NPH Code of Conduct

A. **Business Ethics**

In order to achieve its vision, NPH establish business ethics into codes of conduct for commissioners, directors, employees and NPH business partners. Business ethics drawn up by taking into account provisions of existing law, ethics, company rules and generally accepted social norms. Business Ethics is a value system formulated by the Company that being used as guidelines in the working relationship between employees and outside parties.

1. Customers

Customers are the purchaser or user of the products or services providedd by the Company.

Principles in interacting with the customers:

a. The Company respects the rights of the customers in accordance with applicable laws and regulations
b. The Company is committed to price, quality, delivery time, after-sales service and product warranties in accordance with applicable standards
c. The Company (including Commissioners, Directors and Employees) is not allowed to give to or accept from the customers (substantial) gifts which may influence decision-making
d. The Company maintains the confidential information of the customers
e. The Company adheres to the advertising ethics and applicable laws and regulations

2. Business Partners

Business Partners are the parties that have business relationship with the Company, such as principals, distributors, dealers and suppliers.

Principles in cooperating with business partners:

a. Common interests, equality and mutual trust based on fairness and social responsibility regardless of ethnic, religious beliefs, race and social groups
b. Complies with applicable laws and regulations
c. Commissioners, Directors and Employees of the Company must avoid conflict of interest
d. All agreements must be made in writing in good faith and based on mutual benefit
e. Selection of the business partners is based on professionalism and in line with QCDSM (Quality, Cost, Delivery, Safety, Morale) values
f. Strive to empower small and medium scale business partners

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g. The Company (including Commissioners, Directors and Employees) is not allowed to give to or accept from business partners (substantial) gifts which may influence decision-making

3. Competitors

Competitors are other parties that manufacture or market similar products and/or services to the products and/or services provided by the Company.

Principles in dealing with the competitors:

a. The Company supports fair and healthy competition in accordance with applicable laws and regulations
b. The Company is not allowed to develop cooperation with competitors, which could be detrimental to the customers and/or leads to monopolistic practices
c. The Company is not allowed to discredit competitors in its marketing, promotion and advertising activities
d. Commissioners, Directors and Employees of the Company are not allowed taking part in the management and/or to own shares of a competitor, either directly or indirectly

4. Employees

Employees ara Individuals who work at the Company and receive salary based on an employment relationship.

Principles in conducting an employment relationship with the Employees:

a. The Company honors the universal principle of human rights as well as the rights and obligations of Employees based on applicable laws and regulations
b. The Company provides equal opportunities regardless of seniority, gender, ethnicity, religion, race and social groups, with due observance to their competence and performance
c. The Company treats the Employees as valuable assets, therefore they need to be respected and their competence and character must be enhanced
d. The Company builds an atmosphere of openness and two-way communication with the Employees
e. The Company rewards its outstanding Employees

5. Shareholders

Shareholders are individuals or institutions that are registered in the Shareholder Register of the Company.

Principles in interacting with the shareholders:

a. The Company treats its shareholders in a fair manner, including in providing accurate and timely information, in accordance with the Articles of Association of the Company and applicable laws and regulations
b. The Company endeavors to deliver optimal performance and maintain a good corporate image to increase shareholders value

6. Potential Investors

Potential Investors are individuals or institutions that have the potential or intend to participate in the Company's shares ownership, including investment supporting institutions.

Principles in interacting with potential investors:

a. The Company provides accurate and timely information in accordance with applicable laws and regulations
b. The Company discloses required information in a fair manner

7. Affiliated Companies

Affiliated companies are companies that have an ownership relation with NPH, either directly or indirectly.

Principles in interacting with affiliated companies:

Together with and among affiliated companies, the Company develops a cooperation to achieve synergy in its various business and social activities in accordance with applicable laws and regulations, including competition laws.

8. State Institutions

State institutions area the state implementing agencies which include the legislative, executive, judiciary and other institutions, both at the national or regional levels, and their officers.

Principles in interacting with state institutions:

a. The Company establishes harmonious, constructive and respectful relationships with due observance to applicable laws and regulations
b. The Company supports national and regional programs, particularly in education, socio-economic, health, and environment

9. Community

Community is a group of people who live together in a certain location and having direct or indirect relationship with the Company's activities.

Principles in interacting with the community:

a. The Company participates in maintaining a clean and healthy environment in the surrounding area of the Company
b. The Company, wherever it is located, builds and fosters congenial and harmonious relations and endeavors to provide benefits through empowerment programs, particularly to communities in the surrounding area of the Company
c. The Company respects the social, culture, tradition, modesty, beliefs and religions

10. Mass Media

Mass media are institutions which include printed, electronic and online media providing information, education, promotion, social control and entertainment.

Principles in interacting with the mass media:

a. The Company adheres to the truth and disclosure of information in an accountable manner in accordance with the journalistic code of ethics and applicable laws and regulations
b. The Company positions the mass media as equal partner, therefore it is necessary to build a positive and mutual respective cooperation

B. **Work Ethics**

Work ethics are the Guidelines set by the Company for Commissioners, Directors and Employees of NPH in working relationship among the employees and the boards.

Work Ethics principles cover:

1. Employees' conduct in the Company:
   a. To comply with of the Company Policy and Regulations
   b. To give respect to superior and company leader, co-workers and business partners.
   c. To apply and develop their maximum potentials for themselves and for company's benefit
   d. To participate in creating a conducive working environment
   e. To understand and implement the Corporate Values
   f. Willing to sign the NPH Integrity Pact

2. Employees' conduct in the use of authority and position in the Company:
   a. To responsibly use their authority and position for the interests of the Company, and not to serve for their own or others interests
   b. To maintain and utilize all data, information, assets and facilities of the Company for the benefit of the Company, and not to serve for their own or others interests
   c. To keep the Company's good reputation by minding their conduct and behavior, both outside and inside the Company

3. Employees' conduct towards the Company's Confidential Information.
   The Company's Confidential Information are strategic documents and/or information that are formulated or acquired by the Company which may not be disclosed and conveyed to external parties, with the following considerations:
   - To maintain the Company's competitive advantage, and/or
   - To honor agreements or laws or regulations, which requires the Company to maintain the confidentiality of such information

   Information included in the Company's Confidential Information category is:
   - Financial statements and/or material transactions that have not been disclosed to the public
   - Strategic corporate plan
   - Information bound by confidentiality agreement
   - Products of the Company that are still in the development stage
   - Uniqueness of technology
   - Material Information which is not yet available to the public, and
   - Other information that is considered confidential

   Material Information is important and relevant information that may affect the securities price of the Company/decision of the investor to purchase or sell securities of the Company.

   All Employees are responsible for maintaining the confidentiality of the Confidential Information of the Company and prohibited from abusing such information.

   The Confidential Information of the Company obtained by Employees shall remain confidential after the expiration of their employment at the Company.

4. Employees' relations as superior/subordinate in the Company:
   a. Superior acts as role model, leader and mentor for their subordinates
   b. Subordinates proactively develop and express their potentials under the direction and guidance of their superior

c. To mutually accept, respect and foster a good cooperation in an atmosphere of openness based on sincerity and good faith

5. Relationship among Employees:
   a. To mutually respect, encourage and foster a good cooperation in carrying out their respective duties and responsibilities
   b. To reinforce integrity and foster transparency and abundance mentality in a harmonious relationship as members of the Company

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