

Code of Ethics and Anti-Corruption Policy

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Version History

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1. Our Ethical Commitment

At Tridorian, trust, curiosity, and courage are more than values—they are the foundation of how we do business. As a Premier Google Cloud Partner operating across Southeast Asia and Europe, we recognize that our actions reflect not only on our company but on the broader ecosystem we serve. Our Code of Ethics outlines the principles and behaviors expected of everyone representing Tridorian.

We are committed to operating with:

- **Respect** for individuals, cultures, and local laws
- **Integrity** in all business dealings
- **Transparency** in our decision-making
- **Zero tolerance for corruption and influence peddling**

Every employee, contractor, partner, and third party acting on our behalf is expected to adhere to this Code.

2. Anti-Corruption & Anti-Bribery Policy

We uphold a **zero-tolerance policy** for all forms of corruption, including bribery, kickbacks, extortion, facilitation payments, and influence peddling.

Prohibited Conduct

No one acting on behalf of Tridorian may:

- Offer, give, solicit, or accept any gift, payment, favor, or advantage that may improperly influence business decisions.
- Make facilitation payments to expedite routine governmental actions.
- Launder money or use Tridorian's accounts to cover up undue payments.

In cases where refusing a payment request might endanger personal safety, the individual must prioritize their well-being but report the incident immediately to Tridorian leadership.

3. Gifts, Hospitality & Entertainment

Gifts and invitations must be:

- Reasonable in value
- Infrequent
- Not intended to influence a business decision

Employees must report any gifts or hospitality exceeding thresholds set in local policy. When in doubt, seek guidance from your Country Lead or Compliance Officer.

4. Conflicts of Interest

All team members must avoid personal, financial, or other interests that might conflict with their duties to Tridorian. Any real or potential conflict must be disclosed immediately to a supervisor or HR.

5. Internal Controls, Monitoring & Reporting

To ensure ethical operations:

- Tridorian maintains accurate financial records.
- “Off-book” or “parallel” accounting practices are strictly prohibited.
- All transactions must be recorded transparently, with proper documentation.

We encourage all employees to speak up. Suspected violations can be reported to HR or the CEO directly. Tridorian will treat all concerns with discretion and ensure protection against retaliation for good-faith whistleblowing.

6. Responsibilities of Management & Employees

- **Leaders** must model ethical behavior and ensure their teams understand and comply with this policy.

- **Employees and partners** are expected to complete any required ethics or anti-corruption training and to report suspected breaches immediately.

7. Oversight and Enforcement

The Executive Committee is responsible for monitoring compliance across entities. Violations may result in disciplinary action, including termination or legal proceedings.

8. Global Standards and Legal Compliance

This policy aligns with:

- The **OECD Anti-Bribery Convention**
- The **United Nations Convention Against Corruption**
- The **US Foreign Corrupt Practices Act (FCPA)**
- The **UK Bribery Act 2010**
- Local anti-corruption laws in each country where Tridorian operates

9. Our Pledge

We reaffirm our **zero tolerance** for corruption and unethical behavior. Tridorian will continue to lead with transparency and integrity to foster a responsible digital future across all markets we serve.