



Supplier Code of Conduct

Version: 2.0
Last Document Update: February 17th, 2025

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1. Purpose

PT DFI Retail Nusantara Tbk and its subsidiaries ("DFI Nusantara Group") are committed to always providing the best offers and services to its customers at all times. To achieve this, we strive to conduct business in the right way and partner with suppliers who share our values and principles. In this spirit, we aim to build healthy, open, transparent, and mutually beneficial relationships with our supplier partners. We also strive to minimize, control, and reduce the negative impact of our business on the environment and to positively influence the communities where we live and operate. Our success is achieved through strong relationships with supplier partners, other business partners, and customers.

DFI Nusantara Group Code of Conduct ("the Code") outlines our expectations and those of our supplier partners. While we recognize that the legal and cultural environments in which we operate may differ, we remain committed to implementing this Code across all aspects of our operations. Furthermore, we strive to fairly and consistently evaluate performance across the supply chain and actively encourage continuous improvement. We believe that partnerships based on transparency and collaboration foster responsible and sustainable practices, thereby creating a positive impact for future generations.

This Code, and any updates, amendments, or additions to it, are available on the DFI Nusantara Group website at: <https://dfinusantara.co.id/corporate/corporate-governance/>. (This Code of Conduct can be accessed under the "Corporate Governance" section of the website).

2. Scope

Business Ethics and Compliance

- Legal Compliance
Supplier partners must respect and comply with all applicable laws and regulations, including those related to labor, environmental practices, and customs regulations governing the import, export, re-export, and transportation of goods and raw materials. If the standards set forth in this Code are higher than those required by law, the standards in this Code shall prevail.
- Bribery and Corruption
Supplier partners must have policies, codes of conduct, and procedures to prevent any form of bribery, inducement, corruption, and fraud, and must ensure these are enforced.
- Conflict of Interest
Supplier partners must avoid situations where the personal interests of a DFI Nusantara Group team member or their relationship with the supplier partner conflict with that team member's responsibilities and obligations. This includes entering into personal relationships that could or may potentially interfere with the independence, integrity, impartiality, or judgment of a DFI Nusantara Group team member. Should such a situation occur, it must be reported to DFI Nusantara Group. The appropriateness of any personal relationship depends on the circumstances of each case. Suppliers should contact their main DFI Nusantara Group business contact (or DFI Nusantara Group's secure "Speak Up" contact address at speakup@DFIretailgroup.com) to discuss any potential issues.
- Gifts and Entertainment
DFI Nusantara Group has a "No Gift and Entertainment Policy" that supplier partners must adhere to. "Gifts" include cash or cash equivalents, and any form of entertainment, privilege, and hospitality, including vouchers, parcels, travel, accommodation, and invitations to lunches, dinners, sporting events, or concerts.

Supplier partners are prohibited from offering gifts and entertainment to DFI Nusantara Group team members that contravene this policy. Similarly, gifts and entertainment must not be offered to any third party that could influence the supplier partner's business with DFI Nusantara Group (e.g., audit firms and testing laboratories).

- Unfair Business Practices
Supplier partners must not engage in any form of illegal activity or unfair trade practices. Supplier partners must also avoid any anti-competitive conduct (including bid-rigging, price-fixing agreements, or exchanging sensitive information with competitors of DFI Nusantara Group or the supplier partner's

competitors). Supplier partners must not abuse their market power for their own benefit or that of others (including DFI Nusantara Group).

Human Rights and Labor

- Diversity, Dignity, Respect, and Fairness

DFI Nusantara Group's business track record demonstrates a commitment to diversity and inclusion. Therefore, we expect our supplier partners not to tolerate any form of discrimination, arbitrariness, or harassment, either in the workplace or when interacting with others.

Supplier partners must treat their workers, business partners, and DFI team members (regardless of nationality, gender, ethnicity, social and legal status, race, religion, or other protected status) with dignity, respect, and fairness, and must ensure a work environment free from discrimination, arbitrariness, and harassment.

- Child Labor

Supplier partners must not employ children under the age of: (i) 15 years (or 14 years if permitted by national law under ILO Convention 138); or (ii) the local legal minimum age for work or the age for completing compulsory education, whichever is stricter.

Supplier partners must ensure that any worker under the age of [18 years] does not perform overtime, night shifts, or hazardous work, and that their duties are appropriate within the limits set by legal requirements and best practices.

- Forced Labor and Modern Slavery

Supplier partners must not subject their workers to any form of forced, coerced, trafficked, or bonded labor or debt bondage. Workers must have the freedom to move outside normal working hours, except where there is a reasonable safety or security concern that may threaten their health, safety, or welfare. Workers must be recruited ethically and legally, with all recruitment being free from any form of forced labor, slavery, human trafficking, and debt bondage.

- Harsh or Inhumane Treatment and Disciplinary Practices

Supplier partners must not engage in any form of intimidation or inhumane disciplinary practices, including but not limited to physical violence or discipline, threats of physical violence, sexual or other harassment, and verbal abuse.

- Working Hours

Supplier partners must manage and control working hours to comply with local laws regarding the protection of workers' health, safety, and welfare.

Supplier partners must respect and adhere to the permissible weekly working hour standards set by local law, ensuring they do not exceed 48 hours, excluding overtime. Overtime must be voluntary, conducted responsibly, and not requested regularly, taking into consideration the level, frequency, and hours provided by individual workers and the workforce as a whole.

Supplier partners must respect the right of all workers to rest breaks during shifts, to have at least one day off after six consecutive working days, and to national and annual holidays.

- Fair Wages

Supplier partners must commit to paying their workers' wages in accordance with lawful wages (which may also include overtime pay), regularly and on time, and that workers receive all benefits they are entitled to under local law and contractual arrangements, whichever is better. The regular wages paid must meet applicable minimum wage standards and must satisfy the basic needs of the worker and/or their family (also known as a "Living Wage").

All workers must be provided with a written employment contract in a language they understand, which details their wages for the relevant pay period.

Supplier partners must not make unlawful or illegal wage deductions from the perspective of local law.

Supplier partners must communicate this commitment to their own subcontractors, who must be paid accurately and on time. Accurate and complete records of wages and benefits paid to each worker, and any deductions made, must be maintained for at least 12 months or for a longer period if required by local law.

- Health and Safety
Supplier partners must ensure their workers operate in a safe and healthy environment, protected by a robust health and safety management system, while complying with all relevant health and safety legislation and adhering to applicable international standards and industry best practices.
- Accommodation
Supplier partners commit that workers, if provided accommodation, will reside in a place that is safe, clean, hygienic, and habitable, considering their health as well as physical and mental well-being. Workers' freedom of movement within and around (including entering or exiting) such accommodation must not be restricted without reasonable cause.
- Freedom of Association
Supplier partners must recognize and respect workers' rights to form and join trade unions, or otherwise, without interference or fear of retaliation, intimidation, or harassment. Supplier partners must foster a work environment that allows workers to communicate openly and share ideas and concerns with management regarding working conditions and management practices.

Environment and Community

- Respect for the Environment
DFI Nusantara Group conducts business with supplier partners who share our vision and commitment to environmental conservation. Supplier partners must have policies and procedures to manage and minimize their environmental impact. This includes resource consumption, as well as water and air emissions. Furthermore, supplier partners are obligated to comply with all requirements related to the restriction of chemicals, safety labeling, handling, and storage of approved substances, while preventing or minimizing the release of such chemical and hazardous materials.
- Community
DFI Nusantara Group encourages and supports supplier partners who are active in their communities. By investing in infrastructure and creating educational opportunities, we invite leadership and supplier partners to encourage social development in the communities where we work and live.
- Subcontractors
Supplier partners must ensure their subcontractors are aware of and comply with this Code.

Data Protection and Confidentiality

- Confidentiality
Supplier partners must safeguard and protect the confidentiality of all sensitive, proprietary, and confidential information of DFI Nusantara Group ("DFI Confidential Information"). Supplier partners must apply at least the same standards they use to protect their own proprietary and confidential information to protect DFI Confidential Information.

DFI Nusantara Group retains full ownership of DFI Confidential Information, and such confidential information may not be used in any manner other than as expressly agreed or authorized by DFI Nusantara Group.

- Personal Data Protection and Information Security
DFI Nusantara Group recognizes the value and importance of data and information privacy and security. Supplier partners are obliged to maintain the confidentiality and security of DFI Nusantara Group team members' and customers' personal information and comply with legal and contractual requirements regarding the collection, transfer, processing, storage, and disposal of such information.

Supplier partners must also comply with DFI Nusantara Group's information security requirements and always have adequate security controls in place.

Monitoring and Audit

- Audit Rights
DFI Nusantara Group expects its supplier partners to comply with this Code and reserves the right to audit supplier compliance from time to time. If any material non-compliance is found or becomes known, DFI Nusantara Group may terminate its relationship with the supplier.
- Updates
We may unilaterally update or amend the terms of this Code at any time without prior notice to supplier partners. If so, supplier partners will be notified of such changes by uploading the latest version of the Code at the website link listed in paragraph 1 of this document above.

To submit questions or concerns about this Code, including its application in specific circumstances regarding your organization's performance for DFI Nusantara Group, or to report a suspected violation of this Code, please contact your DFI Nusantara Group representative or email our DFI Nusantara Group "Speak Up" address at speakup@DFIretailgroup.com.

3. Closing

Working as one DFI team, our commitment and expectations based on this Code demonstrate how we collaborate with each other, our stores, and our supplier partners:

- o We always put the customer first
- o We care deeply
- o We respect each other
- o We do the right thing