



# Preventing Insider Trading Policy

PT Prodia Widyahusada Tbk

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## Preventing Insider Trading Policy

PT Prodia Widyahusada Tbk ("The Company") has formulated an Insider Trading Policy, which is a policy that prohibits trading in securities in the form of shares, both in the company's shares and in the shares of other companies that transact with the company, such trading activities are conducted by Insiders or parties that have a special relationship with the company (insider trading). Insiders are prohibited from trading the Company's securities based on Material Information or Facts that have not been disclosed to the public.

This policy aims to avoid conflicts of interest and regulate trading in equity securities. Every employee of the Company who has access to non-public material information must not misuse their position to disclose non-public material information that can influence the decisions of investors. Insider Information is information that has not been widely disseminated to the public, which can prompt someone to buy, sell, or hold the Company's shares.

The term "Insiders" refers to the following:

1. Major Shareholders of the Company.
2. Members of the Board of Commissioners, Directors, or Employees of the Company.
3. Individuals who, due to their position<sup>1</sup> or profession or their business relationship<sup>2</sup> with the Company, are able to obtain Insider Information<sup>3</sup>; or
4. Parties who, within the last 6 (six) months, are no longer considered as Parties as mentioned in points 1, 2, and 3 above.

Every Insider in the Company who has insider information is not allowed/prohibited to perform the following actions:

1. Buying or selling shares in the Company or another company that transacts with the Company.
2. Influencing others to buy or sell such securities.
3. Providing insider information to any party suspected of being able to use such information to buy or sell securities.

Any party who intentionally attempts to unlawfully obtain and ultimately obtains insider information about the Company is also subject to the same prohibitions as those applicable to insiders as referred to above. Examples of unlawful acts include:

1. attempting to obtain insider information through theft;
2. attempting to obtain insider information by persuading insiders; and
3. attempting to obtain insider information through violence or threats.

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<sup>1</sup> The term "position" in point 3 refers to a position within an agency, institution, or government body.

<sup>2</sup> The term "business relationship" in point 3 refers to an employment or partnership in business activities, including relationships such as customers, suppliers, contractors, clients, and creditors.

<sup>3</sup> The term "insider information" in point 3 refers to material information possessed by insiders that is not yet available to the public.

The policy to prevent insider trading within the Company is implemented through:

1. Clearly segregating data and/or information that is confidential and public in nature;
2. Signing Non-Disclosure Agreements when collaborating with third parties;
3. Dividing tasks and responsibilities for the management of confidential information.

The provisions mentioned above are regulated in Law Number 8 of 1995 concerning Capital Markets, Article 95 to Article 99 and their explanations.

Furthermore, Article 104 of Law Number 8 of 1995 concerning Capital Markets regulates Sanctions, whereby any party in the Company that violates the provisions as mentioned above 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).

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