




**Corporate Social Responsibility
Policies**

of

**PT Asia Green Real Estate
Jakarta, Indonesia**

(the “Company” or “AGRE”)

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Chapter I

DIVERSITY, INCLUSION & EQUALITY (DE&I)

1 INTRODUCTION

Human capital is the most valuable asset of the Company. The collective sum of the individual differences, life experiences, knowledge, unique capabilities, talents, innovativeness and self-expressions, that employees bring to the workplace represents significant part of Company's culture, forms its reputation and substantially contributes to its success. The Company is committed to ensuring a diverse, inclusive and equitable workplace.

2 SCOPE OF THE POLICY

- 2.1 The Policy at hand sets forth basic principles aimed at creation, promotion, and maintenance of the workplace diversity and fostering a culture of equality and inclusion across all aspects of Company's business operations in Indonesia.
- 2.2 The Company is committed to establishing a strong team consisting of individuals with diverse and unique skills, values, educational and professional backgrounds and of various age groups, and to ensure equal and respectful treatment of each of the team members at all times. The Company believes that diversity in the workplace conjunct with appreciation and fairness of treatment of all team members irrespective of personal attributes and characteristics substantially contributes to achievement of its business objectives and attainment of the sustainable business results.
- 2.3 "Diversity" in this Policy refers to all the characteristics that make individuals different from each other. They may include, but are not limited to attributes or characteristics such as religion, ethnicity, language, gender, ability, disability, age, competencies, and skill levels.

- 2.4 “Inclusion & Equality” implies that employees feel included and appreciated and have equal development opportunities within the organisation irrespective of their individual attributes and characteristics. The Company is committed to promotion of inclusion and to elimination of any barriers or obstacles that may arise due to employee’s characteristics pertaining to gender, age, ethnic background, religion, family / marital status, or physical ability / disability. The Company promotes the system of values and implements initiatives that aim to ensure that each individual is treated equally and with dignity and respect.

3 ROLES AND RESPONSIBILITIES

- 3.1 This Policy applies to all direct employees, partners, managing and non-managing board members and consultants involved in Company’s business operations in Indonesia (further referred to as “Company Associates” or “Associates”), who individually and collectively shall adhere to the present Policy at all times and to collaborate with the Company in its endeavours to foster, cultivate and preserve the culture of diversity, equity and inclusion.

- 3.2 The following initiatives aimed at promotion and protection of Company’s commitment to DE&I are applicable to all Associates at all times:

- Respectful communication and cooperation;
- Teamwork and participation allowing for representation of various groups and perspectives;
- Continuous support in promotion and encouragement of a diverse, inclusive and equitable workplace drawing on the differing knowledge, perspectives, ways of thinking, experiences and working styles present in our global community;
- Creation an inclusive environment which is respectful of all cultural backgrounds and beliefs across business operations;
- Treating customers, vendors and any other Company’s business partners and stakeholders with respect and dignity at all times;
- Allowing people from diverse backgrounds and possessing various characteristics and attributes to have an equal employment and promotion opportunities within the Company.

- 3.3 The Company is committed to providing equal employment opportunity and fair, i.e. in line with the local market practices, remuneration to each of its Associates. Every employment opportunity offered by the Company is based on business needs and matching individual qualifications and irrespective of personal characteristics pertaining to the gender, race, religion, colour, age, sexual orientation, national origin or ancestry, language, citizenship status or disability of a candidate.
- 3.4 The Company considers gender diversity to be an essential element of its success and commits to ensure gender diversity in its workplace. The Company commits to ensure that men and women are hired at a comparable rate, paid evenly for equal work or work of equal value, and are provided with equal opportunities for promotions.
- 3.5 The Company is committed to treating every individual, in every recruitment and employment process with respect, dignity, and in accordance with the highest local and international hiring and employment standards and laws.
- 3.6 Company Associates bear responsibility of treating each other with dignity and respect at all times and exhibiting conduct that reflects inclusion during work, at work functions on or off the work site, and at all other company-sponsored and participative events.
- 3.7 The Company actively invests into development and well-being of its Associates. It fosters a culture of openness, accountability and professionalism and is committed to continuously improve the way it operates.

4 APPLICABLE PROCEDURES IN CASE OF BREACHES

- 4.1 Identified or alleged breaches of this Policy will be thoroughly investigated by the appointed independent Ethics and Integrity Officer.
- 4.2 Company Associates who believe they have been subjected to any kind of behaviour that conflicts with the present Policy and Company's initiatives should bring up the matter to Company's Ethics and Integrity Officer. Concerns and complaints should be submitted via email associate@alleco.id with the subject AGRE Policy Violation. Concerns or complains may be submitted anonymously or with identification of reporter's details and providing details of the alleged violation, offender, full name of the aggrieved / injured party, time, and place of the violation.
- 4.3 Independently operating Ethics and Integrity Officer will conduct preliminary investigation within no longer than 5 business days upon receipt of the report and submit preliminary assessment including recommendation for appropriate remediation measures to Company's Human Resource Director for consideration and implementation. Disciplinary measures, if deemed appropriate, will be applied in accordance with Company's regulations and applicable international laws and may include termination of employment contact or consultancy agreement. The severity of the disciplinary action will be based upon the circumstances of the infraction.

- 4.4 No employee shall be retaliated against for bringing up a concern or complaint related to breaches of the present Policy.

5 REVIEW OF THE POLICY

The Policy will be reviewed at least once a year by the Legal & Compliance Officer of the Company. Where no update is required, the Policy will be applied consistently over time. Where an update of the Policy is required, the formal approval of the management of AGRE is necessary.

Chapter II

ANTI-HARASSMENT AND ANTI-DISCRIMINATION

1 INTRODUCTION

Any form of discrimination and in particular harassment on the basis of gender, race, language, religion or social standing is a violation of the Article 28G sub (1) and (2) of the Constitution of Republic of Indonesia. The Company is committed to providing work environment that is free of discrimination and harassment and in which all individuals are treated with dignity and respect. The Company maintains zero-tolerance policy regarding any form of discrimination and harassment by or towards any of its Associate.

2 POLICY OBJECTIVES

The Policy has the following objectives:

- To ensure awareness among Company Associates that harassment and discrimination are practices which are not compatible with the responsible business conduct practices applied by the Company and are a violation of the law;
- To set out types of behaviour that may be considered offensive and are strictly prohibited.

3 APPLICABILITY

3.1 The Company is committed to a comprehensive strategy to address harassment and discrimination. The initiatives to ensure adherence to the Policy at hand include:

- Providing trainings to ensure that everyone is aware of their rights and responsibilities;
- Providing an effective and fair complaints procedure;
- Promoting appropriate standards of conduct at all times.

3.2 The Policy prohibits discrimination or harassment on the following grounds:

- Age
- Religion
- Gender
- Sexual orientation

- Family status
- Marital status
- Disability (including mental, physical, developmental or learning disabilities)
- Race
- Language
- Ancestry
- Place of origin
- Ethnic origin
- Citizenship
- Colour
- Association or relationship with a person identified by one of the above grounds.

3.3 Unlawful harassment may take the following forms:

- Verbal conduct, such as derogatory comments, slurs, unwanted sexual invitations or advances;
- Physical conduct, such as unwarranted or offensive touching, impeding or blocking of movement, or assault;
- Visual conduct, such as derogatory or offensive photographs, posters, cards, cartoons, graffiti, drawings or gestures;
- Retaliatory actions for reporting or threatening to report discrimination or harassment;
- Misuse of authority

3.4 Any form of discrimination and / or harassment, stipulated by the provisions 2.2 and 2.3 is strictly prohibited under the present Policy. The lists of grounds for discrimination provided under 2.2 and the forms of harassment under 2.3 are not exhaustive. Regardless of availability on the lists, the reported concerns or complaints will be assessed and subjected to remediation and disciplinary measures if necessary.

3.5 All persons associated with the Company are expected to uphold and abide by this Policy by refraining from any forms of harassment or discrimination and by cooperating fully in any investigation of a harassment or discrimination complaint.

4 APPLICABLE PROCEDURES IN CASE OF BREACHES

- 4.1 Any identified breaches of the present Policy and Company's initiatives should be reported to Company's Ethics and Integrity Officer. Concerns and complaints should be submitted via email to associate@alleco.id with the subject *AGRE Policy Violation*. Reports may be submitted anonymously or with identification of reporter's details and providing details of the alleged violation, offender's name, aggrieved / injured party name, time, and place of the violation.
- 4.2 Independently operating Ethics and Integrity Officer conducts preliminary investigation within no longer than 5 business days upon receipt of the report and submits the assessment including recommendation for the appropriate remediation measures to the Company's Human Resource Director for consideration and implementation. Disciplinary measures, if deemed appropriate, will be applied and may include termination of employment contract or consultancy agreement. The severity of the disciplinary action will be based upon the circumstances of the infraction.
- 4.3 No employee shall be retaliated against for bringing up a complaint of discrimination or harassment.

5 REVIEW OF THE POLICY

The Policy will be reviewed at least once a year by the Legal & Compliance Officer of the Company. Where no update is required, the Policy will be applied consistently over time. Where an update of the Policy is required, the formal approval of the management of AGRE is necessary.

Chapter III

SOCIAL IMPACT AND HUMAN RIGHTS

1. INTRODUCTION

The Company is committed to undertake investment projects, which serve the local community and take into consideration the impact on relevant stakeholders during both construction and operational stages of the investment process. While implementing investment projects in cooperation with the joint-venture partners or independently, the Company is committed to respecting and upholding the fundamental principles of the Universal Declaration of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact's Principles on Human Rights, applicable employment laws of the Republic of Indonesia including frameworks and legislation to protect individual rights, i.e. Law No. 13 of Manpower as amended Law No. 6 of 2023 on the Stipulation of Government Regulation in Lieu of Law No. 2 of 2022 on Job Creation (the "Employment Law") and the effective local government regulations pertaining to minimum remuneration.

2. SCOPE AND APPLICABILITY

- 2.1. This Policy provides a framework, which aims to ensure implementation of Company's approach to social responsibilities, which is consistent with the applicable laws and internationally recognised standards on responsible business conduct and is based on the UN Global Compact principles and OECD Guidelines for Multinational Enterprises.
- 2.2. This Policy applies to Company and its Associates in Indonesia as well as to partially owned subsidiaries and joint ventures, where the Company directly, or indirectly, through the affiliates, holds majority control.

3. ROLES AND RESPONSIBILITIES

- 3.1. The Company has an objective to conduct all business affairs in accordance with the highest business ethics standards, to act as a socially responsible company and as a good corporate citizen. To ensure attainment of these objectives, the Company is committed to implementation of the following initiatives:
 - For construction projects, the Company follows the local government Masterplan for infrastructure (schools, roads, playgrounds and overall community interest) and, if necessary, to accommodate any concerns of the community, conducts counselling sessions surrounding a project during and after completion of the construction works;

- The Company involves tenants and development partners in trainings on actions in case of emergency (drills in case of earth quake, fire events and evacuation procedure) and defines local emergency responsible;
- To ensure well-being and health of the surrounding community, the Company conducts trainings to mitigate the risk of activities negatively impacting comfort and environment, such as waste, noise and traffic management;
- Local employment opportunities are offered to ensure the community benefits financially from the development of the project;
- The Company supports local charity initiatives and conducts community needs assessment (e.g. refurbishment of impacted houses, building of neighbourhood school).

The Company is committed to respecting and supporting the internationally recognized human rights and dignity of the stakeholders within its operations and in communities where it does business. For this purpose, Asia Green Real Estate in Indonesia in cooperation with the joint-venture partners is committed to ensure:

- Availability and adherence to a comprehensive Health and Safety Policy, which is in compliance with the health and safety regulations applicable in Indonesia for all vendors, suppliers, contractors, and/or any other third party engaged in construction and operation of the Company's projects;
- Strict prohibition of the use of forced and child labour;
- Strict prohibition of engaging in human trafficking-related activities;
- Workplace diversity and inclusion (Diversity, Inclusion & Equality chapter);
- Workplace free from any form of discrimination and harassment, malpractice, improper conduct or unethical behaviour (Anti-Discrimination and Anti-Harassment chapter).

The Company is committed to ensure implementation of the initiatives stipulated above and compliance with the international laws and adherence to responsible business conduct practices at all stages of the investment process, i.e. from the pre-investment through to and including construction and operational stages of the investment projects.

4. APPLICABLE DUE DILIGENCE PROCEDURES

- 4.1. Implementation of the construction and rental projects in Indonesia, requires involvement of the local third parties, such as development companies, property management companies, building operators, vendors and various service providers (the "Business Partners"). To ensure compliance with the Policy at hand, prior to entering into business relationship, the Company conducts due diligence of the procedures applied by the prospective Business Partners. For this purpose, prospective Business Partners are required to submit the following documents for review and assessment to Company's Legal & Compliance Officer:

- Health and Safety Policy and implementation statement;
- Enrolment evidence of Social Security System (BPJS Kesehatan & BPJS Ketenagakerjaan);
- Representation, warranties, and undertakings that the prospective Business Partner adheres to the applicable Employment Law of Indonesia at all times;
- (Periodic) evidence of compliance with the applicable Indonesia's Employment Law.

Company's Legal & Compliance Officer conducts an assessment of the submitted documents and evidences and issues recommendation for entering into cooperation with a potential new Business Partner or for continuation of business relationship with the existing one. Asia Green Real Estate in Indonesia is committed to cooperating only with Business Partners whose business conduct standards are compatible with the standards applied by the Company.

The Company is committed to maintaining the highest health and safety standards at all stages of the investment project implementation. Compliance with the Health and Safety Policy maintained by each of the third party provider and other manpower legislation is monitored during periodical on-site meetings with the Business Partners.

4.2. To ensure compliance during the operational phase of the investment project, the Company designates a responsible property manager with a responsibility to conduct the following periodical assessments:

- Review of the investment companies' / subsidiaries' budgets, with focus on remunerations, to ensure that legislative requirements pertaining to applicable minimum wages are adhered to, social security payments are done in full and on time and absence of wage discrimination for equal work or work of equal value. Reviews are conducted on a monthly basis;
- Health and safety inspections on the project sites. Frequency is determined based on the individual characteristics of the project.

Should there be a matter requiring prompt attention of the management, the designated property manager in charge of the abovementioned tasks shall raise attention to Director of the Company.

5. APPLICABLE PROCEDURE IN CASE OF BREACHES

It is a responsibility of any Company Associate to immediately report violations of this Policy as follows:

- Any deviations from the present Policy shall be reported to the Legal & Compliance Officer of the Company either verbally or in writing to the following email address: associate@alleco.id. Concerns or complains shall contain reporter's details, description of the violation including time and place, offender's name, aggrieved/injured party name, associated investment project name and any further relevant details.

- Legal & Compliance Officer conducts an assessment within no later than 5 business days upon receiving of the report and submits preliminary assessment, remediation measures and, if necessary, disciplinary measures to Director of Finance and Compliance.

6. REVIEW OF THE POLICY

The Policy will be reviewed at least once a year by the Legal & Compliance Officer of the Company. Where no update is required, the Policy will be applied consistently over time. Where an update of the Policy is required, the formal approval of the management of AGRE is necessary.

Chapter IV

PERSONAL DATA PROTECTION

1 INTRODUCTION

The Company aims to comply with the requirements of the Law of Republic Indonesia No. 27 of 2022 regarding Personal Data Protection (the "PDP Law") and, if necessary and possible, in absence of the applicable provisions in the PDP Law regarding certain matters of personal data protection, extends applicability to the provisions of the European Union General Data Protection Regulation (the "EU GDPR"). The Policy at hand sets forth the purposes, for which the Company collects, uses, and discloses personal data.

- *"Data-light, Data-tight"* approach is adopted by the Company in managing personal data that it gets hold of as part of its business activities.
- The Company commits to collect data only relevant for business activities conducted by the Company and does not collect personal data without a legitimate business / legal purpose. The Company properly destroys personal data once there is no business / legal purpose for it ("Data-light").
- The Company does not disclose personal data, which it gets hold of as part of its business activities unless prior consent has been obtained ("Data-tight").
- The Company processes personal data, including sensitive personal data, in accordance with the requirements of applicable laws, regulations and guidelines in Indonesia.
- Following the "Think Global, Act Local" approach to data protection / privacy practices, in cases with absence of applicable data protection / privacy laws and regulations, the prevailing standards set out in this Policy shall be adopted as the minimum benchmark for personal data / privacy protection so as to achieve uniformity in practices across the Asia Green Real Estate group of companies.

2 SCOPE AND APPLICABILITY

During the period of employment or engagement as an independent consultant, partner or board member by the Company, the Company will collect personal data for the purposes related to employment with, or services provided to the Company, as well as for evaluative purposes and in order to facilitate the carrying out of duties or provision of services. The following list represents some examples of the purposes, for which personal data may be used and it is not exhaustive:

- Pre-hiring evaluation;
- Recruitment and / or engagement of services;
- Evaluation of performance or services rendered;
- Career management;
- Provision of tools and equipment to facilitate the carrying out of your duties and to enable you to do your job;
- Making arrangements related to business travels, such as bookings of flights, accommodation and processing of expense claims;
- Benefits and compensation and assessment of eligibility thereof, including public and private insurance;
- Cessation of employment or service agreements; transfer of employment within the Asia Green group of companies;
- Appointment as a director or in relation to any other corporate appointments (including authorised signatory or authorised representative for bank accounts, loans/treasury facilities and debt securities programmes for receiving notifications or providing instructions to third parties with whom the Company has a contractual relationship);
- Conducting investigations and proceedings;
- Responding to queries and requests;
- For all internal and external communications related to the business activities of the Company;
- Managing business operations and facilitating business asset transactions;
- Ensuring compliance with the internal policies and procedures of Asia Green group of companies;
- Crime prevention and management of commercial risks;
- Complying with any applicable rules, laws and regulations and the requirements of regulatory authorities or/and protecting and enforcing our contractual and legal rights and obligations.

3 PERSONAL DATA PROCESSING

The Company applies strict controls related to processing of personal data. Personal data is processed only, if and to the extent that at least one of the following circumstances applies:

- Consent for the processing of personal data for one or more specific purposes stipulated in clause 2.1 has been obtained from the affected individual;
- Processing is necessary for the performance of a contract, which an individual is a party to or in order to take steps at the request of the individual prior to entering into a contract;
- Processing is necessary for compliance with legal obligations, which the Company is subject to;
- Processing is necessary in order to protect vital interests of the individual or of a related natural person (e.g., next of kin);
- Processing is necessary for performance of a task carried out in the public interest, (e.g., background check).

Personal data of current (or former) employees, partners, independent consultants and board members that was provided to the Company in the course of recruitment process, appointment or engagement shall be retained only as long as there is a business or legal purpose for it.

4 DISCLOSURE OF PERSONAL DATA

The Company has an obligation to share personal data with the third parties in case it is required by law. The Company may have to disclose personal data on a "need-to-know" basis due to employees' appointment as a director, secretary, authorised signatory or representative to the following third parties:

No.	Disclosure to External Parties	Binding Action
1	Company's subsidiaries and any entities within the Asia Green Real Estate group of companies.	Compliance with Company's Personal Data Protection Policy
2	Third-party service providers, specialist advisers and lenders who are contracted to provide the Company with professional or financial services including not limited to: <ul style="list-style-type: none"> • Insurance Brokers • Insurance Companies • Shares Plan System Administrators • Banks and financial institutions 	Compliance with Company's Personal Data Protection Policy. Adherence to the applicable data protection laws referred to in the third-party service agreements that the Company concludes with them.

3	Any business partner, investor assignee or transferee (actual or prospective) in connection with proposed business transactions (which may extend to any merger, acquisition or sale of assets) involving the Company.	Compliance with applicable data protection legislation in the disclosure or other agreements the Company concludes with the external party.
4	Any regulatory authorities as authorized under applicable laws and regulations.	Processing personal data in the frames of the applicable data protection legislation.

5 STORAGE AND RETENTION OF PERSONAL DATA

Personal data that the Company gets hold of in the frames of its business activities is stored in a combination of secured computer storage facilities and secured physical files. The Company is committed to taking all necessary and appropriate measures to ensure protection of data that it holds from misuse, unauthorized access, modification or disclosure.

The Company retains personal information that it gets hold of in the frames of its business activities only for as long as necessary to fulfil the purposes of business, including for the purpose of satisfying any legal, accounting, or corporate reporting requirements.

6 ACCURACY OF PERSONAL DATA

Employees, partners, independent consultants engaged by the Company and board members are responsible to ensure that important personal details, such as contact details, home address, phone number, email address and emergency contact if applicable is kept up-to-date. Any updates of the personal data shall be provided to the Human Resource Director or the immediate Superior.

7 REVIEW OF THE POLICY

The Policy will be reviewed at least once a year by the Legal & Compliance Officer of the Company. Where no update is required, the Policy will be applied consistently over time. Where an update of the Policy is required, the formal approval of the management of AGRE is necessary.