



Ancora Indonesia Resources Code of Conduct

4/23/2010

ANCORA
INDONESIA RESOURCES

The Code of Conduct

At Ancora Indonesia Resources, we firmly believe that ethical business practices, and a win-win mindset, is at the heart of profitable and sustainable business practices

We want to be the pre-eminent natural resources company in Indonesia, and we want to achieve this noble aspiration through practicing ethical and sustainably 'win-win' business practices that reflects who we are, our processes and how we behave

We believe this starts from our vision and philosophy, which defines the essence of who we are and who we will be.

Our vision and philosophy are expressed through the principles and standards of conduct set in the Code of Conduct, which serves as our *conscience* in the way we navigate the daily challenges of professional life.

We ask and expect you to understand and practice the Code of Conduct, and use it as a continual reference in your work.

Dharma Djojonegoro

Meliza Musa

Roger Harkin

Chief Executive Officer

Chief Financial Officer

Chief Marketing Officer

February 2010

AIR vision

“greatest in importance, significance or achievement”

Our vision is to become the pre-eminent natural resources company in Indonesia and create maximum and sustainable shareholder value

Our focus is on maximizing shareholder value

Not short-term oriented, we want sustainable solutions

AIR philosophy

Our Philosophy:

We are defined by our underlying philosophy, which frames and guides every aspect of our business:

- **Great products and services:** We provide exceptional solutions that create value for our customers
- **Great people:** Our human capital is our greatest asset – we inspire and develop exceptional people
- **Performance-oriented culture:** We are a culture that recognizes performance, and places merit and competence above rank and seniority
- **Good corporate governance:** We aspire to and uphold the highest standards of corporate governance
- **Leaders in CSR:** We make a difference in people's lives through our Corporate Social Responsibility program that center on education and empowerment

Everything starts from the vision...

Our vision is to become the pre-eminent natural resources company in Indonesia and create maximum and sustainable shareholder value

- *We want to be pre-eminent.* We want to be the greatest in importance, significance or achievement. AIR is not the place to retire and relax. AIR is all about achievement and how YOUR performance is contributing to that achievement
- *We want to create maximum shareholder value:* We are here to create value for our shareholders – that is our mission in professional life. EVERYTHING we do must be geared towards this goal
- *We want that value to be sustainable:* We want to create sustainable value. We do not want short-lived value. Hence we should always strive to create SUSTAINABLE WIN-WIN solutions for everyone, starting from customers, suppliers, consultants to fellow employees.

Our philosophy: Great products and services

We want to provide exceptional solutions that create value for our customers. We do business fairly, and ethically, so that everyone win – all employees needs to act in an ethical manner that is win-win with our customers

How this philosophy applies to the Code of Conduct:

- We will compete vigorously and relentlessly but honestly, while complying with all relevant laws and regulations

- We expect the same of our suppliers, partners, vendors and aspire to a mutually beneficial relationship

- We are committed to providing our customers with high quality products and services which are marketed truthfully and creates value for our customers

- All advertising, promotions and other public communications will be conducted in line with the principles of honesty, integrity and openness.

- Gifts of money, goods, services or other favours must not be asked or accepted. Small tokens and reasonable hospitality may be accepted provided they do not place you under any obligation and will not be misconstrued. When in doubt, ask your supervisor

Our philosophy : Great people

Our human capital is our greatest asset – we inspire and develop exceptional people: At the holding level AIR will hold very few assets. Our greatest source of value is our people, from our representatives at subsidiaries to each one of us working at the holding level

How this philosophy applies to the Code of Conduct:

- We are committed to developing exceptional people. We are committed to providing our people with timely feedback and guidance to help you develop

- We are committed to making AIR a great place to work. We expect our people to do work that are exciting and inspiring for them and have a good work-life balance. We seek to provide a healthy, safe and clean environment and encourage all employees of all level to be involved and to communicate with each other to constantly improve the workplace

- We remunerate fairly according to skills and performance and with reference to competitive industry and local conditions.

- . We seek out that are people are driven, self-motivated people who are excited to work at AIR

- We recruit people based on character, competence and commitment. We do not and will not discriminate based on age, gender, religion, creed, tribe or background

Our philosophy: Performance-oriented culture

We are a culture that recognizes performance, and places merit and competence above rank and seniority: We want to be a high performing company, and we will accordingly do everything we can to encourage, support and reward high performance

How this philosophy applies to the Code of Conduct:

- We reward and promote purely on the basis of performance and competence.
- We are committed to providing the environment, support and guidance needed to making each of our people high performers
- We are committed to conducting a fair, transparent periodic performance review for all employees
- We will not tolerate poor performance. AIR is NOT the place for poor performers

Our philosophy: Good corporate governance

We aspire to and uphold the highest standards of corporate governance: We are committed to maximum transparency as required of an Indonesian publicly-listed company consistent with good governance and commercial confidentiality

How this philosophy applies to the Code of Conduct:

- We expect all employees of all level to maintain the highest standards of confidentiality. This might include plans to buy or sell businesses, business plans, concepts, research and development, financial information, personnel and employment matters, and other information which is not yet known to the public. These obligations apply to ALL employees, including those who leave the company.

- We communicate openly, directly and accurately with the public. However given we are a public company, we need to be extra careful on disclosing information. Confidential information and any other information not yet disclosed to the public, must not be shared with others outside AIR or used for the personal gain of yourself or others

- We will not tolerate fraud.

- Employees must not have outside commercial interests that conflict with the best interests of AIR and the group. We expect all employees to act only for the benefit of the company

Our philosophy: Leaders in CSR

We make a difference in people's lives through our Corporate Social Responsibility program that center on education and empowerment: As a group, Ancora is committed to contributing to society and Indonesia.

How this philosophy applies to the Code of Conduct:

- We believe that this contribution needs to come through programs geared towards education and empowerment – we do not believe in the sustainability of spoon-feeding.
- While we encourage employees to contribute to our CSR program, either monetarily or otherwise, this is not compulsory. Employees are also free to contribute to other foundations outside Ancora group
- We are always open for ideas on how to further contribute to Indonesia through empowerment and education programs – everyone is welcome to give suggestions

Compliance with Code of Conduct

- We need the support of EVERY employee to uphold our Code of Conduct, in line with our vision and philosophy. Without the active support, compliance and enforcement by each and everyone of you, the Code of Conduct will just be words
- If you know of any genuine suspicions of violation or breaches of these Codes, you should report them to a member of the BOD
- All our policies should be in line with our vision, philosophy and Code of Conduct. If you find that any is not, please speak up and discuss with a member of the BOD
- This is a living document. It should grow and evolve as AIR grows and evolves into becoming a better, bigger, and more mature company. Please feel free to email us your suggestions