

No.	QUESTIONS/PERTANYAAN	SELF ASSESSMENT		
		ANSWER / JAWABAN	IMPLEMENTATION / IMPLEMENTASI	EVIDENCE/SOURCE DOCUMENT BUKTI/SUMBER DOKUMEN
<b>PART A: RIGHTS OF SHAREHOLDERS</b>				
A.1	<b>Basic Shareholder Rights</b> <b>Hak-hak Dasar Pemegang Saham</b>			
A.1.1	<i>Does the company pay (interim and final/annual) dividends in an equitable and timely manner; that is, all shareholders are treated equally and paid within 30 days after being (i) declared for interim dividends and (ii) approved by shareholders at general meetings for final dividends?</i> Apakah Perseroan membayar dividen (interim dan akhir/tahunan) secara adil dan tepat waktu, dimana semua pemegang saham mendapatkan perlakuan yang sama dan dibayar dalam jangka waktu 30 hari setelah (i) dividen interim diumumkan dan (ii) disetujui oleh RUPS Tahunan untuk dividen final?	Y	Indocement distributed payment for final dividend for the Financial Year 2022 on 8 June 2023 (within 22 days after the Annual General Meeting of Shareholders (AGMS), on time as the resolution of the second agenda of AGMS for Financial Year 2022.	- Announcement of Summary of Annual General Meeting of Shareholders on BEI Website dated 19 May 2023 of the Notification to Shareholders concerning Resolution of the AGMS 17 May 2023. - Deed of Minutes of Meeting (MoM) of AGMS 17 May 2023.
A.2	<b>Right to participate in decisions concerning fundamental corporate changes</b> <b>Hak Pemegang Saham untuk berpartisipasi dalam pengambilan keputusan perubahan-perubahan mendasar dalam perusahaan.</b> <i>Do shareholders have the right to participate in:</i> <b>Apakah Pemegang Saham berpartisipasi dalam:</b>			
A.2.1	<i>Amendments to the company's constitution?</i> Perubahan Anggaran Dasar perusahaan?	Y	As set forth in the Company's Articles of Association Article 21 paragraph (1): Amendment to the Articles of Association shall be determined by the General Meeting of Shareholders (GMS)	- Articles of Association of the Company - Deed of Minutes of Meeting (MoM) of EGMS 8 July 2021.
A.2.2	<i>The authorization of additional shares?</i> Kewenangan atas saham tambahan?	Y	As set forth in the Company's Articles of Association in Article 4 Paragraph (7): The addition to the authorized capital of the Company may only be made based on the resolution of the Annual GMS.	- Articles of Association of the Company
A.2.3	<i>The transfer of all or substantially all assets, which in effect results in the sale of the company?</i> Mengalihkan seluruh atau sebagian besar aset yang mempengaruhi harga jual perusahaan?	Y	As set forth in the Company's Articles of Association in Article 14 Paragraph (4): The addition to the authorized capital of the Company may only be made based on the resolution of the Annual GMS.	- Articles of Association of the Company
A.3	<b>Right to participate effectively in and vote in general shareholder meetings and should be informed of the rules, including voting procedures that govern general shareholder meetings</b> <b>Hak untuk berpartisipasi secara efektif dalam dan pengambilan keputusan dalam rapat umum pemegang saham dan akan diinformasikan tentang ketentuan termasuk prosedur pemungutan suara dalam rapat umum pemegang saham</b>			
A.3.1	<i>Do shareholders have the opportunity, evidenced by an agenda item, to approve remuneration (fees, allowances, benefits-in-kind and other emoluments) or any increases in remuneration for the non-executive directors/commissioners?</i> Apakah pemegang saham mempunyai kesempatan, dibuktikan dengan agenda, untuk menyetujui remunerasi (honor, tunjangan, manfaat dan tunjangan lainnya) atau kenaikan remunerasi untuk non eksekutif direktur/komisaris?	Y	The fifth agenda of the Company's Annual GMS for the Financial Year 2022 is Determination of the salary and other allowances for the Board of Directors and honorarium for the Board of Commissioners of the Company.	- Announcement of Summary of Annual General Meeting of Shareholders on BEI Website dated 19 May 2023 of the Notification to Shareholders concerning Resolution of the AGMS 17 May 2023. - Deed of Minutes of Meeting (MoM) of AGMS 17 May 2023.
A.3.2	<i>Does the company provide non-controlling shareholders a right to nominate candidates for board of directors/commissioners?</i> Apakah perusahaan memberikan hak bagi pemegang saham bukan pengendali untuk mengajukan calon anggota direksi/komisaris?	Y	As stated on the Notice to shareholders, shareholder in compliance with article 10 paragraph 6 of the Company's Articles of Association juncto POJK number 15, the shareholders can propose the agenda, including the candidate of the Board of Directors and Board of Commissioner.	- Announcement to Shareholders dated 3 April 2023 Publish on IDX Website. - Article of Association of the Company
A.3.3	<i>Does the company allow shareholders to elect directors/commissioners individually?</i> Apakah perusahaan memberikan hak kepada pemegang saham untuk memilih anggota direksi dan komisaris secara individu?	Y	As set forth in the Company's Articles of Association in Article 12 Paragraph (5): Voting on a person shall be conducted by sealed and unsigned ballots, and on other matters by verbal, unless the chairman of GMS decided otherwise without any objection from one or more shareholders jointly representing at least 10% of total shares already qualified to vote. It is mean that the shareholders who attend the GMS entitled to elect directors/commissioners individually.	- Article of Association of the Company - Rules of the AGMS 17 May 2023, published on the eASY.KSEI system.
A.3.4	<i>Does the company disclose the voting procedures used before the start of meeting</i> Apakah perusahaan mengungkapkan prosedur pemungutan suara yang digunakan sebelum rapat dimulai.	Y	Before the Meeting commences, the rules of GMS are distributed to the shareholders and/or the proxies, and read by the master of the ceremony of GMS.	- Rules of the AGMS 17 May 2023, published on the eASY.KSEI system. - Deed of Minutes of Meeting (MoM) of AGMS 17 May 2023.

A.3.5	<p><i>Do the minutes of the most recent AGM record that the shareholders were given the opportunity to ask questions and the questions raised by shareholders and answers given recorded?</i></p> <p>Apakah dalam risalah RUPS terakhir mencatat adanya kesempatan bagi pemegang saham untuk mengajukan pertanyaan dan jawabannya dicatat?</p>	Y	Minutes of GMS record the questions and answer during the conducting of GMS.	<p>- Deed of Minutes of Meeting (MoM) of AGMS 17 May 2023.</p> <p>- Announcement of Summary of Annual General Meeting of Shareholders on IDX Website and Company's Website dated 19 May 2023 of the Notification to Shareholders concerning Resolution of the AGMS 17 May 2023.</p>
A.3.6	<p><i>Does the company disclose the voting results including approving, dissenting, and abstaining votes for all resolutions/each agenda item for the most recent AGM?</i></p> <p>Apakah perusahaan mengungkapkan hasil pemungutan suara, termasuk suara setuju, tidak setuju dan abstain dalam keputusan/masing-masing agenda dalam RUPS terakhir?</p>	Y	Publication of the resolution of the GMS and Minutes of GMS stated the voting results including approving, dissenting, and abstaining votes for all resolutions/each agenda item.	<p>- Announcement of Summary of Annual General Meeting of Shareholders on IDX Website and Company's Website dated 19 May 2023 of the Notification to Shareholders concerning Resolution of the AGMS 17 May 2023.</p> <p>- Deed of Minutes of Meeting (MoM) of AGMS 17 May 2023.</p>
A.3.7	<p><i>Does the company disclose the list of board members who attended the most recent AGM?</i></p> <p>Apakah perusahaan mengungkapkan anggota Dewan Komisaris yang hadir dalam RUPS terakhir?</p>	Y	Publication of the resolution of the GMS and Minutes of GMS stated the list of board members who attended the Annual GMS.	<p>- Announcement of Summary of Annual General Meeting of Shareholders on IDX Website and Company's Website dated 19 May 2023 of the Notification to Shareholders concerning Resolution of the AGMS 17 May 2023.</p> <p>- Deed of Minutes of Meeting (MoM) of AGMS 17 May 2023.</p>
A.3.8	<p><i>Does the company disclose that all board members and the CEO (if he is not a board member) attended the most recent AGM?</i></p> <p>Apakah perusahaan mengungkapkan kehadiran seluruh anggota Dewan Komisaris dan Direktur Utama (apabila Direktur Utama bukan anggota Dewan Komisaris) pada RUPS terakhir?</p>	Y	Publication of the resolution of the GMS and Minutes of GMS stated the list of board members who attended the Annual GMS.	<p>- Announcement of Summary of Annual General Meeting of Shareholders on IDX Website and Company's Website dated 19 May 2023 of the Notification to Shareholders concerning Resolution of the AGMS 17 May 2023.</p> <p>- Deed of Minutes of Meeting (MoM) of AGMS 17 May 2023.</p>
A.3.9	<p><i>Does the company allow voting in absentia?</i></p> <p>Apakah perusahaan memungkinkan untuk memberikan suara berdasarkan kuasa bagi peserta RUPS yang tidak hadir?</p>	Y	As forth in invitation of AGMS for financial year 2022: Shareholders who are unable to attend the Meeting can be represented by their proxies in the Meeting by presenting the Power of Attorney provided that the members of the Board of Commissioners, the Board of Directors and the employees of the Company may act as proxies of the Shareholders in the Meeting, however any vote issued by them as proxies in the Meeting will not be counted in the ballot.	<p>- Rules of AGMS 17 May 2023.</p> <p>- Announcement of Summary of Annual General Meeting of Shareholders on IDX Website and Company's website dated 19 May 2023 of the Notification to Shareholders concerning Resolution of the AGMS 17 May 2023.</p> <p>- Deed of Minutes of Meeting (MoM) of AGMS 17 May 2023.</p>
A.3.10	<p><i>Did the company vote by poll (as opposed to by show of hands) for all resolutions at the most recent AGM?</i></p> <p>Apakah perusahaan melakukan pemungutan suara (bukan hanya dengan mengacungkan tangan) untuk semua keputusan RUPS yang terakhir.</p>	Y	<p>The voting in each agenda of the Meeting is conducted by giving a ballot, of which those shareholders and/or proxies who are casting votes to DISAGREE and/or ABSTAIN, are permitted to raise their hands and submit to the officer the ballot paper that they have filled in. Those who do not submit their ballot will be deemed agree.</p> <p>and for Shareholders who use the eASY.KSEI system can cast their votes according to the terms and conditions of the eASY.KSEI system.</p>	<p>- Rules of AGMS 17 May 2023.</p> <p>- Announcement of Summary of Annual General Meeting of Shareholders on IDX Website and Company's Website dated 19 May 2023 of the Notification to Shareholders concerning Resolution of the AGMS 17 May 2023.</p> <p>- Deed of Minutes of Meeting (MoM) of AGMS 17 May 2023.</p>
A.3.11	<p><i>Does the company disclose that it has appointed an independent party (scrutineers/inspectors) to count and/or validate the votes at the AGM?</i></p> <p>Apakah perusahaan mengungkapkan bahwa perusahaan menunjuk pihak independen dalam menghitung dan/atau melakukan validasi atas pemungutan suara dalam RUPS</p>	Y	<p>In the AGMS for the Financial Year 2022, The Company has appointed the independent party namely :</p> <ul style="list-style-type: none"> <li>- PT Raya Saham Registra to count the votes of the each Agenda of AGMS &amp; EGMS;</li> <li>- Notary and PPAT (Land Deed Official) Deni Thanur, S.H., M.Kn. to validate the result of the voting in each Agenda of AGMS.</li> <li>- Tanudiredja, Wibisana, Rintis &amp; Rekan</li> </ul>	- Deed of Minutes of Meeting (MoM) of AGMS 17 May 2023.
A.3.12	<p><i>Does the company make publicity available by the next working day the result of the votes taken during the most recent AGM/EGM for all resolutions?</i></p> <p>Apakah perusahaan mempublikasikan hasil pemungutan suara atas semua keputusan pada RUPS pada hari kerja berikutnya?</p>	Y	Publication of the resolution of GMS publish on Company's website and IDX Website by the next working day of the GMS.	<p>- Announcement of Summary of Annual General Meeting of Shareholders on BEI Website dated 19 May 2023 of the Notification to Shareholders concerning Resolution of the AGMS 17 May 2023.</p> <p>- Company's Website</p>
A.3.13	<p><i>Does the company provide at least 21 days notice for all AGMs and EGMS?</i></p> <p>Apakah perusahaan menyampaikan pengumuman RUPST dan RUPSLB 21 hari sebelumnya?</p>	Y	Publication of the Invitation to Shareholders to attend the GMS publish within 21 days prior the meeting without counting the date of the Invitation and the date of the GMS.	<p>- Publication of Invitation to Shareholders dated 3 April 2023 on IDX Website and easy.KSEI system</p> <p>- Company's website</p>
A.3.14	<p><i>Does the company provide the rationale and explanations for each agenda item which require shareholders' approval in the notice of AGM/circulars and/or the accompanying statement?</i></p> <p>Apakah perusahaan menyampaikan rasionalisasi dan penjelasan masing-masing agenda yang memerlukan persetujuan pemegang saham pada pengumuman RUPST/sirkular dan/atau pernyataan yang diperlukan?</p>	Y	Explanation for each agenda of the Meeting has been published on the invitation to shareholders.	<p>- Publication of Invitation to Shareholders dated 3 April 2023 on IDX Website and easy.KSEI system</p> <p>- Company's website</p>
A.3.15	<p><i>Does the company give the opportunity for shareholders to place item/s on the agenda of AGM?</i></p> <p>Apakah perusahaan memberi kesempatan kepada pemegang saham untuk menempatkan satu atau beberapa agenda dalam RUPST?</p>	Y	As stated on the Notice to shareholders, shareholder in compliance with article 11 paragraph 5 of the Company's Articles of Association juncto POJK number 32/2017 juncto POJK number 15/2020, the shareholders can propose the agenda.	<p>- Publication of the Notice to Shareholders dated 27 March 2023 on IDX Website and easy.KSEI system</p> <p>- Article of Association of the Company</p> <p>- Company's website</p>

A.4	<b>Markets for corporate control should be allowed to function in an efficient and transparent manner</b> <b>Kontrol Pasar terhadap perusahaan harus berfungsi secara efisien dan transparan</b>			
A.4.1	<i>In cases of mergers, acquisitions and/or takeovers requiring shareholders' approval, does the board of directors/commissioners of the company appoint an independent party to evaluate the fairness of the transaction price?</i> Dalam kasus merger, akuisisi dan/atau pengambilalihan yang memerlukan persetujuan pemegang saham, apakah direksi/komisaris perusahaan menunjuk pihak independen to melakukan evaluasi terhadap kewajaran dari nilai transaksi?	Y	Obligated by prevailing laws and regulations In Financial Year 2022 the Company not conducted mergers, acquisitions and/or takeovers requiring shareholders' approval.	
A.5	<b>The exercise of ownership rights by all shareholders, including institutional investors, should be facilitated</b> <b>Pelaksanaan hak kepemilikan oleh seluruh pemegang saham, termasuk investor institusi, harus di fasilitasi</b>			
A.5.1	<i>Does the company publicly disclose policy/practice to encourage shareholders including institutional shareholders to attend the general meetings or engagement with the company?</i> Apakah perusahaan secara terbuka mengungkapkan kebijakan untuk mendorong pemegang saham termasuk pemegang saham institusional untuk menghadiri RUPS?	Y	As set forth in invitation of AGMS for financial year 2022.	- Publication of Invitation to Shareholders dated 3 April 2023 on IDX Website and easy.KSEI system - Company's website
<b>PART B: EQUITABLE TREATMENT OF SHAREHOLDERS</b>				
B.1	<b>Shares and voting rights</b> <b>Saham dan hak dalam pemungutan suara</b>			
B.1.1	<i>Does the company's ordinary or common shares have one vote for one share?</i> Apakah saham biasa perusahaan memberikan satu suara untuk satu saham?	Y	As set forth in the Company's Articles of Association, Article 12 paragraph 8 concerning Quorum, Voting Right and Resolution in GMS which stated that in GMS, each share entitles the owner to cast 1 (one) vote.	- Article of Association of the Company, notarial deed number 02 dated August 4, 2021
B.1.2	<i>Where the company has more than one class of shares, does the company publicise the voting rights attached to each class of shares (e.g. through the company website / reports/ the stock exchange/ the regulator's website)?</i> Bilamana perusahaan memiliki klasifikasi saham lebih dari satu, apakah perusahaan mengungkapkan hak dalam pemungutan suara yang melekat pada setiap klasifikasi saham (misalnya melalui situs web perusahaan/laporan/bursa/situs regulator)?	N/A	As stated on Article 5 paragraph (1) Article of Association of the Company concerning Shares, all shares issued by the Company shall be registered shares.	- Article of Association of the Company, notarial deed number 02 dated August 4, 2021
B.2	<b>Notice of AGM</b> <b>Pengumuman RUPS</b>			
B.2.1	<i>Does each resolution in the most recent AGM deal with only one item, i.e., there is no bundling of several items into the same resolution?</i> Apakah setiap keputusan dalam RUPS terakhir hanya satu agenda dan tidak digabungkan dengan beberapa agenda lainnya dalam satu keputusan?	Y	In the AGMS for the Financial Year 2022, each resolution deal with only one item as stated on the advertisement of Notice to Shareholders and Minutes of AGMS.	- Announcement of Summary of Annual General Meeting of Shareholders on IDX Website and Company's Website dated 19 May 2023 of the Notification to Shareholders concerning Resolution of the AGMS 17 May 2023.
B.2.2	<i>Are the company's notice of the most recent AGM/circulars fully translated into English and published on the same date as the local-language version?</i> Apakah pengumuman RUPS/sirkular yang terakhir perusahaan seluruhnya diterjemahkan dalam bahasa Inggris dan diumumkan pada tanggal yang sama dengan versi bahasa lokal?	Y	In the AGMS for the Financial Year 2022 announcement and invitation of the AGMS has been fully translated into English and published on the same date as the Indonesian version: a. The announcement of the AGMS was published through IDX Website and on Company's website, all of which were published on 3 April 2023; b. The invitation of the AGMS was published through IDX Website and on Company's website, all of which were published on 18 April 2023.	- Publication of the Notice to Shareholders dated 3 April 2023 - Publication of the Invitation to Shareholders dated 18 April 2023 - Company's website
	<b>Does the notice of AGM/circulars have the following details:</b> <b>Apakah pengumuman RUPS/sirkular memiliki rincian sebagai berikut:</b>			
B.2.3	<i>Are the profiles of directors/commissioners (at least age, qualification, date of first appointment, experience, and directorships in other listed companies) in seeking election/re-election included?</i> Apakah profil Direksi/Komisaris (setidaknya umur, kualifikasi, tanggal penunjukan pertama kali, pengalaman dan rangkap jabatan di perusahaan tercatat lain) dicantumkan sebagai syarat pada pemilihan/pemilihan kembali?	Y	Profiles of candidate member of the Board of Directors and Board of Commissioners was published at Company's website in the same day with the Invitation to Shareholders to attend the AGMS - 18 April 2023	Company's website
B.2.4	<i>Are the auditors seeking appointment/ re-appointment clearly identified?</i> Apakah penunjukan/penunjukan kembali auditor diperkenalkan secara jelas?	Y	The appointed/reappointed external auditor has been explained in the implementation of the GMS on 17 May 2023, but not the identity of External Auditor.	MoM AGMS 17 May 2023, published on the Indocement's website

B.2.5	Were the proxy documents made easily available? Apakah dokumen surat kuasa mudah untuk di akses?	Y	Proxy documents both in Indonesia or English can be downloaded on the Company's Website	
B.3	<b>Insider trading and abusive self-dealing should be prohibited</b> <b>Perdagangan orang dalam dan pelanggaran bertransaksi sendiri harus dilarang.</b>			
B.3.1	Does the company have policies and/or rules prohibiting directors/commissioners and employees to benefit from knowledge which is not generally available to the market? Apakah perusahaan memiliki kebijakan dan/atau peraturan yang melarang direksi/komisaris dan karyawan untuk mengambil keuntungan dari informasi dimana informasi tersebut tidak tersedia bagi pasar.	Y	- The Company's Code of Conduct section 2.2.7 concerning Confidential Data and Information which the Company strictly prohibits illegal use or providing of confidential data and information to external parties.  - Charter of the Board of Commissioners and Charter of the Board of Directors stated that All member of the Board who have access to insider information such as knowledge of data, project, transactions or processes, the disclosure of which, likely to result in substantial movements of the price of the stock or any other financial instruments of the Company, shall not disclose such insider information to third party and shall not use such insider information for personal interest.	- Indocement Code of Conduct - Charter of the Board of Directors - Charter Board of Commissioners
B.3.2	Are the directors and commissioners required to report their dealings in company shares within 3 business days? Apakah direksi dan komisaris diwajibkan untuk melaporkan transaksi saham perusahaan yang mereka miliki dalam waktu 3 hari kerja?	Y	Charter of the Board of Commissioners and charter of the Board of Directors stated that the Board of Directors and Board of Commissioners obliged to report to the Company regarding the shares owned by the respective member of Board of Directors and Board of Commissioners and/or their relatives in the Company. The charter also stated that the Board of Directors and Board of Commissioners commits to complying with the laws and regulations.	- Charter of the Board of Directors - Charter Board of Commissioners
B.4	<b>Related-party transactions (RPTs) by directors and key executives</b> <b>Transaksi dengan benturan kepentingan yang dilakukan oleh direksi dan manajemen kunci</b>			
B.4.1	Does the company have a policy requiring directors/commissioners to disclose their interest in transactions and any other conflicts of interest? Apakah perusahaan memiliki kebijakan bagi direksi/komisaris mengungkapkan kepentingan mereka dalam suatu transaksi benturan kepentingan dan dalam transaksi benturan kepentingan lainnya?	Y	Indocement's code of conduct 2.2.4 (10) and Charter of the BOD and BOC concerning conflicts of interest have a statement about policy requiring directors/commissioners to disclose their interest in transactions and any other conflicts of interest.	- Indocement's Code of Conduct - Charter of the Board of Directors - Charter Board of Commissioners
B.4.2	Does the company have a policy requiring a committee of independent directors/commissioners to review material/significant RPTs to determine whether they are in the best interests of the company and shareholders? Apakah perusahaan memiliki kebijakan yang mewajibkan sebuah komite yang terdiri dari direksi/komisaris independen untuk menelaah benturan kepentingan yang material/signifikan untuk memastikan direksi/komisaris mendahulukan kepentingan perusahaan dan pemegang saham?	Y	In the Company's Article of Association Paragraph 14 Point 5 regulate to conduct conflict of interest transaction, BOD shall fulfill the regulation of OJK, where one of them is regarding statement of BOD and BOC.	- Company's Article of Association - Charter of the Board of Directors - Charter Board of Commissioners
B.4.3	Does the company have a policy requiring board members (directors/commissioners) to abstain from participating in the board discussion on a particular agenda when they are conflicted? Apakah perusahaan memiliki kebijakan yang mewajibkan direksi/komisaris untuk abstain/tidak berpartisipasi dalam diskusi agenda dimana mereka memiliki konflik?	Y	In the Company's Article of Association Paragraph 14 Poin 6 regulate if a member of BOD or BOC abstain from participating in the board discussion they shall be represented by another member of BOD or BOC	Company's Article of Association
B.4.4	Does the company have policies on loans to directors/commissioners either forbidding this practice or ensuring that they are being conducted at arm's length basis and at market rates? Apakah perusahaan memiliki kebijakan atas pinjaman direksi/komisaris baik melarang praktik ini atau memastikan bahwa transaksi yang dilakukan dengan arm's length basis dan nilai wajar di pasar?	N		
B.5	<b>Protecting minority shareholders from abusive actions</b> <b>Perlindungan atas pemegang saham minoritas terhadap tindakan yang melanggar</b>			
B.5.1	Does the company disclose that RPTs are conducted in such a way to ensure that they are fair and at arms' length? Apakah perusahaan mengungkapkan bahwa transaksi benturan kepentingan yang dilakukan dalam beberapa cara dipastikan dilakukan dengan wajar dan arms' length?	Y	The information of materials transaction stated in Financial Report and Annual Report 2022	Consolidation Financial Statement and Annual Report 2022

B.5.2	<i>In case of related party transactions requiring shareholders' approval, is the decision made by disinterested shareholders?</i>  Dalam hal transaksi dengan pihak yang berelasi memerlukan persetujuan pemegang saham, apakah keputusan dilakukan oleh pemegang saham yang tidak memiliki benturan kepentingan?	Y	In the event that the Company conducts a transaction with a conflict of interest that requires the approval of an independent shareholder, the Company will conduct an Extraordinary GMS to obtain the approval of the independent shareholders, as stated in Article 14 paragraph 13 of the Company's Articles of Association.	- Articles of Association of the Company
<b>PART C: ROLE OF STAKEHOLDERS</b>				
C.1	<i>The rights of stakeholders that are established by law or through mutual agreements are to be respected</i>  Penghargaan terhadap Hak pemangku kepentingan dalam timbul karena hukum atau melalui perjanjian			
	<i>Does the company disclose a policy and practices that address:</i>  Apakah perusahaan mengungkapkan kebijakan dan praktek ditujukan untuk:			
C.1.1	<i>The existence and scope of the company's efforts to address customers' welfare?</i>  Keberadaan dan lingkup usaha perusahaan ditujukan untuk kesejahteraan konsumen?	Y	Indocement's Code of Conduct stated that the Company has a commitment to address costumers' welfare.	Indocement's Code of Conduct
C.1.2	<i>Supplier/contractor selection procedures?</i>  Prosedur pemilihan pemasok/kontraktor?	Y	Indocement's Vendor Code of Conduct stated that the Company has a procedures to select the supplier/contractor	- Supplier Code of Conduct from Heidelberg Materials Group -Indocement Vendor Code of Conduct - Company's Website
C.1.3	<i>The company's efforts to ensure that its value chain is environmentally friendly or is consistent with promoting sustainable development?</i>  Usaha perusahaan untuk memastikan <i>value chain</i> (proses operasi perusahaan dalam menghasilkan output yang bernilai) ramah lingkungan atau konsisten mendukung pembangunan berkelanjutan?	Y	-Indocement's Code of Conduct stated that the Company has a commitment to ensure that its value chain is environmentally friendly or is consistent with promoting sustainable development.  - Heidelberg Materials Group stated Sustainable Commitment 2030 which must be implemented by all the subsidiaries.  - Sustainability Report 2022	- Indocement Code of Conduct - Heidelbergcement Group 2030 - Sustainability Report 2022
C.1.4	<i>The company's efforts to interact with the communities in which they operate?</i>  Usaha perusahaan untuk berinteraksi dengan komunitas pada kegiatan operasionalnya?	Y	-Indocement's Code of Conduct stated that the Company has a commitment to ensure that its value chain is environmentally friendly or is consistent with promoting sustainable development.  - Heidelberg Materials Group stated Sustainable Commitment 2030 which must be implemented by all the subsidiaries.  - Sustainability Report 2022	- Indocement Code of Conduct - Heidelberg Materials Group 2030 - Sustainability Report 2022
C.1.5	<i>The company's anti-corruption programs and procedures?</i>  Program dan prosedur anti korupsi perusahaan?	Y	-Indocement's Code of Conduct stated that the Company has an anti-corruption programs and procedures.  - Heidelberg Materials Group has the Anti-corruption Guideline which must be implemented by all the subsidiaries.  - Board of Directors Decree No. 018/Kpts/Dir/ITP/VIII/2018 concerning Prevention of Corruption and Gratification PT Indocement Tunggal Prakarsa Tbk.  - Guidance for implementation to the preventing corruption, collusion, nepotism and gratification at PT Indocement Tunggal Prakarsa Tbk.  - Annual Report 2022 page 359-360	- Indocement Code of Conduct - Heidelberg Materials Group 2030 - Board of Directors Decree No. 018/Kpts/Dir/ITP/VIII/2018 - Guidance for implementation to the preventing corruption, collusion, nepotism and gratification at PT Indocement Tunggal Prakarsa Tbk. - Annual Report 2022 page 359-360
C.1.6	<i>How creditor's rights are safeguarded?</i>  Bagaimana perlindungan terhadap hak kreditur?	Y	All creditor's rights stated on contract between Company and the creditors	- All contract between Company and Creditors (Confidential Document)
C.1.7	<i>Does the company have a separate report/section that discusses its efforts on environment/economy and social issues?</i>  Apakah perusahaan memiliki laporan yang terpisah yang menyampaikan usaha yang dilakukan untuk lingkungan/ekonomi dan isu sosial?	Y	the Company have separate report/section that discusses its effort on environment/economy and social issues on the Sustainability Report 2022 and Indocement's Website.	- Indocement Code of Conduct - Indocement Sustainability Report 2022 -Indocement's Website
C.2	<i>Where stakeholder interests are protected by law, stakeholders should have the opportunity to obtain effective redress for violation of their rights</i>  Apabila kepentingan pemangku kepentingan dilindungi oleh hukum, pemangku kepentingan harus mendapat kesempatan untuk mendapatkan ganti rugi atas pelanggaran hah-hak mereka			

C.2.1	Does the company provide contact details via the company's website or Annual Report which stakeholders (e.g. customers, suppliers, general public etc.) can use to voice their concerns and/or complaints for possible violation of their rights?  Apakah perusahaan menyediakan rincian kontak melalui situs web perusahaan atau laporan tahunan dimana pemangku kepentingan (misalnya konsumen, pemasok, masyarakat umum dll) dapat menggunakan suara mereka atas sesuatu dan/atau menyampaikan pelanggaran hak yang terjadi?	Y	- The company provide contact details via the company's website or Annual Report which stakeholders (e.g. customers, suppliers, general public etc.) can use to voice their concerns and/or complaints for possible violation of their rights.  - In addition, the Company also has a violation reporting system called Speak Up, where Stakeholders can report violations they have experienced.	- Annual Report 2022 (page 88) - Indocement's Website - Whistleblowing Policy (SpeakUp)
C.3	<b>Mechanisms for employee participation should be permitted to develop</b>  <b>Mekanisme partisipasi Karyawan yang diijinkan untuk dikembangkan</b>			
C.3.1	Does the company explicitly disclose the policies and practices on health, safety, and welfare policy for its employees?  Apakah perusahaan secara eksplisit mengungkapkan kebijakan dan praktek dalam bidang kesehatan, keselamatan dan kesejahteraan bagi karyawannya?	Y	The Company explicitly disclose the policies and practices on health, safety, and welfare policy for its employees on the Annual Report 2022 and Indocement's Website	- Annual Report 2022 (page 370) - Indocement's Website
C.3.2	Does the company explicitly disclose the policies and practices on training and development programs for its employees?  Apakah perusahaan secara eksplisit mengungkapkan kebijakan dan praktek pelatihan dan program pengembangan karyawan?	Y	The Company explicitly disclose the policies and practices on training and development programs for its employees on the Annual Report 2022 and Indocement's Website	- Annual Report 2022 (page 137-146) - Indocement's Website
C.3.3	Does the company have a reward/compensation policy that accounts for the performance of the company beyond short-term financial measures?  Apakah perusahaan memiliki kebijakan tentang penghargaan/kompensasi yang berdasarkan pada kinerja perusahaan yang melebihi target keuangan jangka pendek?	N		
C.4	<b>Stakeholders including individual employee and their representative bodies should be able to freely communicate their concerns about illegal or unethical practices to the board and their rights should not be compromised for doing this</b>  <b>Pemangku kepentingan termasuk karyawan individu dan badan perwakilan mereka harus dapat dengan bebas mengkomunikasikan kekhawatiran mereka tentang praktik ilegal atau tidak etis kepada dewan dan hak mereka tidak boleh dikompromikan untuk melakukan hal ini</b>			
C.4.1	Does the company have a whistle blowing policy which includes procedures for complaints by employees and other stakeholders alleged concerning illegal and unethical behavior and provide contact details via the company's website or annual report  Apakah perusahaan memiliki kebijakan whistle blowing yang mencakup prosedur pengaduan oleh karyawan dan pemangku kepentingan lainnya yang diduga terkait perilaku ilegal dan tidak etis serta memberikan detail kontak melalui situs web perusahaan atau laporan tahunan	Y	The Company have a whistle blowing policy which includes procedures for complaints by employees and other stakeholders alleged concerning illegal and unethical behavior and provide contact details via the company's website or annual report.	- Annual Report 2022 ( hal 362-364) - Indocement's Website
C.4.2	Does the company have a policy or procedures to protect an employee/person who reveals alleged illegal/unethical behavior from retaliation?  Apakah perusahaan memiliki kebijakan atau prosedur untuk melindungi karyawan/orang yang mengungkapkan dugaan perilaku ilegal/tidak etis dari tindakan balas dendam?	Y	The Company have a policy or procedures to protect an employee/person who reveals alleged illegal/unethical behavior from retaliation	- Whistleblowing Policy (SpeakUp) - Indocement Website
<b>PART D: DISCLOSURE AND TRANSPARENCY</b>				
D.1	<b>Transparent ownership structure</b>  <b>Transparansi Struktur Kepemilikan</b>			
D.1.1	Does the information on shareholdings reveal the identity of beneficial owners, holding 5% shareholding or more?  Apakah informasi tentang kepemilikan saham mengungkapkan identitas pemilik manfaat dari pemegang 5% kepemilikan saham atau lebih?	Y	The information on shareholdings reveal the identity of beneficial owners, holding 5% shareholding or more stated on Annual Report 2022	- Annual Report 2022 (page 117-119, 220) - Indocement's website
D.1.2	Does the company disclose the direct and indirect (deemed) shareholdings of major and/or substantial shareholders?  Apakah perusahaan mengungkapkan kepemilikan saham langsung dan tidak langsung dari pemegang saham utama dan/atau substansial?	Y	The Company disclose the direct and indirect (deemed) shareholdings of major and/or substantial shareholders stated on Annual Report 2022	- Annual Report 2022 (page 117)
D.1.3	Does the company disclose the direct and indirect (deemed) shareholdings of directors/commissioners?  Apakah perusahaan mengungkapkan kepemilikan langsung dan tidak langsung dari direksi/komisaris?	Y	The Company disclose the direct and indirect (deemed) shareholdings of directors/commissioners tated on Annual Report 2022	- Annual Report 2022 (page 120)
D.1.4	Does the company disclose the direct and indirect (deemed) shareholdings of senior management?  Apakah perusahaan mengungkapkan kepemilikan saham langsung dan tidak langsung dari manajemen senior?	N		

D.1.5	<p>Does the company disclose details of the parent/holding company, subsidiaries, associates, joint ventures and special purpose enterprises/vehicles (SPEs)/(SPVs)?</p> <p>Apakah perusahaan mengungkapkan rincian perusahaan induk/grup perusahaan, anak perusahaan, rekanan, usaha patungan dan perusahaan/anak perusahaan dengan tujuan khusus (SPE)/(SPV)?</p>	Y	The Company disclose details of the parent/holding company, subsidiaries, associates, joint ventures and special purpose enterprises/ vehicles (SPEs)/ (SPVs) stated on Annual Report 2022	- Annual Report 2022 (page 123-129)
D.2	<p><b>Quality of Annual Report</b></p> <p><b>Kualitas Laporan Tahunan</b></p> <p>Does the company's annual report disclose the following items:</p> <p>Apakah Laporan Tahunan perusahaan mengungkapkan hal-hal di bawah ini:</p>			
D.2.1	<p><i>Corporate objectives</i></p> <p>Tujuan Perseroan</p>	Y	Corporate Objectives reflected on the purpose, vision and mission of the Company stated in Annual Report 2022	- Annual Report 2022 (page 8)
D.2.2	<p><i>Financial performance indicators</i></p> <p>Indikator kinerja keuangan</p>	Y	Company have the Financial performance indicators stated on Annual Report 2022	- Annual Report 2022 (page 28-30, 170-195)
D.2.3	<p><i>Non-financial performance indicators</i></p> <p>Indikator kinerja non-keuangan</p>	Y	Company have the Non-Financial performance indicators stated on Annual Report 2022	- Annual Report 2022 (page 31-33, 156-169)
D.2.4	<p><i>Dividend policy</i></p> <p>Kebijakan dividen</p>	Y	The Company has dividend policy as stated on the Article 20 of Article of Association of the Company regulate concerning net income application and interim dividend distribution.	Article of Association of the Company Annual Report 2022 (page 185-186)
D.2.5	<p><i>Biographical details (at least age, academic qualifications, date of first appointment, relevant experience, and any other directorships of listed companies) of directors/commissioners</i></p> <p>Riwayat hidup (paling tidak umur, kualifikasi pendidikan, tanggal penunjukan pertama, pengalaman yang relevan, dan jabatan di perusahaan tercatat lain) dari Direksi/Komisaris</p>	Y	Company have the Biographical details (at least age, academic qualifications, date of first appointment, relevant experience, and any other directorships of listed companies) of directors/commissioners stated on Annual Report 2022	- Annual Report 2022 (page 102-116)
D.2.6	<p><i>Attendance details of each director/commissioner in all Number of board of directors/commissioners meetings held during the year</i></p> <p>Kehadiran setiap direksi/komisaris pada semua rapat direksi/komisaris sepanjang tahun</p>	Y	Company have the Attendance details of each director/commissioner in all Number of board of directors/commissioners meetings held during the year stated on the Annual Report 2022	- Annual Report 2022 (page 241-242, 255-257)
D.2.7	<p><i>Total remuneration of each member of the board of directors/commissioners</i></p> <p>Total remunerasi setiap anggota direksi dan dewan komisaris</p>	N	Company has published the total remuneration of the BOD dan BOC on the Annual report 2022	- Annual Report 2022 (page 296)
	<p><i>Corporate Governance Confirmation Statement</i></p> <p>Pernyataan Tata Kelola</p>			
D.2.8	<p>Does the annual report contain a statement confirming the company's compliance with the code of corporate governance and where there is non-compliance, identify and explain reasons for each such issue?</p> <p>Apakah dalam Laporan Tahunan terdapat pernyataan Perseroan tentang pemenuhan terhadap code of corporate governance dan tidak ada yang tidak terpenuhi, identifikasi dan penjelasan alasan dari setiap isu?</p>	Y	Company has a statement confirming the company's compliance with the code of corporate governance and where there is non-compliance, identify and explain reasons for each such issue stated on the Annual Report 2022	- Annual Report 2022 (page 283-290)
D.3	<p><b>Disclosure of related-party transactions (RPT)</b></p> <p><b>Keterbukaan atas Transaksi dengan pihak yang berafiliasi</b></p>			
D.3.1	<p>Does the company disclose its policy covering the review and approval of material/significant RPTs?</p> <p>Apakah perusahaan mengungkapkan kebijakan yang mencakup penelaahan dan persetujuan tentang materialitas dan signifikansi Transaksi dengan pihak yang terafiliasi?</p>	Y	In the Company's Article of Association Paragraph 14 Point 5 regulate to conduct conflict of interest transaction, BOD shall fulfill the regulation of OJK , where one of them is regarding statement of BOD and BOC. Otherwise, review and approval also conducted by independent parties as determine by OJK regulation.	- Articles of Association of the Company
D.3.2	<p>Does the company disclose the name, relationship, nature and value for each material RPTs?</p> <p>Apakah perusahaan mengungkapkan nama, hubungan, sifat dan nilai setiap transaksi material dengan pihak yang terafiliasi?</p>	Y	Company disclose the name, relationship, nature and value for each material RPTs stated on Annual Report 2022.	- Annual Report 2022 (page 187-188)
D.4	<p><b>Directors and Commissioners dealings in shares of the company</b></p> <p><b>Transaksi saham perusahaan oleh Direksi dan Komisaris</b></p>			
D.4.1	<p>Does the company disclose trading in the company's shares by insiders?</p> <p>Apakah perusahaan mengungkapkan transaksi saham perusahaan oleh pihak orang dalam?</p>	N		
D.5	<p><b>External auditor and audit report</b></p> <p><b>Auditor Eksternal dan Laporan Audit</b></p>			

	Where the same audit firm is engaged for both audit and non-audit services Dimana perusahaan audit yang sama dilibatkan untuk jasa audit dan non-audit			
D.5.1	Are the audit and non-audit fees disclosed? Apakah fee jasa audit dan non-audit diungkapkan?	Y	Company disclosed the audit and non-audit fees in Annual Report 2022	Annual Report 2022 (page 133)
D.5.2	Does the non-audit fee exceed the audit fees? Apakah fee jasa audit diluar fee jasa non-audit?	N	Company disclosed the audit and non-audit fees in Annual Report 2022	Annual Report 2022 (page 133)
D.6	<b>Methods of communication</b> <b>Metode Komunikasi</b>			
	Does the company use the following modes of communication? Apakah perusahaan menggunakan model komunikasi berikut?			
D.6.1	Quarterly reporting Laporan Triwulanan	Y	as stated on Quarterly financial report which also publish on Indocement Website	-Indocement's Website -Quarterly Financial Report
D.6.2	Company website Situs web perusahaan	Y	<a href="https://indocement.co.id/">https://indocement.co.id/</a>	-Indocement's Website
D.6.3	Analysts' briefings Pertemuan dengan analis	Y	Materi of Analysts' briefing publish on Indocement Website and Indocement's Website and Annual Report 2022	-Indocement's Website - Annual Report 2022 (page 333)
D.6.4	Media briefings /press conferences Pertemuan dengan media/konferensi pers	Y	Media briefings /press conferences publish on Indocement Website and Annual Report 2022	-Indocement's Website - Annual Report 2022 (page 329, 355)
D.7	<b>Timely filing/release of annual/financial reports</b> <b>Ketepatan waktu dalam penyampaian/publikasi Laporan Tahunan /Laporan Keuangan</b>			
D.7.1	Are the audited annual financial report/statement released within 120 days of the financial year end? Apakah laporan keuangan tahunan yang diaudit dipublikasi dalam 120 hari sejak ditutupnya tahun buku?	Y	Annual Financial Statement (Audited) for financial year 2022 has been submit to OJK and BEI on 27 March 2023.	- Annual Financial Statement 2022 - Indocement Website
D.7.2	Is the annual report released within 120 days from the financial year end? Apakah laporan tahunan dipublikasi setelah 120 hari sejak ditutupnya tahun buku?	Y	Annual Report of the Company Released on 18 April 2023 --> Based on OJK letter No. 045/ITP-CLCC/IV/2023	-Annual Report 2022 -Indocement Website
D.7.3	Is the true and fairness/fair representation of the annual financial statement/reports affirmed by the board of directors/commissioners and/or the relevant officers of the company? Apakah terdapat pernyataan bahwa Laporan Tahunan/Laporan Keuangan adalah benar dan wajar dari direksi/komisaris dan/atau pejabat terkait di perusahaan?	Y		-Annual Report 2022 (page 376-377) -Indocement Website
D.8	<b>Corporate website</b> <b>Situs Web perusahaan</b>			
	Does the company have a website disclosing up-to-date information on the following: Apakah situs web perusahaan mempublikasikan informasi terkini, sebagai berikut:			
D.8.1	Financial statements/reports (latest quarterly) Laporan Keuangan (Triwulan yang terakhir)	Y		-Indocement Website
D.8.2	Materials provided in briefings to analysts and media Materi yang disiapkan untuk pertemuan dengan analis dan media	Y		-Indocement Website
D.8.3	Downloadable annual report Laporan Tahunan yang dapat diunduh	Y		-Indocement Website
D.8.4	Notice of AGM and/or EGM Pengumuman RUPST dan/atau RUPSLB	Y		-Annual Report 2022 (page 222) -Indocement Website
D.8.5	Minutes of AGM and/or EGM Risalah RUPST dan/atau RUPSLB	Y		-Annual Report 2022 (page 225-232) -Indocement Website
D.8.6	Company's constitution (company's by-laws, memorandum and articles of association) Anggaran Dasar perusahaan	Y		-Annual Report 2022 (page 86) -Indocement Website
D.9	<b>Investor relations</b>			



D.9.1	Does the company disclose the contact details (e.g. telephone, fax, and email) of the officer/office responsible for investor relations? Apakah perusahaan mengungkapkan detail kontak (telepon, fax dan email) dari pejabat yang bertanggungjawab untuk hubungan dengan investor?	Y		-Annual Report 2022 (page 88) -Indocement Website
<b>PART E: RESPONSIBILITIES OF THE BOARD</b>				
E.1	<b>Board Duties and Responsibilities</b> <b>Tanggung Jawab Dewan Komisaris dan Direksi/Responsibilities of the Board</b>			
	<b>Clearly defined board responsibilities and corporate governance policy</b> <b>Adanya kejelasan tugas dan tanggung jawab serta kebijakan corporate governance</b>			
E.1.1	Does the company disclose its corporate governance policy / board charter? Perusahaan mengungkapkan board charter	Y	The Company disclose its corporate governance policy named Indocement Code of Conduct and board charter of BOD and BOC on the Company's website.	- Company's Website
E.1.2	Are the types of decisions requiring board of directors/commissioners' approval disclosed? Perusahaan mengungkapkan jenis-jenis keputusan yang perlu mendapat persetujuan Dewan Komisaris	Y	The types of decisions requiring board of directors/commissioners' approval stated on Charter of BOD and BOC and Articles of Association of the Company. All of it, has been disclosed on the Company's Website.	- Articles of Association of the Company - Charter of BOD - Charter of BOC
E.1.3	Are the role and responsibilities of the board of directors/commissioners clearly stated? Tugas dan tanggung jawab Dewan Komisaris dan Direksi didefinisikan dengan jelas	Y	The role and responsibilities of the board of directors/commissioners clearly stated on Charter of BOD and BOC and Articles of Association of the Company	- Articles of Association of the Company - Charter of BOD - Charter of BOC - Company's Website
	<b>Corporate Vision/Mission</b> <b>Visi dan Misi Perusahaan</b>			
E.1.4	Does the company have an updated vision and mission statement? Apakah perseroan memiliki pembaharuan pernyataan atas visi dan misi?	Y	the Company have an updated vision and mission statement stated in Annual Report 2022 and Company's Website	- Annual Report 2022 (page 9) - Company's Website
E.1.5	Does the board of directors play a leading role in the process of developing and reviewing the company's strategy at least annually? Direksi setiap tahunnya memainkan peran utama dalam proses pengembangan dan peninjauan strategi perseroan?	Y	The board of directors reviewing the Company's strategy at least annually on the Management Retreat.	- Charter of BOD - Charter of BOC
E.1.6	Does the board of directors have a process to review, monitor and oversee the implementation of the corporate strategy? Direksi memiliki wewenang dalam meninjau, memantau, dan mengawasi pelaksanaan strategi perusahaan?	Y	The board of directors have a process to review, monitor and oversee the implementation of the corporate strategy stated in Company's Charter of BOD and BOC	- Charter of BOD - Charter of BOC
E.2	<b>Board structure</b> <b>Code of ethics or conduct</b>			
E.2.1	Are the details of the code of ethics or conduct disclosed? Perusahaan mengungkapkan isi Code of Ethics or Conduct	Y	The details of the code of ethics or conduct stated in Code of Conduct BOD and BOC	- Charter of BOD - Charter of BOC
E.2.2	Are all directors/commissioners, senior management and employees required to comply with the codes? Perusahaan mengungkapkan bahwa seluruh Dewan Komisaris, Direksi dan Pejabat Eksekutif dan karyawan wajib mematuhi Code of Ethics or Conduct	Y		- Charter of BOD - Charter of BOC
E.2.3	Does the company have a process to implement and monitor compliance with the code/s of ethics or conduct? Perusahaan mengungkapkan penerapan dan pemantauan kepatuhan terhadap Code of Ethics or Conduct	Y	The company have a process to implement and monitor compliance with the code/s of ethics or conduct stated in Code of Conduct BOD and BOC	- Charter of BOD - Charter of BOC
	<b>Board structure &amp; composition</b> <b>Struktur dan Komposisi Dewan Komisaris dan Direksi</b>			
E.2.4	Do independent directors/commissioners make up at least 50% of the board of directors/commissioners? Komisaris Independen minimal berjumlah paling sedikit 50% dari seluruh Dewan Komisaris	N	The Company just have 3 Independent Commissioner of 7 member of the Board of Commissioners.	

E.2.5	<p>Does the company have a term limit of nine years or less or 2 terms of five years<sup>1</sup> each for its independent directors/commissioners?</p> <p>Perusahaan memiliki batas waktu paling lama 9 tahun atau 2 periode masing-masing selama lima tahun untuk jabatan Komisaris Independen</p> <p><sup>1</sup>The five years term must be required by legislation which pre-existed the introduction of the ASEAN Corporate Governance Scorecard in 2011</p>	N	<p>AoA &amp; Charter of BOD &amp; BOC stated that Directors and Commissioners are appointed for a term of three years (commencing from the date the resolution approving the said appointments is passed at a GMS up to the closing of the third following annual GMS) and maybe re-appointed in accordance with the prevailing laws and regulations.</p> <p>Article 25 (1) OJK Regulation number 33-2014 stated that: The Independent Commissioner already having service term for two service term periods may be re-appointed in the subsequent period as long as the relevant party declared that he remains independent to GMS.</p> <p>It means: By OJK regulation, the Company has been complied, but for ACGS the Company not comply yet.</p>	<p>- Charter of BOD - Charter of BOC</p>
E.2.6	<p>Has the company set a limit of five board seats that an individual independent/non-executive director/commissioner may hold simultaneously?</p> <p>Perusahaan memiliki batasan rangkap jabatan paling banyak 5 jabatan yang bisa dirangkap oleh Dewan Komisaris dan Direksi</p>	Y	<p>The company set a limit of five board seats that an individual independent/non-executive director/commissioner may hold simultaneously stated in Company's Charter of BOD and BOC</p>	<p>- Charter of BOD - Charter of BOC</p>
E.2.7	<p>Does the company have any executive directors who serve on more than two boards of listed companies outside of the group?</p> <p>Perseroan memiliki direktur/komisaris eksekutif yang memiliki rangkap jabatan pada perusahaan terbuka lain diluar grup perseroan?</p>	N		<p>- Charter of BOD - Charter of BOC</p>
	<b>Nominating Committee</b>			
	<b>Komite Nominasi</b>			
E.2.8	<p>Does the company have a Nominating Committee?</p> <p>Perusahaan memiliki Komite Nominasi</p>	Y	<p>The company have a Nominating Committee stated in Annual Report 2022 and Nomination and Remuneration Committee Charter</p>	<p>-Annual Report 2022 (page 307-314) -Nomination and Remuneration Committee Charter - Company's website</p>
E.2.9	<p>Is the Nominating Committee comprised of a majority of independent directors/commissioners?</p> <p>Komite Nominasi terdiri dari mayoritas Komisaris Independen</p>	N	<p>The Nomination and Remuneration Committee of the Company consist of one Independent Commissioner (as the chairman of the committee), two members Board of Commissioners and Human Resources Manager.</p> <p>It is comply to OJK regulation.</p>	<p>- Annual Report 2022 (page 309-310) - Company's Website</p>
E.2.10	<p>Is the chairman of the Nominating Committee an independent director/commissioner?</p> <p>Ketua Komite Nominasi adalah Komisaris Independen</p>	Y	<p>The chairman of the Nominating Committee an independent director/commissioner stated in Annual Report 2022 and Nomination and Remuneration Committee Charter</p>	<p>-Annual Report 2022 (page 104, 309) -Nomination and Remuneration Committee Charter</p>
E.2.11	<p>Does the company disclose the terms of reference/governance structure/charter of the Nominating Committee?</p> <p>Perusahaan mengungkapkan charter/piagam Komite Nominasi</p>	Y	<p>The company disclose the terms of reference/governance structure/charter of the Nominating Committee stated in Nomination and Remuneration Committee Charter, disclosed in Company's Website</p>	<p>-Nomination and Remuneration Committee Charter - Company's website - Annual Report 2022 (page 307-308)</p>
E.2.12	<p>Is the meeting attendance of the Nominating Committee disclosed and if so, did the Nominating Committee meet at least twice during the year?</p> <p>Kehadiran rapat Komite Nominasi sudah diungkapkan dan Komite Nominasi bertemu setidaknya dua kali dalam setahun?</p>	Y	<p>The meeting attendance of the Nominating Committee disclosed and if so, did the Nominating Committee meet at least twice during the year is stated in Annual Report 2022.</p>	<p>-Annual Report 2022 (page 312)</p>
	<b>Remuneration Committee/Compensation Committee</b>			
	<b>Komite Remunerasi/Komite Kompensasi</b>			
E.2.13	<p>Does the company have a Remuneration Committee?</p> <p>Perusahaan memiliki Komite Remunerasi/Kompensasi</p>	Y	<p>The company have a Remuneration Committee stated in Annual Report 2022 and Nomination and Remuneration Committee Charter</p>	<p>-Annual Report 2022 (page 307-314) -Nomination and Remuneration Committee Charter - Company's website</p>
E.2.14	<p>Is the Remuneration Committee comprised of a majority of independent directors/commissioners?</p> <p>Anggota Komite Remunerasi/Kompensasi mayoritas terdiri dari Komisaris Independen</p>	N	<p>The Nomination and Remuneration Committee of the Company consist of one Independent Commissioner (as the chairman of the committee), two members Board of Commissioners and Human Resources Manager.</p> <p>It means: By OJK regulation, the Company has been complied, but for ACGS the Company not comply yet.</p>	<p>- Annual Report 2022 (page 309-310) - Company's Website</p>
E.2.15	<p>Is the chairman of the Remuneration Committee an independent director/commissioner?</p> <p>Ketua Komite Remunerasi/Kompensasi adalah Komisaris Independen</p>	Y	<p>The chairman of the Remuneration Committee is an independent director/commissioner stated in Nomination and Remuneration Committee Charter</p>	<p>-Annual Report 2021 (page 104, 309) -Nomination and Remuneration Committee Charter - Company's website</p>

E.2.16	Does the company disclose the terms of reference/governance structure/charter of the Remuneration Committee?  Perusahaan mengungkapkan charter/piagam Komite Remunerasi/Kompensasi	Y	The company disclose the terms of reference/governance structure/charter of the Remuneration Committee stated in Nomination and Remuneration Committee Charter, disclosed in Company's website	-Nomination and Remuneration Committee Charter - Company's website - Annual Report 2022 (page 307-308)
E.2.17	Is the meeting attendance of the Remuneration Committee disclosed and, if so, did the Remuneration Committee meet at least twice during the year?  Kehadiran rapat Komite Remunerasi sudah diungkapkan dan Komite Remunerasi bertemu setidaknya dua kali dalam setahun?	Y	the meeting attendance of the Remuneration Committee disclosed and, if so, did the Remuneration Committee meet at least twice during the year is stated in Annual Report 2022	-Annual Report 2022 (page 312)
	<b>Audit Committee</b>  <b>Komite Audit</b>			
E.2.18	Does the company have an Audit Committee?  Perusahaan memiliki Komite Audit	Y	The company have an Audit Committee stated in Annual Report 2022	-Annual Report 2022 (page 297-306) -Audit Committee Charter -Company's website
E.2.19	Is the Audit Committee comprised entirely of non-executive directors/commissioners with a majority of independent directors/commissioners?  Komite Audit terdiri dari mayoritas Komisaris Independen	N	The Audit Committee of the Company consist of one Independent Commissioner (as the chairman of the committee), and two Independent.  It means: By OJK regulation, the Company has been complied, but for ACGS the Company not comply yet.	-Annual Report 2022 (page 299-301) -Audit Committee Charter - Charter of BOD - Charter of BOC
E.2.20	Is the chairman of the Audit Committee an independent director/commissioner?  Ketua Komite Audit adalah Komisaris Independen	Y	The chairman of the Audit Committee an independent director/commissioner as stated in Annual Report 2022 and Audit Committee Charter	-Annual Report 2022 (page 299) -Audit Committee Charter - Charter of BOD - Charter of BOC - Company's website
E.2.21	Does the company disclose the terms of reference/governance structure/charter of the Audit Committee?  Perusahaan mengungkapkan charter/piagam Komite Audit	Y	The Company disclose the terms of reference/governance structure/charter of the Audit Committee as stated in Annual Report 2022 and Audit Committee Charter	-Company's website - Annual Report 2022 (page 297-298) -Audit Committee Charter
E.2.22	Does at least one of the independent director/commissioners of the committee have accounting expertise (accounting qualification or experience)?  Paling tidak salah satu dari anggota Komite Audit memiliki keahlian dan pengalaman di bidang Akuntansi	Y	Chairman and Member of the Audit Committee have accounting expertise (accounting qualification or experience) stated in Annual Report 2022 and Charter of Board of BOD and BOC	-Annual Report 2021 (page 297-298) - Company's website
E.2.23	Is the meeting attendance of the Audit Committee disclosed and, if so, did the Audit Committee meet at least four times during the year?  Kehadiran rapat Komite Audit sudah diungkapkan dan Komite Audit bertemu setidaknya dua kali dalam setahun?	Y	The meeting attendance of the Audit Committee are disclosed and the Audit Committee meet at least four times during the year as stated in Annual Report 2022	-Annual Report 2022 (page 304)
E.2.24	Does the Audit Committee have primary responsibility for recommendation on the appointment, and removal of the external auditor?  Salah satu tugas utama dari Komite Audit adalah terkait dalam pemilihan Auditor Eksternal	Y	The Audit Committee of the Company evaluate the performance of the annual financial audit conducted by the Public Accountant and the Accounting Firm for the previous year and give recommendation to Board of Commissioners regarding appointment of the External Auditor.  All this matter stated in Annual Report 2022.	- Annual Report 2022 (page 303-304)
E.3	<b>Board Processes</b>  <b>Board meetings and attendance</b>  <b>Rapat dan Kehadiran Rapat Dewan Komisaris dan Direksi</b>			
E.3.1	Are the board of directors meeting scheduled before the start of financial year?  Perusahaan telah menjadwalkan Rapat Dewan Komisaris dan Direksi di awal tahun	Y	The board of directors meeting scheduled before the start of financial year is stated in Annual Report 2022	- Annual Report 2022 (page 241 dan )
E.3.2	Does the board of directors/commissioners meet at least six times during the year?  Dewan Komisaris/Direksi menyelenggarakan rapat paling tidak 6 kali dalam 1 tahun	Y	The board of directors/commissioners have a meeting at least six times during the year that is stated in Annual Report 2021	- Annual Report 2022 (page 241, 255-256, 287)
E.3.3	Has each of the directors/commissioners attended at least 75% of all the board meetings held during the year?  Dewan Komisaris dan Direksi masing-masing paling tidak menghadiri 75% dari seluruh jumlah rapat yang diselenggarakan	Y	Each of the directors/commissioners was attended at least 75% of all the board meetings held during the year and its stated in Annual Report 2022	- Annual Report 2021 (page 242, 256-257, 287)
E.3.4	Does the company require a minimum quorum of at least 2/3 for board decisions?  Apakah perusahaan memerlukan kuorum minimum 2/3 untuk keputusan dewan?	Y	The minimum quorum of at least 2/3 for board decisions is stated in Articles of Association of the Company	- Articles of Association of the Company
E.3.5	Did the non-executive directors/commissioners of the company have met separately at least once during the year without any executives present?  Direktur/komisaris non-eksekutif perusahaan bertemu secara terpisah setidaknya 1 kali tahun ini tanpa ada eksekutif yang hadir?	Y		

	<b>Access to information</b>			
	<b>Akses Informasi</b>			
E.3.6	<p>Are board papers for board of directors/commissioners meetings are provided to the board at least five business days in advance of the meeting?</p> <p>Perusahaan telah menyediakan materi rapat Dewan Komisaris dan Direksi paling tidak 5 hari sebelum diselenggarakannya rapat</p>	Y		Annual Report 2022 (page 287)
E.3.7	<p>Does the company secretary play a significant role in supporting the board in discharging its responsibilities?</p> <p>Corporate Secretary memiliki peran yang signifikan dalam mendukung Direksi dalam menjalankan kewajibannya</p>	Y	the company secretary play a significant role in supporting the board in discharging its responsibilities as stated in Annual Report 2022.	Annual Report 2022 (page 323-324)
E.3.8	<p>Is the company secretary trained in legal, accountancy or company secretarial practices and has kept abreast on relevant developments?</p> <p>Corporate Secretary diberikan pelatihan di bidang hukum, akuntansi atau kesekretariatan</p>	Y	The company secretary trained in legal, accountancy or company secretarial practices and has kept abreast on relevant developments as stated in Annual Report 2022	- Annual Report 2022 (page 261)
	<b>Board appointments and re-election</b>			
	<b>Penunjukkan dan Pemilihan Kembali anggota Dewan Komisaris</b>			
E.3.9	<p>Does the company disclose the criteria used in selecting new directors/commissioners?</p> <p>Apakah perusahaan mengungkapkan kriteria yang digunakan dalam memilih direktur/komisaris baru?</p>	Y	The company disclose the criteria used in selecting new directors/commissioners stated in Charter of BOD and BOC	- Charter of BOD - Charter of BOC - Company's website
E.3.10	<p>Did the company describe the process followed in appointing new directors/commissioners?</p> <p>Perusahaan mengungkapkan proses yang diikuti dalam menunjuk direktur/komisaris baru?</p>	Y	The company describe the process followed in appointing new directors/commissioners as its stated in Annual Report 2022	- Annual Report 2022 (page 243, 258)
E.3.11	<p>Are all directors/commissioners subject to re-election every 3 years; or 5 years for listed companies in countries whose legislation prescribes a term of 5 years<sup>2</sup> each?</p> <p>Semua direktur/komisaris dapat dipilih kembali setiap 3 tahun; atau 5 tahun untuk perusahaan terdaftar di negara-negara yang undang-undangnya menentukan jangka waktu masing-masing 5 tahun?</p>	Y	All directors/commissioners is subject to re-election every 3 years;as its stated in Articles of Association of the Company	- Articles of Association of the Company
	<p><sup>2</sup>The five years term must be required by legislation which pre-existed the introduction of the ASEAN Corporate Governance Scorecard 2011</p> <p><sup>2</sup>Jangka waktu lima tahun harus disyaratkan oleh undang-undang yang sudah ada sebelum diperkenalkannya ASEAN Corporate Governance Scorecard pada tahun 2011.</p>			
	<b>Remuneration matters</b>			
	<b>Tentang Remunerasi</b>			
E.3.12	<p>Does the company disclose its remuneration (fees, allowances, benefit-in-kind and other emoluments) policy (i.e. the use of short term and long term incentives and performance measures) for its executive directors and CEO?</p> <p>Perusahaan mengungkapkan kebijakan remunerasi untuk Direksi</p>	Y		Annual Report 2022 (page 295)
E.3.13	<p>Is there disclosure of the fee structure for non-executive directors/commissioners?</p> <p>Perusahaan mengungkapkan kebijakan remunerasi Dewan Komisaris</p>	Y		Annual Report 2022 (page 295)
E.3.14	<p>Do the shareholders or the Board of Directors approve the remuneration of the executive directors and/or the senior executives?</p> <p>Pemegang saham menyetujui kebijakan remunerasi Dewan Komisaris dan Direksi</p>	Y	The shareholders or the Board of Directors approves the remuneration of the executive directors as stated in Advertisement of the Notification to Shareholders concerning Resolution of the AGMS and Deed of Minutes of Meeting (MoM) of AGMS & EGMS 19 May 2023	- Advertisement of the Notification to Shareholders concerning Resolution of the AGMS - Deed of Minutes of Meeting (MoM) of AGMS 17 May 2023
E.3.15	<p>Does the company have measurable standards to align the performance-based remuneration of the executive directors and senior executive with long-term interest of the company, such as claw back provision and deferred bonuses?</p> <p>Perusahaan memiliki standar yang terukur untuk menyelaraskan remunerasi berbasis kinerja dari direktur eksekutif dan eksekutif senior dengan kepentingan jangka panjang perusahaan, seperti ketentuan pengembalian dan bonus yang ditangguhkan?</p>	N		
	<b>Internal Audit</b>			
	<b>Audit Internal</b>			
E.3.16	<p>Does the company have a separate internal audit function?</p> <p>Perusahaan memiliki fungsi Internal Audit yang independen</p>	Y	The company have a separate internal audit function as its stated in Annual Report 2022 & Internal Audit Charter	- Annual Report 2022 (page 334 - 341) - Internal Audit Charter

E.3.17	Is the head of internal audit identified or, if outsourced, is the name of the external firm disclosed?  Perusahaan mengungkapkan profil Pimpinan Internal Audit	Y	The head of internal audit is Company's employee.	Annual Report 2022 (page 336)
E.3.18	Does the appointment and removal of the internal auditor require the approval of the Audit Committee?  Penunjukkan dan pemberhentian Internal Auditor disetujui oleh Komite Audit	Y	The appointment and removal of the internal auditor require the approval of the Board of Commissioners. It is inline with the OJK regulation.	- Annual Report 2022 (page 335) - Disclosure to OJK
	<b>Risk oversight</b>  <b>Pengawasan Risiko</b>			
E.3.19	Does the company establish a sound internal control procedures/risk management framework and periodically review the effectiveness of that framework?  Perusahaan menetapkan prosedur pengendalian internal/kerangka kerja manajemen risiko yang baik dan secara berkala meninjau efektivitas kerangka kerja?	Y	The company establish a sound internal control procedures/risk management framework and periodically review the effectiveness of that framework as stated in Annual Report 2022	Annual Report 2022 page 342
E.3.20	Does the annual report/annual CG report disclose that the board of directors/commissioners has conducted a review of the company's material controls (including operational, financial and compliance controls) and risk management systems?  Laporan Tahunan mengungkapkan bahwa dewan direksi/komisaris telah melakukan tinjauan terhadap kontrol material perusahaan (termasuk kontrol operasional, keuangan dan kepatuhan) dan system manajemen risiko?	Y	The Board of Directors and Board of Commissioners of the Company has conducted review of the Company's material control on the Board of Directors and/or Board of Commissioners Meeting. The Agenda of the Meeting stated on Annual Report 2022.	Annual Report 2022 page 342
E.3.21	Does the company disclose the key risks to which the company is materially exposed to (i.e. financial, operational including IT, environmental, social, economic)?  Perusahaan mengungkapkan risiko Material utama (yaitu keuangan, operasi termasuk TI, lingkungan, sosial, ekonomi)?	Y	The Company disclose the key risks to which the Company is materially exposed to (i.e. financial, operational including IT, environmental, social, economic) in Annual Report 2022	Annual Report 2022 page 349-351
E.3.22	Does the Annual Report/Annual CG Report contain a statement from the board of directors/commissioners or Audit Committee commenting on the adequacy of the company's internal control/risk management systems?  Laporan Tahunan/Laporan CG Tahunan berisi pernyataan dari dewan direksi/komisaris atau Komite Audit yang mengomentari kecukupan pengendalian internal/sistem manajemen risiko perusahaan?	Y	The Annual Report/Annual CG Report contain a statement from the board of directors/commissioners or Audit Committee commenting on the adequacy of the company's internal control/risk management systems as stated in Annual Report 2022	Annual Report 2022 page 351
E.4	<b>People on the Board</b>			
	<b>Board Chairman</b>  <b>Komisaris Utama Perusahaan</b>			
E.4.1	Do different persons assume the roles of chairman and CEO?  Komisaris Utama tidak merangkap jabatan sebagai Direktur Utama	Y	President Director and President Commissioner of the Company is different person.	Annual Report 2022 (page102)
E.4.2	Is the chairman an independent director/commissioner?  Komisaris Utama adalah Komisaris Independen	N	President Commissioner of the Company is not an independent Commissioner.	Annual Report 2022 (page102)
E.4.3	Is any of the directors a former CEO of the company in the past 2 years?  Apakah ada direktur yang mantan CEO perusahaan dalam 2 tahun terakhir?	N	Profile Board of Commissioners and Board of Directors stated in Annual Report 2022.	Annual Report 2022 (page 110-116)
E.4.4	Are the roles and responsibilities of the chairman disclosed?  Perusahaan mengungkapkan peran dan tugas Komisaris Utama	Y	The division of duties of the board of commissioners are stated in Annual Report 2022.	Annual Report 2022 page 239
	<b>Lead Independent Director</b>			
E.4.5	If the Chairman is not independent, has the Board appointed a Lead/Senior Independent Director and has his/her role been defined?  Jika Ketua tidak independen, apakah Dewan telah menunjuk seorang Direktur Utama/Independen Senior dan apakah perannya telah ditentukan?	N	The Company has 3 Independent Commissioners and the Company's President Commissioner is not an Independent Commissioner, however the duties of the President Commissioner have been stated on page 239 of the 2022 Annual Report.	page 239 of the 2022 Annual Report.
	<b>Skills and Competencies</b>  <b>Keahlian dan Kompetensi</b>			
E.4.6	Does at least one non-executive director/commissioner have prior working experience in the major sector that the company is operating in?  Perusahaan paling tidak memiliki 1 anggota Dewan Komisaris yang memiliki pengalaman sebelumnya di industri yang sama	Y	one non-executive director/commissioner have prior working experience in the major sector that the company is operating in as stated in Annual Report 2022	Annual Report 2022 page 275-279

E.5	<b>Board Performance</b>			
	<b>Directors Development</b>			
	<b>Pelatihan/Pengembangan Direksi</b>			
E.5.1	Does the company have orientation programmes for new directors/commissioners?  Perusahaan memiliki program orientasi untuk Dewan Komisaris dan Direksi baru	Y		Annual Report 2022 page 243 & 258
E.5.2	Does the company have a policy that encourages directors/commissioners to attend on-going or continues professional education programmes?  Perusahaan memiliki kebijakan yang mendorong Dewan Komisaris dan Direksi mengikuti program pengembangan kompetensi secara berkelanjutan	Y		- Charter of BOD - Charter of BOC
	<b>CEO/Executive Management appointments and performance</b>			
	<b>Penunjukkan dan Penilaian Kinerja Direktur Utama</b>			
E.5.3	Does the company disclose the process on how the board of directors/commissioners plans for the succession of the CEO/Managing Director/President and key management?  Perusahaan mengungkapkan rencana suksesi Direksi dan manajemen kunci	Y	Plans and succession process to appoint BOD and BOC has been stated in Annual Report 2022.	Annual Report 2022 page 313
E.5.4	Does the board of directors/commissioners conduct an annual performance assessment of the CEO/Managing Director/President?  Dewan Komisaris melakukan penilaian kinerja Direktur Utama secara tahunan	Y		Annual Report 2022 page 283-284
	<b>Board Appraisal</b>			
	<b>Penilaian Kinerja Dewan Komisaris</b>			
E.5.5	Did the company conduct an annual performance assessment of the board of directors/commissioners and disclose the criteria and process followed for the assessment?  Perusahaan melakukan penilaian kinerja tahunan dari direktur/komisaris secara kolegal dan mengungkapkan kriteria dan proses yang diikuti untuk penilaian?	Y	The Company conduct an annual performance assessment of the board of directors and disclose the criteria and process followed for the assessment stated in Annual Report 2022	Annual Report 2022 page 282-285
E.5.6	Did the company conduct an annual performance assessment of the individual directors/commissioners and disclose the criteria and process followed for the assessment?  Perusahaan melakukan penilaian kinerja tahunan dari masing-masing direktur/komisaris dan mengungkapkan kriteria dan proses yang diikuti untuk penilaian?	Y	The Company conduct an annual performance assessment of individual member the board of directors and disclose the criteria and process followed for the assessment stated in Annual Report 2022	Annual Report 2022 page 282-285
	<b>Committee appraisal</b>			
E.5.7	Did the company conduct an annual performance assessment of the board committees and disclose the criteria and process followed for the assessment?  Apakah perusahaan melakukan penilaian terhadap kinerja tahunan komite dewan dan mengungkapkan kriteria dan proses yang diikuti untuk penilaian?	Y	The company conduct an annual performance assessment of the board committees and disclose the criteria and process followed for the assessment stated in Annual Report 2022	Annual Report 2022 page 68, 83, 245-246 dan 262
<b>Level 2 : BONUS</b>				
<b>(B)A: Rights of shareholders</b>				
(B)A.1	<b>Right to participate effectively in and vote in general shareholders' meetings and should be informed of the rules, including voting procedures, which govern general shareholders' meetings.</b>			
(B)A.1.1	Does the company practice secure electronic voting in absentia at the general meetings of shareholders?	Y		Deed of Minutes of Meeting (MoM) of AGMS 17 May 2023.
<b>(B)B: Equitable treatment of shareholders</b>				
(B)B.1	<b>Notice of AGM</b>			
(B) B.1.1	Does the company release its notice of AGM (with detailed agendas and explanatory circulars), as announced to the Exchange, at least 28 days before the date of the meeting?	Y	Agendas of the AGMS dated 19 May 2023 stated in the invitation to shareholders that published on 18 April 2023 or 28 days before the date of meeting	
<b>(B)C: Roles of Stakeholders</b>				
(B)C.1	<b>The rights of stakeholders that are established by law or through mutual agreements are to be respected</b>			
(B)C.1.1	Does the company adopt an internationally recognized reporting framework for sustainability (i.e. GRI, Integrated Reporting, SASB)?	Y		
<b>(B)D : Disclosure and transparency</b>				
(B)D.1	<b>Quality of annual report</b>			
(B)D.1.1	Are the audited annual report/statement released within 60 days from the financial year end?	N		
(B)D.1.2	Does the company details of remuneration of the CEO?	N		
<b>(B)E: Responsibilities of the Board</b>				

<b>(B)E.1</b>	<b>Board competencies and diversity</b>			
(B)E.1.1	Does the company have at least one female independent director/commissioner?	N		
(B)E.1.2	Does the company have a policy and disclose measurable objectives for implementing its board diversity and report on progress in achieving its objectives?	Y	The Company has disclosed the diversity of the Company's Directors and Board of Commissioners and has disclosed that the diversity aspects of each Director and Board of Commissioners are necessary for the effectiveness of the duties and responsibilities of the Directors and Board of Commissioners.	Annual Report 2022 page 276-279
<b>(B)E.2</b>	<b>Board Structure</b>			
(B)E.2.1	Is the nominating committee comprise entirely of independent directors/commissioners?	N		
(B)E.2.2	Does the nominating committee undertake the process of identifying the quality of directors aligned with the company's strategic directions?	Y	The Company's Nomination and Remuneration Committee has carried out a process to identify director quality that is in line with the Company's strategic direction. This has been disclosed in the Annual Report on page 312, which is seen in the agenda for the Nomination and Remuneration Committee meeting discussing Changes in the Company's Management Composition.	- Deed of Minutes of Meeting (MoM) of AGMS 17 May 2023. - Annual Report 2022 page 312
<b>(B)E.3</b>	<b>Board Appointment and Re-Election</b>			
(B)E.3.1	Does the company use professional search firms of other external sources of candidates (such as director databases set up by director or shareholder bodies) when searching for candidates to the board of directors/commissioners?	N		
<b>(B)E.4</b>	<b>Board Structure &amp; Composition</b>			
(B)E.4.1	Do independent non-executive directors/commissioners make up more than 50% of the board of directors/commissioners for a company with independent chairman?	N		
<b>(B)E.5</b>	<b>Risk Oversight</b>			
(B)E.5.1	Does the board describe its governance process around IT issues including disruption, cyber security, disaster recovery, to ensure that all key risks are identified, managed and reported to the board?	N		
<b>(B)E.6</b>	<b>Board Performance</b>			
(B)E.6.1	Does the company have a separate board level Risk Committee?	N		
<b>Level 2 : PENALTY</b>				
<b>(P)A: Rights of shareholders</b>				
<b>(P)A.1</b>	<b>Basic shareholder rights</b>			
(P)A.1.1	Did the company fail or neglect to offer equal treatment for share re-purchases to all shareholders?	N		
<b>(P)A.2</b>	<b>Shareholders, including institutional shareholders, should be allowed to consult with each other on issues concerning their basic shareholder rights as defined in the Principles, subject to exceptions to prevent abuse</b>			
(P)A.2.1	Is there evidence of barriers that prevent shareholders from communicating or consulting with other shareholders?	N		
<b>(P)A.3</b>	<b>Right to participate effectively in and vote in general shareholders' meetings and should be informed of the rules, including voting procedures, which govern general shareholders' meetings</b>			
(P)A.3.1	Did the company include any additional and unannounced agenda item into the notice of AGM/EGM	N		
(P)A.3.2	Did the chairman of the board, audit committee chairman and CEO attend the most recent AGM?	Y		
<b>(P)A.4</b>	<b>Capital structures and arrangements that enable certain shareholders to obtain a degree of control disproportionate to their equity ownership should be disclosed</b>			
	Did the company fail to disclose the existence of:			
(P)A.4.1	Shareholders' agreements?	N		
(P)A.4.2	Voting cap?	N		
(P)A.4.3	Multiple voting rights?	N		
<b>(P)A.5</b>	<b>Capital structures and arrangements that enable certain shareholders to obtain a degree of control disproportionate to their equity ownership should be disclosed</b>			
A.5.1(P)	Is a pyramid ownership structure and/ or cross holding structure apparent?	N		
<b>(P)B: Equitable treatment of shareholders</b>				
<b>(P)B.1</b>	<b>Insider trading and abusive self-dealing should be prohibited</b>			
(P)B.1.1	Has there been any conviction of insider trading involving directors/commissioners, management and employees in the past three years?	N		
<b>(P)B.2</b>	<b>Protecting minority shareholders from abusive action</b>			
(P)B.2.1	Has there been any cases of non compliance with the laws, rules and regulations pertaining to significant or material related-party transactions in the past three years?	N		

(P)B.2.2	Were there any RPTs that can be classified as financial assistance (i.e not conducted at arms length) to entities other than wholly-owned subsidiary companies?	N		
<b>(P)C: Role of stakeholders</b>				
(P)C.1	<b>The rights of stakeholders that are established by law or through mutual agreements are to be respected</b>			
(P)C.1.1	Have there been any violations of any laws pertaining to labor/employment/ consumer/insolvency/ commercial/competition or environmental issues?	N		
(P)C.2	<b>Where stakeholders participate in the corporate governance process, they should have access to relevant, sufficient and reliable information on a timely and regular basis.</b>			
(P)C.2.1	Has the company faced any sanctions by regulators for failure to make announcements within the requisite time period for material events?	N		
<b>(P)D: Disclosure and transparency</b>				
(P)D.1	<b>Sanctions from regulator on financial reports</b>			
(P)D.1.1	Did the company receive a "qualified opinion" in its external audit report?	N		
(P)D.1.2	Did the company receive an "adverse opinion" in its external audit report?	N		
(P)D.1.3	Did the company receive a "disclaimer of opinion" in its external audit report?	N		
(P)D.1.4	Has the company in the past year revised its financial statements for reasons other than changes in accounting policies?	N		
(P)E.1	<b>Compliance with listing rules, regulations and applicable laws</b>			
(P)E.1.1	Is there any evidence that the company has not complied with any listing rules and regulations over the past year apart from disclosure rules?	N		
(P)E.1.2	Have there been any instances where non-executive directors/commissioners have resigned and raised any issues of governance-related concerns?	N		
(P)E.2	<b>Board Structure</b>			
(P)E.2.1	Does the Company have any independent directors/commissioners who have served for more than nine years or two terms of five years <sup>1</sup> each (which ever is higher) in the same capacity?  <sup>1</sup> The five years term must be required by legislation which pre-existed before the introduction of the ASEAN Corporate Governance Scorecard in 2011	Y		
(P)E.2.2	Did the company fail to identify who are the independent director(s)? commissioner(s)?	N		
(P)E.2.3	Does the company have any independent directors/non-executive/commissioners who serve on a total of more than five boards of publicly-listed companies?	N		
(P)E.3	<b>External audit</b>			
(P)E.3.1	Is any of the directors or senior management a former employee or partner of the current external auditor (in the past two years)?	N		
(P)E.4	<b>Board Structure and Composition</b>			
(P)E.4.1	Has the chairman been the company CEO in the last three years?	N		
(P)E.4.2	Do independent non-executive directors/commissioners receive options, performance shares or bonuses?	N		