



**DISCLOSURE OF INFORMATION ON
THE PLAN TO TRANSFER A PORTION OF TREASURY SHARES
OF PT BANK BTPN SYARIAH TBK**

Introduction

PT Bank BTPN Syariah Tbk (the "**Company**") has carried out the buyback of the Company's shares on October 23, 2019 referred to the Financial Services Authority Regulation No.30/POJK.04/2017 concerning the Buyback of Shares Issued by Public Companies (the "**POJK No. 30/2017**"), based on the resolutions of the Extraordinary General Meeting of Shareholders held on September 2, 2019.

The purpose of the Company's Share Buyback is as announced through the Information Disclosure via the Kompas and Kontan Daily Newspapers, the Financial Services Authority Website and the Indonesian Stock Exchange as well as the Company Website on July 25, 2019, namely in the context of providing variable remuneration to Members of the Board of Directors for Company performance, to comply with Financial Services Authority Regulation Number 59/POJK.03/2017 concerning the Implementation of Governance in Providing Remuneration for Sharia Commercial Banks and Sharia Business Units (the "**POJK No.59/2017**").

The number of shares that have been repurchased (the "**Treasury Shares**") is as reported in the Company's Financial Report as of September 30, 2020 in the amount of 2,500,000 (two million five hundred thousand) shares, with a total acquisition cost of Rp. 9,763 Million.

Explanation regarding the implementation of the first, second, third and fourth transfers of some of the Company's Treasury Shares in the years 2021, 2022, 2023 and 2024.

Referring to POJK No.30/2017 regarding the timing of the transfer of shares resulting from the buyback, the Company has fulfilled the provisions of transfer of shares resulting from the buyback upon the completion of the share buyback process on October 23, 2019.

The Company has carried out the first, second, third, and fourth transfer of shares as contained in the Information Disclosure of the Company:

- a. Number S.028/DIR/CSGC/I/2021 dated January 26, 2021, for the first transfer of the Treasury Shares;
- b. Number S.031/DIR/CSGC/I/2022 dated January 26, 2022, for the second transfer of the Treasury Shares;
- c. Number S.034/DIR/CSGC/I/2023 dated January 26, 2023, for the third transfer of the Treasury Shares;
- d. Number S.034/DIR/CSGC/I/2024 dated January 26, 2024, for the fourth transfer of the Treasury Shares;

with the details on the realization of transfer of the Treasury Shares as following:

Year	Remarks	Disclosure of Information on Transfer Plan	Implementation Date	Treasury Shares Transferred (number of shares)	Remaining Treasury Shares (number of shares)
2019	Share Buyback	-	October 23, 2019	-	2.500.000
2021	First Transfer of Shares	January 8, 2021	January 25, 2021	402.800	2.097.200
2022	Second Transfer of Shares	January 10, 2022	January, 25 2022	829.200	1.268.000
2023	Third Transfer of Shares	Januari 10, 2023	January, 25 2023	651.900	616.100
2024	Fourth Transfer of Shares	January 10, 2024	January, 25 2024	373.100	243.000

Total number of the Treasury Shares after the consummation of the first, second, third, and fourth transfer of shares (per December 31, 2024) is totaling to 243,000 (Two Hundred Forty Three Thousand) shares

Plan for the fifth Transfer of Shares over a portion of the Treasury Shares of the Company

The Company is planning on carrying out further allocation and distribution over the remaining Treasury Shares as the provision of deferred variable remuneration (Deferred Bonus) to the Board of Directors as the Material Risk Takers of the Company over the performance of the Company for the financial year of 2021, 2022, and 2023, to comply with POJK 59/2017 with the following details:

1. **Transfer of a Portion of the Treasury Shares of the Company**
Transfer of a Portion of the Treasury Shares is carried out outside the Stock Exchange by carrying out direct distribution to the parties who are entitled to the deferred variable remuneration (Deferred Bonus) over the performance of the Company for the financial year of 2021, 2022, and 2023, with due observance of Article 24 of POJK No. 30/2017.
 2. **The Parties who Will Receive the Treasury Shares of the Company**
The parties who will receive the allocation and distribution of a portion of the Treasury Shares (**the "First Party"**) which constitutes a component of deferred variable remuneration (Deferred Bonus) over the performance of the Company for the financial year of 2021, 2022, and 2023, to comply with POJK No. 59/2017 are:
 - a. The Members of the Board of Directors of the Company with the term of office from April 16, 2020, up to April 12, 2023; and
 - b. The Members of the Board of Directors of the Company with the term of office from April 12, 2023, up to the closing of the Annual General Meeting of Shareholders of the Company to be convened in the year 2026 (both those who are currently the incumbent members and those who have no longer occupied the office)
- Provisions on the implementation for the payment of variable remuneration**
- Whereas the implementation for the payment of variable remuneration to the members of the Board of Directors of the Company shall be with due regards to the written approval from the Board of Commissioners by means of the Circular Resolution of the Board of Commissioners Number 011/CIR/DEKOM/XI/2024 dated November 28, 2024, with due regards to the recommendations of the Nomination and Remuneration Committee by means of the Minutes of Meeting Number MOM.003/RNC/XI/2024 dated November 28, 2024.
- This matter conforms to the resolution of the Extraordinary General Meeting of Shareholders dated September 2, 2019, which resolved that the implementation of shares buyback in the framework of provision of variable remuneration to the Members of the Board of Directors of the Company, as well as the implementation of payment of variable remuneration aforesaid must be with written approval from the Board of Commissioners.
3. **Time for the Implementation and Total Number of Transfer of a Portion of the Treasury Shares of the Company**
The Transfer of a Portion of the Treasury Shares will be carried out on **January 24, 2025**, totaling to **186,000** (one hundred eighty six thousand) shares to be allocated based on the amount of deferred variable remuneration (Deferred Bonus) over the performance of the Company for the Financial Year of 2021, 2022, and 2023 as contained in point 2 above in this Information Disclosure.
 4. **Status of the Treasury Shares allocated to the Recipients**
The Treasury Shares to be allocated and distributed to the Recipients constitute a component of deferred variable remuneration (Deferred Bonus), provided that at the time the Treasury Shares to be distributed on January 24, 2025, the relevant shares will not be imposed with Lock-up Period, thus therefore, it can be transacted and transferred by the Recipients, both through trading at the Indonesian Stock Exchange and/or outside the Stock Exchange.
 5. The total number of the remaining Treasury Shares of the Company after the fifth transfer shall be 57,000 (fifty seven thousand) shares.
 6. Based on the Decree of the Board of Commissioners Number 010/CIR/DEKOM/X/2024 dated October 21, 2024, with due regards to the recommendation from the Nomination and Remuneration Committee Number M.002/RNC/VIII/2024 dated August 15, 2024, regarding the Plan for the Transfer of Treasury Shares in the Year 2025 approves that over the remaining Treasury Shares, after the relevant fifth transfer as explained number 5 above, **will be distributed to the Employees of the Company**, the distribution implementation of which will be entrusted to the Board of Directors, with due regards to the resolution of the HC Committee by means of the Minutes of Meeting Number 03/KHC/X/2024 dated October 14, 2024, with the transfer date to employees on **January 24, 2025**.
 7. Total number of Treasury Shares of the Company upon the completion the implementation of transfer to the Employees is **0 (Zero)** share.

Thus, this information is conveyed in order to comply with the provisions of Information Disclosure Article 23 POJK No.30/2017.

Jakarta, 9 January 2025

PT Bank BTPN Syariah Tbk
Board of Directors