



PEDOMAN KEPATUHAN |
COMPLIANCE GUIDELINES
PT HUMPUSS MARITIM INTERNASIONAL

DISTRIBUSI <i>DISTRIBUTION</i> ◊ DEWAN KOMISARIS <i>BOARD OF COMMISSIONERS</i> ◊ DIREKSI <i>BOARD OF DIRECTORS</i> ◊ GENERAL MANAGER ◊ MANAGER	PERIHAL <i>REGARDING</i> Pedoman Kepatuhan	NOMOR: <i>NUMBER:</i> 004/PEDOMAN-GCG/VII/2025
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1.	PENDAHULUAN Kepatuhan diartikan dalam Sistem Manajemen Kepatuhan ISO 37301:2021 — Persyaratan Dengan Panduan Penggunaannya sebagai proses yang sedang berlangsung dan hasil keluarannya adalah pemenuhan kewajibannya. Kepatuhan yang berkelanjutan didapatkan dengan menanamkannya dalam budaya kerja dan dalam perilaku setiap orang yang bekerja di perusahaan. Penerapan sistem manajemen kepatuhan sesuai standar ISO 37301:2021 di PT Humpuss Maritim Internasional Tbk. (“ HUMI/Perseroan ”) terintegrasi dengan proses manajemen mutu, kesehatan keselamatan kerja, dan lingkungan sesuai standar ISO 9001:2015, ISO 45001:2018, dan ISO 14001:2015, beserta persyaratan dan prosedur operasionalnya.	1.	INTRODUCTION <i>Compliance is defined in ISO 37301:2021 Compliance Management System — Requirements with Guidance for Use as an ongoing process and the output is the fulfillment of its obligations. Sustainable compliance is achieved by embedding it in the work culture and in the work conduct of everyone working in the company.</i> <i>The implementation of a compliance management system according to the ISO 37301:2021 standard at PT Humpuss Maritim Internasional (“HUMI/Company”) is integrated with the quality, occupational health and safety and environmental management processes based on the ISO 9001:2015, ISO 45001:2018, and ISO 14001:2015 standards, along with their operational requirements and procedures.</i>
2.	TUJUAN PENERAPAN SISTEM MANAJEMEN KEPATUHAN Perseroan, Anak Usaha dan Unit Usaha berkomitmen menerapkan prinsip-prinsip kepatuhan secara konsisten untuk: 1. Mengukuhkan budaya kepatuhan (compliance) terhadap hukum, kode etik, tata kelola, dan persyaratan internal maupun eksternal terkait lainnya yang relevan di dalam kegiatan bisnis manajemen	2.	OBJECTIVE OF COMPLIANCE MANAGEMENT SYSTEM IMPLEMENTATION <i>The Company, Subsidiary and Business Unit is committed to consistently implementing the principles of compliance to:</i> 1. <i>To strengthen the culture of compliance with the law, code of conduct, governance and other related requirements, whether internally or externally, that are relevant to the company's business management activities, and therefore must be met in</i>

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	perusahaan yang harus dipenuhi sesuai prinsip kepatuhan. 2. Menunjukkan adanya langkah sistematis yang dijalankan untuk memastikan kepatuhan melalui pendekatan berbasis proses dan siklus <i>plan do check act (PDCA)</i> . 3. Memitigasi risiko kerugian akibat ketidakpatuhan atau pelanggaran terhadap peraturan dan persyaratan seperti yang disebut di tujuan pertama.		<i>accordance with the principles of compliance.</i> 2. <i>To demonstrate that there are systematic steps taken to ensure compliance through a process-based approach and plan do check act (PDCA) cycle.</i> 3. <i>To mitigate the risk of losses stemming from noncompliances or the act of violation against the regulation and requirements as described in the first objective.</i>
3.	LINGKUP Penerapan Pedoman Kepatuhan di PT HUMI Tbk., mencakup seluruh persyaratan dalam Sistem Manajemen Kepatuhan ISO 37301:2021, dan selaras dengan penerapan Pedoman Tata Kelola Perusahaan, Pedoman Dewan Komisaris dan Direksi yang mengatur hubungan kerja, serta Pedoman Perilaku.	3.	SCOPE <i>The implementation of Compliance Guidelines in the Company encompasses all requirements in ISO 37301:2021 Compliance Management System, and is in accordance with the implementation of the Guidelines for Corporate Governance, Guidelines for the Board of Commissioners and Directors that regulate work relations, as well as Code of Conduct.</i>
4.	IMPLEMENTASI PRINSIP-PRINSIP KEPATUHAN PT HUMI Tbk., Anak Usaha dan Unit Usaha memastikan bahwa enam prinsip kepatuhan dilaksanakan secara konsisten. ◇ Tata Kelola yang Baik PT HUMI Tbk. menunjukkan komitmen kepatuhan terhadap peraturan, etika, norma atau praktik yang diterima di industri terkait, dan harapan dari pihak internal dan eksternal terkait kegiatan bisnis manajemen.	4.	THE IMPLEMENTATION OF COMPLIANCE PRINCIPLES <i>The Company, Subsidiaries and Business Units consistently implement the six principles of compliance.</i> ◇ Good Governance <i>The company demonstrates a commitment to compliance with regulations, ethics, norms or practices accepted in the relevant industry, and the expectations of internal and external parties regarding management business activities.</i>

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◇ Proporsionalitas PT HUMI Tbk. mengidentifikasi kewajiban-kewajiban kepatuhannya dan memprioritaskan pengendalian berdasarkan tingkat risiko pelanggaran terhadap setiap kewajiban tersebut.	◇ Proportionality <i>The company identifies its compliance obligations and prioritize control based on the assessment regarding the level of risk of noncompliance against each obligation.</i>
◇ Integritas PT HUMI Tbk. menjaga integritas dengan memitigasi ketidakpatuhan terhadap kewajiban kepatuhan, mencakup di antaranya: Peraturan, Kebijakan, Pedoman, Tugas dan Tanggung Jawab, Prosedur, hingga Audit Internal, Uji Kelayakan, dan Tindakan Disipliner.	◇ Integrity <i>The Company maintains integrity by mitigating non-compliances against compliance obligations, including the Regulations, Policies, Guidelines, Tasks and Responsibilities, Procedures, to Internal Audit, Due Diligence, and Disciplinary Action.</i>
◇ Transparansi PT HUMI Tbk. menyediakan material dan informasi relevan yang mudah diakses dan dipahami oleh pemangku kepentingan, termasuk menyebarkan data dan informasi yang valid dan akurat.	◇ Transparency <i>The Company provides material and relevant information that is easily accessible and understood by stakeholders, in addition to the dissemination of valid and accurate data and information.</i>
◇ Akuntabilitas PT HUMI Tbk. harus dapat mempertanggungjawabkan kinerjanya secara transparan dan wajar atas kejelasan fungsi, pelaksanaan dan pertanggungjawaban organ sehingga pengelolaan Perusahaan terlaksana secara efektif.	◇ Accountability <i>The Company is able to account for its performance in a transparent and fair manner for the clarity of the functions, implementation and responsibilities of the organs so that the management of the Company is carried out effectively.</i>
◇ Keberlanjutan PT HUMI Tbk. senantiasa melakukan	◇ Sustainability <i>The company undergoes continuous</i>

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perbaikan atas ketidaksesuaian, meningkatkan peluang keberlanjutan bisnis (<i>business sustainability</i>), dan fokus mengatasi dampak perubahan iklim terhadap lingkungan dan sosial. Sistem Manajemen Kepatuhan ISO 37301:2021 memandu PT HUMI Tbk. untuk menerapkan prinsip kepatuhan secara terstruktur dan sistematis sebagai berikut: ◇ Budaya Kepatuhan PT HUMI Tbk. menetapkan dan senantiasa mengembangkan, memelihara dan mempromosikan budaya kepatuhan nilai, etika dan perilaku di semua tingkatan dalam perusahaan sesuai peraturan yang berlaku, dan dengan mempertimbangkan persyaratan dari pihak berkepentingan ◇ Kepemimpinan PT HUMI Tbk. mampu mendelegasikan tanggung jawab untuk mencapai sasaran melalui peran manajemen puncak, dewan pengarah, fungsi kepatuhan, dan seluruh manajemen, yang secara aktif bersama-sama menunjukkan komitmen terhadap standar kerja perilaku yang dipersyaratkan. ◇ Pendekatan Berbasis Proses PT HUMI Tbk. senantiasa melakukan perbaikan atas ketidaksesuaian, meningkatkan peluang bisnis dan keberlanjutan (<i>business sustainability</i>), dan fokus mengatasi dampak perubahan iklim terhadap lingkungan dan sosial.	<i>improvements to nonconformities, increase opportunities for business sustainability, and focus on addressing the impacts of climate change on the environment and society.</i> <i>ISO 37301:2021 Compliance Management System guides companies to implement compliance principles in a structured and systematic manner as follows:</i> ◇ Compliance Culture <i>The company establishes and continuously develops, maintains and promotes a culture of compliance with values, ethics and work conduct at all levels within the company in accordance with applicable regulations, while also taking into account the requirements of interested parties.</i> ◇ Leadership <i>The company is able to delegate responsibility for achieving targets through the roles of top management, the board of directors, the compliance function, and all management, who actively work together to demonstrate commitment to the required work standard and work conduct.</i> ◇ Proses-Based Approach <i>The companies undergo continuous improvements to nonconformities, increase business opportunities and sustainability, and focus on addressing the impacts of climate change on the environment and society.</i>
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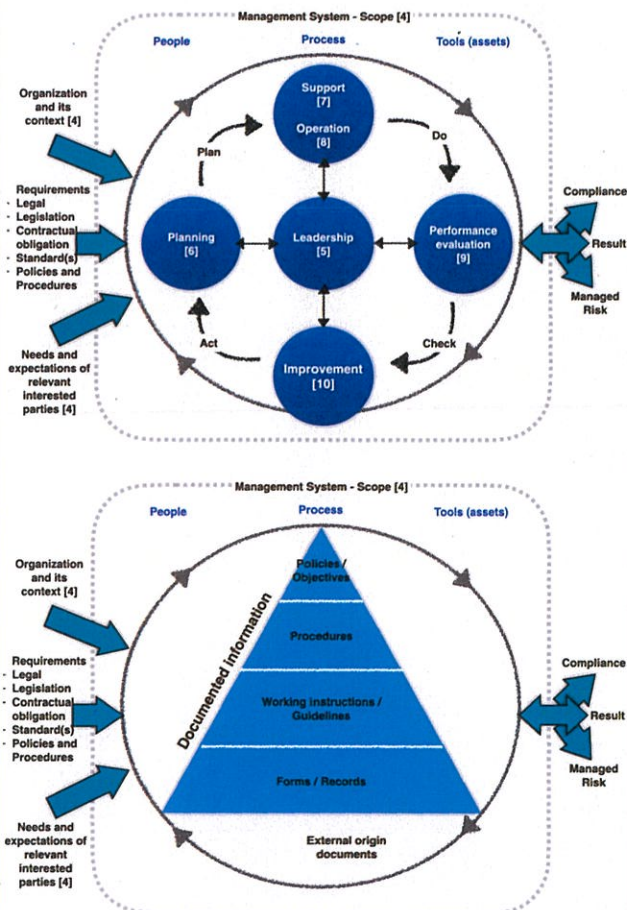
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- ◇ **Pemikiran Berbasis Risiko**
 PT HUMI Tbk. menunjukkan komitmen untuk mengelola risiko kepatuhannya secara efektif dan efisien untuk memitigasi risiko terjadinya ketidakpatuhan atau pelanggaran yang bisa menimbulkan kerugian atau kerusakan reputasi akibat tidak terpenuhinya kewajiban peraturan atau persyaratan lainnya dari pihak berkepentingan.



- ◇ **Risk-Based Thinking**
The company demonstrates its commitment to managing its compliance risks effectively and efficiently to mitigate the risk of non-compliance or violations that could result in loss or damage to its reputation due to failure to fulfill compliance obligations or other requirements from interested parties.

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	◇ Pengambilan Keputusan Berdasarkan Bukti Guna memastikan penerapan sistem manajemen kepatuhan yang efektif, perusahaan mengelola informasi terdokumentasi dari pengawasan dan laporan untuk mendapatkan informasi dan data yang akurat yang akan menjadi bukti pendukung pengambilan keputusan yang tepat saat berupaya mengendalikan risiko atau meraih peluang terkait kepatuhan, termasuk di antaranya penanganan terhadap indikasi atau praktik ketidakpatuhan. Sehubungan dengan itu, PT HUMI Tbk. menyediakan kanal resmi bagi pihak berkepentingan untuk melaporkan, atas dasar itikad baik, indikasi atau praktik ketidakpatuhan di PT HUMI Tbk., memperlakukan laporan sebagai dokumen rahasia, dan memastikan bahwa laporan dapat dijadikan bukti yang dapat dipertanggungjawabkan untuk investigasi lebih lanjut, hingga pengambilan keputusan yang tepat atas hasil investigasi.		◇ <i>Evidence-Based Decision Making</i> <i>To ensure effective implementation of compliance management system, the company manages documented information from monitoring and reports to obtain accurate information and data, which will be used as evidence to support correct decision-making when dealing with risks or opportunities regarding compliance, as such the handling of indications or practices of non-compliances.</i> <i>For the latter, the Company provides official channel for interested parties to report, on the basis of goodwill, an indication or practices of non-compliances in the Company, handling the report with confidentiality, and ensuring the credibility of the report as an evidence to be made a basis for further investigation, and ultimately the correct decision making upon investigation.</i>
5.	SISTEM MANAJEMEN KEPATUHAN 1. Ruang Lingkup PT HUMI Tbk. menerapkan sistem manajemen kepatuhan sesuai standar ISO 37301:2021 yang berisi persyaratan dan memberikan pedoman untuk menetapkan, mengembangkan, menerapkan, mengevaluasi, memelihara dan meningkatkan sistem manajemen kepatuhan	5.	<i>COMPLIANCE MANAGEMENT SYSTEM</i> <i>1. Scope</i> <i>The company implements compliance management system according to ISO 37301:2021 standard which contains requirements and provides guidelines for establishing, developing, implementing, evaluating, maintaining and improving an</i>

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yang efektif di PT Humpuss Maritim Internasional Tbk. 2. Acuan Normatif Lihat ISO 37301:2021 Sistem Manajemen Kepatuhan — Persyaratan Dengan Panduan Penggunaannya 3. Istilah dan Definisi Lihat SNI ISO 37301:2021 Sistem Manajemen Kepatuhan — Persyaratan Dengan Panduan Penggunaannya 4. Konteks Organisasi PT HUMI Tbk. membangun pemahaman tentang isu penting, kebutuhan dan harapan pihak berkepentingan yang dapat memengaruhi sistem manajemen kepatuhan, kemudian digunakan untuk memandu perencanaan, penerapan, pelaksanaan, dan peningkatan sistem manajemen kepatuhan. Selain menentukan ruang lingkup sistem manajemen kepatuhan sesuai batas-batas fisik dan organisasional, perusahaan menetapkan kewajiban kepatuhan yang dapat mencakup hukum, peraturan, perizinan, komitmen lingkungan, kesepakatan atau kontrak, kebijakan, kode etik, prosedur, standar industri dan manajemen yang relevan.	<i>effective compliance management system at PT Humpuss Maritim Internasional Tbk.</i> 2. Normative Reference <i>See ISO 37301:2021 Compliance Management System – Requirements with Guidance for Use</i> 3. Terms and Definitions <i>See SNI ISO 37301:2021 Compliance Management System – Requirements with Guidance for Use</i> 4. Context of the Organization <i>The company builds an understanding of the key issues, needs and expectations of stakeholders that may impact the compliance management system, which is then used to guide the planning, implementation, execution and improvement of the compliance management system.</i> <i>In addition to defining the scope of the compliance management system within physical and organizational boundaries, the company establishes compliance obligations that may include laws, regulations, permits, environmental commitment, agreements or contracts, policies, codes of conduct, procedures, industry and management standards.</i>
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PT HUMI Tbk. juga mengidentifikasi risiko kepatuhan sesuai kewajiban kepatuhannya, menganalisis, dan mengevaluasinya secara berkala. Sub-klausul: 4.1 Memahami Organisasi dan Konteksnya Sebagai Perusahaan Terbuka, PT HUMI Tbk. beroperasi dalam lingkungan bisnis yang diatur oleh regulasi pasar modal, hukum korporasi, serta standar tata kelola perusahaan (GCG). HUMI senantiasa mempertimbangkan faktor eksternal seperti persaingan pasar, regulasi Otoritas Jasa Keuangan (OJK), tuntutan pemegang saham, dan ekspektasi masyarakat terhadap transparansi dan kepatuhan. Selain itu, faktor internal seperti budaya organisasi, struktur manajemen, dan sistem pengendalian internal turut mempengaruhi kemampuan perusahaan dalam memenuhi kewajiban kepatuhan. Faktor eksternal yang mempengaruhi: • Regulasi pasar modal dan peraturan OJK • Peraturan pemerintah dan hukum nasional terkait usaha • Persaingan industri dan kondisi ekonomi makro • Ekspektasi pemegang saham, investor, dan pemangku kepentingan lain	<i>The company identifies compliance risks based on its compliance obligations, analyzes, and evaluates them on regular basis.</i> <i>Sub-clauses:</i> 4.1 Understanding the Organization and Its Context <i>As a Public Company, PT HUMI Tbk. operates in a business environment governed by capital market regulations, corporate law, and good corporate governance (GCG) standards. HUMI always considers external factors such as market competition, OJK (Financial Services Authority) regulations, shareholder demands, and public expectations for transparency and compliance. In addition, internal factors such as organizational culture, management structure, and internal control systems also affect the company's ability to meet compliance obligations.</i> External influencing factors: • <i>Capital market regulations and OJK regulations</i> • <i>Government regulations and national laws related to business</i> • <i>Industry competition and macroeconomic conditions</i> • <i>Expectations of shareholders, investors and other stakeholders</i>
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- Tren teknologi dan digitalisasi dalam pelaporan dan tata kelola Faktor internal yang mempengaruhi: - Struktur organisasi dan tata kelola perusahaan - Sistem pengendalian internal dan manajemen risiko - Budaya kepatuhan dan etika bisnis - Kompetensi dan kesadaran karyawan terhadap kepatuhan - Infrastruktur TI untuk mendukung sistem manajemen kepatuhan 4.2 Memenuhi Kebutuhan dan Harapan Pihak Berkepentingan 1. Identifikasi Pihak Berkepentingan (Stakeholders) - Pemegang Saham/Investor - Regulator Nasional dan Internasional: Kementerian Perhubungan, Kantor Kesyahbandaran dan Otoritas Pelabuhan (KSOP), Otoritas Jasa Keuangan (OJK), International Maritime Organization (IMO), Badan Pemeriksa Keuangan (BPK) - Pelanggan dan Mitra Bisnis - Karyawan dan Awak Kapal - Masyarakat dan Lingkungan Sekitar - Lembaga Pengawas dan Auditor - Media dan Publik	- Technology and digitization trends in reporting and governance Internal influencing factors: - Organizational structure and corporate governance - Internal control and risk management systems - Culture of compliance and business ethics - Employee competence and awareness of compliance 4.2 Understanding the Needs and Expectations of Interested Parties 1. Identification of Stakeholders - Shareholders/Investors - National and International Regulators: Ministry of Transportation, Harbormaster and Port Authority Office (KSOP), Financial Services Authority (OJK), International Maritime Organization (IMO), Supreme Audit Agency (BPK) - Customers and Business Partners - Employees and Ship Crew - Community and Surrounding Environment - Supervisory Institutions and Auditors - Media and Public
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2. Kebutuhan dan Harapan Pihak Berkepentingan: • Pemegang Saham/Investor : Kepatuhan terhadap regulasi pasar modal, transparansi pelaporan, pengelolaan risiko kepatuhan. • Regulator Nasional & Internasional : Mematuhi regulasi pelayaran, keselamatan, lingkungan, dan tata kelola Perusahaan. • Pelanggan dan Mitra Bisnis : Kepastian layanan yang sesuai regulasi, integritas dan etika bisnis. • Karyawan dan Awak Kapal : Perlindungan hak kerja, pelatihan kepatuhan, lingkungan kerja aman dan sehat. • Masyarakat dan Lingkungan: Pengelolaan dampak lingkungan, tanggung jawab sosial perusahaan. • Lembaga Pengawas & Auditor : Keterbukaan data dan akses informasi untuk audit dan inspeksi. • Media dan Publik : Informasi yang akurat dan transparan terkait kinerja kepatuhan perusahaan. 4.3 Menentukan Ruang Lingkup Sistem Manajemen Kepatuhan Ruang lingkup sistem manajemen kepatuhan menjelaskan batasan organisasi, aktivitas, lokasi, dan fungsi yang termasuk dalam sistem manajemen kepatuhan yang diterapkan. Ruang lingkup harus relevan dengan konteks organisasi dan kebutuhan pihak berkepentingan.	2. <i>Needs and Expectations of Interested Parties:</i> • Shareholders/Investors: Capital market regulatory compliance, reporting transparency, compliance risk management. • National & International Regulators: Comply with shipping, safety, environmental and corporate governance regulations. • Customers and Business Partners: Regulatory service assurance, integrity and business ethics. • Employees and Crew: Protection of employment rights, compliance training, safe and healthy work environment. • Society and Environment: Environmental impact management, corporate social responsibility. • Supervisory & Auditor Institutions: Data disclosure and access to information for audits and inspections. • Media and Public : Accurate and transparent information on company compliance performance. 4.3 Determining the Scope of Compliance the Management System The scope of the compliance management system describes the organizational boundaries, activities, locations, and functions included in the implemented compliance management system. The scope should be relevant to
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Sistem Manajemen Kepatuhan di PT HUMI Tbk meliputi seluruh proses bisnis yang terkait dengan kegiatan pelayaran, manajemen korporasi, keuangan, sumber daya manusia, dan kepatuhan terhadap peraturan pasar modal, dengan penjelasan sebagai berikut : • Kegiatan operasional dijalankan oleh anak Perusahaan. • Fungsi Corporate Secretary sebagai Compliance di kantor pusat yang mengelola kepatuhan terhadap OJK, BEI, dan regulasi pasar modal. • Proses manajemen risiko, audit internal, dan pelaporan kepatuhan. • Lokasi: Kantor pusat di Jakarta dan anak perusahaan yang beroperasi. • Ruang lingkup mencakup kepatuhan terhadap hukum dan peraturan pelayaran, peraturan pasar modal, ketenagakerjaan, dan perpajakan. 4.4 Sistem Manajemen Kepatuhan Implementasi Sistem Manajemen Kepatuhan di PT HUMI Tbk. dengan menunjuk fungsi Tim Kepatuhan di bawah Departemen Legal & Compliance di bawah Divisi Corporate Secretary. - Dokumen Sistem: • Kebijakan Kepatuhan, Pedoman Etika Bisnis, Panduan Kepatuhan Pasar Modal.	<i>the context of the organization and the needs of interested parties.</i> <i>The Compliance Management System at PT HUMI Tbk covers all business processes related to shipping activities, corporate management, finance, human resources, and compliance with capital market regulations, with the following explanation:</i> • <i>Operational activities are carried out by subsidiaries.</i> • <i>Corporate Secretary functions as Compliance at head office managing compliance with OJK, IDX, and capital market regulations.</i> • <i>Risk management, internal audit and compliance reporting processes.</i> • <i>Location: Head office in Jakarta and operating subsidiaries.</i> • <i>Scope includes compliance with shipping laws and regulations, capital market regulations, labor, and taxation.</i> 4.4 Compliance Management System <i>Implementation of the Compliance Management System at PT HUMI Tbk. by appointing the Compliance Team function under the Legal & Compliance Department under the Corporate Secretary Division.</i> - System Documents: • <i>Compliance Policy, Business Ethics Guidelines, Capital Market.</i>
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- Integrasi Kepatuhan: - Kepatuhan pasar modal (OJK, BEI) melalui pelaporan keuangan berkala, keterbukaan informasi, dan GCG. - Kepatuhan maritim melalui pengawasan operasional anak perusahaan pelayaran dan armadanya. - Aktivitas Utama: - Penilaian risiko kepatuhan tahunan. - Pengelolaan pelaporan pelanggaran (<i>whistleblowing system</i>). - Sosialisasi kepatuhan kepada semua karyawan dan manajemen. - Audit internal terhadap area-area rawan pelanggaran hukum. - Review berkala atas kebijakan dan standar. - Sistem ini harus terdokumentasi, terintegrasi dengan sistem manajemen lainnya (ISO 9001, ISO 14001, ISO 45001, ISO 37301, GCG), dan dievaluasi berkala. - Tanggung jawab dan kewenangan tiap peran dalam sistem harus dijabarkan jelas. - Sistem ini bersifat dinamis dan harus dapat beradaptasi dengan perubahan regulasi atau risiko baru.	- Compliance Guidelines: <i>Compliance Integration:</i> <i>Capital market compliance (OJK, IDX) through periodic financial reporting, information disclosure, and GCG.</i> <i>Maritime compliance through operational supervision of shipping subsidiaries and their fleets.</i> - Main Activities: <i>Annual compliance risk assessment.</i> <i>Management of whistleblowing system.</i> <i>Compliance socialization to all employees and management.</i> <i>Internal audit of areas prone to legal violations.</i> <i>Periodic review of policies and standards</i> <i>This system should be documented, integrated with other management systems (ISO 9001, ISO 14001, ISO 45001, ISO 37301, GCG), and periodically evaluated.</i> <i>The responsibility and authority of each role in the system must be clearly defined.</i> <i>The system is dynamic and must be able to adapt to changing regulations or new risks.</i>
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4.5 Kewajiban Kepatuhan 1. PT HUMI Tbk mengidentifikasi kewajiban kepatuhan melalui proses pemetaan regulasi dan komitmen eksternal. Sumber kewajiban meliputi: • Kewajiban hukum & peraturan: ○ UU No. 8 Tahun 1995 tentang Pasar Modal ○ POJK No. 35/POJK.04/2014 tentang Sekretaris Perusahaan ○ UU No. 17 Tahun 2008 tentang Pelayaran ○ UU No. 40 Tahun 2007 tentang Perseroan Terbatas • Kewajiban sukarela: ○ Komitmen ESG dan keberlanjutan ○ Kode etik internal perusahaan dan piagam GCG ○ Sertifikasi ISO (9001, 14001, 45001, 37301) 2. Dokumentasi & Aksesibilitas • Daftar kewajiban kepatuhan disusun dalam Matriks Kewajiban Kepatuhan, yang ditinjau minimal setiap 6 bulan. • Matriks ini mencakup: ○ Nama regulasi/kewajiban. ○ Ringkasan isi. ○ Pihak yang bertanggung jawab. ○ Frekuensi pelaporan atau pemenuhan ○ Status pemenuhan (<i>compliant / at risk / non-compliant</i>).	4.5 Compliance Obligation 1. PT HUMI Tbk identifies compliance obligations through a process of mapping external regulations and commitments. Sources of obligations include: • Legal & regulatory obligations: ○ Law No. 8 Year 1995 on Capital Market. ○ POJK No. 35/POJK.04/2014 on Corporate Secretary. ○ Law No. 17 Year 2008 on Shipping. ○ Law No. 40 Year 2007 on Limited Liability Company. • Voluntary Obligations: ○ ESG and Sustainability commitments ○ Internal Company Code of Conduct and GCG charter ○ ISO certifications (9001,14001,45001,37301) 2. Documentation and Accesibility • The list of compliance obligations is compiled in the Compliance Obligations Matrix, which is reviewed at least every 6 months. • This Matriks contain of: ○ Name of regulation/obligation. ○ Summary of content. ○ Responsible party. ○ Frequency of reporting or compliance. ○ Compliance status (<i>compliant / at risk / non-compliant</i>).
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- Sistem dokumentasi berbasis digital terintegrasi dengan departemen Legal, Compliance, dan Internal Audit. 3. Pemantauan & Review - Fungsi Compliance melakukan regulatory scanning berkala untuk mengantisipasi perubahan regulasi dari OJK, Kementerian Perhubungan, dan lembaga internasional. - Review matriks dilakukan setiap kuartal dan dilaporkan ke Direksi dan Komite Audit. 4. Tanggung Jawab Dewan Komisaris dan Direksi: Bertanggung jawab atas kepatuhan strategis terhadap semua kewajiban eksternal dan internal. Corporate Secretary: Menjamin kepatuhan pasar modal dan komunikasi publik. Departemen Legal & Compliance: Memastikan pengendalian operasional berjalan sesuai kewajiban yang berlaku. 4.6 Penilaian Risiko Kepatuhan 1. Penilaian risiko dilakukan terhadap seluruh Departemen termasuk: - Manajemen SDM (kepatuhan ketenagakerjaan). - Procurement & Finance (anti-suap dan gratifikasi).	- The digital-based documentation system is integrated with the Legal, Compliance, and Internal Audit departments. 3. Monitoring & Review - The Compliance function conducts periodic regulatory scanning to anticipate regulatory changes from the OJK, Ministry of Transportation, and international institutions. - Review of the matrix is conducted every quarter and reported to the Board of Directors and Audit Committee. 4. Responsibility Board of Commissioners and Directors: Responsible for strategic compliance with all external and internal obligations. Corporate Secretary: Ensures capital market compliance and public communications. Legal & Compliance Department: Ensures operational controls are in place in accordance with applicable obligations. 4.6 Compliance Risk Assessment 1. Risk assessments are conducted on all Departments including: - HR Management (labor compliance) - Procurement & Finance (anti-bribery and gratification)
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c. Anak perusahaan (governance & legal exposure). 2. Metodologi - Penilaian risiko kepatuhan dilakukan secara tahunan menggunakan pendekatan qualitative risk assessment berbasis matriks risiko: - Risiko dinilai berdasarkan 4 parameter: Likelihood (kemungkinan pelanggaran terjadi) Impact (dampak finansial, hukum, reputasi) Control Effectiveness (kekuatan pengendalian internal) Regulatory Sensitivity (tingkat perhatian regulator) 3. Tindak Lanjut - Risiko dengan kategori Tinggi dimasukkan dalam Rencana Tindak Mitigasi Risiko Kepatuhan dan dimonitor berkala. - Laporan penilaian risiko disampaikan ke Direksi, Komite Audit, dan Dewan Komisaris. - Fungsi Compliance dan Risk Management melakukan review dan validasi setiap 6 bulan. 5. Kepemimpinan Dewan governansi dan manajemen puncak menunjukkan komitmen untuk mencapai tujuan sistem manajemen kepatuhan, dan	c. <i>Subsidiaries (governance & legal exposure).</i> 2. Methodology <i>Compliance risk assessment is conducted on an annual basis using a qualitative risk assessment approach based on a risk matrix.</i> <i>Risks are assessed based on 4 parameters:</i> <i>Likelihood (likelihood of a violation occurring)</i> <i>Impact (financial, legal, reputational impact)</i> <i>Control Effectiveness (strength of internal control)</i> <i>Regulatory Sensitivity (level of regulatory attention)</i> 3. Follow-up <i>High category risks are included in the Compliance Risk Mitigation Action Plan and monitored regularly.</i> <i>Risk assessment reports are submitted to the Board of Directors, Audit Committee, and Board of Commissioners</i> <i>Compliance and Risk Management functions conduct reviews and validations every 6 months.</i> 5. Leadership <i>The governing and top management demonstrate a commitment to achieving the objectives of the compliance</i>
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terciptanya budaya kepatuhan di seluruh perusahaan, terindikasi dari adanya kebijakan, tata kelola, fungsi kepatuhan, serta peran dari dewan governansi, manajemen puncak, dan semua personel. Sub-klausul: 5.1 Kepemimpinan dan Komitmen Memastikan manajemen puncak secara aktif menunjukkan kepemimpinan dan komitmen terhadap sistem manajemen kepatuhan serta memastikan integrasi prinsip kepatuhan ke dalam budaya organisasi dan proses bisnis, melalui : 1. Pernyataan dan Tindakan Direksi • Direktur Utama secara rutin menyampaikan komitmen kepatuhan dalam <i>town hall meeting</i>, laporan tahunan, dan saat kick-off. • Direksi menandatangani dan mensosialisasikan Kebijakan Kepatuhan Perusahaan yang mencakup integritas, antikorupsi, dan kepatuhan regulasi nasional serta internasional. • Komitmen kepatuhan dijadikan bagian dari strategi korporasi tahunan, termasuk target penguatan budaya kepatuhan.	<i>management system, and the creation of a compliance culture across the company, indicated by the existence of policies, corporate governance, compliance functions, and the roles of the governing, top management, and all personnel.</i> <i>Sub-clauses:</i> 5.1 Leadership and Commitment <i>Ensure top management actively demonstrates leadership and commitment to the compliance management system and ensures the integration of compliance principles into the organization's culture and business processes, through:</i> 1. Director's Statement and Actions • The President Director regularly conveys compliance commitments in <i>town hall meetings</i>, annual reports, and during kick-offs. • The Board of Directors signs and socializes the Company's Compliance Policy which covers integrity, anti-corruption, and national and international regulatory compliance. • Compliance commitments are made part of the annual corporate strategy, including targets for strengthening the culture of compliance.
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2. Kepatuhan dalam Tata Kelola - Dewan Direksi memastikan kepatuhan menjadi bagian tak terpisahkan dari: - Proses due diligence - Proses tender dan pengadaan barang/jasa - Operasi kapal dan manajemen pelaut - Sistem remunerasi dan reward berbasis nilai kepatuhan - Direksi mewajibkan penyampaian laporan kepatuhan dalam rapat manajemen bulanan. 3. Penugasan dan Dukungan Sumber Daya - Manajemen menunjuk Compliance Officer, yaitu pejabat Fungsi Kepatuhan di bawah Sekretaris Perusahaan) dan memberikan wewenang serta anggaran untuk mengelola sistem kepatuhan. - Menyediakan pelatihan kepatuhan rutin, termasuk anti-fraud dan anti-korupsi, kepada seluruh karyawan dari manajemen atas hingga pelaut. - Mendukung pengembangan sistem whistleblowing dan audit kepatuhan internal berbasis risiko. 4. Teladan Kepatuhan - Manajemen puncak secara aktif menjadi role model dalam kepatuhan terhadap etika bisnis,	2. Compliance in Governance - The Board ensures compliance is an integral part of: - Due diligence process - Tendering and procurement process - Vessel operations and seafarer management - Compliance value-based remuneration and reward system. - The Board of Directors requires the submission of compliance reports in monthly management meetings. 3. Assignment and Resource Support - Management appoints a Compliance Officer (the acting Compliance Function under the Corporate Secretary) and provides authority and budget to manage the compliance system. - Provide regular compliance training, including anti-fraud and anti-corruption, to all employees from upper management to seafarers. - Support the development of whistleblowing systems and risk-based internal compliance audits. 4. Compliance Model - Top management actively role models compliance with business
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menghindari konflik kepentingan, dan menolak gratifikasi. • Dewan Komisaris dan Direksi mengisi Laporan Kepentingan (Conflict of Interest Disclosure) secara berkala. 5. Evaluasi dan Pengawasan • Manajemen menilai efektivitas sistem manajemen kepatuhan melalui: ○ Hasil audit internal & eksternal ○ Umpan balik dari whistleblowing system ○ Laporan kepatuhan triwulanan ke Komite Audit dan Dewan Komisaris 5.2 Kebijakan Kepatuhan HUMI harus menetapkan, mengimplementasikan, dan memelihara kebijakan kepatuhan yang: - Sesuai dengan tujuan dan konteks organisasi - Menyatakan komitmen terhadap pemenuhan kewajiban kepatuhan - Mendorong budaya kepatuhan dan perbaikan berkelanjutan - Dikomunikasikan, dipahami, dan tersedia bagi pihak yang relevan	<i>ethics, avoiding conflicts of interest and rejecting gratuities.</i> • <i>The Board of Commissioners and Board of Directors fill out Conflict of Interest Disclosure periodically.</i> 5. Evaluation and Monitoring • <i>Management assesses the effectiveness of the compliance management system through:</i> ○ <i>Internal & External audit results</i> ○ <i>Feedback from the whistleblowing system</i> ○ <i>Quarterly compliance reports to the Audit Committee and Board of Commissioners.</i> 5.2 Compliance Policy <i>HUMI shall establish, implement and maintain a compliance policy that:</i> - <i>Appropriate to the organization's objectives and context</i> - <i>Expresses a commitment to the fulfillment of compliance obligations</i> - <i>Promotes a culture of compliance and continuous improvement</i> - <i>Are communicated, understood, and available to relevant parties</i>
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5.3 Peran, Tanggung Jawab dan Wewenang 1. Peran Strategis berada pada Pengawasan dan Pengendalian Tata Kelola Kepatuhan di bawah tanggung jawab Dewan Komisaris, untuk : - Mengawasi efektivitas penerapan sistem manajemen kepatuhan. - Menilai kinerja Direksi dalam pengelolaan risiko kepatuhan. - Memastikan independensi dan kecukupan fungsi kepatuhan. Dengan Wewenang: - Meminta laporan berkala dari Direksi dan Fungsi Kepatuhan. - Memberikan masukan dan teguran atas temuan atau ketidaksesuaian kepatuhan. - Menyetujui penunjukan atau pemberhentian pejabat kepatuhan senior (jika berlaku). 2. Manajemen Puncak (Direksi) memiliki peran Eksekutif sebagai Penanggung Jawab Pelaksanaan Sistem Kepatuhan, berupa : - Menetapkan dan menyetujui Kebijakan Kepatuhan dan Kode Etik.	5.3 Roles, Responsibilities and Authorities 1. The Strategic Role is in Compliance Governance Oversight and Control under the responsibility of the Board of Commissioners, to: - Oversee the effectiveness of the implementation of the compliance management system. - Assess the performance of the Board of Directors in managing compliance risk. - Ensure the independence and adequacy of the compliance function. With Authority: - Request periodic reports from the Board of Directors and Compliance Function. - Provide input and admonishment on compliance findings or discrepancies. - Approve the appointment or dismissal of the senior compliance officer (if applicable). 2. Top Management (Board of Directors) has an Executive role as the Person in Charge of Compliance System Implementation, in the form of:
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- Mengintegrasikan kepatuhan ke dalam strategi bisnis (termasuk aturan OJK/BEI). - Menyediakan sumber daya (anggaran, SDM, pelatihan) untuk sistem manajemen kepatuhan. - Menunjuk dan mendukung Fungsi Kepatuhan serta menjamin independensinya. - Melaporkan pelaksanaan sistem kepatuhan kepada Dewan Komisaris. Dengan wewenang: - Mewajibkan seluruh unit kerja untuk tunduk pada kebijakan dan SOP kepatuhan. - Menjatuhkan sanksi terhadap pelanggaran kepatuhan (termasuk di kapal dan kantor pusat). - Menghentikan aktivitas operasional jika terindikasi pelanggaran hukum signifikan. 3. Fungsi Kepatuhan (Compliance Function) yang memiliki peran teknis dan operasional untuk pengelola Sistem Manajemen Kepatuhan, yang memiliki tanggung jawab : - Merancang, mengimplementasikan, dan mengevaluasi sistem manajemen kepatuhan sesuai ISO 37301. - Mengidentifikasi kewajiban kepatuhan (peraturan perundang-undangan pelayaran, maritim, pasar	- Establish and approve the Compliance Policy and Code of Ethics. - Integrate compliance into business strategy (including OJK/BEI rules) - Appoint and support the Compliance Function and ensure its independence - Report the implementation of the Compliance system to the Board of Commissioners. With Authority: - Require all work units to comply with compliance policies and SOPs. - Impose sanctions on compliance violations (including at the ship and head office). - Stop operational activities if significant legal violations are indicated. 3. The Compliance Function, which has a technical and operational role for managing the Compliance Management System, has the following responsibilities: - Design, implement, and evaluate the compliance management system in accordance with ISO 37301. - Identifying compliance obligations (shipping, maritime, capital market,
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	modal, ketenagakerjaan, lingkungan). - Melakukan pelatihan, komunikasi, dan sosialisasi kepada pegawai dan awak kapal. - Menjalankan sistem whistleblowing dan investigasi pelanggaran. - Menyusun laporan berkala kepada Direksi dan Dewan Komisaris. Dengan wewenang: - Mengakses semua area dan dokumen yang diperlukan untuk pemantauan kepatuhan. - Mengeluarkan rekomendasi tindakan korektif kepada Departemen lain. - Melaporkan langsung kepada Direktur Utama tanpa intervensi. 4. Divisi memiliki peran utama, mengintegrasikan kepatuhan dalam pelaksanaan kerja harian, dengan tanggung jawab : - Menindaklanjuti instruksi dari fungsi kepatuhan. - Memastikan SOP sesuai regulasi - Melaporkan potensi pelanggaran dan memastikan karyawan patuh.		labor, environmental laws and regulations). - Conduct training, communication, and socialization to employees and crew. - Implement a whistleblowing system and investigation of violations. - Prepare periodic reports to the Board of Directors and Board of Commissioners. With authority: - Access all areas and documents required for compliance monitoring. - Issue corrective action recommendations to other Departments. - Report directly to the President Director without intervention. 4. The Division has a leading role, integrating compliance in daily work execution, with responsibilities: - Following up on instructions from the compliance function. - Ensure SOPs are in accordance with regulations. - Reporting potential violations and ensuring employees are compliant.
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Dan memiliki wewenang : - Memberi sanksi administratif di unitnya. - Menyesuaikan proses bisnis agar sesuai kebijakan kepatuhan. - Menyampaikan umpan balik atau tantangan kepatuhan ke manajemen. 5. Seluruh Karyawan memiliki peran utama sebagai pelaksana langsung budaya dan kebijakan kepatuhan, dengan tanggung jawab : - Memahami dan mematuhi kebijakan serta kode etik perusahaan. - Melaporkan potensi pelanggaran atau konflik kepentingan. - Mengikuti pelatihan kepatuhan yang diwajibkan. Dan wewenang : - Menggunakan saluran pelaporan pelanggaran tanpa takut pembalasan (whistleblowing system). - Menolak perintah yang melanggar hukum atau etika. 6. Perencanaan Berdasarkan hasil penilaian risiko kepatuhan, PT HUMI Tbk. merencanakan bagaimana mengatasi efek yang tidak diinginkan sebelum terjadi dan bagaimana	<i>And has the authority:</i> - To impose administrative sanctions in their units. - Adjust business processes to comply with compliance policies. - Communicate compliance feedback or challenges to management. 5. All Employees have a primary role as direct implementers of the compliance culture and policies, with responsibilities: - Understanding and complying with company policies and codes of conduct. - Reporting potential violations or conflicts of interest. - Attend required compliance training. <i>And Authority:</i> - Using whistleblowing channels without fear of retaliation. - Refuse orders that violate the law or ethics. 6. Planning Based on the results of the compliance risk assessment, PT HUMI Tbk. plans how to address undesirable effects before they occur and how to benefit from favorable
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mendapatkan keuntungan dari kondisi atau keadaan yang menguntungkan yang dapat mendukung efektivitas sistem manajemen kepatuhan, mencakup penentuan sasaran, pengendalian operasional, dan evaluasi keefektifan sistem manajemen kepatuhan Sub-klausul: 6.1 Tindakan Untuk Menangani Risiko dan Peluang 1. Identifikasi Risiko dan Peluang, Melalui proses konsultasi internal dan pemantauan eksternal, perusahaan pelayaran Tbk dapat mengidentifikasi risiko kepatuhan. 2. Analisis dan Penilaian Risiko dengan menggunakan metode penilaian risiko kepatuhan berbasis: - Kemungkinan (Likelihood): seberapa besar peluang risiko terjadi. - Dampak (Impact): seberapa signifikan efek jika risiko terjadi. - Level Risiko (High, Medium, Low): dikombinasikan dalam matriks risiko. 3. Penetapan Tindakan (Mitigasi dan Penguatan), dimana setiap risiko dan peluang, perusahaan menyusun rencana tindakan konkret 4. Pemantauan & Evaluasi melalui KPI ditetapkan, termasuk melakukan Audit Internal Tahunan untuk evaluasi efektivitas Tindakan.	<i>conditions or circumstances that can support the effectiveness of the compliance management system, including determining targets, operational control, and evaluating the effectiveness of the compliance management system.</i> <i>Sub-clauses:</i> 6.1 Acts to Address Risks and Opportunities 1. <i>Identification of Risks and Opportunities, Through the process of internal consultation and external monitoring, the shipping company can identify compliance risks.</i> 2. <i>Risk Analysis and Assessment using a compliance risk assessment method based on:</i> - <i>Likelihood: how likely the risk is to occur.</i> - <i>Impact: how significant is the effect if the risk occurs.</i> - <i>Risk Level (High, Medium, Low): combined in a risk matrix.</i> 3. <i>Action Determination (Mitigation and Strengthening), where for each risk and opportunity, the company develops a concrete action plan.</i> 4. <i>Monitoring & Evaluation through KPIs set, including conducting Annual Internal Audits for evaluation of the effectiveness of Actions.</i>
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6.2 Sasaran Kepatuhan dan Perencanaan Untuk Mencapainya 1. Compliance Objectives 2. Perencanaan untuk Mencapai Sasaran 3. Format Sasaran dalam Dokumen Sistem Manajemen 6.3 Perencanaan Perubahan • Semua perubahan harus disetujui oleh manajemen puncak jika berdampak sistemik. • Perlu dilakukan penilaian risiko sebelum dan sesudah perubahan. • Evaluasi efektivitas perubahan dilakukan setelah implementasi minimal 1 bulan. 7. Dukungan PT HUMI Tbk. menyediakan sumber daya yang dibutuhkan untuk penetapan, penerapan, pemeliharaan dan peningkatan berkelanjutan dari sistem manajemen kepatuhan, mencakup kompetensi yang akan memengaruhi kinerja kepatuhan, proses kepegawaian, proses komunikasi, pelatihan, kesadaran akan pentingnya mendukung budaya kepatuhan, hingga pengendalian informasi terdokumentasi, mencakup kerahasiaan, distribusi, akses, dan perlindungan terhadap risiko kebocoran atau penyalahgunaan.	6.2 Compliance Objectives and Planning to Achieve Them 1. Compliance Objectives 2. Planning to Achieve in Management 3. Format of Objectives in Management System Documents. 6.3 Planning of Changes • All changes must be approved by top management if they have a systemic impact. • It is necessary to conduct a risk assessment before and after the change. • Evaluation of the effectiveness of changes is carried out after a minimum of 1 month of implementation. 7. Support PT HUMI Tbk., provides the resources needed for the establishment, implementation, maintenance and continuous improvement of the compliance management system, including competencies that will affect compliance performance, personnel processes, communication processes, training, awareness of the importance of supporting a culture of compliance, and control of documented information, including confidentiality, distribution, access and protection against the risk of breaches or misuse.
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Sub-klausul: 7.1 Sumber Daya • Penunjukan Fungsi Kepatuhan. • Penguatan fungsi Audit Internal untuk mendukung kepatuhan. • Ruang data compliance & legal archive digital • Budaya organisasi yang mendukung keterbukaan dan pelaporan pelanggaran • Dukungan penuh Direksi terhadap kebijakan kepatuhan Sistem pelaporan kepatuhan terintegrasi (Compliance Monitoring System) • Aplikasi Whistleblowing System (WBS) berbasis online • Kebijakan Kepatuhan (Compliance Policy) • SOP Pelaporan Pelanggaran. 7.2 Kompetensi Sebagai perusahaan terbuka, risiko hukum dan kepatuhan cukup tinggi. Oleh karena itu, kompetensi dalam regulasi maritim, hukum perusahaan terbuka, serta etika dan kepatuhan menjadi sangat penting. • Direksi & Dewan Komisaris, wajib memiliki kompetensi untuk Pemahaman prinsip GCG, kepatuhan terhadap POJK & UU Perseroan • Fungsi Kepatuhan, wajib memiliki kompetensi: - Pemahaman dan penerapan ISO 37301.	Sub-clauses: 7.1 Resources • <i>Appointment of Compliance Function.</i> • <i>Strengthening the Internal Audit function to support compliance.</i> • <i>Digital compliance & legal archive data room</i> • <i>Organizational culture that supports transparency and whistleblowing</i> • <i>Full support from the Board of Directors on compliance policy Integrated compliance reporting system (Compliance Monitoring System)</i> • <i>Online-based Whistleblowing System (WBS) application</i> • <i>Compliance Policy</i> • <i>SOP on Whistleblowing.</i> 7.2 Competence <i>As a public company, legal and compliance risks are high. Therefore, competencies in maritime regulations, public company law, and ethics and compliance are very important.</i> • <i>Board of Directors & Board of Commissioners, must have the competency to understand GCG principles, compliance with POJK & Company Law.</i> • <i>Compliance function, must have competency:</i> - <i>Understanding and implementation of ISO 37301.</i>
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- Audit internal ISO 37301. - Hukum Korporasi Tbk 7.3 Kesadaran • Risiko pelanggaran bisa datang dari: • Karyawan yang tidak menyadari larangan gratifikasi atau insider trading, • Vendor dan mitra bisnis yang tidak mengikuti kebijakan integritas perusahaan. • Maka, diperlukan : - Pelaporan insiden - Poster edukatif Jumlah pelaporan insiden meningkat (positif) - Kebijakan Kepatuhan & Etika - WBS (Whistleblowing System) - Sosialisasi Anti fraud & anti bribery (online & tatap muka) - Email kampanye bulanan, kuartal. Tingkat partisipasi pelatihan ≥90% - Risiko hukum jika lalai - Kepatuhan terhadap POJK & BEI - Workshop GCG & compliance - Executive briefing setahun sekali dengan kehadiran - Code of Vendor Conduct, adanya konsekuensi pelanggaran kontrak, termasuk sesi onboarding vendor	- Internal audit of ISO 37301. - Public Company Law. 7.3 Awareness • The risk of breaks can come from: - Employees who are unaware of the prohibition on gratuities or insider trading. - Vendors and business partners who do not follow the company's integrity policy. • Therefore, it is required: - Incident reporting - Educational posters Number of incident reports increased (positive) - Compliance & Ethics Policy - WBS (Whistleblowing System) - Anti-Fraud & Anti-bribery socialization (online & face to face) - Email campaigns monthly, quarterly. Training participation ≥90% - Legal risk if negligent - Compliance with POJK & BEI - GCG & Compliance workshop - Executive briefing once a year with attendance - Code of vendor conduct, consequences for breach of contract, including vendor onboarding sessions.
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7.4 Komunikasi PT HUMI Tbk. menghadapi tantangan komunikasi berhubungan dengan banyak pihak luar seperti OJK, mitra bisnis, dan pemegang saham. Sedangkan pihak internal didalamnya ada Manajemen & Karyawan, dibutuhkan media : • Update berkala kebijakan anti-suap dan gratifikasi • Email blast peraturan baru OJK • Pengumuman hasil audit internal untuk menyampaikan info penting secara masif dan cepat melalui email internal, Townhall, intranet • Lembar saku kepatuhan (compliance pocket guide) • Pelaporan insiden hukum atau compliance ke OJK/IDX. Sedangkan untuk Eksternal - Publik & Investor berupa paparan kepatuhan dalam Laporan Tahunan & Laporan Keberlanjutan • Pengumuman penerapan ISO 37301 di media sebagai bukti transparansi kepada pemegang saham dan reputasi public, juga disampaikan melalui website, media massa, publikasi BEI, juga Penyampaian <i>Code of Vendor Conduct</i>. • Komunikasi kebijakan anti-suap saat pengadaan dengan menyelaraskan standar kepatuhan.	7.4 Communication PT HUMI Tbk. faces communication challenges in dealing with many external parties such as OJK, business partners, and shareholders. While internal parties include Management & Employees, media is needed: • Periodic updates on anti-bribery and gratification policies • Email blasts of new OJK regulations • Announcement of internal audit results to convey important information massively and quickly through internal email, Townhall, intranet. • Compliance pocket guide. • Reporting of legal or compliance incidents to OJK/IDX. While for External – public & investors in the form of compliance exposure in the Annual Reports & Sustainability report. • Announcement of ISO 37301 implementation in the media as evidence of transparency to shareholders and public reputation, also conveyed through the website, mass media, IDX publications, as well as Submission of Code of Vendor Conduct • Communication of anti-bribery policy during procurement by harmonizing compliance standards.
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7.5 Informasi Terdokumentasi Sebagai perusahaan yang tercatat di Bursa Efek Indonesia, dokumentasi kepatuhan di pasar modal sangat krusial. Ketidaksesuaian dokumentasi dapat menyebabkan pelanggaran hukum, penalti regulator, dan rusaknya reputasi. Melalui, Kebijakan & Prosedur : • Prosedur Anti-Suap & Gratifikasi • Kode Etik Perusahaan • Manual ISO 37301 yang ditinjau tahunan • Log pelaporan insiden/kasus • Whistleblowing berupa Laporan WBS, Proses investigasi & hasil, tindakan yang diambil, sistem WBS (anonim), arsip Legal & Audit, perlindungan kerahasiaan Pengendalian Dokumen dan Akses: • Semua SOP & kebijakan diberi nomor versi, tanggal revisi • Dokumen sensitif (mis. hasil investigasi) hanya diakses oleh Legal & Audit • Sistem compliance cloud memiliki backup otomatis harian • Retensi dokumen minimal 5 tahun atau sesuai ketentuan regulator (OJK, Kemenhub) • Dokumen kadaluarsa dimusnahkan secara prosedural dengan berita acara.	7.5 Documentation of Information <i>As a company listed on the Indonesia Stock Exchange, capital market compliance documentation is crucial. Documentation discrepancies can lead to legal violations, regulatory penalties, and reputational damage. Through, Policies & Procedures:</i> • <i>Anti-Bribery & Gratification Procedure</i> • <i>Company Code of Conduct</i> • <i>ISO 37301 Manual which is reviewed annually</i> • <i>Incident/case reporting log</i> • Whistleblowing in the form of WBS Reports, Investigation process & results, actions taken, WBS system (anonymous), Legal & Audit records, confidentiality protection <i>Document and Access Control:</i> • <i>All SOPs & policies are assigned version numbers, revision dates</i> • <i>Sensitive documents (e.g. investigation results) are only accessed by Legal & Audit</i> • <i>Compliance cloud system has daily automatic backup</i> • <i>Document retention is at least 5 years or as required by regulators (OJK, Ministry of Transportation)</i> • <i>Expired documents are destroyed procedurally with official report.</i>
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8. Operasional PT HUMI Tbk., merencanakan, menerapkan dan mengendalikan proses yang diperlukan untuk mengatasi isu penting, memenuhi kebutuhan dan harapan pihak berkepentingan, dan persyaratan yang relevan dengan sistem manajemen kepatuhan, menerapkan pengendalian untuk mengelola kewajiban kepatuhan dan risiko kepatuhan terkait, ditinjau secara berkala dan diuji untuk memastikan keefektifannya. PT HUMI Tbk., menetapkan, menerapkan dan memelihara proses untuk mendorong dan memungkinkan pelaporan atas percobaan, dugaan atau pelanggaran aktual dari kebijakan kepatuhan atau kewajiban kepatuhan. Perusahaan memastikan semua personel menyadari prosedur pelaporan, hak mereka untuk melaporkan dengan itikad baik dan dengan kebenaran informasi secara anonim, dan perlindungan atas tindakan balasan. PT HUMI Tbk. memperlakukan laporan secara rahasia, dan memastikan proses investigasi dilakukan oleh personel yang kompeten, independen, tanpa konflik kepentingan, dan hasilnya terdokumentasi, dilaporkan kepada dewan governansi atau manajemen puncak.	8. Operation <i>PT HUMI Tbk, plans, implements and controls the processes necessary to address significant issues, meet the needs and expectations of stakeholders, and the requirements relevant to the compliance management system, implements controls to manage compliance obligations and related compliance risks, is regularly reviewed and tested to ensure its effectiveness.</i> <i>PT HUMI Tbk., establishes, implements and maintains processes to encourage and enable reporting of attempted, suspected or actual violations of compliance policies or compliance obligations. The Company ensures that all personnel are aware of the reporting procedures, their right to report in good faith and with truthful information anonymously, and protection from retaliation.</i> <i>PT HUMI Tbk treats reports confidentially, and ensures that investigations are conducted by competent, independent personnel without conflicts of interest, and the results are documented and reported to the board of governance or top management.</i>
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Sub-klausul: 8.1 Perencanaan dan Pengendalian Operasional PT HUMI Tbk. memiliki kompleksitas operasional tinggi karena: • Mitra eksternal (regulator, vendor, OJK, BEI), • Ekspektasi tinggi dari pemegang saham publik. • Kegagalan kepatuhan dapat berdampak hukum, finansial, dan reputasi. • Pengadaan (Procurement), berisiko untuk suap/gratifikasi vendor, pengendalian yang diterapkan SOP pengadaan berbasis e-proc. • Vendor wajib tanda tangan <i>Vendor Integrity Pact</i> • Sosialisasi etika & gratifikasi • Pelaporan tidak sesuai ke OJK • SOP pelaporan berkala • Whistleblowing • SOP investigasi yang transparan, Sistem WBS, Rekap Laporan, Notulen Tindak Lanjut. 8.2 Menetapkan Pengendalian dan Prosedur PT HUMI Tbk. tercatat di Bursa Efek memiliki kewajiban kepatuhan ganda: 1. Ketentuan pasar modal (OJK, BEI), 2. Tanggung jawab GCG sebagai emiten. Pengendalian dan prosedur yang tepat sangat penting agar seluruh unit bisnis—darat dan laut—berjalan sesuai prinsip kepatuhan.	Sub-clauses: 8.1 Operational Planning and Control PT HUMI Tbk., has high operational complexity due to: - External partners (regulators, vendors, OJK, IDX), - High Expectations from public shareholders - Compliance failures can have legal, financial and reputational impacts - Procurement, risk for vendor bribery/graft, controls applied e-proc based procurement SOP - Vendors required to sign vendor integrity pact - Ethics & gratification socialization - Non-compliant reporting to OJK - Periodic reporting SOP - Whistleblowing - Transparent investigation SOP, WBS System, Report Recap, Follow-up Minutes. 8.2 Establishing Controls and Procedures PT HUMI Tbk. listed on the Stock Exchange have dual compliance obligations: 1. Capital market regulations (OJK, IDX), 2. GCG responsibilities as an issuer. Proper controls and procedures are essential for all business units—land and sea—to be in compliance.
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8.3 Penyampaian Kepedulian PT HUMI Tbk. memiliki kegiatan yang tersebar: dari kantor pusat, hingga operasi di laut. Risiko pelanggaran dapat terjadi di berbagai titik — mulai dari manipulasi hingga gratifikasi di operasional kapal, sampai penyimpangan pelaporan ke OJK. Maka sistem pelaporan harus mencakup semua area tersebut. Kebijakan Whistleblowing System (WBS) • Ditetapkan melalui SK Direksi dan disahkan oleh Dewan Komisaris. • Dinyatakan secara terbuka dalam Kebijakan Kepatuhan dan Kode Etik Perusahaan. • Mencakup: ◦ Jenis pelanggaran yang dapat dilaporkan (korupsi, manipulasi dokumen, pelanggaran keselamatan). ◦ Jaminan perlindungan bagi pelapor. ◦ Prosedur penanganan dan eskalasi. • Saluran pelaporan multikanal melalui Email, Telepon (Whatsapp) dan pengiriman hardcopy • Sosialisasi & Edukasi : ◦ Karyawan darat: pelatihan mengenai prosedur WBS. ◦ Awak kapal: disosialisasikan melalui video singkat sebelum keberangkatan, dan poster di ruang kru. ◦ Mitra kerja/vendor: diikutkan dalam pelatihan integritas saat proses onboarding	8.3 Raising Concerns/whistleblowing PT HUMI Tbk. has dispersed activities: from the head office, to operations at sea. The risk of violations can occur at various points - from manipulation to gratuities in ship operations, to irregularities in reporting to OJK. So the reporting system must cover all these areas. Whistleblowing System Policy (WBS) • Established through Decree of the Board of Directors and ratified by the Board of Commissioners. • Publicly stated in the Company's Compliance Policy and Code of Ethics. • Includes: ◦ Types of violations that can be reported (corruption, document manipulation, safety violations). ◦ Protection guarantees for whistleblowers. ◦ Handling and escalation procedures. • Multichannel reporting channels via Email, Phone (Whatsapp) and hardcopy delivery. • Socialization & Education : ◦ Ground employees: training on WBS procedures. ◦ Ship crew: socialized through a short video before departure, and posters in the crew room. ◦ Working partners/vendors: included in integrity training during the onboarding process.
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8.4 Proses Investigasi Investigasi kepatuhan harus adaptif dengan standar tata kelola perusahaan terbuka (GCG), dengan proses: 1. Pemicu Investigasi - Laporan masuk dari Whistleblowing System (WBS), audit internal, hasil pemantauan kepatuhan, atau temuan eksternal. 2. Penyaringan Awal (Preliminary Assessment) - Tim Kepatuhan mengevaluasi apakah laporan mengandung unsur dugaan pelanggaran kewajiban kepatuhan. - Ditentukan tingkat urgensi, cakupan, dan potensi dampak (hukum, keuangan, reputasi). 3. Penunjukan Tim Investigasi - Dibentuk Tim Investigasi melibatkan Internal Audit, - Jika laporan menyangkut manajemen puncak, dilaporkan langsung ke Dewan Komisaris. 4. Pelaksanaan Investigasi - Pengumpulan bukti dokumen, wawancara saksi/pelapor/terlapor. - Untuk laporan dari atas kapal, bukti bisa berupa: logbook, laporan pelayaran, rekaman CCTV, rekam komunikasi radio.	8.4 Investigation Process Compliance investigations should be adaptive to public company governance (GCG) standards, with processes: 1. Investigation Trigger - Incoming reports from the Whistleblowing System (WBS), internal audit, compliance monitoring results, or external findings. 2. Preliminary Assessment - The Compliance Team evaluates whether the report contains elements of an alleged violation of compliance obligations. - The level of urgency, scope, and potential impact (legal, financial, reputational) are determined. 3. Appointment of Investigation Team - An Investigation Team is formed involving Internal Audit. - If the report concerns top management, it is reported directly to the Board of Commissioners. 4. Implementation of Investigation - Collection of documentary evidence, interviews, of witnesses/ complainants/ reported parties. - For shipboard reports, evidence may include: logbooks, voyage reports, CCTV recordings, radio communication records.
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- Semua proses dijalankan dengan asas kerahasiaan, praduga tak bersalah, dan akuntabilitas. i. Dokumentasi & Pelaporan - Hasil investigasi dituangkan dalam Laporan Investigasi Kepatuhan yang berisi: - Kronologi kasus, - Bukti yang dikumpulkan, - Analisis temuan, - Rekomendasi tindakan. - Laporan ini ditinjau oleh Fungsi Kepatuhan PT HUMI Tbk. ii. Tindakan Korektif Jika pelanggaran terbukti, dilakukan: - Tindakan disipliner (peringatan, demosi, PHK), Pemutusan hubungan kontrak dengan vendor (jika eksternal), - Perbaikan kebijakan/prosedur terkait. - Disampaikan ke Dewan Komisaris (jika berdampak signifikan).	- All processes are carried out with the principles of confidentiality, presumption of innocence, and accountability. i. Documentation & Reporting - The results of the investigation are outlined in the Compliance Investigation Report which contains: - Chronology of the case, - Evidence collected, - Analysis of findings, - Recommended actions. - This report is reviewed by the Compliance Function of PT HUMI Tbk. ii. Corrective Action If the violation is proven. It is carried out: - Disciplinary action (warning, demotion, termination), Termination Contractual relationship with vendor (if external). - Improvement of related policies/procedures. - Delivered to the Board of Commissioners (if significant impact)
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iii. Evaluasi Proses Investigasi Setiap 6 bulan, dilakukan evaluasi efektivitas investigasi: - Durasi penanganan kasus, - Persentase laporan yang ditindaklanjuti, - Tingkat kepuasan pelapor (jika bersifat terbuka). 9. Evaluasi Kinerja PT HUMI Tbk., menjalankan proses pengumpulan informasi untuk tujuan menilai keefektifan sistem manajemen kepatuhan dan kinerja kepatuhan organisasi, mencakup pengendalian risiko ketidakpatuhan, pelatihan, tanggung jawab memenuhi kewajiban kepatuhan, serta pencapaian sasaran kepatuhan. PT HUMI Tbk., menerima umpan balik tentang kinerja kepatuhannya dari berbagai sumber informasi dan melalui berbagai metode pengumpulan informasi, di antaranya pelaporan dari personel, keluhan pelanggan, atau pengaduan dari pihak berkepentingan lainnya. PT HUMI Tbk., melakukan audit internal secara terencana, dan terdokumentasi sesuai panduan audit serta menjalankan tinjauan manajemen yang dipimpin oleh Dewan Governansi dan Manajemen Puncak untuk menilai keefektifan kinerja, serta memutuskan peluang peningkatan	iii. Evaluation of the investigation process Every 6 months, an evaluation of the effectiveness of the investigation is conducted: - Duration of case handling - Percentage of reports that are followed up, - Reporter satisfaction level (if open) 9. Performance Evaluation PT HUMI Tbk., carries out an information gathering process for the purpose of assessing the effectiveness of the compliance management system and the organization's compliance performance, including control of non-compliance risks, training, responsibility for fulfilling compliance obligations, and achievement of compliance targets. PT HUMI Tbk., receives feedback on its compliance performance from a variety of information sources and through a variety of information gathering methods, including reporting from personnel, customer complaints, or complaints from other interested parties. PT HUMI Tbk., conducts planned and documented internal audits in accordance with the ISO 19011 management system audit guidelines, and conducts management review led by the Governing Body and Top Management to assess the
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berkelanjutan terkait sistem manajemen kepatuhan. Sub-klausul: 9.1 Pemantauan, Pengukuran, Analisis dan Evaluasi PT HUMI Tbk. mengelola berbagai risiko kepatuhan mulai dari aspek operasional regulasi, ketenagakerjaan kapal, hingga kepatuhan finansial dan pelaporan kepada OJK. Oleh karena itu, pemantauan dilakukan secara menyeluruh pada berbagai lini. Pemantauan dan Pelaporan • Tim Kepatuhan memantau laporan audit internal, laporan whistleblowing, dan review pelaporan regulasi. • Data dikumpulkan dalam dashboard kepatuhan yang diperbarui secara real-time untuk manajemen puncak. • Laporan kepatuhan disusun secara rutin dan disampaikan ke Dewan Komisaris. Analisis dan Evaluasi • Analisis tren pelanggaran dan potensi risiko melalui data historis selama 12 bulan terakhir. • Evaluasi efektivitas tindakan korektif dan pencegahan dari hasil investigasi. • Benchmark dengan ketentuan OJK.	<i>effectiveness of performance and determine opportunities for continual improvement of the compliance management system.</i> <i>Sub-clauses:</i> 9.1 Monitoring, Measurement, Analysis and Evaluation <i>PT HUMI Tbk. manages various compliance risks ranging from operational aspects of regulation, ship labor, to financial compliance and reporting to OJK. Therefore, monitoring is carried out thoroughly on various lines.</i> Monitoring and Reporting • <i>The Compliance Team monitors internal audit reports, whistleblowing reports, and regulatory reporting reviews.</i> • <i>Data is collected in a compliance dashboard that is updated in real-time for top management.</i> • <i>Compliance reports are prepared regular and submitted to the Board of Commissioners.</i> Analysis and Evaluation • <i>Trend analysis of violations and potential risks through historical data over the past 12 months.</i> • <i>Evaluation of the effectiveness of corrective and preventive actions from investigations results.</i> • <i>Benchmark with OJK regulations</i>
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- Hasil evaluasi menjadi masukan untuk perbaikan kebijakan dan program pelatihan kepatuhan. Tindak Lanjut dan Perbaikan - Mengupdate kebijakan dan SOP berdasarkan hasil evaluasi. - Menyelenggarakan pelatihan ulang bagi personel dengan temuan pelanggaran. - Memperketat pengawasan terhadap area risiko tinggi, seperti pelaporan keuangan. - Melakukan audit tambahan atau inspeksi mendadak. 9.2 Audit Internal Audit internal pada PT HUMI Tbk. harus mencakup aspek operasional serta aspek korporasi seperti kepatuhan terhadap regulasi pasar modal dan pelaporan keuangan. 1. Perencanaan Audit Internal - Disusun Jadwal Audit Internal Tahunan yang meliputi seluruh fungsi: Operasi, HSE, Kepatuhan, Keuangan, SDM, dan Unit Kerja Pendukung lainnya. - Prioritas audit diberikan pada area risiko tinggi berdasarkan hasil penilaian risiko kepatuhan. - Audit dilakukan minimal satu kali dalam setahun untuk setiap unit. 2. Pelaksanaan Audit - Tim Auditor Internal terdiri dari personel yang kompeten, independen,	<i>Evaluation results serve as input for policy improvement and compliance training programs.</i> Follow-up and Improvement <i>Update policies and SOP's based on evaluation results.</i> <i>Conduct retraining for personnel with findings of violations.</i> <i>Tighten supervision of high-risk areas, such as financial reporting.</i> <i>Conduct additional audits or unannounced inspections.</i> 9.2 Internal Audit <i>Internal audit at PT HUMI Tbk. must cover operational aspects as well as corporate aspects such as compliance with capital market regulations and financial reporting.</i> 1. Internal Audit Planning <i>An Annual Internal Audit Schedule is prepared covering all functions: Operations, HSE, Compliance, Finance, HR, and other Supporting Work Units.</i> <i>Audit Priority is given to high risk areas based on the results of compliance risk assessment.</i> <i>Audits are conducted at least once a year for each unit.</i> 2. Audit Implementation <i>The Internal Auditor team consists of competent, independent personnel who are</i>
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dan tidak terlibat langsung dengan area yang diaudit. - Penggunaan checklist audit berbasis persyaratan SNI ISO 37301:2021 dan peraturan terkait. - Audit mencakup pemeriksaan dokumentasi, wawancara, observasi lapangan, dan sampling bukti kepatuhan. 3. Pelaporan Hasil Audit - Tim auditor menyusun Laporan Audit Internal yang memuat: - Temuan kepatuhan (sesuai/tdk sesuai), - Ketidaksesuaian (non-compliance), - Rekomendasi perbaikan, - Identifikasi peluang peningkatan. - Laporan disampaikan kepada Manajemen Puncak. 4. Tindak Lanjut Audit - Unit terkait wajib menindaklanjuti temuan audit dengan membuat Rencana Tindakan Perbaikan yang terukur dan terjadwal. - Tim Audit melakukan verifikasi terhadap pelaksanaan tindakan korektif dalam waktu yang ditentukan.	not directly involved with the audited area. - The use of audit checklists is based on the requirements of SNI ISO 37301:2021 and related regulations. - The Audit includes examination of documentation, interviews, field observations, and sampling of evidence of compliance 3. Reporting of Audit Results - The Auditor team prepares an Internal Audit Report that contains: - Compliance findings (compliant/ non compliant) - Non-compliance - Recommendations for improvement - Identification of improvement opportunities. - The report is submitted to Top Management 4. Follow-up Audit - Related units are required to follow up on audit findings by creating a measurable and scheduled Corrective Action Plan - The Audit Team verifies the implementation of corrective actions within the specified time.
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- Hasil verifikasi dilaporkan kembali kepada manajemen dan Dewan Komisaris. 5. Evaluasi Efektivitas Audit Internal - Setiap akhir tahun dilakukan evaluasi efektivitas program audit, mencakup cakupan, frekuensi, dan kualitas temuan. - Feedback auditor dan auditee dikumpulkan untuk perbaikan proses audit berikutnya 9.3 Tinjauan Manajemen Tinjauan Manajemen dilakukan oleh Direksi dan Dewan Komisaris, untuk mengevaluasi hasil pelaksanaan sistem manajemen kepatuhan, mendukung pengambilan keputusan strategis, dan mengarahkan perbaikan berkelanjutan. Frekuensi dan Peserta - Tinjauan Manajemen dilakukan minimal 1 kali setahun, atau lebih sering jika diperlukan (misal setelah kejadian pelanggaran besar). - Peserta utama: Direksi, Dewan Komisaris, Kepala Fungsi Kepatuhan, Kepala Divisi Operasi, HSE, Keuangan, dan lainnya terkait.	<i>Verification results are reported back to management and the Board of Commissioners.</i> 5. Evaluation of Internal Audit Effectiveness <i>At the end of each year, the effectiveness of the audit program is evaluated, including the scope, frequency, and quality of findings.</i> <i>Auditor and auditee</i> 9.3 Management Review <i>The Management Review is conducted by the Board of Directors and Board of Commissioners, to evaluate the results of implementation of the compliance management system, support strategic decision-making, and direct continuous improvement.</i> Frequency and Participants <i>Management Reviews are conducted at least once a year, or more frequently if required (e.g. after a major breach).</i> <i>Key participants: Board of Directors, Board of Commissioners, Head of Compliance Function, Head of Operations, HSE, Finance, and other relevant divisions.</i>
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Agenda Tinjauan Manajemen: • Status pelaksanaan kebijakan kepatuhan • Hasil audit internal dan eksternal • Evaluasi risiko kepatuhan • Laporan pelanggaran dan investigasi • Kepatuhan terhadap peraturan eksternal • Kinerja proses sistem manajemen kepatuhan • Perubahan yang mempengaruhi sistem manajemen • Sumber daya yang dibutuhkan • Kesempatan perbaikan dan inovasi 10. Peningkatan Perusahaan senantiasa meningkatkan dan mengembangkan sistem manajemen kepatuhan di tengah perubahan persyaratan pihak berkepentingan, kewajiban kepatuhan, atau isu internal dan eksternal terkait bisnis manajemen perusahaan dari waktu ke waktu. Perusahaan mengambil tindakan untuk mengendalikan dan memperbaiki konsekuensi atas ketidaksesuaian atau ketidakpatuhan, menentukan akar penyebab masalah, dan mencegah terulangnya ketidaksesuaian atau ketidakpatuhan.	Management Review Agenda: • Status of compliance policy implementation • Internal and external audit results • Compliance risk evaluation • Violation and investigation reports • Compliance with external regulations • Performance of compliance management system processes • Changes affecting the management system • Resources required • Opportunities for improvement and innovation. 10. Improvement The Company continuously improves and develops the compliance management system amidst changes in stakeholder requirements, compliance obligations, or internal and external issues related to the company's management business from time to time. The Company takes action to control and correct the consequences of non-conformity or non-compliance, determine the root cause of the problem, and prevent recurrence of non-conformity or non-compliance.
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Sub-klausul: 10.1 Peningkatan Berkelanjutan PT HUMI Tbk. menghadapi risiko kepatuhan yang dinamis dari regulasi nasional maupun internasional, serta tuntutan pasar modal. Oleh sebab itu, peningkatan berkelanjutan menjadi kunci menjaga reputasi, kelangsungan operasional, dan kepatuhan terhadap pemangku kepentingan. Penerapan Peningkatan Berkelanjutan: 1. Identifikasi Peluang Perbaikan ○ Mengumpulkan feedback dari hasil audit internal, tinjauan manajemen, laporan whistleblowing, dan survei kepuasan karyawan terkait kepatuhan. ○ Monitoring tren risiko kepatuhan baru, perubahan regulasi pasar modal (OJK). ○ Analisis insiden pelanggaran dan kegagalan sistem yang pernah terjadi. Pelaksanaan Perbaikan ○ Pengembangan dan revisi kebijakan serta prosedur kepatuhan untuk menyesuaikan dengan perubahan regulasi dan hasil evaluasi. ○ Pelaksanaan pelatihan tambahan bagi staf kantor tentang regulasi terbaru dan praktik kepatuhan terbaik. ○ Penerapan teknologi baru untuk monitoring dan pelaporan kepatuhan,	Sub-clauses: 10.1 Continual Improvement <i>PT HUMI Tbk., faces dynamic compliance risks from national and international regulations, as well as capital market demands. Therefore, continuous improvement is key to maintaining reputation, operational continuity, and stakeholder compliance.</i> <i>Implementation of Continuous Improvement:</i> 1. Identify Opportunities for Improvement. ○ <i>Collect feedback from internal audit results, management reviews, whistleblowing reports, and employee satisfaction surveys related to compliance.</i> ○ <i>Monitor new compliance risk trends, changes in capital market regulations (OJK)</i> ○ <i>Analyze past incidents of violations and system failures.</i> Implementation of Improvements ○ <i>Development and revision of compliance policies and procedures to align with regulatory changes and evaluation results.</i> ○ <i>Implementation of additional training for office staff on the latest regulations and compliance best practices.</i> ○ <i>Implementation of new technologies for compliance monitoring and reporting, such as document</i>
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seperti software manajemen dokumen dan sistem pelaporan digital. ○ Meningkatkan komunikasi internal mengenai pentingnya kepatuhan dan budaya etika melalui kampanye dan workshop rutin. Evaluasi Efektivitas Perbaikan ○ Melakukan review pasca-implementasi perbaikan dengan memantau KPI terkait kepatuhan, seperti tingkat pelaporan yang tepat waktu, pengurangan insiden pelanggaran, dan hasil audit. ○ Menyelenggarakan evaluasi berkala untuk memastikan bahwa tindakan perbaikan berkontribusi pada peningkatan berkelanjutan. ○ Melaporkan hasil evaluasi ke manajemen puncak dalam rapat tinjauan manajemen. Dokumentasi dan Rekam Jejak ○ Mendokumentasikan setiap inisiatif perbaikan dan hasil evaluasinya sebagai bagian dari sistem manajemen kepatuhan. ○ Menyimpan bukti pelatihan, revisi prosedur, laporan audit, dan hasil tinjauan manajemen secara terorganisir dan mudah diakses	management software and digital reporting systems. ○ Improving internal communication on the importance of compliance and ethical culture through regular campaign and workshops. Evaluation of Remedy Effectiveness ○ Conduct post-implementation reviews of improvements by monitoring compliance-related KPIs, such as timely reporting rates, reduction in incidents of misconduct and audit results. ○ Conduct periodic evaluations to ensure that corrective actions contribute to continuous improvement. ○ Report evaluation results to top management in management review meetings. Documentation and Records ○ Document any improvement initiatives and their evaluation results as part of the compliance management system. ○ Maintain evidence of training, procedure revisions, audit reports, and management review results in an organized and easily accessible manner.
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10.2 Ketidaksesuaian dan Tindakan Korektif Ketidaksesuaian dapat muncul dari pelanggaran ketidaksesuaian dokumen kepatuhan, hingga pelanggaran regulasi pasar modal dan tata kelola perusahaan. Penanganan cepat dan tepat penting untuk menjaga kepatuhan dan reputasi perusahaan. Penerapan Ketidaksesuaian dan Tindakan Korektif: 1. Identifikasi Ketidaksesuaian Ketidaksesuaian terdeteksi melalui audit internal, laporan whistleblowing, atau pengawasan regulator. 2. Pelaporan dan Dokumentasi - Ketidaksesuaian dicatat dalam formulir laporan ketidaksesuaian (NCR - Non-Conformity Report). - Formulir memuat rincian temuan, tanggal, lokasi, pihak terkait, dan dampak potensi. 3. Analisis Akar Masalah - Tim kepatuhan melakukan investigasi untuk mencari penyebab utama ketidaksesuaian, misalnya kegagalan pengawasan dokumentasi atau kurangnya pelatihan awak kapal. 4. Penentuan Tindakan Korektif - Menyusun rencana tindakan korektif yang spesifik, terukur, dapat dilaksanakan, relevan, dan berbatas waktu (SMART).	10.2 Nonconformity and Corrective Action Non-conformities can arise from violations of non-compliance of compliance documents, to violations of capital market regulations and corporate governance. Prompt and appropriate handling is important to maintain compliance and the company's reputation. Implementation of Nonconformities and Corrective Actions: 1. Identification of Nonconformities Nonconformities are detected through internal audits, whistleblowing reports, or regulatory oversight. 2. Reporting and Documentation - Nonconformities are recorded in a non-conformity report (NCR) form. - The form contains details of the findings, date, location, relevant parties, and potential impact. 3. Root Cause Analysis - The compliance team conducts an investigation to find the root cause of the nonconformity, such as failure to monitor documentation or lack of crew training. 4. Determination of Corrective Action - Develop a corrective action plan that is specific, measurable, implementable, relevant, and time-bound (SMART).
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	5. Implementasi Tindakan Korektif - Tim yang ditunjuk melaksanakan tindakan korektif sesuai rencana. - Progres pelaksanaan dipantau dan didokumentasikan. 6. Verifikasi Efektivitas - Setelah tindakan selesai, dilakukan verifikasi apakah tindakan tersebut efektif dalam mengatasi ketidaksesuaian dan mencegah terulang. - Jika tindakan kurang efektif, dilakukan evaluasi ulang dan penyesuaian. 7. Penutupan Ketidaksesuaian - Ketidaksesuaian dapat ditutup secara resmi setelah semua tindakan selesai dan diverifikasi. - Dokumen ketidaksesuaian dan tindak lanjut disimpan sebagai bukti kepatuhan dan perbaikan.		5. Implementation of Corrective Actions - The designated team implements the corrective action as planned. - Implementation progress is monitored and documented. 6. Verification of Effectiveness - After the action is completed, verify whether the action is effective in addressing the nonconformity and preventing recurrence. - If the action is not effective, re-evaluation and adjustments are made. 7. Nonconformity Closure - Nonconformities can be officially closed once all actions are completed and verified, - Nonconformities and follow-up documents are kept as evidence of compliance and improvement
6.	PELAPORAN PEMBAHARUAN Setiap potensi terjadinya perubahan, ketidaksesuaian, penyimpangan terhadap implementasi pedoman ini maka harus ada pelaporan ke Corporate Secretary Perusahaan.	6.	REPORTING UPDATES Any potential changes, discrepancies, deviations from the implementation of this guidance must be reported to the Corporate Secretary Company.
7.	PENUTUP Pedoman ini disusun dengan penuh itikad baik untuk memastikan pemenuhan persyaratan sistem manajemen kepatuhan ISO 37301:2021.	7.	CLOSING This guidance is prepared in good faith to ensure the compliance with the requirements of ISO 37301:2021 compliance management system.

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- Seluruh organ Perusahaan dan pejabat wajib untuk mematuhi pedoman ini. - Pedoman ini dievaluasi secara berkala paling sedikit 1 (satu) kali dalam setahun dan dapat dilakukan revisi untuk menyesuaikan dengan versi terkini Sistem Manajemen Kepatuhan ISO 37301:2021.	<i>All Company organs and officials are required to adhere to the guidelines.</i> <i>This guidelines is evaluated periodically at least 1 (one) time a year and can be revised to suit the latest version of ISO 37301:2021 Compliance Management System.</i>
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Jakarta, **23** Juli 2025

PT Humpuss Maritim Internasional

**Mengetahui & Menyetujui, |
Acknowledged & Approved,**

TIRTA HIDAYAT
Direktur Utama | *President Director*

ABDUL RACHIM SOFYAN
Komisaris Utama | *President Commissioner*

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Form – 1

**PERNYATAAN KOMITMEN
DEWAN KOMISARIS DAN DIREKSI
PT HUMPUSS MARITIM INTERNASIONAL TBK |
STATEMENT OF COMMITMENT OF THE BOARD OF COMMISSIONERS
AND BOARD OF DIRECTORS
PT HUMPUSS MARITIM INTERNASIONAL TBK**

Dewan Komisaris dan Direksi PT Humpuss Maritim Internasional Tbk dengan ini menyatakan bahwa dalam menjalankan tugas, fungsi dan wewenang masing-masing senantiasa mematuhi Pedoman Kepatuhan.

The Board of Commissioners and the Board of Directors of PT Humpuss Maritim Internasional Tbk hereby declare that in carrying out their respective duties, functions and authorities, they always comply with the Compliance Guidelines.

Jakarta, Juli 2025

DIREKSI | *The Board of Directors*

**DEWAN KOMISARIS |
*The Board of Commissioners***

Tirta Hidayat
Direktur Utama | *President Director*

A.R Sofyan
Komisaris Utama *President
Commissioner*

Dedi Hidayana
Direktur | *Director*

Daryono
Komisaris Independen | *Independent
Commissioners*

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Form – 2

**PERNYATAAN KOMITMEN
FUNGSI KEPATUHAN
PT HUMPUSS MARITIM INTERNASIONAL TBK |
STATEMENT OF COMMITMENT OF THE BOARD OF COMMISSIONERS
AND BOARD OF DIRECTORS
PT HUMPUSS MARITIM INTERNASIONAL TBK**

Fungsi Kepatuhan PT Humpuss Maritim Internasional Tbk dengan ini menyatakan bahwa dalam menjalankan tugas, fungsi dan wewenang masing-masing senantiasa mematuhi Pedoman Kepatuhan.

Compliance Function of PT Humpuss Maritim Internasional Tbk hereby declare that in carrying out their respective duties, functions and authorities, they always comply with the Compliance Guidelines.

Jakarta, Juli 2025

KETUA

Okty Saptarini Minarti
VP of Corporate Secretary

ANGGOTA

Ervan Saropie
AVP of Legal & Compliance

Dwi Setya Adiningrat
Compliance Executive

Paraf: | *Initials:*

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