

COMMUNICATIONS POLICY

PT Astra Graphia Tbk



COMMUNICATIONS POLICY

A. Introduction

This document contains the policy of PT Astra Graphia Tbk (the "Company") in providing necessary information about the Company to the shareholders or investors of the Company regarding their investment decisions.

B. General Policy

As part of the practice of Good Corporate Governance, the Company applies equal treatment to its shareholders or investors in providing accurate and timely information in accordance with the Company's Articles of Association and capital market regulations.

The Investor Relations Division of the Company is responsible for coordinating the delivery and dissemination of material and non-material information to the capital market community.

C. Policy on Dissemination of Material Information

Information relating to events, events or facts that may affect the price of the Company's shares and/or the decisions of the shareholders or investors of the Company ("Material Information") is not disclosed to the media before being submitted to the Indonesian Otoritas Jasa Keuangan ("OJK") and the Stock Exchange ("IDX"), in accordance with capital market regulations.

To avoid selective disclosure and potential violations of information disclosure regulations, the Company does not provide:

- Interviews or exclusive information to the media, shareholders or investors, which contain Material Information that has not been disclosed to the public;
- Material information that has not been disclosed to the public to the media, shareholders or investors with 'off the record' basis.

If there is a material information leak, the Company will issue a release to the public through the IDX. If there are rumors that are Material Information in the media that are not true or misleading and which originate from the Company, the Company will also issue a release. Beyond that, the Company will consider whether to confirm or deny the rumors. In general, the Company does not comment on rumors in the market regardless of whether the rumors are true or not.

D. Company Spokesperson

The Company, from time to time, will appoint one or more official spokespersons to speak on behalf of the Company or to respond to specific inquiries from the capital market community, as the circumstances apply.

Those who may serve as official spokespersons are the President Director (Chief Executive Officer), Chief Financial Officer, other members of the Board of Directors (for each area under their responsibility), Chief of Corporate Secretary & Communications, or Chief of Finance (supervising Investor Relations) Company.

No other employee is entitled to speak with shareholders, investors, analysts or the media, unless specifically requested by one of the official spokespersons. In the event that an employee is contacted by a shareholder, investor or analyst, he or she is required to forward the request to the Chief of Finance and/or Corporate Secretary. If contacted by the media, employees are asked to forward the request to the Chief of Corporate Secretary and Communications.

The official spokesperson works closely with Investor Relations to ensure that all proposed responses that will be submitted to the public are in accordance with capital market regulations.

E. Communication with the capital market community

Communication is carried out through one door (related work units) according to the fields of the respective regulators, Corporate Communications together with the Corporate Secretary and Investor Relations for every Communication from and to the Capital Market Authority, including OJK Capital Market - formerly Bapepam-LK, the Indonesia Stock Exchange (IDX), and the Kustodian Sentral Efek Indonesia (KSEI).

Communication with Shareholders

1. Sebagai As a company with the status of a public company, communication between the company and its shareholders must be by accordance to the provisions of the capital market and the stock exchange that information about the company is in principle obtained by shareholders through the disclosure of information published by the company either through newspapers and/or company links (websites) and the IDX website.
2. Matters that need to be considered in communicating with shareholders include the provisions of GCG, transparency, equal information for all shareholders, provisions regarding company secrets, prohibition of shareholder involvement in the company's operational activities, and information that may used or considered as "insider trading".
3. Every communication with shareholders, including the Controlling Shareholder ("CS") is carried out through the Corporate Secretary and Investor Relations in coordination with Corporate Communications.

In communicating with the capital market community, the Company carries out routine activities, including:

- Issuing an audited Annual Report and Annual Financial Report
- Issuing Quarterly Financial Reports and Semi-Annual Financial Reports
- Holding public exposure
- Publish press releases relating to quarterly financial highlights
- Holding analyst meetings
- Holding media briefings
- Holding domestic conferences

The Company implements a 'quiet period' policy, which is a period when the Company is not in contact with the capital market community. Exceptions to this policy may occur at the discretion of the Company, in the event that there is a need to discuss breaking news or other reasons. During quiet times, Investor Relations officers can provide answers to inquiries from capital market community regarding the facts (fact-based inquiries).

The quiet period in general, starts from or immediately after the end of the financial period and ends when the company's financial performance is announced. The quiet period for the Company is 21 days before the announcement of the Company's financial performance.

F. Communication with the Board of Commissioners and the Supporting Executive Committee of

1. Communication with the Board of Commissioners is carried out periodically through Joint Meetings of the Board. Commissioners and Directors on a quarterly basis, including Meetings with the Audit Committee and the Nomination and Remuneration Committee.
2. Communication channels: from members of the Board of Directors to members of the Board of Commissioners or through the President Director, and vice versa from members of the Board of Commissioners to members of the Board of Directors is carried out through the President Director.
3. Provisions regarding the authority and approval required from the Board of Commissioners refer to the Company's Articles of Association, Board of Commissioners Guidelines, and other relevant laws and regulations.

G. Communication with Employee

1. Basically, communication with employees can be done by 2 (two) work units, namely Corporate Communications and Human Capital Management.
 - a. Corporate Communications informs all information and/or data related to company activities or activities and information of a public nature.
 - b. Human Capital Management informs all information and/or data related to employee related activities.
2. All data and/or information that will be displayed or informed must obtain prior approval from the parties concerned.

H. Communication with Mass Media (Release and Event)

1. Press Release
 - a. Every press release that will be issued to the mass media related to corporate events, corporate image/ and corporate branding must go through and with the approval of the Corporate Communications Team.
 - b. Marketing Communication Astragraphia Group can make press releases concerning product and service promotions which must first obtain approval from the Corporate Communications Team before the press release is issued.
2. Media Events
 - a. All company activities that invite media as event audiences must coordinate with the Corporate Communications Team.
 - b. Invitations to events organized by Astragraphia group companies for the media will be coordinated by the Corporate Communications Team.
 - c. Especially for Branch Managers (BM) can communicate with local mass media (local) where the branch operates through special interviews arranged by Corporate Communications with communication materials that have been reviewed and approved in advance by the relevant Director and Corporate Communications.
 - d. No one may offer or give bribes or improper advantages (including facilitation payments) to the media for any purpose.

I. Communication with External Media

1. Corporate Printing
 - a. All Communication materials in the form of brochures, banners, billboards, banners, greeting cards and the like must first obtain approval from Corporate Communications, both for content and design.
 - b. The placement of outdoor media is fully the responsibility of the relevant work unit and must be informed to Corporate Communications.
2. Website
All communication materials on the website, both static (eg company profiles) and dynamic ones, are the responsibility of Corporate Communications.

J. Corporate Social Responsibility (CSR)

CSR is the fulfillment of corporate social responsibility to the community and/or the surrounding environment.

Things that need to be considered in the implementation of CSR:

1. Coordinated by Corporate Communications and CSR
2. Cooperate with third parties who have a good reputation and provide benefits to the community and/or the surrounding environment.
3. Assistance must be directly received by community members or social organizations that need it.
4. The implementation of CSR must obtain approval from the President Director, Director of Finance, and the relevant Director and an accountability report must be made to the giver of approval.
