

SHARE OWNERSHIP AND INSIDER TRANSACTIONS

Basic Principles of Share Ownership

1. Members of the Board of Commissioners, Board of Directors and all employees of the Company are allowed to own the Company's shares as well as other companies.
2. Ownership of shares can be through the mechanism of buying and selling transactions of shares of the Company through the stock exchange and direct selling and buying between parties. Ownership may also be provided through the ESOP / MSOP program provided by the Company.
3. Members of the Board of Commissioners and the Board of Directors holding the shares of the Public Company shall submit this to OJK within 10 (ten) days after the ownership and / or ownership change.
4. Members of the Board of Commissioners and Board of Directors shall also notify the Company of ownership and any change of ownership of the shares of the Public Company.
5. The submission of information to the Company shall be made no later than 3 (three) working days after the ownership or change of ownership of the shares of the Public Company.

Basic Principles of Insider Transactions

The Company prohibits the transaction of securities by "Insiders" who have "Insider" Information as follows:

- a. Affects the other party to make a purchase or sale of such Securities, or
- b. Giving Insider Information to any Person who is reasonably suspected of using such Information to make purchases or sales of securities.
- c. All Employees who have Insider trading information are prohibited from trading (buying or selling) activities on securities.
- d. All Employees or Covered Persons are prohibited from contacting investors or shareholders to obtain Information for the purpose of trading privately.
- e. All Employees or Covered Person may conduct securities transactions at any time if such persons do not have Insider Information at the time of their trading.
- f. In relation to such transaction activities, Covered Person is not allowed to conduct transactions on the Company's securities during the black out period. This policy also applies to ESOP / MSOP mechanism.
- g. The Black Out Period is defined as follows:
 - i. 10 (ten) working days before the Company discloses the disclosure of the Company's financial statement during the first three quarters or one month before the Company discloses the disclosure of annual performance results and ends two business days after such disclosure is submitted.
 - ii. Other periods as determined by the Board of Directors at any time in connection with the disclosure of Information concerning the Company's action plan.
- h. For a Husband or Wife of an Employee or Covered Person who will trade on the Company's securities or other financial transactions in a manner not provided for in this policy, contact the Corporate Secretary function to obtain direction.
- i. Covered Person trading activities are expected not to interfere with their job responsibilities.