



CODE OF BUSINESS ETHICS AND CONDUCT

in Pursuance of
Good Corporate Governance





MESSAGE FROM THE CEO

We aim to be a leader in health and wellness supplements by doing close collaboration with all of our stakeholders to develop, produce and commercialise our products for our consumers. We also seek to foster a positive working environment for our people, where they can excel professionally, and to create a culture that supports innovative, agile thinking and creative decisive actions.

To achieve our goals, we have established guiding values and standards to not only meet our ethical compliance and legal obligations but also to position us for lasting success. Thus, we have established a solid Good Corporate Governance for PT SOHO Global Health Tbk and its subsidiaries (“Company”).

In line to this, we have created our Code of Business Ethics and Conduct (“Code”) which is our guiding principle for our business practices. This Code describes how we put the corporate core values into practice every day. It explains our commitment and expectation towards stakeholders and provides guidance for everyone in the organization and those who works on our behalf.

It contains ethics on key areas or issues that we commonly face. This Code states how we should respond and behave morally on specific areas or issues so that we are confident in making a decision when we face such issues.

Whether you interface with customers and market products, pack, quality test and ship products, develop new molecules, pursue product approvals, or participate in any of a myriad of other roles as we fulfill our purpose and vision, we each must continue to do the right thing in every decision we make, every action we take, every single day.

I encourage you to always refer to this Code on daily basis and when interacting with internal and external stakeholders of the organization. You can also contact the Compliance function on any concerns related to the application of this Code, in particular to help you make any sensitive decisions that may arise in your interactions with customers, co-workers, business partners, resource providers or others.

Together, let us build and maintain the trust of all our stakeholders.

Sincerely,

Rogelio C. La O' Jr.

President Director and Chief Executive Officer

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PURPOSE, VISION AND CORE VALUES

SOHO Global Health has defined its purpose, vision and core values as follows:

PURPOSE

To hold the care of human life as our highest priority

VISION

To be a healthcare leader and the preeminent provider of innovative natural pharmaceutical products.

We are a Company that values the well-being of the community and promotes a healthy lifestyle in a socially responsible way

CORE VALUES



Absolute Integrity

We adhere to the highest standards of ethical behavior within the internal and external business environment. We are committed to be transparent and compliant in all of our processes.



Mutual Respect

We value diversity in team collaboration and nurture sustainable trusting relationships in everything we do.



Passion for Innovation

We enable the innovative spirit and mindset in everything we do to continuously improve. We will embrace creative thinking in developing new products and services, and find better ways to solve problems and to face challenges.



Culture of Discipline

We will embed the culture that requires disciplined people who engage in disciplined thought and then take disciplined action towards achieving Company objectives, and strive for self-discipline to follow its policies and procedures.

INTRODUCTION

What is Code of Business Ethics and Conduct?

To achieve our purpose and vision and meet the requirements of Good Corporate Governance, we need a road map, this Code will be that map. This Code states the SOHO Global Health's commitment to our different stakeholders. It also defines our expectation towards employees and sets the standards for business behavior that apply throughout the Company.

This Code lays out principles on how we respond, behave, and what decisions we should make when we deal with certain issues in our business practices. All of our interactions with the stakeholders: customer, business partners/resource providers, communities, government, and users of the products and services should be conducted in an ethical and proper manner.

Who must follow the Code of Business Ethics and Conduct?

All employees and management of SOHO Global Health are required to comply with and implement this Code of Business Ethics and Conduct, all supporting policies, applicable codes, and laws and regulations. It is the responsibility of every employee to know and follow the Code. By following the Code, will support our commitment to good conduct and controlled framework. It is important to understand that just following the rules is not enough. We all must commit to act with integrity.

Business partners/resource providers who conduct business on our behalf are expected to apply and observe our standards. They also need to update their understanding of this Code by participating in various activities by the Company such as formal trainings, formal discussions, or Question and Answer sessions.



RESPONSIBILITIES

Board of Directors and Management of the Company should ensure that business activities are conducted according to all applicable regulations, as well as the Code of Business Ethics and Conduct. Board of Directors and Management of the Company and all managerial levels who have a responsibility to lead by example. They must be positive role models to inspire others to follow the Code and conduct business according to the highest ethical standards and professional behavior. They are responsible for providing appropriate support to enable their teams to understand the requirements of this Code, relevant supporting policies, laws and regulations, and how they should be applied in practice. They are responsible for creating a speak-up climate that will enable employees to discuss any issues regarding this Code and our business. They must behave in exemplary way that embodies our corporate core values.

All employees must understand and respect the ethics and business conduct prescribed in this Code. We should be aware of our corporate values prescribed in this Code of Business Ethics and Conduct. We should be good examples to others in exercising this Code.

We must also exercise sound judgement in deciding the right actions to take because this Code and our supporting policies do not have a specific guidance that will cover every situation that may arise. We should consult if we are unclear about any aspect of this Code or if we are not sure how to respond to an issue that the Code does not explicitly address. We must also promptly report any known, suspected, or observed violations of laws, regulations, Code of Business Ethics and Conduct, or supporting policies of which we become aware of.



COMMITMENT to SHAREHOLDERS and SOHO GLOBAL HEALTH

We strive to earn the confidence of our shareholders, with the objective of providing them a profitable and sustainable investment. We regularly provide full and transparent information to all shareholders. We maintain an ongoing and constructive dialogue with them through diverse communication channels. We are attentive to their expectations, concerns, and questions on any subject.

Protection of Company Assets and Ownership of Intellectual Property

It is our responsibility to protect all Company assets and equipment from unauthorized and improper use, damage, or loss. These include buildings, vehicles, equipment, tools, supplies and anything that belongs to the Company that are provided by Company to employees. These assets should not be used or taken for employees' personal benefit, nor allow them to be sold, loaned, given away, or disposed of without proper authorization.

It is also our responsibility to maintain all of our assets and equipment so that they function properly. If the equipment we use for work is not working properly, it will decrease our productivity and the efficiency of our work, which will also impact the overall performance of our Company. Therefore, all employees should take care of the assets and equipment provided to them for their work to pursue the objective of our Company.

Our creativity and innovative ideas make significant contributions to our Company's continued success in the marketplace. We must protect and leverage all intellectual property which includes inventions, improvements, ideas, programs, and related documentation and proprietary information. All intellectual property invented, created, or developed by employees during their employment with the Company will belong to the SOHO Global Health.

Confidential Information, Prohibition of Insider Trading

All types of information which are not available to the public, these include data about employees, customers, distributors, vendors, partners that are stated in writing as confidential and/or information which according to the applicable laws and regulations must be treated confidential or due to a certain situation which makes the data as confidential information. Employees should not disclose these to any party, both inside and outside the Company who does not have the need and right to receive these data and information. Employees must be responsible in safeguarding these data and information regardless of form (hard or soft). These include printed information and those that are sent or stored on a computer or any other authorized devices.

As a rule of thumb, confidential information is a type of information that is only disclosed to certain people in the Company; it is not available to everyone. Confidential information includes employee salaries, any product development in research phase, passwords for accessing computer and information technology systems, or any information that is considered as confidential information by Management. We shall protect confidential information from being exploited for personal gain. Employees must avoid discussing confidential information in casual talks with other people, including their family members.

The distribution of confidential information must be handled with care. Marking documents as “confidential” is one way to control that information should only be for authorized receivers /viewers. If there is confidential information that should be shared to other people as required by law or regulation, we shall consult with our supervisor before distributing it. It is possible that certain information which is classified as confidential information by Management should be provided to regulators. Information related to tax or financial records could be required by regulators.

In accordance with laws and regulations, the Company prohibits the Board of Commissioners, Board of Directors, employees and parties who have close relationships with these individuals who have material information or facts to trade shares and/or securities of the Company or other companies conducting transactions with the Company based on Company’s insider information that has not been published. The information referred to is important data or facts that can directly or indirectly influence the decision of shareholders or potential investors to make a purchase or sale.

Question:

I am going to resign from the Company and I know a lot of information and hold some confidential information. What should I do before I leave the Company?

Answer: All information regarding the Company belongs to Company. Therefore, you should return all confidential file and data that you have kept during your employment in the Company. Return any company property to your supervisor before you leave the Company. Further, you should not disclose confidential company data to other people.

Question:

I suspect an employee has stolen a Company asset. How do I handle this?

Answer: If you suspect that there is a potential violation, please report to Compliance function. Your identity will be kept as anonymous by the Company for reporting such ethics violation.

Question:

If requested, can we share company internal information to our business partners?

Answer: All internal information that is requested by business partners shall be reviewed and approved before releasing to external stakeholders. For documents classified as confidential, it shall also be reviewed by Legal function before it is released to external stakeholders.

Question:

We have hired an employee that used to work for our competitor. He knows some confidential information of our competitor. Is it ok to use that confidential information brought for our Company?

Answer: No. Our company prohibits such action. We should not use any confidential information of other companies including our competitors. It is against our Code of Business Ethics and Conduct. We should decline to use such information for our Company.

Record-Keeping and Management of Records

We should not create, provide, and give false information to our peers, supervisor, manager or other people outside the Company such as government officials. We should make sure that all information that we provide is accurate and reliable. All Company's records, documents, and information must be accountable and accurate. We should not manipulate information both in print and electronic form. We shall protect all records, documents, and information from personal interest and use.

Because all information is either in print or electronic form, we must manage all records, documents, and information according to applicable policy. The policy should state the type of information that should be kept and for how long. This is to help employees sort regularly what kind of information to be destroyed so that only important and necessary files are kept in accordance with Company and local government policies.

The use, distribution, and disposal of records, documents, and information must be approved by the authorized personnel from the corresponding function. Some information may not be available to all employees. Such information, if required or needed by a certain employee, must consult first to the person/division that issued such document, including its distribution.

Question:

I keep a lot information both in electronic and paper. I think some of them are not important and out of date. Could I destroy them by myself?

Answer: Before you destroy that information, read available record management policy or if you are not sure, you may ask relevant personnel in the particular function who is responsible in the management and disposal of information or document.

Question:

I observe that my manager provides incorrect information to the Company. What should I do?

Answer: Inform your manager that the information is not correct, and advise the manager to provide correct information. If your advice is not accepted or ignored, contact Compliance function to report your concerns.

Question:

I have been asked by my manager to modify report to the government which does not reflect the correct facts. What should I do?

Answer: Inform your manager that we should give accurate report data to government institutions. We must comply with our Code of Business Ethics and Conduct. We must provide accurate and reliable information on our official report to any government institutions. If your manager still insists on using the inaccurate report, inform Compliance function.

Handling External Communications

In order to preserve Company reputation and to uphold integrity, we need to ensure that our communication with the public gives an accurate and honest picture of our business operations, transactions, and plans. It is important for us to provide accurate and consistent Company information. Therefore, we may not make public statements on our Company's behalf unless we have been designated as a Company representative. If an investor, analyst, press, or public personnel requests information from you, even if the request is informal, please refer them to Public Relation function.

Question:

My position is quite strategic in the Company and I may be asked by a journalist about an issue related to our Company on a public seminar that I will attend. How should I respond to such question?

Answer: You should not answer that question in a public forum. You should tell that person that you are not the authorized person to answer such question.



Conflict of Interest

A “conflict of interest” exists when a person’s private interests interferes in any way with the interests of the Company. We shall act in the best interests of Company and avoid situations in which our personal interests are preferred over Company’s interests. It means that every time we make decision for the interests of the Company, our personal interests should not affect the decision. We should not take any opportunity to get some benefits from decisions that we make for the Company. Our decision should be made only for the interests of the Company, not to use that situation for any personal gain.

A conflict of interest could happen in various situations. For example, a conflict of interest may arise when an employee, acting on behalf of the Company enters into a contractual relationship with a contractor or supplier (vendor). The vendor was chosen by the Company personnel since the vendor is a friend of the Company personnel, without further considering the credentials of the other vendors.

A conflict of interest may arise when an employee serves on the Board, management of the Company’s competitor or any other employment arrangement. By having a second job with the Company’s customer/supplier/competitor, promoting personal financial interests by owning a substantial share of a supplier while in a position to steer the business towards the benefit of that customer/supplier/competitor, receiving fees/discounts/gifts/hospitality/services from the Company’s business partner. Therefore, we shall not work for another company as a consultant, member of the board of director or commissioner, especially a company that has similar business with our Company.

Regarding personal relationships in the workplace, those employees must not have a superior and subordinate relationship or parties where one party have influence over the other. Employees must not be involved in any hiring decision regarding closely related persons (including internal/external hiring and internal transfers).

A conflict of interest may arise when we do our personal business during regular Company working hours. With respect to this, employee must not use Company facilities for his/her personal business such as computer, internet, e-mail, telephone, cars, or any other facilities. We shall not do our any personal business while working in the Company.

We shall avoid any situations in which our independence or judgment is compromised which will influence our business decision and give favor to personal interests or third party’s interests. Business relationships, friendship, family ties, or specific events in which other people may have given us help in the past could become contributing factors to this situation. We must be aware of this situation when we carry out Company’s business. It could lead to a situation in which we cannot make fair decision and we make compromised decision that conflicts with our Company’s core value and this Code.

Employees are expected to disclose conflicts of interest, identify and report existing or potential conflicts of interest so that all risks can be managed. The potential conflict of interest will be reviewed, as appropriate, by a corresponding department and in certain cases by the Audit Committee of the Board.

Question:

A friend of mine informs me that he will participate in a tender for a specific service to the Company. What should I do?

Answer: Inform your friend that all procurement process including tendering process will be done as per Company policy and standard operating procedure. In addition, you should not give any information regarding the tendering process such as estimated value of the tender, information about the people that will evaluate the tender or other information related to the tender process.

Question:

A friend asks me to become a shareholder in a company that will provide products and services to SOHO Global Health. If my involvement in that company is just a shareholder, not having any position such as Directors or Commissioner, will it be a potential for conflict of interest?

Answer: It may raise a conflict of interest depending on your position in SOHO Global Health, your ability to influence decision for all dealings related to that company. You should consult with Compliance function.

Question:

I am a department supervisor of SOHO Global Health and there is an available position in my department. I have a cousin who meets the requirements for that position and is suitable to fill that position. Could he apply for that position?

Answer: Your cousin may apply for that position. If he passes all tests and interviews required for that position, he could fill that position. However, the position should not be a position that directly reports to you or under your area of responsibility as a supervisor. You could also consult Human Resources function before your cousin applies for that position.



Receiving Gifts and Hospitalitys

Gifts and hospitalitys are common practice in business to build good relations between business partners. However, when the value of the gift or hospitality provided is more than what is appropriate, it may influence our decision making process for the Company's best interest. Therefore, it is necessary that we make clarify as to what value of gift or hospitality is appropriate.

We should not receive gifts or anything of considerable value or more than what is appropriate from business partners, customers, and suppliers that may influence us from making professional and fair judgment. Money or gratuities in any form: loans, credit, store credits, gift checks are strictly prohibited and are not to be accepted under any circumstances. Valuable items for personal use like computers, notebooks, hand phones, cars, jewelry, and other things that have considerable value are prohibited. Employees should not also receive from a third party any facilities such as holiday tickets, sport and cultural event tickets, etc. Employees should ask themselves whether the gift or hospitality being offered is more than what it should. If the offer is more than what it should, employees should make a polite refusal to such gift or hospitality.

We should avoid receiving any gifts or hospitalitys from a third party that may create conflict of interest in the business relationship or result in compromised business decision that is favorable for the third party. We may accept common courtesies that are associated with customary business practices, as long as they are modest in value, such as promotional gifts (e.g., pens, calendars, notepads, etc.), courtesy gifts (such as flowers, fruit, chocolates). Courtesy or promotional gifts received should be shared with colleagues or offered to charity events. Occasionally, it is expected that business will be conducted over a meal (breakfast/lunch/dinner). In this case, each party should pay for their own meal. Good judgement should prevail when participating in such business meal.

If we received a gift from business partners, suppliers, or others and its value is considerable, we shall report it to Compliance function for further advice.



Question:

During holiday seasons (Christmas or Lebaran), vendors or suppliers may give simple gifts such as chocolate, cake, or snacks. There is also a possibility for the vendors or suppliers to give a gift that has considerable value such as shopping vouchers. What should I do with the gift?

Answer: You should share the gift received with other people in your department. However, you should seek advice from Compliance function if the value of the gift is significant. Employees are not allowed to receive any gift that has considerable value from vendors or suppliers.

Question:

I won a personal computer from a game sponsored by one of our vendors in a public conference of business association. Should I give that gift to Company?

Answer: If everyone has the same opportunity to win that prize and it was not arranged so that you would win that gift, you could keep that personal computer for yourself. But if the game was designed so that you would win, because they knew you are from SOHO Global Health and that company is a vendor of SOHO Global Health, you should decline such prize because it could raise a conflict of interest. Employee should not receive any gifts of considerable value from any vendor that may cause conflicts of interest in business.

Question:

I have received a gift of considerable value from one of our business partners. Our business partner has given such gift traditionally in the past. How should I handle this situation?

Answer: For a certain company, it has been a common practice to give gift of considerable value for their business partners. It is one of key factors to maintain good business relationship. However, our Code of Business Ethics and Conduct clearly state that we cannot receive such gift. You should consult to Compliance function to get guidance.



COMMITMENT to EMPLOYEES and CO-WORKERS

It is our commitment to make our Company as a great place to work. We create an environment in which employees are valued, empowered, and encouraged to grow. SOHO Global Health realizes that employees are the most important factor in supporting the success of the Company. Therefore, Company provides equal opportunities for all employees to actively participate in achieving the purpose and vision of the Company.

Protection of Personal Data

Personal data is any information attached and identifiable, either directly or indirectly, to each individual and the use of such information should be in accordance with the provisions of the legislation. Each of us provides personal data to our Company with confidence that it will be used for appropriate business purposes, stored, and kept confidentially. To uphold this sense of trust, we must ensure that we respect the privacy of our employees. When we collect, access, use, and disclose personal data, we must do so ethically and in accordance with all applicable legal requirements, including privacy and data protection laws. This information is not allowed to be shared with anyone except to a party whose business is to know and has the authority to do so.

Question:

A superior wants to know the personal data of his subordinates and asks the HR department, is this allowed?

Answer: Employee personal data should be kept confidential. As long as the request for personal data is for an appropriate or official matter, like medical records, the superior is allowed to know the data and the superior is obliged to maintain and protect the confidentiality of such personal data.

Human Rights, Diversity, and Inclusivity

The Company is committed to protecting and respecting human rights as regulated in the laws and regulations. Areas related to human rights which are priority for the Company to its employees are the prohibition of child labor/minimum age workers, equality, fair compensation, prohibition of forced labor, occupational health and safety, pregnancy protection, prohibition of harassment, harsh or degrading treatment, non-discrimination, right to join trade unions and collective bargaining, working conditions including working hours and labor social assurance.

We all want and deserve a workplace where each of us is respected and appreciated for our unique skills and backgrounds. The Company is committed to providing a workplace that respects diversity and differences such as race, religion, gender, culture, age, ethnic, education, etc., so that all employees are treated fairly and respectfully. We apply fair treatment in recruitment, hiring, development, compensation, benefits, and promotion. We do not recruit only a certain type of people. We do not hire only people with a certain belief. We do not develop people only from a certain university. We do not give different treatment in benefits and promotion based only on any of the characteristics above. We do not promote only certain employee. We treat employee with fairness based on job performance, training, experience or other factors needed to do the job properly.

Inclusivity is creating a work environment that respects all opinions, acknowledges and rewards everyone. It is the Company's commitment to treat all people with respect, in a fair, equal and impartial manner. The company does not tolerate discrimination or harassment in the workplace.

Harassment of any kind is not tolerated in the Company. Any kind of harassment will damage our work environment. Harassment can take many forms, including verbal remarks, physical or visual advances. Our Company prohibits any behavior that has an intention or effect of creating an intimidating, offensive, or demeaning environment for another person, including sexual harassment.

Each manager and employee has the duty to try to keep his or her workplace free of discrimination, harassment and intimidation. If an employee is experiencing or believes that he/she is experiencing these actions, he/she may talk to Human Resources function.

Question:

I feel uncomfortable with someone at the office talking and joking about my physical appearances with others. What should I do to that employee?

Answer: You could tell that employee that his/her behavior or action is against our Code of Business Ethics and Conduct and you will report him/her to Human Resources function. By doing so, you could prevent or stop any further harassment of any form in the Company and keep a healthy environment for employees to work.

Health, Safety and Environment

We consistently promote safe work practices by prioritizing health and safety in order to minimize/avoid risks to our employees and also the impact on the environment around the workplace. Referring to applicable and current regulations, we must also implement programs, trainings, internal controls, risk analysis and applicable procedures in order to achieve these goals. We must all do our part to maintain health, safety, and sustainable environment to support productivity of all employees.

That is why it is so important to follow procedures designed to reduce the risk of accidents and use Personal Protective Equipment (PPE) on the designated areas. Each employee is responsible for observing the health, safety and environment rules that apply to his or her job.

The use, sale, possession, negotiation for, or being under the influence of illegal drugs or alcohol on the job or Company property is prohibited. The abuse or improper use of substance is also prohibited. If an employee is suspected of substance abuse, the Company will conduct further investigation. Employees cooperate to make our Company free from substance abuse.

Question:

I see an employee not using Personal Protective Equipment when working on determined area that requiring Personal Protective Equipment. What should I say to that person?

Answer: You remind him/her the importance of Personal Protective Equipment when working on any area that requires PPE. Remind him/her the impact of not wearing Personal Protective Equipment. You also report that event to Health, Safety and Environment (HSE) function so that this action is not repeated.

COMMITMENT to CUSTOMERS, BUSINESS PARTNERS, RESOURCE PROVIDERS and OTHERS

Company has a commitment to apply high ethical standard to all dealings with customers, business partners, resource providers (suppliers), and others. We continuously monitor, assess, and improve our products, services, technology, and procedures that are of good quality and innovative at every stage of the development, production, and distribution process. Quality means consistently satisfying requirements and expectations by delivering products and services of the highest value in a timely manner.

We believe in working with business partners who demonstrate high standards of ethical business conduct. We expect suppliers and others who work on our behalf to be guided by the standards set forth in this Code. We choose our suppliers based on price, quality, service, diversity, reputation and business practices. We will not engage vendors or contractors who operate unethically or violate applicable laws. We work with all business partners and resource providers to ensure compliance with applicable laws and regulations when they provide goods and services to the Company.

We give equal opportunity to all resource providers (suppliers) that meet the qualifications to provide products and services to the Company. We apply fair treatment to all resource providers (suppliers). We shall not make any preference for certain suppliers to provide products or services to our Company or give preferred treatment to certain suppliers.

Interaction with Healthcare Professionals, Organizations, and Institutions

We are committed to ensure that interactions with healthcare professionals, organizations, and institutions do not, directly or indirectly, make, promise, authorize payment, or provide anything of value to any healthcare professionals to induce them to prescribe, recommend, purchase, supply, or administer SOHO Global Health products, to influence the outcome of a clinical trial, or otherwise to improperly benefit SOHO Global Health's business activities. Interactions should be focused on informing healthcare professionals about products, providing scientific and educational information, and supporting medical research and education.

No financial benefit or benefit-in-kind (including grants, scholarships, subsidies, support, consulting contracts, or educational or practice related items) may be provided or offered to a healthcare professional in exchange for prescribing, recommending, purchasing, supplying, or administering products or for a commitment to continue to do so. Nothing may be offered or provided in a manner or on conditions that would have inappropriate influence on a healthcare professional's prescribing practices (no quid pro quo).

Question:

Can we promise anything of value to healthcare professionals or institutions so that they use our products?

Answer: No, we should not give nor promise anything of value to healthcare professionals or institutions in order to use our products. We only provide information about the benefits of our products to healthcare professionals and institutions. Upon approval from management, what we can propose to provide to the healthcare professional is continuing medical education in the form of seminars or symposiums. Sponsorship shall not influence healthcare professionals and institutions to use our product.

Environmentally and Socially Responsible Procurement

The company expects business partners/resource providers who do business on our behalf to adhere to the business principles that we apply to them. For the procurement of goods and services, where appropriate, we prohibit the engagement of underage workers, discrimination, and forced labor. Further and we committed to compliance with applicable laws and regulations including but not limited to minimum wages, safe and healthy working conditions, monitoring and control of environmental impact.

Prohibition of Monopolistic Practices and Unfair Business Competition

In order to create a conducive business climate, the Company is committed to preventing monopolistic practices and or unfair business competition in conducting its business in accordance with applicable laws. The Company is prohibited from entering into agreements with other entities to jointly control the production and/or marketing of goods and or services, influence or control over prices for goods and or services. The Company is prohibited from conspiring with other parties to regulate and/or determine tender winners, nor the Company may conspire with other parties to obtain information on the business activities of its competitors which are classified as confidential so as to result in monopolistic practices and or unfair business competition.

Giving Gifts and Hospitalitys

Business gifts and hospitalitys can help us develop strong working relationship with our customers, resource providers, and other business partners. However, any kind of gift, hospitality, or any item of value given to business partners and customers should be appropriate and should not be made to influence future business decision or transaction. We may give gifts and hospitalitys only if they are customary business practices and allowed by applicable laws, modest in value, not be made in cash or cash equivalent, and will not embarrass the employees or our Company if it is publicly disclosed. We should avoid situations where, through gifts and hospitalitys, other people could not make reasonable and fair judgment for our products and services.

Sales-related commissions, rebates, discounts, and credits are customary business inducements, but they require our careful attention. We must make sure that we always comply with applicable tax regulations. Any business inducements must be reasonable in value, competitively justified, and properly documented. Company takes its commitment to integrity very seriously, and does not tolerate bribes and kickbacks in any form, whether directly or indirectly.

Question:

If our customer asks for a business gift from our Company in the form of money or anything of value, what should I do?

Answer: Respond to them politely that based on our Code of Business Ethics and Conduct, we could not provide a business gift or hospitality in the form of cash or equivalent.

COMMITMENT to COMMUNITIES, GOVERNMENT and USERS OF THE PRODUCTS AND SERVICES

It is our commitment to serve our community, society, and the state. We commit that our presence is valuable for our society. We provide products and services for the community and society.

Company continuously ensures our corporate responsibility is embedded within the Company's business strategy and appropriately evolves as our business does. This approach helps us deliver on our goal to create shared value that supports both the needs of society and our business.

Interaction with Government Officials

Government officials play an important role in society, e.g. by establishing and maintaining the necessary conditions and institutions for economic stability, social and environmental protection, as well as for providing access to healthcare for their citizens. For all these reasons, Company considers and respects government officials as important partners and stakeholders.

We will proactively seek dialogue and cooperation with government officials, providing such engagement in accordance with the business needs and Company's purposes. In our interactions with government officials, we are committed to honesty and integrity, adopting transparent and responsible behavior, and respecting all applicable laws and regulations.

Any improper influences by an employee on government officials are strictly prohibited. We will not tolerate any unacceptable practices. The granting of gifts or any compensation to government officials is only acceptable if it is allowed by applicable national laws, and in conformity with local custom, appropriate, properly registered in the Company's books, and the value of the gift or compensation does not raise any question about an obligation on the part of the recipient.

Question:

If a government official asks from us money for a certain service, what should I do?

Answer: Some services by a government official require some money. If by regulation a specific service requires money, we should pay as required by law or government regulation. If there is payment due for a specific service, it must be documented. If the service does not require money, we should not make any payments. Inform the government official respectfully that we are not allowed to give cash or equivalent in return for their services.

Involvement in Politics

Employees have the freedom to get involved in a political party or political activities. It is a right for every employee to be a part of a political party. However, political activities must be done only during employees' personal time and outside of office hours.

When an employee is engaged in a political party or activity, the employee shall not use any of Company's assets, facilities, or equipment for his/her involvement in such activity. This principle applies to whoever and whatever position the employee is and holds in the Company, including the top management, no exception.

The Company does not allow political contributions. Employees are not allowed to directly or indirectly distribute Company's funds to a political party, candidate, or campaign. Employees may freely use their own funds to support a political party of their choice, but they should not use Company's funds. Employees should not redirect any funds that are for charity and use it for political activities.

We shall not associate our Company when we promote or campaign for a political party. Our Company should be free from any influence of any political party, regardless of employees' position in the Company and their political affiliations. Employees should not use their position to influence subordinates or other employees to choose or support a certain political party.

Question:

If I am involved in a political party, will my involvement impact my career or benefits or other opportunities in Company?

Answer: Your involvement in a political party will not impact your career development, benefits, or other opportunities in the Company. You are free to join any political party you like. You will get the same benefits from Company as the other employees. However, if you are involved in a political party, you should not use Company's facilities for your involvement or activities in a political party. You should not use Company time to do any political activities. Political activities must be done outside of Company time.

Compliance to Laws and Regulations

In addition to our general ethical responsibilities to our Company, our customers, business partners, resource providers, and employees, we each have a fundamental responsibility to ensure that we comply with all laws, rules, and regulations of every government in every country where we do business.

When we deal with government officials such as obtaining business licenses or documents necessary to run our business, employees must never, directly or indirectly, offer or promise any personal or improper financial or other incentives to a government or non-government official whose task is issuing documents necessary for the operation of our Company. We obtain all necessary business licenses from government and non-government institutions without violating our Code of Business Ethics and Conduct.

We comply with laws and regulations issued by both central and local governments. Laws and regulations are made for the benefits of people. They are developed through stages and a lot of thinking has been put in to defining them. Even if there is a law or regulation that may seem to be making an unfair treatment to our business, we should comply with said law or regulation until the government makes a proper amendment of such law and regulation.

On the high level, our Company complies with all laws and regulations issued by the state. However, to govern our business, we also develop Company policies that are relevant to our situation. In principle, our Company policies should be in line with the laws and regulations issued by the government and Code of Business Ethics and Conduct. We are free to develop business practices that are relevant to our business as long as they are not contrary to laws and regulations. Company policies and business processes must always be updated periodically in accordance with the current laws and government regulations.

Question:

If a government official asks us for some money to solve issues because our Company does not comply with the laws and regulations, what should I do?

Answer: Our Company will make a commitment to comply with the corresponding laws and regulations. If a government official asks for some money to smoothen our problem for not complying with laws and regulations, we will decline this request.

Question:

My manager asks me to do something that is against Company policy. What should I do?

Answer: Contact higher level management or if you are not certain about your action, you may contact Compliance function for guidance. Company protects your identity if you report any potential or actual ethics violation.

Supporting Environmental Sustainability

It is our responsibility and commitment to protect our environment, especially on area that has been impacted by the operation of our Company. We comply with all laws and regulations with respect to the protection of the environment. We should provide anything that is required by laws and regulations. On top of that, we make sure that our business operation does not destroy our environment.

We manage our environmental impacts and seek to continuously improve the sustainability of the environment in which our Company operates. We identify, mitigate, and monitor existing and emerging risks to the environment associated with our business operation activities.

To increase our awareness of the importance of environmental protection, we increase our knowledge through training and sharing of information relevant to the protection and sustainability of environment.

Question:

If I see industrial waste not properly managed in our Company, what should I do?

Answer: We are responsible for protecting the environment. Inform the Health, Safety and Environment (HSE) function for proper waste management.

Corporate Responsibility

In accordance with the local or national government's regulatory requirements, our Company has an obligation to give contribution for the development of society, which is our Corporate Social Responsibility. Non-profit organizations or communities on the area where we do our operation may ask for donation from our Company. Communities may ask our Company to participate in a certain community events such as independence day, national holiday, or religious festivities. For this purpose, our donation is given only to charity, in accordance with government regulations and the Company's Corporate Social Responsibility Policy. Corporate Social Responsibility conducted by Company should be relevant with Company's Purpose, Vision, and Core Values.



Question:

During certain seasons such as on Independence day or religious holiday or in any special events organized by communities, local government and non-profit organizations may ask for donations. How do we distribute our donation to these communities or non-profit organizations?

Answer: Make sure that our donation is properly donated to active organizations and our donation is used for the activity of the event as mentioned in their proposal. Ask for a final report from them after the event, supported by pictures and receipts of the use of funds. Donations must be pre-approved by Public Relation function.

MAKING ETHICAL DECISIONS

There are times when we may be unsure of what to do. We may face ethical issues in our job, which we have never experienced before. We may be unsure about the ethical issues we face or we may not be aware about the ethical impact of the decision we make. When facing a question with respect to our core values or ethical issues, should first ask yourself:

- Is the action/decision legal?
- What Company policies and procedures apply to this situation?
- Is it free from personal interest?
- Does it have a negative impact on Company and stakeholders?
- How would it read in a newspaper article?

Although these questions will provide guidance in decision making, or if we are ever unsure about what to do, or have a sense that something may not be quite right, consult with Compliance function.

To increase our knowledge and understanding of this Code, we mentioned several ways. First, we read the Code of Business Ethics and Conduct. We take the time to read this Code in our available time. We could read it all at once, but the best method is to read one or two topics at a time.

Second, we try to apply each principle in our day-to-day activities. We should continue applying each ethical principle in and out of our work place. As we continue applying ethics as prescribed on this Code, this becomes part of our habit.

Third, we attend trainings pertaining covering this Code. Ask questions if you have uncertainty about a specific issue. Through questions and answers session, we will have better understanding about the specific issue.

Fourth, we can seek advice and guidance by contacting the Compliance function if we are not sure about the application of a specific ethics point in our job.

REPORTING ETHICS VIOLATIONS

If we become aware of a situation that may involve a violation of our Code of Business Ethics and Conduct, Company policy, or the law, we have a responsibility to report it. Reporting actual or suspected misconduct allows our Company to investigate potential problems, stop actual misconduct, and prevent the same incident in the future that could damage our reputation.

Employees reporting any ethics violations are protected by Company. Company is committed to protect confidentiality and personal data. We will not tolerate retaliation against employees who raise concerns in good faith.

External stakeholders can also contact Compliance function for any questions on the implementation of our Code of Business Ethics and Conduct or raise any concerns regarding ethics violations.

Question:

Will an employee violating Code of Business Ethics and Conduct be terminated from Company?

Answer: Violation by an employee of the Code of Business Ethics and Conduct will be assessed further by management. Appropriate corresponding sanctions applied to violators.

TRAINING OF CODE OF BUSINESS ETHICS AND CONDUCT

Knowing and understanding Code of Business Ethics and Conduct are two of many keys to the success of the practice of this Code. Therefore, supervisors ensure that each employee in their department has read and understood this Code. Supervisors ensure that each employee has taken training on this Code delivered by Compliance function.



ACKNOWLEDGEMENT OF CODE OF BUSINESS ETHICS AND CONDUCT

Everyone must read and understand this Code of Business Ethics and Conduct and acknowledge that he/she has read and understood this Code. Everyone must submit a completed acknowledgement form of Code of Business Ethics and Conduct. Everyone must renew his/her acknowledgement of this Code annually.

REVIEW OF CODE OF BUSINESS ETHICS AND CONDUCT

Company reviews this Code periodically so that it is up to date and relevant to the current situations that the Company faces. Compliance function is responsible for initiating this review and make necessary updates of this Code.

CONTACT

If not certain on how do deal with a specific issue on this Code, consult with Compliance function

Please feel free to ask any unclear issues or report any ethics violations via e-mail to:

compliance@sohglobalhealth.com

or via telephone call to **021-4683-2727** or **0811-882-1111**

or via letter to our office address:

PT. SOHO Global Health Tbk
Compliance Division

Jl. Rawa Sumur II Kav. B.B3
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