

### **AFFILIATED TRANSACTION POLICY**

In order to apply the principles of Good Corporate Governance, the Company needs to establish provisions regarding affiliated party transaction policies in accordance with the applicable laws and regulations.

### **Legal Basis**

- 1. Law Number 8 of 1995 concerning the Capital Market;
- 2. Financial Services Authority Regulation No.42/POJK.04/2020 concerning Affiliated Transactions and Conflict of Interest Transactions;
- 3. Guidelines for the Implementation of Good Corporate Governance.

The following is a summary of the affiliated party transaction policies and transactions containing conflicts of interest:

## 1. Affiliated Party Transactions

Affiliated Transactions are transactions made by and between the Company and the Affiliated Parties of the Company. The term affiliated party has the meaning as referred to in Law Number 8 of 1995 concerning the Capital Market. What is meant by the Affiliated Party of the Company is as follows:

- 1. Employees, directors and commissioners of the Company.
- 2. Companies controlled by the Company's major shareholders.
- A person who has a family relationship through marriage or descent to the second degree, both horizontally and vertically, with members of the Company's Board of Directors, Board of Commissioners, and/or major shareholders
- 4. The main shareholders of the Company are individuals or companies that directly or indirectly own at least 20% of the shares with voting rights issued by the Company or less than the percentage determined by the Financial Services Authority.
- 5. Companies controlled by the Company, namely companies controlled by the Company, either directly or indirectly.
- 6. A company in which one or more Directors or Commissioners is also a Director or Commissioner of the Company.

The following principles must be observed by the relevant work units in relation to transactions with affiliated parties:

- 1. Applying the principles of Good Corporate Governance (GCG), namely transparency, accountability, responsibility, independence, and fairness.
- 2. Ensure that transactions are carried out fairly.



# 3. Fairness of Transaction

The core principles that must be considered in conducting transactions with Affiliated Parties are:

- Pay attention to the principles of good governance, namely transparency, accountability, responsibility, independence and fairness.
- Confirming the fairness and reasonableness of the transaction value and requirements (arm's length transactions

### 4. Affiliate Transaction Material

Especially for material affiliation transactions that have a potential conflict of interest, will first be analyzed/reviewed by the Audit Committee and reported to the Board of Commissioners with the following flow:

