness, and applicable laws and regulations. The execution of loan agreements shall be carried out in good faith and with due observance of good corporate governance and prudential principles.

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IV. COMPLIANCE AT WORK

IV.1 Transparency of Communication and Financial Information

Every Garuda Indonesia personnel must have a good understanding of the scope, work process, and operational and financial performance in order to improve work engagement and contribution as well as the delivery of transparent and accountable reporting.

A good understanding must be aligned with Garuda Indonesia's strategy and policies in the disclosure of material and non-material information in accordance with the authority of the position.

IV.2 Handling Conflict of Interest

Garuda Indonesia recognizes that every Garuda Indonesia personnel has the right to take part in financial, business, socio-cultural, political and other legitimate activities outside of his or her employment, while taking into account the Garuda Indonesia personnel's obligations to the Company. Such activities must be legitimate and free from conflict of interest with their responsibilities as Garuda Indonesia personnel. Garuda Indonesia personnel must not misuse Garuda Indonesia's resources or influence in order to maintain Garuda Indonesia's good name and reputation.

Potential conflicts of interest that arise need to be managed with the aim of preventing a non-conducive working environment and encouraging an independent work spirit that prioritizes the interests of the company over those of any individual or group.

IV.3 Giving and Receiving Gratuities

Garuda Indonesia's policy on gratuities is designed to maintain the Company's reputation as a reliable airline company that acts with integrity and bases its decisions on lawful business considerations.

In principle, Garuda Indonesia prohibits any acceptance of gratuities by Garuda Indonesia personnel from any party and requires all Garuda Indonesia personnel to reject gratuities and/or report any acceptance and rejection of gratuities. The policy on gratuities is subject to the prevailing regulations in the Company.

IV.4 Protection of Company Assets

The protection of company assets, both tangible and intangible, is intended to ensure that all physical, financial, intellectual property and other assets are optimally used and protected.

IV.5 Anti-Bribery and Anti-Corruption

The Company is fully committed to the implementation of anti-bribery and anti-corruption policies in relation to the implementation of the Company's business activities.

The Company strictly prohibits any action, either directly or indirectly associated with giving, receiving, promising, or authorizing, in any form or value to an official or government agency or other individual for the purpose of a business interest, influencing business or government decision making related to the Company's business activities, or attempting to induce the recipient to abuse power or position and office.

The prohibition should be interpreted broadly and applies to any person acting for and/or on behalf of the Company, including suppliers, distributors, contractors, consultants and agents. The Company is committed to complying with and respecting applicable anti-corruption and anti-bribery laws in the jurisdictions where the Company conducts business.

Although in many countries, it is common to be rewarded for a service, it can have an unethical impression so the Company prohibits such reward as an effort to maintain integrity and ethics in carrying out its business activities.

V. DATA AND INFORMATION SECURITY

V.1 Protection of Company Confidentiality

The policy on the protection of company confidentiality is designed to ensure the security of the Company's data, information and image and to ensure that information that needs to be disclosed by Garuda Indonesia is fairly and equitably conveyed to all interested parties without any preferential treatment for any particular party.

Data and information considered confidential include the Company's business plans and strategies, the results of research and development used in the production process, the Company's standards and operating procedures, internal documents signed by employees or company leaders, intellectual property rights or other important information that could affect the performance of Garuda Indonesia's financial condition, reputation or have a negative impact on Garuda Indonesia if disseminated, unless such information has been published or is known by other parties without violating the provisions or is required to be published based on the provisions of applicable laws or regulations.

V.2 Protection of Intellectual Property

Intellectual property is intangible wealth resulting from creativity, including patents, copyrights and trademarks. As a valuable asset, Garuda Indonesia's intellectual property rights must be protected and Garuda Indonesia personnel must respect the intellectual property rights of others.

The Company encourages Garuda Indonesia personnel to register any inventions, innovations and developments made with Intellectual Property Rights in the form of copyrights,

trademarks, patents and other rights in accordance with applicable laws and regulations. The Company also reserves the right of preference for Intellectual Property Rights created by Garuda Indonesia personnel in the performance of their corporate duties using Company assets or facilities.

Garuda Indonesia personnel must always take into account the prevailing rules and regulations in creating, protecting and utilizing the Company's intellectual property rights and avoid violating intellectual property rights.

Garuda Indonesia personnel must comply with the laws and regulations governing intellectual property rights.

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VI. RESPONSIBILITIES OF GARUDA INDONESIA PERSONNEL

VI.1 Responsibilities to Communities

Garuda Indonesia has a mission as an agent of national economic development which in carrying out its mission, the company has a responsibility to the community where the company operates. The form of corporate responsibility to the community is corporate social responsibility, which must be fulfilled in accordance with the prevailing laws and regulations.

Garuda Indonesia personnel are required to succeed in the corporate social responsibility program to the community and by carrying out the corporate social responsibility program on an ongoing basis, Garuda personnel are expected to become dignified and responsible citizens of the community.

VI.2 Responsibilities of the Government

In conducting its business, Garuda Indonesia must comply with the prevailing laws and regulations issued by the Government as the regulator. The Government, in addition to being the regulator, is also the Shareholder and therefore Garuda Indonesia is obliged to maximize Shareholder value. Therefore, the Company strives to build and maintain a harmonious partnership with the Government.

Garuda Indonesia personnel must be able to maximize their ability to assist the Company in realizing its corporate responsibility to the Government.

Thus, Garuda Indonesia personnel must be able to maintain a harmonious and respectful relationship between Garuda Indonesia and the Government in carrying out its business activities, to ensure that the Company's business can grow and develop smoothly and sustainably.

VI.3 Responsibilities to Environment

In conducting its business, Garuda Indonesia does not solely focus on economic aspects, but also pays full attention to environmental aspects. Environmental aspects that have an important impact are the starting point for Garuda Indonesia's environmental management. Garuda Indonesia formulates strategies and policies to control environmental impacts.

Garuda Indonesia personnel have a responsibility to contribute to all programs and activities that are in line with Garuda Indonesia's strategy and policy on environmental impact control. By being proactive and responsive to environmental impact control in a sustainable manner, Garuda Indonesia personnel become dignified and responsible citizens of society.

VII. ENFORCEMENT OF CODE OF BUSINESS ETHICS AND WORK ETHICS

VII.1 Reporting Violations

Every Garuda Indonesia personnel is responsible for behaving in accordance with the Company's Code of Business Ethics and Work Ethics. If a Garuda Indonesia Person is in doubt as to whether an action or decision to be taken is in accordance with the Company's Code of Business Ethics and Work Ethics, he or she may discuss the matter with his or her immediate supervisor or any of the parties mentioned in the Company's Code of Business Ethics and Work Ethics.

VII.1.1 Implementation Guidelines for Violation Reporting

If a Garuda Indonesia personnel finds that a decision or action is inconsistent with the Company's Business Ethics and Work Ethics, he or she must immediately report the matter to his or her immediate supervisor or the parties mentioned in the Company's Business Ethics and Work Ethics.

VII.1.2 Violations Found by the Internal Audit Unit (SPI)

If in the process and development of the examination of an activity conducted by SPI, a decision or action is found to be inconsistent with the Garuda Indonesia Code of Business Ethics and Work Ethics, the immediate superior or the parties mentioned in the Garuda Indonesia Code of Business Ethics and Work Ethics must immediately follow up on SPI's recommendations in accordance with the mechanisms and provisions established by the Company.

VII.1.3 Whistle Blowing System (WBS)

Garuda Indonesia provides a medium or forum for the submission of any whistleblowing submitted by stakeholders including Garuda Indonesia personnel and/or representatives of Garuda Indonesia stakeholders in relation to violations of Garuda Indonesia's Code of Business Ethics and Work Ethics.

The settlement of whistleblowing is a form of enhancing stakeholder protection in order to guarantee the rights of stakeholders in relation to the Company. Whistleblowing by stakeholders that is not promptly followed up has the potential to increase reputational risk for the Company.

To resolve whistleblowing, Garuda Indonesia has established written policies and procedures covering:

- (1) Receipt of whistleblowing reports;
- (2) Handling and settlement of whistleblowing;
- (3) Protection of whistleblowers;
- (4) Monitoring of the handling and settlement of whistleblowing.

Whistleblowing is submitted by Garuda Indonesia personnel or the public ("Whistleblower") through the Company's WBS at <http://whistleblower.garuda-indonesia.com/>. Reports submitted to the WBS will be followed up by the WBS management unit, and if a violation is proven, it will be followed up by the Investigator. The whistleblower is entitled to legal protection from the company.

The full explanation and provisions are regulated in the Decree of the Board of Directors of Garuda Indonesia regarding the Whistleblowing System.

Handling of Violations Committed by Garuda Indonesia Personnel

All allegations of violations of the Code of Business Ethics and Work Ethics that are reported will be adequately followed up through further assessment or examination for the process of proof and determination of the weight of the violation as consideration for disciplinary action or sanctions.

Provisions regarding consultation review and/or reporting of violations of the Code of Business Ethics and Work Ethics and its handling are described as follows:

- a. To prevent violations of the Code of Business Ethics and Work Ethics, direct supervisors or superiors of direct supervisors should supervise and provide guidance to employees in their work units, especially to employees who are proven to have violated the Code of Business Ethics and Work Ethics and provide role models in upholding the Code of Business Ethics and Work Ethics.
- b. Immediate superiors or superiors of immediate superiors should, to the extent possible, respond directly to consultations, including reviewing and issuing reprimands and/or warnings in accordance with the Collective Labor Agreement or applicable regulations, for Garuda Indonesia personnel who are found to have violated the Code, and if there are matters that cannot be answered or addressed, immediately forward them to the unit in charge of managing the Code of Business Ethics and Work Ethics and the unit in charge of Corporate Security.
- c. The Immediate Superior or Superior of the Immediate Superior must report about the consultation and the answer, including if there is a proven violation and its handling (reprimand and/or warning) to the unit in charge of managing the Code of Business Ethics and Work Ethics, the Internal Audit Unit and the unit in charge of Corporate Security.
- d. If from the reported problems there are violations that have been given reprimands and / or warnings (I, II, or III) but repeated, or are serious violations, violations of the law or harm the company, then a more in-depth examination must be carried out by the unit in charge of Corporate Security.
- e. The Board of Directors imposes sanctions on Garuda Indonesia personnel, including in the case of sanctions involving termination of employment (PHK),

in accordance with the provisions of the Collective Labor Agreement and applicable legislation.

- f. In the event that the violation involves a general criminal offense, the Board of Directors may refer the matter to the authorities in accordance with the prevailing laws and regulations.

Handling of Violations Committed by Members of the Board of Directors:

- a. The President Director shall provide direct answers as much as possible, and if there are matters that cannot be answered, immediately forward them to the Board of Commissioners.
- b. The President Director shall report on consultations including the answers to the Board of Commissioners.
- c. If from the matters consulted and/or reported there are indications of violations by members of the Board of Directors, the Board of Commissioners reports it to the Shareholders, for a more in-depth study.

VII.2 Sanctions for Violations

Violations of the Garuda Indonesia Code of Business Ethics and Work Ethics will have consequences:

- (1) Garuda Indonesia personnel who are found to have violated Garuda Indonesia's Code of Business Ethics and Work Ethics may be subject to disciplinary measures in the form of verbal or written reprimands, stern warnings with suspension up to termination of employment with reference to the provisions in the Collective Labor Agreement.
- (2) Any Garuda Indonesia Business Partner who is found to have committed a violation will be subject to sanctions in accordance with the Company's regulations and policies;
- (3) If the situation involves a violation of the law, the matter may be forwarded to the authorities;

VII.3 Socialization

Socialization is an important stage in the implementation of Garuda Indonesia's Code of Business Ethics and Work Ethics. The Human Capital Management Unit, together with the Corporate Secretary Unit, effectively and thoroughly conducts socialization by taking into account the following:

- (1) Socializing the Garuda Indonesia Code of Business Ethics and Work Ethics at the time the Code of Business Ethics and Work Ethics is issued.
- (2) Socializing the Garuda Indonesia Code of Business Ethics and Work Ethics during the orientation program for Garuda Indonesia personnel in accordance with the program organized by Garuda Indonesia.
- (3) Periodically socializing the Code to all Garuda Indonesia personnel, including during the Good Corporate Governance (GCG) socialization. In supporting the socialization

process of the Garuda Indonesia Code of Business Ethics and Work Ethics, Garuda Indonesia will conduct briefings and internalization, or indirectly, through Garuda Indonesia's internal communication media;

- (4) Building commitment among all Business Partners associated with Garuda Indonesia;
- (5) Realizing the application of ethics as an integral part of the business practices and performance assessment of all Garuda Indonesia personnel.

VII.4 Integrity Pact

Garuda Indonesia personnel are obliged to comply with and implement the Garuda Indonesia Code of Business Ethics and Work Ethics established by Garuda Indonesia. As a form of compliance and commitment to the Code of Business Ethics and Work Ethics, all Garuda Indonesia personnel, including the Board of Directors and Board of Commissioners and their supporting organs, are required to sign an Integrity Pact (Statement of Compliance and Commitment to the Code of Business Ethics and Work Ethics), which is done annually.

Thinking and acting in accordance with the Code of Business Ethics and Work Ethics will ensure that Garuda Indonesia personnel always maintain their dignity and avoid any misconduct that could damage Garuda Indonesia's image and reputation. Therefore, any violation of Garuda Indonesia's Code of Business Ethics and Work Ethics has the consequence of strict sanctions.

VII.5 Evaluation

Periodic evaluation of the implementation of ethics enforcement:

- a. SPI and the Unit responsible for the Whistleblowing System once every 6 months, reporting to the Director of Human Capital with a copy to the Human Capital Unit and the Corporate Secretary Unit.
- b. Director of Human Capital once a year, reporting to the President Director.

VIII. CLOSING

The Garuda Indonesia Code of Business Ethics and Work Ethics within Garuda Indonesia is a normative rule and is the minimum standard that must be complied with by all Garuda Indonesia personnel in carrying out their daily duties and responsibilities.

This Code of Business Ethics and Work Ethics may be implemented in parallel with other applicable provisions of Garuda Indonesia and/or the prevailing laws and regulations.

In the event that this Code of Business Ethics and Work Ethics contains provisions that are lower in level than other provisions applicable within Garuda Indonesia and/or other laws and regulations, the higher level provisions shall prevail.

This Code of Business Ethics and Work Ethics may be amended in accordance with the needs of Garuda Indonesia. During the amendment process, this Code of Business Ethics and Work Ethics shall remain in effect until the amendment takes effect.

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IX. FORM OF INTEGRITY PACT

STATEMENT OF COMPLIANCE AND COMMITMENT TO THE CODE OF BUSINESS ETHICS AND WORK ETHICS PT GARUDA INDONESIA (PERSERO) Tbk.

The undersigned :

Name / Employee Number :

Work Unit :

Position :

Hereby declare :

1. Knowing and understanding the provisions stipulated in the Code of Business Ethics and Work Ethics of PT Garuda Indonesia (Persero) Tbk.
2. Will comply with the Business Ethics and Work Ethics as well as the Cultural Values and Code of Conduct applicable at PT Garuda Indonesia (Persero) Tbk, including but not limited to:
 - a. Commitment not to abuse my position at PT Garuda Indonesia (Persero) Tbk beyond the authority granted to me under the applicable internal regulations;
 - b. Respect for all Garuda Indonesia personnel and maintain my dignity as a clean and ethical individual;
 - c. Commitment to refrain from Corruption, Collusion, and Nepotism (KKN), bribery, and other unethical practices that are contrary to my integrity as a Garuda Indonesia personnel;
 - d. Commitment to safeguarding the good name of PT Garuda Indonesia (Persero) Tbk, among others, by not conveying information and/or responses about PT Garuda Indonesia (Persero) Tbk that could create a negative image;
 - e. Commitment not to excessively display my luxurious lifestyle and/or ownership of luxury goods on social media, including avoiding all forms of social activities that may raise suspicion of the source of Garuda Indonesia's wealth.
3. If I violate this statement, I am willing to accept the consequences as stipulated in the Collective Labor Agreement of PT Garuda Indonesia (Persero) Tbk, and/or other applicable laws and regulations.

I hereby make this statement truthfully, without any coercion from any party and to be used as accordingly

.....,

(_____).

X. APPENDICES

Examples of behavior of Garuda Indonesia personnel

X.1 Relationship with Garuda Indonesia personnel

X.1.1. Safety and comfort in the workplace

Behavior that must be displayed by Garuda Indonesia personnel:

- (1) Complying with all applicable provisions and policies of the Company, including the established security system and laws and regulations relevant to the Company's operations.
- (2) Safeguarding and using all data, information, assets, facilities and work inventory items for the benefit of the Company in accordance with their functions, not for personal interests or those of certain parties outside the Company.
- (3) Maintaining the confidentiality, storage, use and dissemination of employee personal data that is used improperly such as name, home and office contact data, salary, training data, performance records and other data both to internal and external parties.
- (4) Respecting each other, honoring, encouraging enthusiasm and fostering cooperation in carrying out their respective duties and responsibilities.
- (5) Avoiding social activities that cause negative perceptions.

Behavior that must not be displayed by Garuda Indonesia personnel:

- (1) Committing or failing to prevent acts of bullying, harassment, and abusing, including committing immoral acts in the work environment.
- (2) Acting in a manner that could jeopardize the security or disturb the comfort of the workplace, such as: eating and drinking at the work desk, throwing garbage out of place, and being drunk in the workplace.
- (3) Conducting buying and selling transactions in the workplace for personal interests including but not limited to carrying personal goods, entrusted goods, merchandise and / or goods belonging to others when carrying out services with the aim of obtaining personal gain and / or the benefit of other parties.
- (4) Violating the provisions of attendance/absence, the provisions of dressing work uniforms and its complementary equipment, and the use of identification.
- (5) Bringing firearms/sharp or dangerous weapons into the company environment except those authorized to carry them.
- (6) Behaving inappropriately as an employee, uttering foul language, behaving disrespectfully both towards superiors and fellow employees in the work environment.

X.1.2 Occupational Health and Safety

Behavior that must be displayed by Garuda Indonesia personnel:

- (1) Complying with national and international laws and regulations regarding Occupational Safety and Health that are used as references by the Company.
- (2) Creating and maintaining a safe working environment and preventing accidents in the workplace, through:
 - (a) Use of various work equipment and supplies in accordance with the demands of the occupational safety and health system.
 - (b) Maintaining and caring for safety equipment and supplies that are company inventory items.
 - (c) Reporting to the authorities on any incident that has the potential to cause a work accident (hazard).
- (3) Maintaining health and fitness and carrying out medical examinations in accordance with work requirements.

Behavior that must not be displayed by Garuda Indonesia personnel:

- (1) Disobeying procedures in performing work that has a direct impact on flight safety.
- (2) Gambling, drunkenness, drinking intoxicating liquors in the Company's work environment.
- (3) Smoking in the workspace (air-conditioned and enclosed spaces).
- (4) Working in poor or unhealthy conditions.
- (5) Joking or not concentrating when performing high-risk work.
- (6) Performing work that is not in accordance with his/her function and position and/or not requested by the supervisor/company.
- (7) Refusing examination, treatment and care as well as other health protection efforts deemed necessary by the Company and not contrary to the CLA and the law.
- (8) Unwilling to undergo medical examinations related to the prevention and control of drug/psychotropic use.
- (9) Acts committed in relation to Narcotics, Psychotropic and Addictive Substances (NAPZA) without the knowledge and supervision of a doctor such as being an addict, user, producer, dealer and/or assisting in the distribution of drugs.
- (10) Committing immoral acts, intentionally or with his/her consent becoming an object or model containing pornographic or pornographic content both within the Company and outside the Company which such acts may have an impact on the damage to the good name of the Company.

X.1.3 Providing Employees with Equal Opportunities for Employment, Promotion, and Dismissal

Behavior that must be displayed by Garuda Indonesia personnel:

- (1) Respecting management's decisions on employee transfers, promotions and demotions.
- (2) Respecting employees who experience transfers, promotions or demotions.
- (3) Providing equal opportunities to all employees in terms of the need for transfers and promotions on the condition that they meet the competencies and capabilities in accordance with the needs and provisions applicable in the Company.

- (4) Accepting employees with more competence to be prioritized for development opportunities.
- (5) Continuously improving competence both through company programs and self learning.

Behavior that must not be displayed by Garuda Indonesia personnel:

- (1) Obstructing/preventing other employees from transferring or being promoted.
- (2) Discriminating against employees in order to gain priority for transfer or promotion, outside of competency reasons.
- (3) Conducting office politics for transfer or promotion.
- (4) Refusing/ignoring assignments that are not in conflict with the company manual, CLA or law.
- (5) Superiors do not foster and guide subordinates in carrying out their duties and/or do not develop their careers.

X.1.4 Conducive Working Environment

Behavior that must be displayed by Garuda Indonesia personnel:

- (1) Building communication and coordination to create a solid work team.
- (2) Giving awards/appreciation for the success achieved by their coworkers.
- (3) Helping each other and reminding fellow coworkers to always work innovatively and goal-oriented.
- (4) Providing moral support to fellow coworkers who are experiencing problems / disasters.
- (5) Leadership staff provide clear and understandable directions and assignments in order to achieve predetermined targets and provide objective assessments of performance achievements.
- (6) Leadership staff and employees strive to foster positive and productive cooperation, mutual acceptance and respect based on sincerity and good faith.
- (7) Leadership staff act as role models, mentors and are responsible for the behavior and performance of staff in their ranks.
- (8) Employees must comply with the orders and/or directions of the Leadership Staff for the benefit of the company (such as overtime work, assignments, business trips and others) as long as they do not conflict with ethics, morals and religion.
- (9) Employees are obliged to report to the Leadership Staff on events that have the potential to harm or damage the company's image.
- (10) Providing equal opportunities to employees to obtain employment, promotion, and dismissal.
- (11) Employees must maintain the good name of the Company by not submitting information and/or responses about the Company that may cause a negative image of the Company.

Behavior that must not be displayed by Garuda Indonesia personnel:

- (1) Defaming a coworker.

- (2) Gossiping or talking about things that are not certain to be true.
- (3) Discriminating against a coworker using racial and ethnic issues.
- (4) Disrespecting a coworker
- (5) Quarreling with fellow coworkers
- (6) Persecuting or intimidating fellow coworkers
- (7) Committing sexual harassment against fellow coworkers
- (8) Employee reports his/her performance not in accordance with the facts
- (9) A Leadership Staff member does not convey information about the progress of Garuda Indonesia's performance and other important information to a Staff member.

- (10) A Leadership Staff member conveys incorrect information regarding the development of Garuda Indonesia's performance and other important information to Employees.
- (11) A Leadership Staff member reveals the shortcomings of one Staff member to another Staff member.
- (12) An employee reveals the shortcomings of a Leadership Staff to a fellow coworker or to another Leadership Staff member.
- (13) A Leadership Staff member gives correction or direction to an Employee in an unwise manner.
- (14) Performing work that is not his/her duty which may endanger or harm the Company or which is suspected of endangering himself/herself without a written order from a superior.
- (15) Committing acts of corruption as regulated by the Anti-Corruption Law.
- (16) Committing fraud, theft, embezzlement, forgery, extortion and/or seizure of goods and/or money belonging to fellow coworkers and/or the Company.
- (17) Obstructing employees who report suspected acts of corruption.

X.1.5 Right of Association and Politics

Behavior that must be displayed by Garuda Indonesia personnel:

- (1) Always prioritizing the interests of the Company.
- (2) In carrying out union and political activities, one must still consider and even improve the Company's performance.
- (3) In forming and joining trade unions, professional associations, both internal and external, non-governmental organizations, socio-economic organizations, and social organizations, one must notify the Company of his/her membership through his/her immediate superior.
- (4) In participating and channeling political aspirations must comply with all applicable provisions and regulations in the company.

Behavior that must not be displayed by Garuda Indonesia personnel:

- (1) Becoming an organizer of a political party.
- (2) Utilizing company facilities and resources for political activities.

- (3) Speaking on behalf of the Company or making contributions on behalf of Garuda Indonesia to political parties.
- (4) Becoming a candidate for the Legislative, Executive and Judicial branches.

X.2 Relationship with Customers

Behavior that must be displayed by Garuda Indonesia personnel:

- (1) Fulfilling all published commitments to customers.
- (2) Providing optimal service without discriminating against ethnicity, religion, race, skin color and social status.
- (3) Providing easy access to bookings and transactions for the company's flight services.
- (4) Providing convenience and comfort for customers in flight readiness reporting services.
- (5) Fulfilling the accuracy of customer flight schedules
- (6) Protecting the safety, security and comfort of passengers while on board the aircraft.
- (7) Ensuring passengers and their luggage are safe.
- (8) Ensuring the accuracy and completeness of customer freight transportation services.
- (9) Maintaining the confidentiality of information about customers.
- (10) Providing relevant and accurate information to customers regarding Garuda Indonesia services.
- (11) Handling customer complaints by providing the best solution.
- (12) Thanking customers for their suggestions and criticisms.
- (13) Fostering good relationships with customers
- (14) Utilizing and managing customer feedback.

Behavior that must not be displayed by Garuda Indonesia personnel:

- (1) Utilizing important information about customers for personal gain.
- (2) Making customers without clear and accurate information.
- (3) Failing to respond to problems faced by customers.
- (4) Not reporting the receipt of gratuities either directly or indirectly from customers in accordance with the applicable provisions in the Company
- (5) Receiving gratuities from customers.
- (6) Sacrificing the interests of customers in favor of personal interests, family and coworkers.
- (7) Behaving inappropriately, unprofessionally, uttering foul language, behaving disrespectfully towards customers.
- (8) Misusing Company facilities such as selling and/or transferring them to customers.
- (9) Working with disregard for the applicable work procedures that have an impact on material and immaterial losses for complaints submitted by customers.
- (10) Conducting joint activities with customers with the aim of personal gain or other parties, which directly or indirectly harms the Company.

X.3 Relationship with Partners

X.3.1 Relationship with Airport Authorities

Behavior that must be displayed by Garuda Indonesia personnel:

- (1) Providing accurate data and information on specifications, technical and other requirements set by the Airport Authority in accordance with applicable regulations.
- (2) Building and fostering a harmonious relationship with the Airport Authority.
- (3) Obeying and fulfilling all rules and regulations set by the Airport Authority.

Behavior that must not be displayed by Garuda Indonesia personnel:

- (1) Violating the rules and regulations set forth by the Airport Authority.
- (2) Giving gratuities to airport-related parties, either directly or indirectly, that may influence the Airport Authority to take an action that is contrary to its obligations or not to take an action that is its obligation, even if the gratuity is given for the benefit of Garuda Indonesia.
- (3) Providing Garuda Indonesia with data, information and documents required by the Airport Authority in an incomplete or inaccurate manner and not in accordance with the applicable provisions of the Company.
- (4) Behaving inappropriately, unprofessionally, uttering foul language, behaving in an impolite manner.

X.3.2 Relationship with Suppliers

Behavior that must be displayed by Garuda Indonesia personnel:

- (1) Providing accurate data and information on the specifications of goods and services and other requirements stipulated in accordance with the stages of the procurement process.
- (2) The selection of suppliers must be carried out in an open manner for Goods and Services Providers that meet the requirements and conducted through fair competition among equal Goods and Services Providers that meet certain requirements/criteria based on the stipulated provisions.
- (3) Providing equal treatment and opportunities to producers, both micro, small, and medium enterprises and cooperatives, including subsidiaries, as suppliers as long as the quality, price, and purpose can be accounted for.
- (4) Conducting the procurement process in a Professional and Independent manner and in accordance with applicable procurement regulations and GCG principles.
- (5) Avoiding conflicts of interest and prohibiting directing to suppliers whose owners and/or management are affiliated with Garuda Indonesia.

Behavior that must not be displayed by Garuda Indonesia personnel:

- (1) Not reporting the receipt of direct or indirect gratuities from suppliers in accordance with the applicable provisions of the Company.
- (2) Accepting gratuities from suppliers
- (3) Providing confidential company data and/or information, as well as "personal data" to suppliers.

- (4) Communicating with any or all bidders other than those specified by Garuda Indonesia.
- (5) Disclosing supplier data or information to other suppliers.
- (6) Obstructing the supplier's rights fulfillment process.
- (7) Making unauthorized/unlawful levies in any form whatsoever for the purpose of obtaining personal or other party benefits.
- (8) Behaving inappropriately, unprofessionally, uttering foul language, behaving disrespectfully.

X.3.3 Relationship with Agents

Behavior that must be displayed by Garuda Indonesia personnel:

- (1) Providing equal access and disclosure of data and information to agents.
- (2) Maintaining the confidentiality of confidential corporate data and/or information as well as "personal data" to agents.
- (3) Avoiding conflicts of interest and prohibiting directing to agents whose owners and/or management are affiliated with Garuda Indonesia.
- (4) Fostering good relationships with agents in order to increase the Company's revenue.

Behavior that must not be displayed by Garuda Indonesia personnel:

- (1) Selecting agents without regard to the criteria and procedures established by the Company.
- (2) Failing to report the receipt of direct or indirect gratuities from agents in accordance with the Company's regulations.
- (3) Receiving gratuities from agents
- (4) Providing confidential company data and/or information, as well as "personal data" to agents.
- (5) Communicating with any or all agents other than those stipulated by the Company.
- (6) Disclosing agent data or information to other agents.
- (7) Obstructing the process of fulfilling the agent's rights.
- (8) Making unauthorized/unlawful levies in any form whatsoever to agents in order to obtain personal or other parties' benefits.
- (9) Conducting joint activities with superiors, peers, subordinates or other parties in order to maintain good relations with agents but with a detrimental impact on the Company either directly or indirectly.
- (10) Behaving inappropriately, unprofessionally, using profanity, or behaving in a disrespectful manner.

X.4 Relationship with Shareholders

Behavior that must be displayed by Garuda Indonesia personnel:

- (1) Fulfilling the right of every Shareholder to receive fair and reasonable treatment in accordance with the laws and regulations.

- (2) Fulfilling the right of every Shareholder to vote in accordance with the classification and number of shares held.
- (3) Providing each Shareholder with complete and accurate material information regarding Garuda Indonesia, through various available channels.
- (4) Ensuring open share sale and purchase transactions in accordance with the prevailing market mechanism.
- (5) Protecting the rights of minority Shareholders against the dominance of majority Shareholders.
- (6) Ensuring the achievement of optimal performance and building Garuda Indonesia's image in order to provide added value to Shareholders.
- (7) Ensuring that any reporting, statements and disclosures of information to investors must be transparent, clear, accurate, complete and not contain any matters that could be misinterpreted, except for information that the Board of Directors has a justifiable reason not to provide;
- (8) Ensuring that the determination of dividends is decided by the shareholders in the General Meeting of Shareholders, based on the interests of Garuda Indonesia, taking into account various matters such as business continuity, strategies that will be and are being implemented and investment plans.

Behavior that must not be displayed by Garuda Indonesia personnel:

- (1) Allowing Shareholders to intervene in the Company's operational activities which are the responsibility of the Board of Directors in accordance with the provisions of Garuda Indonesia's Articles of Association and prevailing laws and regulations.
- (2) Disseminating inaccurate or incomplete Garuda Indonesia information or data required by Shareholders.
- (3) Violating regulations issued by the OJK, and the Indonesia Stock Exchange.
- (4) Buying/selling Garuda Indonesia securities or securities of companies that have transactions with Garuda Indonesia that are conducted by insiders (insider trading).
- (5) Influencing others to buy or sell Garuda Indonesia securities
- (6) Providing inside information to any party who is reasonably suspected of using such information to buy or sell securities (this is referred to as inside information)
- (7) Engaging in buying and selling Garuda Indonesia securities among Garuda Indonesia employees.

X.5 Relationship with Competitors

Behavior that must be displayed by Garuda Indonesia personnel:

- (1) Building a market that is open for trade and investment.
- (2) Encouraging fair and socially beneficial competition and respectful behavior among competitors.
- (3) Respecting the copyrights and intellectual works of competitors
- (4) Complying with applicable laws and regulations, especially on the prohibition of monopoly and unfair business competition.

Behavior that must not be displayed by Garuda Indonesia personnel:

- (1) Winning the competition through unethical or illegal means.
- (2) Colluding in the procurement of goods and services.
- (3) Making unfair or fraudulent payments just to win a competition.
- (4) Using dishonest/illegal or unethical means to obtain commercial information from competitors.
- (5) Conducting "Black Campaign" against competitors.
- (6) Performing actions that are illegal and prohibited under the provisions of the Business Competition Law.
- (7) Discriminating against other business actors.
- (8) Conducting conspiracies in the form of cartels and fixing production cost components and fixing prices jointly.

X.6 Relationship with Creditors

Behavior that must be displayed by Garuda Indonesia personnel:

- (1) Committed to providing the best efforts to fulfill obligations and conditions under the loan agreements
- (2) Implementing the funding strategy since the creditor onboarding process, the negotiation process and the implementation of the loan agreement provisions based on good faith while adhering to good corporate governance and the principle of prudence
- (3) Establishing good communication and relationships with creditors in the implementation of loan agreements based on good corporate governance and prudential principles
- (4) Providing disclosure of information in the implementation of funding strategies to creditors with the principle of prudence and based on information that can be accounted for.

Behavior that must not be displayed by Garuda Indonesia personnel:

- (1) Not making maximum efforts to fulfill obligations and conditions under the loan agreement.
- (2) Implementing funding strategies from the creditor onboarding process, the negotiation process or the implementation of the loan agreement provisions without being based on good faith and without being guided by good corporate governance.
- (3) Having poor relationships and communication with creditors.
- (4) Ignoring the precautionary principle in information disclosure, by providing misleading information and information that cannot be accounted for to creditors.

X.7 Transparency of Communication and Financial Information

Behavior that must be displayed by Garuda Indonesia personnel:

- (1) Disclosing corporate information prudently and in accordance with one's authority.

- (2) Valuing and upholding honesty, sincerity, and openness while taking into account the precautionary principle.
- (3) Complying with financial information disclosure standards that have been regulated in the applicable laws and regulations.
- (4) Always providing complete, fair, accurate, timely and understandable information in the form of reports and documents archived by Garuda Indonesia, or submitted to stakeholders.
- (5) Making financial information a means of controlling activities.
- (6) Reporting any information that has a significant impact on the Company's image and reputation to immediate superiors or authorized work units.
- (7) Always maintaining the distribution of material company information from potential leakage.

Behavior that must not be displayed by Garuda Indonesia personnel:

- (1) Giving opinions through various forums, print, electronic or other information technology media regarding the Company's performance and prospects to external parties, other than those designated by the Company.
- (2) Discussing information that has an important impact on the Company, other than information that has been officially released by the Company, with spouses, relatives, and other unauthorized parties.
- (3) Conveying misleading information.
- (4) Discussing sensitive matters relating to Garuda Indonesia in the Public Area.

X.8 Handling Conflict of Interest

Behavior that must be displayed by Garuda Indonesia personnel:

- (1) Always maintaining personal integrity to ensure that the image of the profession and Garuda Indonesia is well maintained.
- (2) Reporting any business activity or relationship that may give rise to a potential conflict of interest through the Company's conflict of interest handling mechanism.
- (3) Avoiding actions or relationships that could lead to a conflict of interest with one's work or the interests of Garuda Indonesia;
- (4) Obtaining approval from one's immediate superior before accepting a position as an officer on the board of a non-governmental organization with which Garuda Indonesia may have a business relationship or expect to receive financial or other assistance from Garuda Indonesia;
- (5) The Board of Directors and Board of Commissioners must make an annual declaration regarding conflicts of interest.

Behavior that must not be displayed by Garuda Indonesia personnel:

- (1) Utilizing corporate resources, corporate information, intellectual property, Garuda Indonesia's time and facilities including office equipment such as telephones, facsimiles, emails, computers, etc. for personal or group interests.

- (2) Engaging in business or part-time work outside the Company, which Garuda Indonesia personnel may be encouraged to do during active working hours at Garuda Indonesia or using Garuda Indonesia equipment or materials;
- (3) Utilizing business opportunities with all partners that are related to the Company's business for personal gain.
- (4) Accepting anything in any form from a third party that has a business relationship with Garuda Indonesia.
- (5) Abusing one's authority and position in various business activities of the Company for personal or group interests.
- (6) Allowing Garuda Indonesia personnel with conflicts of interest to participate in discussions and decision-making processes;
- (7) Transacting in the shares of another company, even though the Garuda Indonesia personnel is in contact with that company in the course of his/her work;
- (8) Having a special preference in hiring or making promotion decisions regarding one's wife, family or close friends;
- (9) Abusing one's authority and position to the detriment of the Company for personal or other party's benefit.
- (10) Being an employee or working for another company with the same core business or the same type of business as the Company and directly harming the Company.
- (11) Directly or indirectly having equity participation in other companies whose business activities are within the scope of his/her authority and can determine the implementation or course of the Company's policies and harm the Company either directly or indirectly.

X.9 Giving and Receiving Gratuities

Behavior that must be displayed by Garuda Indonesia personnel:

- (1) Rejecting gratuities given in any form from third parties in connection with the position of Garuda Indonesia personnel.
- (2) In giving gratuities on behalf of Garuda Indonesia, Garuda Indonesia personnel must refer to the Company's policies and ensure that such gratuities do not conflict with the obligations, duties and functions of the position and are not directed to state officials.
- (3) In making donations on behalf of the Company for social purposes or for other purposes that do not conflict with the prevailing laws and regulations, one must refer to the Company's policies.
- (4) Making a disclosure report on each acceptance, rejection, and / or provision of gratuities in accordance with the procedures established by the company.

Behavior that must not be displayed by Garuda Indonesia personnel:

- (1) Offering or directing others to provide gratuities.
- (2) Accepting any form of gratification from any party.
- (3) Giving gratuities to a third party, either directly or indirectly, that may influence the recipient of the gratuity to take an action that is contrary to his or her obligations, even if the gift is made for the benefit of Garuda Indonesia.

- (4) Making donations with hidden interests or motives that are intended to (negatively) influence other parties and/or could lead to conflicts of interest.
- (5) Accepting money or its equivalent, a gift or a gift in a particular form or format, where it is known or reasonably suspected that the gift is given in relation to the work or position of the Garuda Indonesia personnel concerned. The prohibition on receiving money or its equivalent is excluded if it is given within the bounds of reasonableness/appropriateness in the context of donations in the event of a disaster and/or certain celebrations/events according to local customs.
- (6) Receiving gratuities from third parties in connection with one's position and failing to report such receipt in accordance with the procedures set forth by the Company.

X.10 Protection of Company Assets

Behavior that must be displayed by Garuda Indonesia personnel:

- (1) Adhering to generally accepted accounting and reporting standards in recording and reporting the company's assets.
- (2) Using, managing, and maintaining the company's asset documents and assets optimally, effectively, and efficiently to achieve the company's objectives;
- (3) All physical, financial and other company assets must be protected from unauthorized uses such as embezzlement and fraud;
- (4) Optimizing the company's intangible assets by conducting appropriate knowledge management in order to increase the company's capabilities.
- (5) Using the Company's assets only for the benefit of the Company and preventing assets from abuse of authority and/or collusion by personnel or groups, to other parties that may cause losses to the Company;
- (6) Implementing an effective and efficient control process over the use of company assets to avoid losses that may occur;
- (7) Reporting indications or occurrences of fraud within the company early, to direct superiors or through the Company's Whistle Blowing System mechanism or parties that have been appointed by the Board of Directors.
- (8) Be actively involved in the supervision of the Company's assets by reporting any indication of misuse of the Company's assets by any other party to the Company.

Behavior that must not be displayed by Garuda Indonesia personnel:

- (1) Use of Company assets other than for the benefit of the Company;
- (2) Excessive use of physical assets or other resources, unauthorized transfer or write-offs;
- (3) Producing a new product or service without registering the Intellectual Property Rights in accordance with the provisions on copyrights, trademarks, patents and other rights.
- (4) Not reporting the results of inventions related to the Company's business and produced during working hours or outside working hours.
- (5) Using the Company's inventory for personal use without written authorization from the Company.

- (6) Carelessly or intentionally committing acts that may damage the Company's assets which may cause losses to the Company.
- (7) Unlawfully possessing, misusing, giving, selling, mortgaging, pledging, granting, leasing, lending goods, money, securities belonging to the Company and/or Third Parties that are being controlled by the Company.

X.11 Anti-Bribery and Anti-Corruption

Behavior that must be displayed by Garuda Indonesia personnel:

- (1) Not making payments, either directly or indirectly through third parties, if knowing or believing that such payments are likely to be used to influence government officials or other individuals in decision-making.
- (2) Reporting any potential bribery that occurs through the applicable reporting media in the Company.
- (3) Complying with applicable anti-corruption and anti-bribery laws and conventions in each country where the Company has business activities.
- (4) Conducting risk-based anti-bribery due diligence to third parties who will cooperate with the Company.

Behavior that must not be displayed by Garuda Indonesia personnel:

- (1) Offering, promising, or giving any form of payment to government officials or other third parties, in violation of the law, for the purpose of obtaining a business advantage.
- (2) Instructing, authorizing, or allowing third parties to make prohibited payments on behalf of the Company.

X.12 Protection of Company Confidentiality

Behaviors that must be displayed by Garuda Indonesia personnel:

- (1) Protecting confidential corporate data, information and documents;
- (2) Using confidential corporate data, information and documents in accordance with the limits of authority that have been set.
- (3) Reporting immediately to the Chairman when they become aware of any misuse of confidential corporate data, information and documents.
- (4) Protecting the interests of Shareholders who are potentially harmed by insider trading.
- (5) Maintaining the confidentiality of other companies' information and complying with all laws and regulations relating to information confidentiality;
- (6) Efforts to collect information from other companies in the context of carrying out work that is the scope of work must be carried out with the knowledge of the immediate superior or the Corporate Secretary Work Unit;
- (7) Contacting the Corporate Secretary Unit if there is any doubt or problem that arises in relation to information or the confidentiality of Garuda Indonesia information.

Behavior that must not be displayed by Garuda Indonesia personnel:

- (1) Disclosing orally or in writing all Garuda Indonesia data, information and documents that are confidential outside of one's duties, responsibilities and authority, including disclosing material information that could affect the Company.
- (2) Accessing, duplicating, reproducing data or information and corporate documents of a confidential nature directly or indirectly, except in the course of performing duties and work for the company.
- (3) Storing confidential company data, information and documents on a personal computer or other media that does not belong to Garuda Indonesia with the intention of unlawfully disseminating it, unless otherwise specified and/or authorized by a direct superior.
- (4) Discussing "material information" regarding the Company with anyone. This prohibition includes husbands or wives, colleagues at home, relatives, relatives of colleagues at home, brokers and other Garuda Indonesia personnel (except colleagues within Garuda Indonesia who need to know about such matters);
- (5) Transacting in the Company's shares if he/she is in possession of information that may affect the price of Garuda Indonesia's shares;
- (6) Using confidential company information in an unauthorized or unlawful manner or providing confidential company documents to external parties without the knowledge of the Corporate Secretary Unit;
- (7) Taking confidential information before leaving the company. All documents that have been created by the Garuda Indonesia personnel concerned during the course of their work in the work environment become the full property of the Company. Before leaving the Company, Garuda Indonesia personnel are not permitted to take any documents with them unless they are required for the performance of work outside the Company.
- (8) Unauthorized collection of external information, such as spying, stealing information, or by falsifying one's identity;
- (9) Falsifying one's identity or using the name of Garuda Indonesia to obtain confidential information from another company;
- (10) Leaking and utilizing the Company's secrets and/or documents known due to one's position for personal or other party's interests that may harm the Company, except for matters related to corruption.

X.13 Protection of Intellectual Property

Behavior that must be displayed by Garuda Indonesia personnel:

- (1) Knowing the obligations regarding the ownership and confidentiality of Garuda Indonesia's intellectual property;
- (2) Actively participating in the protection of Garuda Indonesia's intellectual property rights or those of others;
- (3) Informing Garuda Indonesia of any work he/she produces that is related to Garuda Indonesia's business or operations, both during and outside working hours, and whether or not it uses Garuda Indonesia's facilities and data/information in the production process;

- (4) Reporting to the legal unit in charge of the Company if he/she becomes aware of any party using Garuda Indonesia's intellectual property rights without consent or without rights.

Behavior that must not be displayed by Garuda Indonesia personnel:

- (1) Using illegal products that violate laws and regulations.
- (2) Committing violations, misuse, or actions that are prohibited under the laws and regulations regarding intellectual property rights.

X.14 Responsibilities to Communities

Behavior that must be displayed by Garuda Indonesia personnel:

- (1) Always upholding the commitment that, wherever the work unit operates, good relations and the development of the surrounding communities are fundamental to the long-term success of Garuda Indonesia.
- (2) Valuing any partnership activity that contributes to the community and enhances the social value and image of Garuda Indonesia;
- (3) Building and fostering harmonious relationships that benefit the community.
- (4) Assisting communities affected by calamities and natural disasters.
- (5) Being sincere and responsible when carrying out community social responsibilities.
- (6) Participating in building dignity in accordance with the social and cultural conditions of the local community.
- (7) Being a role model for the citizens of the surrounding community.

Behavior that must not be displayed by Garuda Indonesia personnel:

- (1) Being insensitive to the problems experienced by the communities surrounding the Company's operations.
- (2) Taking advantage of personal interests when carrying out the task of distributing relief funds for victims of calamities and disasters.
- (3) Engaging in social activities that could create a negative public perception and/or raise suspicions about the source of wealth of Garuda Indonesia personnel.
- (4) Excessively displaying luxurious lifestyles and/or ownership of luxury goods on social media.

X.15 Responsibilities of the Government

Behavior that must be displayed by Garuda Indonesia personnel:

- (1) Complying with and fulfilling all applicable laws and regulations.
- (2) Establishing harmonious, transparent and constructive relationships with Government Agencies.
- (3) Supporting and succeeding the Government's programs, especially in the fields of tourism, culture, education and social affairs.

Behavior that must not be displayed by Garuda Indonesia personnel:

- (1) Failing to comply with the prevailing laws and regulations, including but not limited to laws and regulations related to the prohibition of gifts and other grants to Government Officials/State Officials.
- (2) Providing Garuda Indonesia data, information and documents required by the Government in an incomplete or inaccurate manner, and not in accordance with the applicable provisions of the Company.

X.16 Responsibilities to Environment

Behavior that must be displayed by Garuda Indonesia personnel:

- (1) Operating production equipment in accordance with procedures that do not conflict with environmental laws and regulations, especially exhaust emissions and noise.
- (2) Taking responsibility for and actively participating in environmental conservation programs at both national and international levels.
- (3) Pursuing various creativity to produce services and services that provide added value to the economy and business ecosystem.

Behavior that must not be displayed by Garuda Indonesia personnel:

- (1) Failure to perform regular maintenance on the production equipment used and the resulting increase in noise.
- (2) In carrying out work, causing direct or indirect damage to the environment.



Garuda Indonesia



LEMBAR PENGESAHAN PEDOMAN ETIKA BISNIS DAN ETIKA KERJA

Dengan rahmat Tuhan Yang Maha Esa, pada hari ini, telah ditetapkan Pedoman Etika Bisnis dan Etika Kerja PT Garuda Indonesia (Persero) Tbk terbitan ke 3.

Pedoman Etika Bisnis dan Etika Kerja berisi hal-hal yang harus ditampilkan dan tidak boleh ditampilkan oleh seluruh Insan Garuda Indonesia dalam beraktivitas dan berhubungan dengan *stakeholder* Perseroan.

Jakarta,
PT GARUDA INDONESIA (PERSERO) Tbk

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Jabatan: Direktur Human Capital

DEWAN KOMISARIS

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Jabatan: Komisaris Utama /
Komisaris Independen

Nama : **Chairal Tanjung**
Jabatan: Komisaris

Nama : **Abdul Rachman**
Jabatan: Komisaris Independen

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