

ANTIBRIBERY AND ANTICORRUPTION POLICY

COMPLIANCE PROGRAM

This Compliance Program on Ethical Business Practices ("Compliance Program") aims to ensure PT Global Plastic Trading and Global Plastic Trading Pty Ltd (GPT) maintains its integrity, and unwavering commitment to the highest standards of business ethics, and full compliance with applicable laws and regulations, including Australian and Indonesian antibribery and anticorruption laws.

This Compliance Program applies to GPT's directors, officers, employees, team and committee members, and third parties, when they are acting on behalf of GPT (collectively "Representatives"). No one within GPT has authority to grant waivers or exceptions with respect to GPT's commitment to complying with all applicable laws and regulations. Regardless of how much difficulty is encountered or pressure faced, no situation can justify wilful violation of the policies articulated in this Compliance Program.

Anticorruption laws prohibit GPT representatives from offering or paying, directly or indirectly, bribes to any employee, official or agent of any government; commercial entity; or individual in connection with GPT's business or activities. A bribe for purposes of this Compliance Program is any money, good, service, or other item of value offered or given to gain improper advantage.

The requirements set forth in the Compliance Program apply to GPT activities across the globe. While readers may initially focus on how the Compliance Program prohibits improper payments outside of Australia, it is imperative to remain vigilant in ensuring adherence to the highest standards of business ethics within Australia as well. Australian federal and state laws prohibit improper payments to federal, state and local officials in Australia, and to employees of private parties.

GPT will conduct annual compliance training and implement standard operating procedures (SOPs) to support proper awareness and implementation of the Compliance Program. The SOPs will require that due diligence review occurs before GPT makes payment to third parties, identify staffing responsibility for ensuring the review process has been completed, and establish recordkeeping and other administrative controls necessary for proper documentation and continuing oversight of the payments.

