



DUE DILIGENCE POLICY

PT. Perusahaan Pelayaran Equinox does business with many types of third party including, but not limited to contractors, agents, suppliers, logistics, law and advisory firms; the company also maintains relations with unions and recipients of donations. This policy sets out PT. Perusahaan Pelayaran Equinox commitments in doing business with third parties in order to mitigate the risks of bribery, corruption, money laundering, fraud and violation to human rights, risks that the Company is exposed to in its relations with third parties.

This policy was defined in abidance of the Indonesia Government Bribery Act, the Law for the Prevention and Identification of Operations with Resources of Illegal Origin, the Law of Administrative Responsibilities of Public Officials, and other related secondary laws that applying for the private sector; as well as in abidance of the Guiding principles on business and human rights issued by the Indonesia Government Act, among others.

This policy extends not only to PT. Perusahaan Pelayaran Equinox employees, but to third parties with which it does business.

Applicability of this policy:

A third party is defined as any company, organization or individual not owned, controlled or employed by PT. Perusahaan Pelayaran Equinox that is retained to provide goods or services or engage business activities on behalf of PT. Perusahaan Pelayaran Equinox.

PT. Perusahaan Pelayaran Equinox policy commitments are as follows:

1. PT. Perusahaan Pelayaran Equinox will only do business with third parties that do not engage in bribery and corruption. Specifically, PT. Perusahaan Pelayaran Equinox will not permit any third party to pay, offer to pay or accept a bribe on behalf of PT. Perusahaan Pelayaran Equinox.
2. PT. Perusahaan Pelayaran Equinox will only do business with third parties that uphold anti-bribery and corruption, anti-money laundering, fraud and human right laws to which both PT. Perusahaan Pelayaran Equinox and the third party are subject to.
3. PT. Perusahaan Pelayaran Equinox will only do business with third parties that either
 - a. Have in place adequate controls that are equivalent in standard to PT. Perusahaan Pelayaran Equinox or
 - b. Adopt PT. Perusahaan Pelayaran Equinox counter bribery and corruption policies.
4. PT. Perusahaan Pelayaran Equinox will only make payments to third parties that are proper and proportionate to the services provided and in accordance with the contract or written agreement.