

MPI subscribes to established international ethics and compliance standards, including those outlined in this document specifically. A copy of the terms of reference of our commitment to good business ethics and compliance standards is part of every business and/or client contract signed by MPI Directors and Managers and is the primary basis underlying all MPI business activities.

1. MPI represents, warrants and undertakes that it, and each of its owners, directors, officers, employees, and every other person acting on its behalf, will not, in connection with any transaction or Agreement, or in connection with any related business transactions make, offer or promise to make or authorize any payment or other transfer of anything of value, including without limitation any portion of the compensation or reimbursements received by MPI or provide any service, gift or entertainment, directly or indirectly to:
 - (i) any government official (including directors, officers and employees of government-owned and government-controlled companies and public international organizations);
 - (ii) any director, officer, or employee of any client or associated companies;
 - (iii) any political party, official of a political party, or candidate for public office;
 - (iv) an agent or intermediary for payment to any of the foregoing; or
 - (v) any other person or entity for purposes of obtaining or influencing official actions or decisions or securing any improper advantage in order to obtain or retain business, or engage in acts or transactions otherwise in violation of or inconsistent with the principles of any applicable anti-corruption legislation, including but not limited to anti-corruption laws of the Republic of Indonesia or Australia.

2. For purposes of this clause the term "government official" shall include any minister, deputy minister, manager, civil servant, director, officer, or employee of any government or any department, agency or instrumentality of any government, and/or of any public sector company or an enterprise in which a

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government owns a majority or controlling interest, and/or of any public international organization including without limitation the Indonesian Ministry of Defense, the Indonesian anti-monopoly enforcement agency “Komisi Pengawas Persaingan Usaha” (KPPU), the Indonesian Corruption Eradication Commission (KPK) and the Indonesian Ministry of State Enterprises. This term also includes any police or military personnel and any person acting in any official, administrative or judicial capacity for or on behalf of any such government or such department, agency, instrumentality, company or public international organization.

3. It is the intent of the parties that no payments or transfers of anything of value shall be made which have the purpose or effect of public or commercial bribery, money laundering, extortion or other unlawful or improper means of obtaining or retaining business. MPI acknowledges that it is familiar with the UK Anti Terrorism, Crime and Security Act 2001, and Bribery Act (UK) 2010, the U.S. Foreign Corrupt Practices Act 1977 (US), the Criminal Code 1995 (Cth) and the Anti-Bribery Convention, and MPI will take no action inconsistent with the requirements of such laws and the Anti-Bribery Convention.
4. MPI expressly represents and warrants that any funds or property received in connection with any Agreement or contract, or any transactions performed in connection herewith shall not be transferred to or from any Restricted Person or contrary to any applicable laws, including but not limited to anti-money laundering or anti-corruption laws, rules or regulations. It is the intent of the parties hereto that no payments or transfers of anything of value shall be made which have the *effect* or purpose of public or commercial bribery, money laundering, or other improper means of obtaining or retaining business.
5. For purposes of this clause, a "Restricted Person" is any person who is identified from time to time by any government or legal authority under applicable trade sanctions, export controls, anti-money laundering, non-proliferation, anti-terrorism and similar laws (together "Trade Restrictions") as a person with whom

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trade or financial dealings and transactions by any company and/or its affiliates are prohibited or restricted, including but not limited to:

- a) persons designated on the United Nations lists of persons subject to sanctions;
 - b) persons or entities designated under the Consolidated List issued by the Australian Commonwealth Department of Foreign Affairs and Trade (DFAT) or otherwise nominated or identified by the Reserve Bank of Australia;
 - c) the Bank of England and European Union Consolidated Lists of Financial Sanctions Targets;
 - d) the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) List of Specially Designated Nationals and Other Blocked Persons (including terrorists and narcotics traffickers);
 - e) the U.S. Department of State's lists of persons subject to non-proliferation sanctions;
 - f) the U.S. Department of Commerce's Denied Parties List, Entity List, Unverified List, General Order 3 to Part 732 List;
 - g) persons and entities subject to Special Measures regulations under Section 311 of the USA PATRIOT Act and the Bank Secrecy Act and its regulations; and
 - h) relevant equivalent restricted party listings maintained by other relevant jurisdictions.
6. Without limitation to clause 6(ix), MPI will comply with sanctions imposed by the United Nations (UN) and Australia in connection with its performance of all Client Agreements. MPI will not, in connection with its performance of Client Agreements, engage in dealing with (including making payments to or procuring Services from) persons or entities from nations or regimes sanctioned by the United Nations, the US Government, the US Department of Treasury's Office of Foreign Assets Control, the Australian Government or the Reserve Bank of Australia including but not limited to Burma, Côte d'Ivoire, Cuba, Democratic People's Republic of Korea (North Korea), Democratic Republic of

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the Congo, Eritrea, Iran, Iraq, Lebanon, Liberia, Libya, Russia, Sudan, Somalia, Syria, the Former Federal Republic of Yugoslavia and Zimbabwe.

This statement can be viewed on the MPI website at:

www.mainpacificinvestment.com