

# **Client Ethics Policy**

Sandy Bali

## **1. Purpose**

This Client Ethics Policy outlines our consulting firm's ethical, legal, and professional standards when engaging with clients. We are committed to conducting our operations with the highest integrity and in full compliance with Indonesian law and international business practices.

## **2. Core Principles**

We are committed to:

- Integrity: Delivering objective, truthful, and reliable advice.
- Confidentiality: Protecting client data and proprietary information.
- Transparency: Being clear about deliverables, fees, timelines, and expectations.
- Respect for Culture: Operating with cultural sensitivity in all regions of Indonesia.
- Zero Tolerance for Criminal Activity: We strictly prohibit and will not tolerate involvement—direct or indirect—in any form of criminal behavior, including but not limited to fraud, corruption, bribery, terrorism financing, and money laundering.

## **3. Client Relationship Standards**

### **3.1 Strict Prohibition on Bribery, Kickbacks and Informal Payments**

Our firm maintains a zero-tolerance policy toward all forms of bribery, kickbacks and informal payments, including but not limited to:

- Direct or indirect payments, gifts, or incentives to government officials, local authorities, or state-owned entities for the purpose of securing business advantages, permits, licenses, or favorable treatment.
- Use of third parties or intermediaries to facilitate such payments.
- “Facilitation payments” or unofficial fees, even if considered common or customary practice.
- Payments where the recipient has an undisclosed conflict of interest

### **3.2 Our legal obligations**

We do not participate in, facilitate, or condone any actions that would violate Indonesia’s Anti-Corruption Law (Law No. 31/1999 as amended by Law No. 20/2001) or international frameworks such as the OECD Anti-Bribery Convention or the U.S. Foreign Corrupt Practices Act and UK Bribery Act, where applicable.

Clients must not request, encourage, or expect the firm to make such payments on their behalf. Any such request will result in immediate termination of the engagement.

### **3.3 Due Diligence**

We assess all prospective clients to ensure alignment with our ethical and legal standards. We will decline or terminate relationships with clients that:

- Pose significant reputational, legal, or regulatory risks;
- Operate in sectors known for systemic unethical or criminal practices.

### **3.4 Conflicts of Interest**

We proactively disclose and resolve any real or perceived conflicts of interest. For example, we never pay introducer fees or kickback to individuals with a vested interest in the client company, such as an employee or a contractor.

### **3.5 Data Confidentiality and Protection**

All client information is protected under strict confidentiality agreements and handled in compliance with Indonesia's Personal Data Protection Law (Law No. 27 of 2022).

### **3.6 Fair Dealing and Transparency**

We:

- Price our services fairly and transparently.
- Avoid exploiting privileged or confidential information.
- Make no guarantees of outcomes based on influence or personal relationships.

### **3.7 No Engagement with Unethical or Clients involved in illegal activities**

Sandy Bali maintains a strict policy of non-engagement with any individual or organization that is known or reasonably suspected to be involved in:

- Money laundering
- Tax evasion
- Environmental crimes
- Human trafficking or labor exploitation
- Fraud or financial misconduct
- Violent activity, including:
  - Participation in, incitement to, or material support for acts of violence or armed conflict
  - Affiliation with terrorist organizations or militias
  - Business practices that directly or indirectly cause harm to communities, individuals, or public order
- Prior Convictions:
  - We do not engage with clients who have been convicted of serious criminal offenses—including but not limited to corruption, money

laundering, violent crime, terrorism, or fraud—unless sufficient, independently verifiable evidence is provided that the individual or organization has since been rehabilitated and operates in compliance with legal and ethical standards.

We reserve the right to request legal disclosures, conduct background checks, or decline engagements based on past convictions or reputational risk. Any concealment or misrepresentation of relevant legal history will result in immediate termination of services and referral to appropriate Indonesian or international authorities.

#### **4. Reporting Violations**

Concerns or violations can be reported confidentially via email:

[team@sandy-bali.com](mailto:team@sandy-bali.com)

All reports are investigated with discretion, and no retaliation is tolerated against whistleblowers.

#### **5. Training and Enforcement**

All staff undergo annual ethics training. Any employee or contractor found in violation of this policy will face disciplinary action, including possible termination and legal reporting.

#### **6. Review and Amendment**

This policy is reviewed annually or as laws and regulatory standards change.