



Affiliated Party Transaction's Policy

PT Prodia Widyahusada Tbk

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As an effort to protect the interests of shareholders and as part of the implementation of good Corporate Governance principles, the Company has a policy guideline regarding transactions with affiliated parties and parties with conflicts of interest. Transactions with affiliated parties and conflicts of interest have the potential risk of abuse by related parties that could harm minority shareholders and impact market integrity.

The objectives of the Affiliated Transactions and Conflict of Interest Policy are as follows:

1. To serve as a guideline for conducting transactions with affiliated parties and conflicts of interest, ensuring that such transactions are conducted fairly.
2. To ensure that transactions carried out with affiliated parties do not harm the interests of the Company and the Company's shareholders.
3. To assist and enhance the independence of the Company's management in managing transactions with affiliated parties and those with conflicts of interest with the Company.

The legal basis for this Policy on Transactions with Affiliated Parties is Regulation IX.E.1 of the Indonesian Capital Market and Financial Institution Supervisory Agency (BAPEPAM) concerning Affiliated Transactions and Certain Conflict of Interest Transactions.

A. Definitions

1. Controlled company is a company that is controlled either directly or indirectly by the Company.
2. Transactions are activities in the context of:
 - a. Providing and/or receiving loans.
 - b. Acquiring, disposing, or using assets, including in the context of guaranteeing.
 - c. Acquiring, disposing, or using services or securities of a Company or Controlled Company.
 - d. Entering contracts related to activities as referred to in points 1, 2, and 3 above.
3. Affiliated Transactions are transactions conducted by the Company or Controlled Company with Affiliates of the Company or Affiliates of members of the Board of Directors, members of the Board of Commissioners, or major shareholders of the Company. Affiliated Transactions in this policy exclude the following transactions:
 - a) Compensation, including salaries, pension fund contributions, and/or special benefits provided to members of the Board of Commissioners, members of the Board of Directors, and major shareholders in the case where the major shareholder also serves as an employee, if the overall amount of such compensation is disclosed in periodic financial reports.
 - b) Transactions that constitute the Company's or Controlled Company's main business activities.
 - c) Transactions that support the main business activities of the Company or Controlled Company.
4. Conflict of Interest is the disparity between the Company's economic interests and the personal economic interests of members of the Board of Directors, members of the Board of Commissioners, or major shareholders that could harm the Company.
5. Independent General Meeting of Shareholders is a general meeting of shareholders that does not have a Conflict of Interest in relation to a particular Transaction and/or is not an Affiliate of members of the Board of Directors, members of the Board of Commissioners, or major shareholders who have a Conflict of Interest in a particular Transaction.
6. Employees are all workers who receive wages and/or salaries from the Company.
7. The Company is PT Prodia Widyahusada Tbk

B. Affiliated Transactions

Affiliated parties of the Company are prohibited from utilizing the Company for personal, family, and/or other parties' interests that could harm or diminish the Company's profits. They are also prohibited from taking and/or receiving personal benefits from the Company other than remuneration and other facilities stipulated based on the General Meeting of Shareholders (GMS).

Affiliated transactions are conducted in a manner and process such that the Company or Controlled Company does not receive different or preferential treatment from/to the Company's affiliated parties. Affiliated Transactions are carried out based on normal and reasonable commercial terms and conditions.

Transactions that are required to be disclosed:

1. Every member of the Company's Board of Directors and/or Board of Commissioners is required to disclose their plans to engage in an Affiliated Transaction, whether conducted personally or by their family.
2. Any operational unit of the Company that plans to conduct an Affiliated Transaction must disclose the plans for such Affiliated Transaction.
3. Affiliated Transactions with a value exceeding 0.5% of the Company's paid-up capital and exceeding the amount of Rp 5 billion must include an assessment report from an independent appraiser registered with the Financial Services Authority (OJK).

Reporting and Information Disclosure

The Corporate Secretary will fulfill the obligation of information disclosure regarding affiliated transactions conducted by the Company to the Financial Services Authority (OJK) and/or to the public in accordance with applicable regulations and laws.

C. Conflict of Interest

In the event of a Conflict of Interest, members of the Board of Commissioners, the Board of Directors, and the Major Shareholders of the Company must prioritize the interests of the Company and are prohibited from taking actions that could harm and/or reduce the Company's profits. According to the applicable provisions, any decision concerning a conflict of interest must be made at an Independent General Meeting of Shareholders unless otherwise specified. In the event of a conflict of interest in a transaction, the relevant Director or Commissioner must abstain from the review or approval process of that transaction.

D. Others

The Policy on Transactions with Affiliated Parties will be periodically reviewed in accordance with the applicable provisions and regulations.
