

INSIDER TRADING PREVENTION POLICY



I. Introduction

The Company recognizes that insider trading is contrary to the law, propriety, or decency and may be subject to criminal prosecution as referred to in Law Number 8 of 1995 concerning the Capital Market and falls within the category of fraudulent practices (unfair trading) and market crimes (market crime) as regulated in Law Number 5 of 1999 concerning the Prohibition of Monopolistic Practices and Unfair Business Competition.

Insider trading is prohibited because it can cause injustice whereby parties who possess information not accessible to the public can obtain the greatest possible profit. In addition, insider trading can result in the loss of trust of shareholders and/or the public in general in the Company.

The purpose of issuing this Policy is to prevent the misuse of information by the Company's Internal Parties and other parties involved in the Company's operations, which may affect the Company's share price.

II. Definitions

Company Internal Parties: Persons who possess information within the Company, including but not limited to:

1. Members of the Board of Commissioners, Board of Directors, or employees
2. Controlling Shareholders
3. Individuals who, due to their position, profession, or legal relationship with the Company, enable such persons to obtain information
4. Parties who, within the last 6 (six) months, are no longer parties as referred to in points 1, 2, and 3 above.

Insider Trading: The activity of trading the Company's securities by the Company's internal parties who possess material information in the form of plans or decisions of the Company that have not been or are not published by the Company, thus categorized as illegal activities within the financial market environment to seek certain profits, which are usually carried out by utilizing internal information.

Securities: Securities, namely debt acknowledgment letters, commercial securities, shares, bonds, debt instruments, units of participation in collective investment contracts, futures contracts on securities, and any derivatives of securities.

Material Information: Important and relevant information or facts regarding events, occurrences, or facts that directly or indirectly may affect the price of the Company's securities and/or the decisions of shareholders/prospective investors.

Confidential Information: All information or data that is not open to the public, including the Company's internal data and that of its subsidiaries or certain parties within the Company, namely consumers, distributors, vendors, business partners, suppliers, whether commercial, financial, technical, or otherwise, and materials that are expressly stated in writing as confidential information or which by their nature and/or pursuant to applicable laws and regulations must clearly be treated as confidential, or due to circumstances that can generally be interpreted or concluded as confidential information. Accordingly, such parties are obliged to protect such data or information from disclosure or delivery to third parties or parties outside the Company.

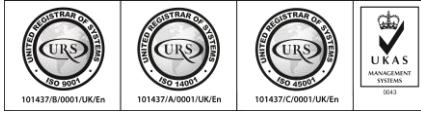
III. General Policy

The Company will minimize the occurrence of insider trading through preventive policies by:

1. Strictly separating confidential data and/or information from public information;
2. Distributing duties and responsibilities for the management of confidential information in a proportional and efficient manner.

The Company prohibits insiders of the Company from using Material Information that has not been officially published by the Company and that is in their possession to conduct insider trading, including but not limited to the following actions:

1. Influencing other parties to carry out the purchase or sale of the Company's securities



2. Providing information to any party who may reasonably be suspected of using such information to conduct the purchase or sale of the Company's shares or securities.

IV. Sanctions

Any insider of the Company who does not comply with this Policy shall be subject to disciplinary sanctions and/or dismissal as determined by the Company's discretion. Any insider of the Company who becomes aware of a violation of this policy may report such violation through the whistleblowing system implemented by the Company. The provisions as referred to above are regulated in Law Number 8 of 1995 concerning the Capital Market in Articles 95 through 99 and their explanations. In addition, Article 104 of Law Number 8 of 1995 concerning the Capital Market regulates sanctions, whereby any party of the Company who violates the aforementioned provisions is subject to imprisonment for a maximum of 10 (ten) years and a fine of up to Rp15,000,000,000.00 (fifteen billion Rupiah).

The Company is authorized to determine appropriate measures or actions from time to time to penalize violations of insider trading in accordance with applicable laws and regulations, as well as to take preventive actions against conflicts of interest and to regulate trading of the Company's securities.

V. Closing

1. This Policy shall be effective as of the date of its stipulation.
2. This Policy shall be reviewed periodically in accordance with needs and developments, both within and outside the Company.

Stipulated in Jakarta
On 8 December 2021



Ryanto Husodo
President Director