

THE POLICY ON REPORTING OF OWNERSHIP OR ANY CHANGE IN SHARES OWNERSHIP OF BOARD OF DIRECTORS AND BOARD OF COMMISSIONERS

PT Astra Graphia Tbk

PT Astra Graphia Tbk
Jl. Kramat Raya No. 43, Jakarta 10450, Indonesia
T: +6221 390 9190; 390 9444
F: +6221 390 9181; 390 9388
www.astragraphia.co.id



The Policy on Reporting of Ownership or Any Change in Shares Ownership of Board of Directors and Board of Commissioners PT Astra Graphia Tbk (the "Company")

I. Introduction

As the Company's commitment to implementing the values of good corporate governance, the Company deems it necessary to establish The Policy on Reporting of Ownership or Any Change in Shares Ownership of Board of Directors and Board of Commissioners of the Company.

II. Legas Basis

- a. Law of the Republic of Indonesia Number 40 of 2007 on Limited-Liability Companies.
- b. Regulation of Financial Services Authority Number 33/POJK.04.2014 on the Board of Directors and Board of Commissioners of Issuers or Public Companies.
- c. Regulation of Financial Services Authority Number 21/POJK.04/2015 on the Implementation of Corporate Governance Guidelines of Public Companies.
- d. Circular Letter of Financial Services Authority Number 32/SEOJK.04/2015 on Governance Guidelines of Public Companies.
- e. Regulation of the Financial Services Authority Number 3/POJK.04/2021 of 2021 on the Organization of Activities Within The Capital Market Sector.
- f. Regulation of Financial Services Authority Number 11/POJK.04/2017 on Reports of Ownership or Any Changes to the Ownership of Shares in Public Companies.
- g. Circular Letter of Financial Services Authority Number 16/SEOJK.04/2021 on the *Form and Contents of Annual Report of Issuers or Public Companies*.
- h. Articles of Association of the Company.

III. Reporting Obligation

Reporting obligation to Financial Services Authority ("OJK") applies to members of the Board of Directors and members of the Board of Commissioners regarding current ownership and Any change in shares ownership in the Company, either directly or indirectly.

IV. Format and Content of Report

The report shall be submitted using the form of the Financial Services Authority ("OJK"), as listed in Appendix II to this Policy, including among others:

1. name, address, and nationality;
2. Public Company's shares name;
3. number of shares and percentage of shares ownership prior and after transaction;
4. number of shares either purchased or sold;
5. price of purchasing and selling per share;
6. date of transaction; g. purpose of transaction;
7. shares ownership status (direct or indirect); and
8. in the event of indirectly shares ownership, disclosed the information regarding to recorded shareholders on shareholders register of Public Company for interest of beneficial owner.

V. Submission Of Reporting Mechanism

1. The Company, on a quarterly basis, will ask the members of the Board of Directors and members of the Board of Commissioners of the Company to sign a Statement of Share Ownership in the Company to ensure the share ownership of members of the Board of Directors and members of the Board of Commissioners in the Company.

2. If a member of the Board of Directors or the Board of Commissioners, or a member of their family does not own shares in the Company, the member of the Board of Directors or the Board of Commissioners simply states that the related person and their family do not own shares in the Company and signs the Share Ownership Declaration Form as listed in Appendix I.
3. If a member of the Board of Directors or the Board of Commissioners, or a member of their family, owns shares in the Company, the related person shall complete and sign the Share Ownership Declaration Form as listed in Appendix I and submit the share ownership through the Corporate Secretary.
4. Reporting through Corporate Secretary
 - a. Members of the Board of Directors and members of the Board of Commissioners report current ownership or Any change in shares ownership of Company, shall attach Special Power of Attorney ("Proxy") and submitted through Corporate Secretary.
 - b. The report as referred in point a, shall be conducted with the following methods:
 - i. Submit proof of the shares transaction no later than 2 (two) calendar days after the date of ownership or Any change in shares ownership; and
 - ii. Complete the form of the Special Power of Attorney as listed in Appendix I, to be attached to the Reporting Form. This Special Power of Attorney is only filled 1 (one) time if it is valid for a certain period.
5. The Corporate Secretary will submit a report on current ownership or Any change in shares ownership of Company to OJK according to the format as listed in Appendix II: Ownership Report or Any Change in Share Ownership of a Public Company Submitted Through the Corporate Secretary Format and Appendix III: Power of Attorney Format.

VI. Report Submission Time

The Corporate Secretary shall be reported the share ownership of members of the Board of Directors or Commissioners in the Company to OJK no later than 3 (three) calendar days since the occurrence of the shares ownership or Any change in shares ownership of the Company.

VII. Closing

This policy can be amended at any time according to the prevailing laws and regulations in Indonesia.

This policy is effective from November 11st, 2021.

Appendix I:
Share Ownership Statement Format

SHARE OWNERSHIP STATEMENT

Name of Issuer/ Company : PT Astra Graphia Tbk
Issuer Code : ASGR
Name :
Title :

I hereby declared the Share Ownership of the Company on behalf of myself and my family with the following details:

No.	Name	Family Relationship	No. Sub Securities Account KSEI *)	Number of Share Ownership	Date of Last Change of Ownership
1.		The Related Person			
2.		Husband/ Wife			
3.		Child			
4.		Child			
5.		Child			
6.		Child			
7.		Child			

*) Note:

- If the shares owned are in the form of script, please provide the information "Scripts".

Best Regards,

Name :
Date :

Appendix II:
Ownership Report or Any Change in Share Ownership of a Public Company Submitted Through the Corporate Secretary Format

Jakarta, [***]

No. :

Atts:

To:

Financial Services Authority

Gedung Sumitro Djojohadikusumo

Jalan Lapangan Banteng Timur No. 2-4 Jakarta

Attn : Executive Head of Capital Market Supervisor

**Subject: Ownership Report or Any Change in Share Ownership
PT Astra Graphia Tbk**

Dir Sir,

In accordance with Article of the Financial Services Authority Regulation Number regarding Report of Ownership or Any Changes to The Ownership of Shares in Public Companies, based on the Power of Attorney number date, hereby submitted the following Statement of Change the Share Ownership of the Company on behalf of as (President Director/ Director/ President Commissioner/ Commissioner) PT Astra Graphia Tbk, with the following details:

1.	Name of Public Company	PT Astra Graphia Tbk
2.	Number of shares and shareholding percentage	Before transaction: shares or ...% After transaction : shares or.....%
3.	Number of shares purchased/sold	... shares
4.	Price per shares	Rp
5.	Date of transaction	
6.	Purpose of transaction	
7.	Share ownership status	<input type="checkbox"/> Direct <input type="checkbox"/> Indirect Note: (Complete with information regarding shareholders registered in the shareholder list).

This report is carried out based on a special Power of Attorney signed on a seal and attached to this report.

Handwritten signature

Thus our information, thank you for your kind attention and cooperation.

Best Regards,
PT Astra Graphia Tbk

(Name and signature of Corporate Secretary)

Copy:
Head of Issuer Monitoring Division

Appendix III:
Power of Attorney Format

Power of Attorney
Number: SK/AG/CSL-XXX -XX/XXX

The undersigned:

(Name), private and domiciled in Jakarta, in my capacity as a (President Director/ Director/ President Commissioner/ Commissioner) of PT Astra Graphia Tbk, a company duly established and existing under the laws of the Republic of Indonesia and having its registered office di Jl. Kramat Raya No. 43 Jakarta 10450, Indonesia (the "Company"), hereinafter referred to as the "Authorizer":

Do hereby confer power of attorney to the following persons:

(Name), private, Corporate Secretary of the Company, hereinafter referred to as the "Authorized".

----- **SPECIFICALLY** -----

to represent and act on behalf of the Authorizer to submit a report, implement, and take necessary actions relating to any change in the share ownership of the Authorizer in the Company to the Financial Services Authority.

This Power of attorney is granted based on the Financial Services Authority Regulation.... (insert the applicable POJK at the time of reporting) regarding Report of Ownership or Any Changes to The Ownership of Shares in Public Companies and The Policy on Reporting of Ownership or Any Change in Shares Ownership of Board of Directors and Board of Commissioners PT Astra Graphia Tbk.

This Power of Attorney is executed on

Authorizer,

Authorized,

(Name)

Corporate Secretary