

**PT Bank BTPN Syariah Tbk**  
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**Level 1**

<b>A.</b>	<b>Rights and Equitable Treatment of Shareholders</b>	
<b>A.1</b>	<b>Basic Shareholder Rights</b>	
A.1.1	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? In case the company has offered Scrip dividend, did the company paid the dividend within 60 days.	<p>The company pay final 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, as stated in the following:</p> <ul style="list-style-type: none"> <li>• 2023 Annual Report – Page 28, 29, 107 – Dividends history from previous years</li> <li>• AGMS held on March 20, 2024 approved the final dividends to pay in 2024</li> <li>• Minutes of recent 2024 AGMS Resolution that has been available on the website since March 22, 2024, informing the date of the dividend payment</li> </ul>
<b>A.2</b>	<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>	
A.2.1	Do shareholders have the opportunity, evidenced by an agenda item, to approve remuneration (fees, allowances, benefit-in-kind and other emoluments) or any increases in remuneration for the non-executive directors/commissioners?	<p>The shareholders have the opportunity, evidenced by an agenda item, to approve remuneration (fees, allowances, benefit-in-kind and other emoluments) or any increases in remuneration for the non-executive directors/commissioners, as stated in the following:</p> <ul style="list-style-type: none"> <li>• 2023 Annual Report - Page 281 (the approval of remuneration from previous year)</li> <li>• The recent AGMS held on March 20, 2024 approved the 3<sup>rd</sup> agenda regarding the remuneration</li> <li>• Minutes of AGMS Resolution held in 2024 that has made available on the website since March 22, 2024</li> </ul>

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A.2.2	Does the company provide non-controlling shareholders a right to nominate candidates for board of directors/commissioners?	<p>The company provides non-controlling shareholders a right to nominate candidates for board of directors/commissioners, as stated in the following:</p> <ul style="list-style-type: none"> <li>• The Articles of Association of the Company, Article 10, paragraph 11</li> <li>• The Announcement of the recent 2024 AGMS, that has made available on the website of IDX and website of the Company since February 12, 2024, prior to the 2024 AGMS</li> </ul>
A.2.3	Does the company allow shareholders to elect directors/commissioners individually?	<p>The Company allows Shareholders to elect directors/commissioners individually, as stated in the following:</p> <ul style="list-style-type: none"> <li>• 2023 Annual Report – page 280, 286 The Curriculum Vitae of the candidates elected and re-elected in the AGMS held in 2023 have been available on the website of the Company since the date of the Invitation of 2023 AGMS;</li> <li>• Code of Conduct of the AGMS held in 2023 has been available on the website of the IDX and Company since the date of the Invitation of 2023 AGMS;</li> <li>• The Announcement of the 2023 AGMS has been available on the website of IDX and Company since the data of the Invitation prior to the 2023 AGMS;</li> <li>• The Minutes of AGMS Resolution held in 2023 has been available on the website of IDX and Company</li> </ul>
A.2.4	Does the company disclose the voting procedures used before the start of meeting?	<p>The Company discloses the Voting Procedures used before the start of the meeting as stated in the following:</p> <p><b>2023 AGMS</b></p> <ul style="list-style-type: none"> <li>• 2023 Annual Report – page 283: <ul style="list-style-type: none"> <li>• The Invitation of AGMS held in 2023, has been available on the website of the IDX and the Company since March 30, 2023, prior to the 2023 AGMS</li> <li>• The Code of Conduct of the AGMS held in 2023 that has been available on the website since March 30, 2023 prior to the 2023 AGMS'</li> </ul> </li> </ul>

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		<ul style="list-style-type: none"> <li>The Code of Conduct of voting procedures read by the Chairman of the Meeting</li> </ul> <p><b>2024 AGMS</b></p> <ul style="list-style-type: none"> <li>The Invitation of AGMS held in 2024, has been available on the website of the IDX and website of the Company since February 27, 2024, prior to the 2024 AGMS</li> <li>The Code of Conduct of the AGMS held in 2024 has been available on the website of IDX and the website of the Company since February 27, 2024 prior to the AGMS</li> <li>The Code of Conduct of voting procedures read by the Chairman of the Meeting in the recent 2024 AGMS.</li> </ul>
A.2.5	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?	<p>The most recent 2024 AGM records that the shareholders were given the opportunity to ask questions and the questions raised by shareholders and answers given recorded, as stated in the following:</p> <ul style="list-style-type: none"> <li>The Minutes of AGMS Resolution held in 2024, that has been available on the website of IDX and website of the Company since March 22, 2024</li> </ul>
A.2.6	Does the company disclose the voting results including approving, dissenting, and abstaining votes for all resolutions/each agenda item for the most recent AGM?	<p>The Company discloses voting results including approving, dissenting, and abstaining votes for all resolutions/each agenda item, as stated in the following:</p> <ul style="list-style-type: none"> <li>The Minutes of most recent 2024 AGMS Resolution, that has been available on the website of IDX and website of the Company since March 22, 2024</li> </ul>
A.2.7	Does the company disclose the list of board members who attended the most recent AGM?	<p>The Company discloses list of board members who attended the most recent 2024 AGM, as stated in the following:</p> <ul style="list-style-type: none"> <li>The Minutes of recent AGMS Resolution held in 2024, that has been available on the website of IDX and website of the Company since March 22, 2024</li> </ul>
A.2.8	Does the company disclose that all board members and the CEO (if he is not a board member) attended the most recent AGM?	<p>The Company discloses list of board members and the CEO who attended the most recent 2024 AGM, as stated in the following:</p> <ul style="list-style-type: none"> <li>The Minutes of AGMS Resolution held in 2024, that has been available on the website of IDX and website of the Company since March 22, 2024</li> </ul>

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A.2.9	Does the company allow voting in absentia?	<p>The Company allows shareholders to vote in absentia by giving their proxies, either through KSEI's EASY or filling out the power of attorney form available on the Company's Website which can be accessed by all shareholders and the public since the date of the invitation of the AGMS, as stated in the following</p> <ul style="list-style-type: none"> <li>• The Invitation of AGMS held in 2024, has been available on the website of the IDX and website of the Company since February 27, 2024, prior to the 2024 AGMS</li> <li>• The Code of Conduct of the AGMS held in 2024 has been available on the website of IDX and the website of the Company since February 27, 2024 prior to the AGMS</li> <li>• The Code of Conduct of voting procedures read by the Chairman of the Meeting in the recent 2024 AGMS.</li> </ul>
A.2.10	Did the company vote by poll (as opposed to by show of hands) for all resolutions at the most recent AGM?	<p>At the most recent 2024 AGMS, the company is in accordance with the provisions of Article 11 paragraph 6 of Company/ Articles of Association, that governs voting on each GMS event shall be conducted orally, unless the chairman of the meeting determines otherwise without objection from the shareholders present at the meeting who own at least 5% of the total shares with voting rights issued by the Company, as stated in the following:</p> <ul style="list-style-type: none"> <li>• The Code of Conduct of the AGMS held in 2024, that has been available on the website of IDX and the website of the Company since February 27, 2024 prior to the AGMS</li> </ul>
A.2.11	Does the company disclose that it has appointed an independent party (scrutineers/inspectors) to count and/or validate the votes at the AGM?	<p>The company discloses that it has appointed an independent party (scrutineers/inspectors) to calculate and certify the quorum and votes at the recent 2024 AGMS as follows:</p> <ol style="list-style-type: none"> <li>1) PT Datindo Entrycom as the Shares Administration Bureau and</li> <li>2) Notary Ashoya Ratam, SH</li> </ol>
A.2.12	Does the company make publicly available by the next working day the result of the votes taken during the most recent AGM/EGM for all resolutions?	<p>The Company makes publicly available by the next 2 working day the result of the votes taken during the most recent 2024 AGMS for all resolutions, as stated in the following:</p>

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		<ul style="list-style-type: none"> <li>The Minutes of AGMS Resolution held in 2024, that has been available on the website of IDX and website of the Company since March 22, 2024</li> </ul>
A.2.13	Does the company provide at least 21 days' notice for all AGMs and EGMS?	The Company provides Notice for all AGMS and EGMS, as stated on the website of the Company, in compliance with the Financial Service Authority regulations concerning the AGM
A.2.14	Does the company provide the rationale and explanation for each agenda item which require shareholders' approval in the notice of AGM/circulars and/or the accompanying statement?	<p>The Company provides the rationale and explanation for each agenda item which require shareholders' approval in the notice of AGM/circulars and/or the accompanying statement, as stated in the following:</p> <ul style="list-style-type: none"> <li>The Invitation of AGMS held in 2024, that has been available on the website of the IDX and website of the Company since February 27, 2024, prior to the 2024 AGMS</li> <li>The accompanying statement of the recent 2024 AGMS that has been available on the website of the IDX and Company since February 27, 2024, prior to the 2024 AGMS</li> </ul>
A.2.15	Does the company give the opportunity for shareholders to place item/s on the agenda of general meetings and/or to request for general meetings subject to a certain percentage?	<p>The company gives the opportunity for shareholders to place item/s on the agenda of general meetings and/or to request for general meetings subject to a certain percentage, as stated in the following:</p> <ul style="list-style-type: none"> <li>The Articles of Association of the Company, Article 10, paragraph 11</li> <li>The Announcement of the recent 2024 AGMS, that has been available on the website of IDX and website of the Company since February 12, 2024, prior to the 2024 AGMS</li> </ul>
<b>A.3</b>	<b>Markets for corporate control should be allowed to function in an efficient and transparent manner.</b>	
A.3.1	In cases of mergers, acquisitions and/or takeovers requiring shareholders' approval, does the board of directors/commissioners of the company appoint an	The Company has never conducted a merger, acquisition and/or takeover.

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	independent party to evaluate the fairness of the transaction price?	However, in cases of mergers, acquisitions and/or takeovers requiring shareholders' approval, the Board of Directors/ Commissioners of the Company shall appoint an independent party to evaluate the fairness of the transaction price, as stated in the internal policy regarding Corporate Action
<b>A.4</b>	<b>The exercise of ownership rights by all shareholders, including institutional investors, should be facilitated.</b>	
A.4.1	Does the company disclose its practices to encourage shareholders to engage with the company beyond general meetings?	<p>The Company discloses its practices to encourage shareholders to engage with the company beyond general meetings.</p> <p>BTPN Syariah recognizes the importance of establishing regular communication relationships with Shareholders and Investors and is fully committed to implementing information disclosure, transparency to foster trust, which is realized through Public Expose at least once a year and quarterly analyst meetings.</p> <p>Beyond commitments, information regarding Investor Relations and Corporate Governance will be available on the Company's Website on a regular basis</p>
<b>A.5</b>	<b>Shares and Voting Rights</b>	
A.5.1	Where the company has more than one class of shares, does the company publicize the voting rights attached to each class of shares (e.g. through the company website / reports/ the stock exchange/ the regulator's website)?	<p>The Company has no more than one class of shares.</p> <p>Each share of the Company gives the right to shareholders to issue one voting right as stated in the following:</p> <ul style="list-style-type: none"> <li>• The Invitation of the recent 2024 AGMS that has been available on the website of the IDX and Company since February 27, 2024, prior to the 2024 AGMS</li> <li>• The Code of Conduct of the recent 2024 AGMS that has been available on the website since February 27, 2024 prior to the AGMS</li> <li>• The Code of Conduct of voting procedures read by the Chairman of the Meeting in the recent 2024 AGMS</li> </ul>

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<b>A.6</b>	<b>Notice of AGM</b>	
A.6.1	Does each of the resolutions tabled at the most recent annual general meeting deal with only one item, i.e., there is no bundling of several items into the same resolution?	Each of the Resolution tables at the most recent AGMS deal with only one item, and no bundling of several items into the same resolution, as stated in the following: <ul style="list-style-type: none"> <li>Minutes of AGMS Resolution held in 2024 that has been available on the website since March 22, 2024</li> </ul>
A.6.2	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?	The company's Notice of the most recent AGMS is fully translated into English and published on the same date as the local-language version, Bahasa Indonesia, as stated in the following: <ul style="list-style-type: none"> <li>The Invitation of the recent 2024 AGMS that has been available on the website of the IDX and Company since February 27, 2024, prior to the 2024 AGMS both in Bahasa and in English</li> </ul>
	<b>Does the notice of AGM/circulars have the following details:</b>	
A.6.3	Are the profiles of directors/commissioners at least age, academic qualification, date of first appointment, experience, and directorships in other listed companies) in seeking election/re-election included?	There is no agenda in seeking election /re-election of Directors/ Commissioners/Sharia Supervisory Board at the recent 2024 AGMS  The profile of Directors/Commissioners (at least age, academic qualification, date of first appointment, experience, and directorships in other listed companies) in seeking election/re-election included in 2023, as stated in the following: <ul style="list-style-type: none"> <li>2023 Annual Report – page 280, 286  The Curriculum Vitae of the candidates elected and re-elected in the AGMS held in 2023 have been available on the website of the Company since the date of the Invitation of 2023 AGMS;</li> <li>The Invitation of AGMS held in 2023, that has been available on the website of the IDX and website of the Company since March 30, 2023, prior to the 2023 AGMS</li> </ul>
A.6.4	Are the auditors seeking appointment/re-appointment clearly identified?	The Auditors seeking appointment/re-appointment clearly identified, as stated in the following:

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		<ul style="list-style-type: none"> <li>• The Invitation of the recent 2024 AGMS that has been available on the website of the IDX and Company since February 27, 2024, prior to the 2024 AGMS</li> <li>• The accompanying statement of the recent 2024 AGMS that has been available on the website of the IDX and website of the Company since February 27, 2024, prior to the 2024 AGMS</li> </ul>
A.6.5	Were the proxy documents made easily available?	<p>The Proxy documents made easily available, as stated in the following:</p> <ul style="list-style-type: none"> <li>• The Invitation of the recent 2024 AGMS that has been available on the website of the IDX and website of the Company since February 27, 2024, prior to the 2024 AGMS</li> <li>• The accompanying statement of the recent 2024 AGMS that has been available on the website of the IDX and website of the Company since February 27, 2024, prior to the 2024 AGMS</li> </ul>
<b>A.7</b>	<b>Insider trading and abusive self-dealing should be prohibited.</b>	
A.7.1	Are the directors / commissioners required to report their dealings in company shares within 3 business days?	<p>The Directors / Commissioners required to report their dealings in company shares within 3 business days, as stated in the following:</p> <ul style="list-style-type: none"> <li>• GCG Manual</li> <li>• Charter of the Board of Directors (Section 7.9, Transparency),</li> </ul> <p>that have been made available on the website</p>
<b>A.8</b>	<b>Related party transactions by directors and key executives.</b>	
A.8.1	Does the company have a policy requiring a committee of independent directors/commissioners to review material RPTs to determine whether they are in the best interests of the company and shareholders?	<p>The company have a policy governing material RPTs to determine whether they are in the best interests of the company and shareholders, as stated in the following:</p> <ul style="list-style-type: none"> <li>• GCG Manual</li> <li>• Board of Directors/Commissioners/Sharia Supervisory Board' Manual</li> </ul>



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		<ul style="list-style-type: none"> <li>• Procedures related to Affiliate Transactions and Conflict of Interest Transactions</li> <li>• 2023 Annual Report – page 244 (section 8), 254 ((section 10), 257 (Section 8), 261 (section 8), 420, 598 (OJK Reference)</li> </ul> <p>Members of the Board of Directors, Board of Commissioners and Sharia Supervisory Board must avoid conflicts of interest. In the event of a conflict of interest between the Company and members of the Board of Directors, Board of Commissioners and Sharia Supervisory Board that may harm the Company or reduce the Company's profits, it is mandatory to disclose the conflict of interest referred to in every decision.</p> <p>Disclosure of conflicts of interest is set forth in the minutes of the meeting that at least regulate the names of parties who have conflicts of importance.</p>
A.8.2	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?	<p>The company has a policy requiring board members (directors/commissioners) to abstain from participating in the board discussion on a particular agenda when they are conflicted, as stated in the following:</p> <ul style="list-style-type: none"> <li>• Articles of the Association of the Company Section concerning Directors and Commissioners</li> <li>• GCG Manual</li> <li>• Charter of the Boards (Directors and Commissioners)</li> </ul> <p>that have been available on the website</p>
A.8.3	Does the company have policies on loans to directors and commissioners either forbidding this practice or ensuring that they are being conducted at arm's length basis and at market rates?	<p>There are no members of the Board of Directors and Board of Commissioners of the Company who receives loans from the Company.</p>

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<b>A.9</b>	<b>Protecting minority shareholders from abusive actions</b>	
A.9.1	Does the company disclose that RPTs are conducted in such a way to ensure that they are fair and at arms' length?	<p>There is no related party transactions conducted by the Company in 2023.</p> <p>The company discloses that RPTs are conducted in such a way to ensure that they are fair and at arms' length, as stated in the following:</p> <ul style="list-style-type: none"> <li>2023 Annual Report – page 244 (section 8), 254 (section 10), 257 (Section 8), 261 (section 8), 420, 598 (OJK Reference)</li> </ul> <p>that has been available on the website</p>
A.9.2	In case of related party transactions requiring shareholders' approval, is the decision made by disinterested shareholders?	<p>There is no related party transactions conducted by the Company in 2023.</p> <p>In case of related party transactions requiring shareholders' approval, the decision is made by disinterested shareholders, as stated in the following:</p> <ul style="list-style-type: none"> <li>Articles of Association of the Company Articles 11 paragraph 8</li> </ul>
<b>B</b>	<b>Sustainability and Resilience</b>	
<b>B.1</b>	<b>Sustainability-related disclosure should be consistent, comparable and reliable, and include retrospective and forward-looking material information that a reasonable investor would consider important in making an investment or voting decision</b>	
	<b>Material Sustainability-related information should be specified</b>	
B.1.1	Does the company identify/report ESG topics that are material to the organization's strategy?	<p>The Company identifies /reports ESG topics that are material to the organization's strategy as stated in the following:</p> <ul style="list-style-type: none"> <li>2023 Sustainability Report, page 38, page 178 - 182, that has been available on the website</li> </ul>

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B.1.2	Does the company identify climate change as an issue?	The Company identifies climate change as in issue, as stated in the following: <ul style="list-style-type: none"> <li>2023 Sustainability Report, page 124 - 131, that has been available on the website</li> </ul>
B.1.3	Does the company adopt an internationally recognized reporting framework or standard for sustainability (i.e. GRI, Integrated Reporting, SASB, IFRS Sustainability Disclosure Standards)?	The Company adopts an internationally recognized reporting framework or standard for sustainability (i.e. GRI) as stated in the following: <ul style="list-style-type: none"> <li>2023 Sustainability Report, page 180, that has been available on the website</li> </ul>
If a company publicly sets a sustainability-related goal or target, the disclosure framework should provide that reliable metrics are regularly		
B.1.4	Does the company disclose quantitative sustainability target?	The Company discloses quantitative sustainability target as stated in the following: <ul style="list-style-type: none"> <li>2023 Sustainable Financial action Plan (RAKB)</li> </ul>
B.1.5	Does the company disclose sustainability-related performance progress in relation to its previously set targets?	The Company discloses sustainability-related performance progress in relation to its previously set targets as stated in the following: <ul style="list-style-type: none"> <li>2023 Sustainability Report that has been available on the website</li> </ul>
B.1.6	Does the company confirm that its Sustainability Report / Reporting is reviewed and / or approved by the Board or Board Committee?	The Company confirms that its Sustainability Report / Reporting is reviewed and /or approved by the Board of Directors and Board of Commissioners as stated in the following: <ul style="list-style-type: none"> <li>2023 Sustainability Report, page 142, page 161, that has been available on the website</li> </ul>
<b>B.2</b>	<b>Corporate governance frameworks should allow for dialogue between a company, its shareholders and stakeholders to exchange views on sustainability matters</b>	
B.2.1	Does the company engage internal stakeholders to exchange views and gather feedback on sustainability matters that are material to the business of the company?	The Company engages internal stakeholders to exchange views and gather feedback on sustainability matters that are material to the business of the company, as stated in the following: <ul style="list-style-type: none"> <li>2023 Sustainability Report, page 142 – 143, page 181 that has been available on the website</li> </ul>

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		<ul style="list-style-type: none"> <li>The Engaging Forum is conducted by Sustainability Task Force of the Company</li> </ul>
B.2.2	Does the company engage external stakeholders to exchange views and gather feedback on sustainability matters that are material to the business of the company?	<p>The company engage external stakeholders to exchange views and gather feedback on sustainability matters that are material to the business of the company as stated in the following:</p> <ul style="list-style-type: none"> <li>2023 Sustainability Report, page 181 that has been available on the website</li> <li>The engaging Forum is conducted by means of discussion between Sustainability Task Force of the Company with representative of PT Bank BTPN Tbk as Lead Entity within the SMBC Group</li> </ul>
<b>B.3</b>	<b>The corporate governance framework should ensure that boards adequately consider material sustainability risks and opportunities when fulfilling their key functions in reviewing, monitoring and guiding governance practices, disclosure, strategy, risk management and internal control systems, including with respect to climate-related physical and transition risks</b>	
	<b>Boards should assess whether the company's capital structure is compatible with its strategic goals and its associated risk appetite to ensure it is resilient to different scenarios</b>	
B.3.1	Does the company disclose that the board reviews on an annual basis that the company's capital and debt structure is compatible with its strategic goals and its associated risk appetite?	<p>The Company discloses that the Board reviews on an annual basis that the company's capital and debt structure is compatible with its strategic goals and its associated risk appetite, as stated in the following:</p> <ul style="list-style-type: none"> <li>2023 Annual Report - that has been available on the website</li> <li>The Company also has Business Plan and Corporate Plan</li> </ul>
<b>B.4</b>	<b>The corporate governance framework should recognize the rights of stakeholders established by law or through mutual agreements and encourage active co-operation</b>	

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	<b>between corporations and stakeholders in creating wealth, jobs, and the sustainability of financially sound enterprises.</b>	
	<b>Does the company disclose a policy and practices that address :</b>	<b>The company discloses a policy and practices that address:</b>
B.4.1	The existence and scope of the company's efforts to address customers' welfare?	<p>The existence and scope of the company's efforts to address customers' welfare as stated in the following:</p> <ul style="list-style-type: none"> <li>• Company's Code of Conduct Company has provisions governing the relationship with customers and stakeholders as stipulated in the Code of Conduct. The Code of Conduct has been made available on the website. <p>BTPN Syariah is committed to providing excellent service to customers regardless of the amount of customer deposits or financing, ethnicity, religion, skin color, gender and age.</p> <li>• The implementation of the Relationship with the Customer includes: <ul style="list-style-type: none"> <li>➤ Employees are required to serve customers professionally and offer products and services that are in accordance with customer needs and abilities;</li> <li>➤ Employees are required to inform customers of any changes in benefits, costs, risks, terms and conditions stated in documents and/or agreements regarding products and/or services;</li> <li>➤ Employees are prohibited from using product and/or service marketing strategies that harm customers by taking advantage of customer conditions that have no other choice in decisions making;</li> <li>➤ Employees are required to provide and/or submit information about products and/or services that are</li> </ul> </li> </li></ul>

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		<p>accurate, honest, clear and not misleading, which must:</p> <ol style="list-style-type: none"> <li>1) Submitted when explaining to the customers concerning their rights and obligations.</li> <li>2) Submitted when making an agreement with the customer.</li> <li>3) Published when delivered through various media, including through advertisements in print or electronic media</li> </ol> <ul style="list-style-type: none"> <li>➤ Whistle Blowing System BTPN Syariah is committed to ensuring the availability of various facilities for employees and other parties who intend to submit reports or violations in the work environment.</li> <li>➤ Agreement with Customer Any information regarding benefits, costs and risks of bank products and/or services is stated in the agreement with the customer</li> </ul>
B.4.2	Supplier/contractor selection procedures?	<p>The Company has provisions of Supplier/contractor selection procedures, as stated in the following:</p> <ul style="list-style-type: none"> <li>• Vendor Management Provisions.</li> <li>• Procurement of goods and/or services is carried out through the Tender / Bidding / Direct Appointment Process, and the Direct Purchase Process.</li> <li>• In order to protect legal risks, the following are documents that regulate the terms and conditions (agreements) that form the basis of cooperation between the Company and vendors, namely: <ol style="list-style-type: none"> <li>a. Cooperation Agreement (PKS)</li> <li>b. Purchase/ Work Order (PO/WO)</li> </ol> </li> </ul>
B.4.3	The company's efforts to ensure that its value chain is environmentally friendly or is consistent with promoting sustainable development?	The company's efforts to ensure that its value chain is environmentally friendly or is consistent with promoting sustainable development as stated in the following

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		<ul style="list-style-type: none"> <li>• 2023 Sustainability Report, page 126 - 131 that has been available on the website</li> </ul>
B.4.4	The company's efforts to interact with the communities in which they operate?	<p>The company's efforts to interact with the communities in which they operate, as stated in the following</p> <ul style="list-style-type: none"> <li>• 2023 Annual Report</li> <li>• 2023 Sustainability Report</li> </ul> <p>that have been available on the website</p>
B.4.5	The company's anti-corruption programs and procedures?	<p>The company's anti-corruption programs and procedures as stated in the following</p> <ul style="list-style-type: none"> <li>• 2023 Annual Report, page 199, 234, 245, 431,</li> <li>• 2023 Sustainability Report, page 170 - 172</li> <li>• Anti-Fraud Management Policy</li> <li>• Code of Conduct</li> </ul> <p>that have been available on the website</p>
B.4.6	How creditors' rights are safeguarded?	<p>The Company has no credit lines from other parties, as stated in the following</p> <ul style="list-style-type: none"> <li>• 2023 Annual Report – page 268, section 7.4 - that have been available on the website</li> </ul> <p>Policy which includes Creditors' rights are safeguarded will be made available in the event of policy changes in the future</p>
B.4.7	Does the company have a separate report/section that discusses its efforts on environment/economy and social issues?	The company has no separate section that discusses its efforts on environment/economy and social issues
<b>B.5</b>	<b>Where stakeholder interests are protected by law, stakeholders should have the opportunity to obtain effective redress for violation of their rights.</b>	
B.5.1	Does the company provide contact details via the company's website or Annual Report which stakeholders (e.g. customers,	The Company provides contact details via company's website, Annual Report and Sustainability Report which stakeholders

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	suppliers, general public etc.) can use to voice their concerns and/or complaints for possible violation of their rights?	(e.g. customers, general public etc.) can use to voice their concerns and/or complaints for possible violation of their rights
<b>B.6</b>	<b>Mechanisms for employee participation should be permitted to develop.</b>	
B.6.1	Does the company explicitly disclose the policies and practices on health, safety and welfare for its employees?	The Company explicitly discloses the policies and practices on health, safety and welfare for its employees, as stated in the following: <ul style="list-style-type: none"> <li>• Code of Conduct that has made available on the website</li> <li>• The Company Regulation that has distributed to all employees</li> <li>• Internal Portals concerning internal policies and procedures that can be accessed by employees</li> </ul>
B.6.2	Does the company explicitly disclose the policies and practices on training and development programs for its employees?	The Company explicitly discloses the policies and practices on training and development programs for its employees, as stated in the following: <ul style="list-style-type: none"> <li>• The Company Regulation that has distributed to all employees</li> <li>• Internal Portals concerning internal policies, and procedures that can be accessed by employees</li> <li>• Email blast of trainings and development programs from Human Capital of the Company to employees</li> </ul>
B.6.3	Does the company have a reward/compensation policy that accounts for the performance of the company beyond short-term financial measures?	The Company has a reward/compensation policy that accounts for the performance of the company beyond short-term financial measures
<b>B.7</b>	<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>	



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B.7.1	Does the company have a whistle blowing policy which includes procedures for complaints by employees and other stakeholders concerning alleged illegal and unethical behavior and provide contact details via the company's website or annual report	The Company has a whistle blowing policy which includes procedures for complaints by employees and other stakeholders concerning alleged illegal and unethical behavior and provide contact details via the Company's website or annual report, as stated, amongst others: <ul style="list-style-type: none"> <li>• 2023 Annual Report – page 1, 63, 66-67, 112, 428 and 441-442, 460-462</li> <li>• 2023 Sustainability Report – page 1, 50, 181</li> <li>• Social Media - Instagram, Facebook, YouTube, dan LinkedIn</li> </ul>
B.7.2	Does the company have a policy or procedures to protect an employee/person who reveals alleged illegal/unethical behavior from retaliation?	The company has a policy or procedures to protect an employee/person who reveals alleged illegal/unethical behavior from retaliation, as stated in the following, amongst other: <ul style="list-style-type: none"> <li>• 2023 Annual Report – page 428 and 442 – that has been available on the Company's Website</li> </ul>
<b>C.</b>	<b>Disclosure and Transparency</b>	
<b>C.1</b>	<b>Transparent Ownership Structure</b>	
<b>C.1.1</b>	Does the information on shareholdings reveal the identity of beneficial owners, holding 5% shareholding or more?	The information on shareholdings reveals the identity of beneficial owners, holding 5% shareholding or more
<b>C.1.2</b>	Does the company disclose the direct and indirect (deemed) shareholdings of major and/or substantial shareholders?	The Company discloses the direct and indirect (deemed) shareholdings of major and/or substantial shareholders
<b>C.1.3</b>	Does the company disclose the direct and indirect (deemed) shareholdings of directors (commissioners)?	The company discloses the direct and indirect (deemed) shareholdings of directors
<b>C.1.4</b>	Does the company disclose the direct and indirect (deemed) shareholdings of senior management?	The Senior Managements do not have direct and indirect shareholding of the Company
<b>C.1.5</b>	Does the company disclose details of the parent/holding company, subsidiaries, associates, joint ventures and special purpose enterprises/ vehicles (SPEs)/ (SPVs)?	The company discloses details of the parent/holding company and subsidiary

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<b>C.2</b>	<b>Quality of Annual Report</b>	
	<b>Does the Company's Annual Report disclose the following items:</b>	The Company's Annual Report discloses the following items
<b>C.2.1</b>	Corporate Objectives	Corporate Objectives
<b>C.2.2</b>	Financial Performance Indicators	Financial Performance Indicators
<b>C.2.3</b>	Non-Financial Performance Indicators	Non-Financial Performance Indicators
<b>C.2.4</b>	Dividend Policy	Dividend Policy
<b>C.2.5</b>	Biographical details (at least age, academic qualifications, date of first appointment, relevant experience, and any other directorships of listed companies) of all directors/commissioners	Biographical details (at least age, academic qualifications, date of first appointment, relevant experience, and any other directorships of listed companies) of all Directors/Commissioners
	<b>Corporate Governance Confirmation Statement</b>	
<b>C.2.6</b>	Does the Annual Report contain a statement confirming the company's full compliance with the code of corporate governance and where there is non-compliance, identify and explain reasons for each such issue?	The Annual Report contains a statement confirming the company's full compliance with the code of corporate governance and where there is non-compliance, identify and explain reasons for each such issue
<b>C.3</b>	<b>Remuneration of Member of the Board and Key Executives</b>	
<b>C.3.1</b>	Is there disclosure of the fee structure for non-executive directors/commissioners?	There is disclosure of the Remuneration for Directors/Commissioners, as stated in the following: <ul style="list-style-type: none"> <li>• 2023 Annual Report – page 244, 334, 347-351, that has been available on the website</li> </ul>
<b>C.3.2</b>	Does the company publicly disclose [i.e. annual report or other publicly disclosed documents] details of remuneration of each non-executive director/commissioner?	There is disclosure of the Remuneration for Directors/Commissioners, as stated in the following: <ul style="list-style-type: none"> <li>• 2023 Annual Report – page 244, 334, 347-351, that has been available on the website</li> </ul>
<b>C.3.3</b>	Does the company disclose its remuneration (fees, allowances, benefit-in-kind and other emoluments) policy/practices (i.e. the	There is disclosure of the Remuneration for Directors/Commissioners, as stated in the following:

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	use of short term and long term incentives and performance measures) for its executive directors and CEO?	<ul style="list-style-type: none"> <li>2023 Annual Report – page 244, 334, 347-351, that has been available on the website</li> </ul>
<b>C.3.4</b>	Does the company publicly disclose [i.e. annual report or other publicly disclosed documents] the details of remuneration of each of the executive directors and CEO [if he/she is not a member of the Board]?	<p>There is disclosure of the Remuneration for Directors/Commissioners, as stated in the following:</p> <ul style="list-style-type: none"> <li>2023 Annual Report – page 244, 334 347-351, that has been available on the website</li> </ul>
<b>C.4</b>	<b>Disclosure of Related Party Transaction (RPT)</b>	
<b>C.4.1</b>	Does the company disclose its policy covering the review and approval of material RPTs?	There is no related party transactions conducted by the Company in 2023.
<b>C.4.2</b>	Does the company disclose the name, relationship, nature and value for each material RPTs?	<p>The company discloses that RPTs are conducted in such a way to ensure that they are fair and at arms' length, as stated in the following:</p> <ul style="list-style-type: none"> <li>2023 Annual Report – page 244 (section 8), 254 ((section 10), 257 (Section 8), 261 (section 8), 420, 598 (OJK Reference)</li> </ul>
<b>C.5</b>	<b>Directors and Commissioners dealing in shares of the Company</b>	
<b>C.5.1</b>	Does the company disclose trading in the company's shares by insiders?	There is no trading in the company's shares by insiders
<b>C.6.</b>	<b>External Auditor and Auditor Report</b>	
	<i>Where the same audit firm is engaged for both audit and non audit services</i>	
<b>C.6.1</b>	<i>Are the audit and non-audit fees disclosed?</i>	<p><i>The audit and non-audit fees disclosed and there is non audit fee exceed the audit fees, as stated in the following:</i></p> <ul style="list-style-type: none"> <li><i>2023 Annual Report – page 411-413, that has been available on the website</i></li> </ul>
<b>C.6.2</b>	Does the non-audit fee exceed the audit fees?	
<b>C.7</b>	<b>Medium of Communications</b>	
	<i>Does the company use the following modes of communication?</i>	
<b>C.7.1</b>	Quarterly reporting	Quarterly reporting is available on the website of the Company

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<b>C.7.2</b>	Company website	Company website is regularly updated
<b>C.7.3</b>	Analyst's briefing	Analyst's briefing is conducted on quarterly basis
<b>C.7.4</b>	Media briefings /press conferences	Media briefings /press conferences are available on the website
<b>C.8</b>	<b>Timely Filling/release of Annual/Financial Report</b>	
<b>C.8.1</b>	Are the audited annual financial report / statement released within 120 days from the financial year end?	<p>The audited annual financial report /statement are released within 60 days from the financial year end, as stated in the following:</p> <ul style="list-style-type: none"> <li>• 2023 Audited Financial Report has been published and submitted to Regulators on February 7, 2024</li> <li>• The Invitation of AGMS held in 2024, with accompanying statements which are 2023 Annual Report and Audited Financial Report for Financial Year of 2023 have been available on the website of the IDX and website of the Company since February 27, 2024, prior to the 2024 AGMS</li> </ul>
<b>C.8.2</b>	Is the annual report released within 120 days from the financial year end?	<p>The Annual Reports (bilinguals) are released within 60 days from the financial year end, as stated in the following:</p> <ul style="list-style-type: none"> <li>• 2023 Annual Report has been published and submitted to Regulators on February 27, 2024</li> <li>• The Invitation of AGMS held in 2024, with accompanying statements which are 2023 Annual Report and Audited Financial Report for Financial Year of 2023 have been available on the website of the IDX and website of the Company since February 27, 2024, prior to the 2024 AGMS</li> </ul>
<b>C.8.3</b>	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?	The true and fairness/fair representation of the Annual Financial Statement/reports is affirmed by the Board of Directors/Commissioners of the company

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<b>C.9</b>	<b>Company website</b>	
	<b><i>Does the company have a website disclosing up-to-date information on the following:</i></b>	<i>The company has a website disclosing up-to-date information on the following:</i>
C.9.1	Financial statements/reports (latest quarterly)	Financial statements/reports (latest quarterly)
C.9.2	Materials provided in briefings to analysts and media	Materials provided in briefings to analysts and media
C.9.3	Downloadable annual report	Downloadable annual report
C.9.4	Notice of AGM and/or EGM	Notice/Invitation of AGM and/or EGM
C.9.5	Minutes of AGM and/or EGM	Minutes of AGM and/or EGM
C.9.6	Company's constitution (company's by-laws, memorandum and articles of association)	Company's constitution (company's by-laws and articles of association)
<b>C.10</b>	<b>Investor relations</b>	
C.10.1	Does the company disclose the contact details (e.g. telephone, fax, and email) of the officer / office responsible for investor relations?	The company discloses the contact details (e.g. telephone, fax, and email) of the officer / office responsible for investor relations, as stated in the following, amongst other: <ul style="list-style-type: none"> <li>• 2023 Annual Report – page 1, 66, 404, 441 – that has been available on the Company's Website</li> </ul>
<b>D.</b>	<b>Responsibilities of the Board</b>	
<b>D.1</b>	<b>Board Duties and Responsibilities</b>	
	<b><i>Clearly defined board responsibilities and corporate governance policy</i></b>	

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D.1.1	Does the company disclose its corporate governance policy / board charter?	<p>The Company discloses its corporate governance policy / Board Charter, as stated in the following:</p> <ul style="list-style-type: none"> <li>• Charter of Board of Directors and Commissioners</li> <li>• 2023 Annual Report – page 248-249 (GCG Manual)</li> <li>• 2023 Annual Report – page 353 (Directors)</li> <li>• 2023 Annual Report – page 293 (Commissioners)</li> </ul> <p>that have been available on the website</p>
D.1.2	Are the types of decisions requiring board of directors/commissioners' approval disclosed?	<p>The types of decisions requiring board of directors/ commissioners' approval disclosed as stated in the following:</p> <ul style="list-style-type: none"> <li>• Charter of Board of Directors and Commissioners</li> <li>• 2023 Annual Report – (GCG Part – Directors Section)</li> <li>• 2023 Annual Report – (GCG Part – Commissioners Section)</li> </ul> <p>that have been available on the website</p>
D.1.3	Are the roles and responsibilities of the Board of Directors/Commissioners clearly stated?	<p>The roles and responsibilities of the board of directors/commissioners clearly stated in the following, amongst other:</p> <ul style="list-style-type: none"> <li>• Charter of Board of Directors and Commissioners</li> <li>• 2023 Annual Report – (GCG Part – Directors Section)</li> <li>• 2023 Annual Report – (GCG Part – Commissioners Section)</li> </ul> <p>that have been available on the website</p>
	<b><i>Corporate Vision/Mission</i></b>	
D.1.4	Does the company have an updated vision and mission statement?	<p>The company has no updated vision and mission statement, however the Vision and Mission is annually reviewed by the Board of Directors/Commissioners and remain relevant, as stated in the following:</p>

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		<ul style="list-style-type: none"> <li>• 2023 Annual Report – page 70, 311, 369, 425, 426, 436</li> <li>• 2023 Sustainability Report – page 46, 145-146</li> </ul> <p>that have been available on the website</p>
D.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?	<p>The Board of Directors plays a leading role in the process of developing and reviewing the company's strategy at least annually, as stated in the following, amongst other:</p> <ul style="list-style-type: none"> <li>• 2023 Annual Report – page 70, 311-315, 369-375</li> <li>• 2023 Sustainability Report – page 46, 145-149</li> </ul> <p>that have been available on the website</p>
D.1.6	Does the board of directors have a process to review, monitor and oversee the implementation of the corporate strategy?	<p>The Board of Directors has a process to review, monitor and oversee the implementation of the corporate strategy as stated in the following, amongst other:</p> <ul style="list-style-type: none"> <li>• 2023 Annual Report – page 70, 311-315, 369-375</li> <li>• 2023 Sustainability Report – page 46, 145-149</li> </ul> <p>that have been available on the website</p>
<b>D.2</b>	<b>Board structure</b>	
	<b><i>Code of Ethics or Conduct</i></b>	
D.2.1	Are the details of the code of ethics or conduct disclosed?	<p>The Company discloses:</p> <ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• 2023 Annual Report – page 425-426</li> </ul> <p>That have been available on the website of the Company</p>
D.2.2	Are all directors/commissioners, senior management and employees required to comply with the code/s?	All Directors/Commissioners/Sharia Supervisory Board/ Senior Management and employees are required to comply with the Code of Conduct
D.2.3	Does the company have a process to implement and monitor compliance with the code/s of ethics or conduct?	The Company has a process to implement and monitor compliance with the Code of Conduct
	<b><i>Board Structure &amp; Composition</i></b>	

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D.2.4	Do independent directors/commissioners make up at least 50% of the board of directors/commissioners?	The Independent Commissioners make up at least 50% of Commissioners, as stated in the following: <ul style="list-style-type: none"> <li>• Charter of Board of Commissioners</li> <li>• 2023 Annual Report - page 78-81, 296 (number 5), 297, 298</li> <li>• 2023 Sustainability Report - page 142-143</li> </ul> that have been available on the website
D.2.5	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?	The Articles of Association of the Company governs a 3-year term of service of Directors/Commissioners/Sharia Supervisory Board and can be reappointed
	<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	•
D.2.6	Has the company set a limit of five board seats that an individual independent/non-executive director/commissioner may hold simultaneously?	The Articles of Association of the Company governs a 3-year term of service of Directors/Commissioners/Sharia Supervisory Board and can be reappointed.
D.2.7	Does the company have any executive directors who serve on more than two boards of listed companies outside of the group?	The Company applies two-tier board system and there is no Directors who serve in other companies of the group and in compliance with prevailing regulations
	<b><i>Nominating Committee</i></b>	
D.2.8	Does the company have a Nominating Committee?	The Company has a Nomination and Remuneration Committee in compliance with Financial Service Authority Regulation (namely Peraturan Otoritas Jasa Keuangan/POJK), as stated in the following: <ul style="list-style-type: none"> <li>• 2023 Annual Report – page 333-337 that has been available on the website</li> </ul>
D.2.9	Is the Nominating Committee comprised of a majority of independent directors/commissioners?	The Nomination and Remuneration Committee comprises of a majority of independent Commissioners
D.2.10	Is the chairman of the Nominating Committee an independent director/commissioner?	The Chairman of the Nominating Committee is an Independent Commissioner



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D.2.11	Does the company disclose the terms of reference/ governance structure/charter of the Nominating Committee?	The Company discloses the terms of reference/ governance structure/charter of the Nominating Committee
D.2.12	Is the meeting attendance of the Nominating Committee disclosed and if so, did the Nominating Committee meet at least twice during the year?	The meeting attendance of the Nomination and Remuneration Committee disclosed meet at least twice during the year.  The Company regulates the Nomination and Remuneration Committee meets 3 times a year
	<b><i>Remuneration Committee/ Compensation Committee</i></b>	
D.2.13	Does the company have a Remuneration Committee?	Same as E.2.8 The Company has a Nomination and Remuneration Committee
D.2.14	Is the Remuneration Committee comprised of a majority of independent directors/commissioners?	Same as E. 2.9 The Nomination and Remuneration Committee comprises of a majority of independent Commissioners
D.2.15	Is the chairman of the Remuneration Committee an independent director/commissioner?	Same as E.2.10 The Chairman of the Nominating Committee is an Independent Commissioner
D.2.16	Does the company disclose the terms of reference/ governance structure/ charter of the Remuneration Committee?	Same as E.2.11 The Company discloses the terms of reference/ governance structure/charter of the Nomination and Remuneration Committee
D.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?	Same as E.12 The meeting attendance of the Nomination and Remuneration Committee disclosed meet at least twice during the year, as stated in the following: <ul style="list-style-type: none"> <li>• 2023 Annual Report - Page 343-344, that has been available on the website</li> </ul>
	<b><i>Audit Committee</i></b>	
D.2.18	Does the company have an Audit Committee?	The Company has an Audit Committee, as stated in the following:

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		<ul style="list-style-type: none"> <li>2023 Annual Report - page 327-332, that has been available on the website</li> </ul>
D.2.19	Is the Audit Committee comprised entirely of non-executive directors/commissioners with a majority of independent directors/commissioners?	The Audit Committee comprised entirely of non- directors with a majority of independent commissioners and independent party
D.2.20	Is the chairman of the Audit Committee an independent director/commissioner?	The Chairman of the Audit Committee is an independent Commissioner
D.2.21	Does the company disclose the terms of reference/governance structure/charter of the Audit Committee?	<p>The Company discloses the terms of reference/governance structure/charter of the Audit Committee as stated in the following:</p> <ul style="list-style-type: none"> <li>2023 Annual Report - page 327-332, that has been available on the website</li> <li>The Charter of Audit Committee, that has been available on the website</li> </ul>
D.2.22	Does at least one of the independent directors/commissioners of the committee have accounting expertise (accounting qualification or experience)?	<p>At least one of the Independent Commissioners of the Audit Committee has accounting expertise (accounting qualification or experience), as stated in the following:</p> <ul style="list-style-type: none"> <li>2023 Annual Report - page 330, that has been available on the website</li> <li>The profile of Chairman and Member of Audit Committee has been available in the 2023 Annual Report - page 79, 93,94, explaining experience in accounting and finance and sharia banking supervisory function</li> </ul>
D.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?	<p>The meeting attendance of the Audit Committee is disclosed and the Audit Committee meets at least four times during the year, as stated in the following:</p> <ul style="list-style-type: none"> <li>2023 Annual Report - page 343, that has been available on the website</li> </ul>
D.2.24	Does the Audit Committee have primary responsibility for recommendation on the appointment, and removal of the external auditor?	The Audit Committee has primary responsibility for recommendation on the appointment, and removal of the external auditor, as stated in the following:

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		<ul style="list-style-type: none"> <li>• Charter of the Audit Committee, that has been available on the website</li> <li>• 2023 Annual Report – page 329 (number 7)</li> </ul> <p>that have been available on the website</p>
<b>D.3</b>	<b>Board Processes</b>	
	<b><i>Board meetings and attendance</i></b>	
D.3.1	Are the board of directors meeting scheduled before the start of financial year?	<p>The Board of Directors meeting are scheduled before the start of financial year, as stated in the following:</p> <ul style="list-style-type: none"> <li>• 2023 Annual Report – page 368</li> <li>• Charter of the Board of Directors</li> <li>• Articles of Association (Directors Section)</li> </ul> <p>that have been available on the website</p>
D.3.2	Does the board of directors/commissioners meet at least six times during the year?	<p>The Board of Directors/Commissioners meet at least six times during the year, as stated in the following:</p> <ul style="list-style-type: none"> <li>• 2023 Annual Report – page 361 (number 3), 364</li> <li>• Charter of the Board of Directors</li> </ul> <p>that have been available on the website</p>
D.3.3	Has each of the directors/commissioners attended at least 75% of all the board meetings held during the year?	<p>Each of the Directors/Commissioners has attended at least 75% of all the Board Meetings held during the year, as stated in the following:</p> <ul style="list-style-type: none"> <li>• 2023 Annual Report – page 307, 361 (number 3), 364, that has been available on the website</li> </ul>
D.3.4	Does the company require a minimum quorum of at least 2/3 for board decisions?	<p>The company requires a minimum quorum of at least 2/3 for Board of Commissioners decisions, as stated in the following:</p> <ul style="list-style-type: none"> <li>• 2023 Annual Report – page 304 (number 1)</li> <li>• Charter of the Board of Commissioners</li> </ul> <p>that have been available on the website</p>

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D.3.5	Did the non-executive directors/commissioners of the company meet separately at least once during the year without any executives present?	The Company regulates corporate meetings with and without any executives presents
	<b><i>Access to information</i></b>	
D.3.6	Are board papers for board of directors/commissioners meetings provided to the board at least five business days in advance of the board meeting?	The Board Papers for Board of Directors/Commissioners meetings provided to the board at least five business days in advance of the board meeting, as stated in the following: <ul style="list-style-type: none"> <li>Articles of Association</li> <li>2023 Annual Report – page 304 (number 16)</li> </ul> that have been available on the website
D.3.7	Does the company secretary play a significant role in supporting the board in discharging its responsibilities?	The company secretary plays a significant role in supporting the Board of Directors in discharging its responsibilities, as stated in the following: <ul style="list-style-type: none"> <li>2023 Annual Report – page 389-403, that has been available on the website</li> </ul>
D.3.8	Is the company secretary trained in legal, accountancy or company secretarial practices and has kept abreast on relevant developments?	The company secretary is trained in legal, accountancy or company secretarial practices and has kept abreast on relevant developments, as stated in the following: <ul style="list-style-type: none"> <li>2023 Annual Report – page 389-403, that has been available on the website</li> </ul>
	<b><i>Board Appointments and Re-Election</i></b>	
D.3.9	Does the company disclose the criteria used in selecting new directors/commissioners?	The company discloses the criteria used in selecting new Directors/Commissioners, as stated in the following: <ul style="list-style-type: none"> <li>2023 Annual Report – page 296, 355-356,</li> <li>Charters of the Board of Directors/Commissioners</li> <li>Charter of the Nomination and Remuneration Committee</li> </ul> that have been available on the website

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D.3.10	Did the company describe the process followed in appointing new directors/commissioners?	The company describes the process followed in appointing new Directors/Commissioners, as stated in the following: <ul style="list-style-type: none"> <li>• 2023 Annual Report – page 376</li> <li>• Charter of Nomination and Remuneration Committee</li> </ul> that have been available on the website
D.3.11	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?	In compliance with the Articles of Association of the Company, Directors/Commissioners are subject to re-election every 3 years
	<sup>2</sup> The five years term must be required by legislation which pre-existed the introduction of the ASEAN Corporate Governance Scorecard in 2011	
	<b>Remuneration Matters</b>	
D.3.12	Do the shareholders or the Board of Directors approve the remuneration of the executive directors and/or the senior executives?	The shareholders approve the remuneration of the Board of Directors/Commissioners/Sharia Supervisory Board, as stated in the following: <ul style="list-style-type: none"> <li>• Minutes of AGMS Resolution held in 2024 that has been available on the website since March 22, 2024</li> </ul>
D.3.13	Does the company have measurable standards to align the performance-based remuneration of the executive directors and senior executives with long-term interests of the company, such as claw back provision and deferred bonuses?	The Company has measurable standards to align the performance-based remuneration of the directors and senior executives with long-term interests of the company, such as claw back provision and deferred bonuses, as stated in the following: <ul style="list-style-type: none"> <li>• 2023 Annual Report – page 348-351, that has been available on the website</li> </ul>
	<b>Internal Audit</b>	
D.3.14	Does the company have a separate internal audit function?	The Company does not have a separate internal audit function
D.3.15	Is the head of internal audit identified or, if outsourced, is the name of the external firm disclosed?	The Head of Internal Audit is identified, as stated in the following: <ul style="list-style-type: none"> <li>• 2023 Annual Report – page 406, that has been available on the website</li> </ul>

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D.3.16	Does the appointment and removal of the internal auditor require the approval of the Audit Committee?	The appointment and removal of the internal auditor requires the approval of the Audit Committee, as stated in the following: <ul style="list-style-type: none"> <li>• 2023 Annual Report – page 328 (section 2.b. xi), 406</li> <li>• Charter of The Audit Committee</li> </ul> that have been available on the website
	<b>Risk Oversight</b>	
D.3.17	Does the company establish a sound internal control procedures/risk management framework and periodically review the effectiveness of that framework?	The company establish a sound internal control procedures/risk management framework and periodically review the effectiveness of that framework, as stated in the following <ul style="list-style-type: none"> <li>• 2023 Annual Report – Risk Management Section, that has been available on the website</li> </ul>
D.3.18	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?	The 2023 Annual Report discloses 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
D.3.19	Does the company disclose the key risks to which the company is materially exposed to (i.e. financial, operational including IT, environmental, social, economic)?	The Company discloses the key risks to which the company is materially exposed to (i.e. financial, operational including IT, environmental, social, economic)
D.3.20	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 controls/risk management systems?	The 2023 Annual Report contains a statement from the Board of Directors/Commissioners or Audit Committee commenting on the adequacy of the company's internal controls/risk management systems, as stated in the following: <ul style="list-style-type: none"> <li>• 2023 Annual Report – Page 142-213, 332</li> </ul>
<b>D.4</b>	<b>People on the Board</b>	
	<b>Board Chairman</b>	
D.4.1	Do different persons assume the roles of chairman and CEO?	There is different persons assume the roles of Chairman and CEO

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D.4.2	Is the chairman an independent director/commissioner?	The Chairman of Commissioners is an Independent Commissioner
D.4.3	Is any of the directors a former CEO of the company in the past 2 years?	There is no Directors former CEO of the Company in the past 2 years
D.4.4	Are the roles and responsibilities of the chairman disclosed?	The roles and responsibilities of the Chairman are disclosed, as stated in the following: <ul style="list-style-type: none"> <li>• 2023 Annual Report – Page 295</li> <li>• Charter of the Board of Commissioners</li> </ul>
	<b><i>Lead Independent Director</i></b>	
D.4.5	If the Chairman is not independent, has the Board appointed a Lead/Senior Independent Director and has his/her role been defined?	N/A
	<b><i>Skills and Competencies</i></b>	
D.4.6	Does at least one non-executive director/commissioner have prior working experience in the major sector that the company is operating in?	There is at least one director/commissioner has prior working experience in the major sector that the company is operating in
<b>D.5</b>	<b>Board Performance</b>	
	<b>Directors Development</b>	
D.5.1	Does the company have orientation programs for new directors/commissioners?	The company has an orientation program for new Directors/Commissioners, as stated in the following: <ul style="list-style-type: none"> <li>• 2023 Annual Report – page 304, 361, that has been available on the website</li> </ul>
D.5.2	Does the company have a policy that encourages directors/commissioners to attend on-going or continuous professional education programmes?	The company has a policy that encourages Directors/Commissioners to attend on-going or continuous professional education programs, as stated in the following: <ul style="list-style-type: none"> <li>• Charter of Board of Directors</li> <li>• Charter of Board of Commissioners</li> </ul> That have been available on the website
	<b>CEO/Executive Management Appointments and Performance</b>	

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D.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?	The Company discloses the process on how the board of Directors/Commissioners plans for the succession of the BOD, as stated in the following: <ul style="list-style-type: none"> <li>• 2023 Annual Report – page 359-360, 369, 376, that has been available on the website</li> </ul>
D.5.4	Does the board of directors/commissioners conduct an annual performance assessment of the CEO/Managing Director/President?	The Board of Directors/Commissioners conducts an annual performance assessment of the CEO, as stated in the following: <ul style="list-style-type: none"> <li>• 2023 Annual Report – page 368-369, that has been available on the website</li> </ul>
	<b><i>Board Appraisal</i></b>	
D.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?	The company conducts an annual performance assessment of the Board of Directors/Commissioners and discloses the criteria and process followed for the assessment, as stated in the following: <ul style="list-style-type: none"> <li>• 2023 Annual Report – page 309, 368-369, that has been available on the website</li> </ul>
	<b><i>Director Appraisal</i></b>	
D.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?	The Company conducts an annual performance assessment of the individual directors/commissioners and disclose the criteria and process followed for the assessment
	<b><i>Committee Appraisal</i></b>	
D.5.7	Did the company conduct an annual performance assessment of the board committees and disclose the criteria and process followed for the assessment?	The Company conducts an annual performance assessment of the Board of Commissioners' committees and disclose the criteria and process followed for the assessment, as stated in the following: <ul style="list-style-type: none"> <li>• 2023 Annual Report – page 345-346, that has been available on the website</li> <li>•</li> </ul>



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Level 2	Bonus Items	
<b>(B) A.</b>	<b>Rights of shareholders</b>	
<b>(B) A.1</b>	<b>Right to participate effectively in and vote in general shareholders meeting and should be informed of the rules, including voting procedures, that govern general shareholders meeting.</b>	
B) A.1.1	Does the company practice secure electronic voting in absentia at the general meetings of shareholders?	<p>The company practices secure electronic voting in absentia at the general meetings of shareholders, as stated in the following:</p> <ul style="list-style-type: none"> <li>• The Company practice Electronic Proxy by means of Easy KSEI Application;</li> <li>• The Invitation of the recent 2024 AGMS that has been available on the website of the IDX and Company since February 27, 2024, prior to the 2024 AGMS</li> <li>• The Code of Conduct of the recent 2024 AGMS that has been available on the website since February 27, 2024 prior to the AGMS</li> </ul>
<b>(B) . A.2</b>	<b>Equitable treatment of shareholders</b>	
<b>(B) A.2</b>	<b>Notice of AGM</b>	
(B) A.2.1	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?	<p>The Company releases its notice of the recent 2024 AGMS (with detailed agendas and explanatory circulars):</p> <ul style="list-style-type: none"> <li>• The Announcement of the recent 2024 AGMS, that has been available on the website of IDX and website of the Company since February 12, 2024, prior to the 2024 AGMS</li> <li>• The Invitation of AGMS held in 2024, that has been available on the website of the IDX and website of the Company since February 27, 2024, prior to the 2024 AGMS</li> <li>• The accompanying statement of the recent 2024 AGMS that has been available on the website of the IDX and Company since February 27, 2024, prior to the 2024 AGMS held on March 20, 2024</li> </ul>

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<b>(B)B.</b>	<b>Sustainability and Resilience</b>	
<b>(B)B.1</b>		
(B) B.1.1	Does the company disclose how it manages climate-related risks and opportunities?	The Company discloses how it manages climate-related risks and opportunities, as stated in the following: <ul style="list-style-type: none"> <li>• 2023 Sustainability Report, page 41, 126, that has been available on the website</li> </ul>
(B) B.1.2	Does the company disclose that its Sustainability Report / Sustainability Reporting is externally assured?	The-Sustainability Report is not yet externally assured
(B) B.1.3	Does the company disclose the engagement channel with stakeholder groups and how the company responds to stakeholders' ESG concerns?	The Company discloses the engagement channel with stakeholder groups and how the company responds to stakeholders' ESG concerns, as stated in the following: <ul style="list-style-type: none"> <li>• 2023 Sustainability Report that has been available on the website</li> </ul>
(B) B.1.4	Does the company have a unit / division / committee who is specifically responsible to manage the sustainability matters?	The Company has a task force/committee who is specifically responsible to manage the sustainability matters, as stated in the following <ul style="list-style-type: none"> <li>• 2023 Sustainability Report – page 140-141, that has been available on the website</li> </ul>
(B) B.1.5	Does the company disclose board of directors/commissioners' oversight of sustainability-related risks and opportunities?	The Company discloses Board of Directors/Commissioners' oversight of sustainability-related risks and opportunities, as stated in the following <ul style="list-style-type: none"> <li>• 2023 Sustainability Report, that has been available on the website</li> </ul>
(B) B.1.6	Does the company disclose the linkage between executive directors and senior management remuneration and sustainability performance for the previous year?	The Company discloses remuneration in its Annual Report
(B) B.1.7	Is the company's Whistle Blowing System managed by independent parties / institutions?	The company's Whistle Blowing System still being managed by internal unit within the Company

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<b>B).C.</b>	<b>Disclosure and transparency</b>	
<b>B)C.1</b>	<b>Quality of Annual Report</b>	
(B) C.1.1	Are the audited annual financial report /statement released within 60 days from the financial year end?	<p>The audited annual financial report /statement are released within 60 days from the financial year end, as stated in the following:</p> <ul style="list-style-type: none"> <li>• 2023 Audited Financial Report has been published and submitted to Regulators on February 7, 2024</li> <li>• The Invitation of AGMS held in 2024, with accompanying statements which are 2023 Annual Report and Audited Financial Report for Financial Year of 2023 have been available on the website of the IDX and website of the Company since February 27, 2024, prior to the 2024 AGMS</li> </ul>
<b>B)D.</b>	<b>Responsibilities of the Board</b>	
<b>(B)D.1</b>	<b>Board Competencies and Diversity</b>	
B) D.1.1	Does the company have at least one female independent director/commissioner?	<p>The Company has one female Director and one female Independent Commissioner, as stated in the following:</p> <ul style="list-style-type: none"> <li>• 2023 Annual Report</li> <li>• Profiles of Board of Directors and Commissioners</li> </ul> <p>That have been available on the website</p>
B) D.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?	<p>BTPN Syariah is a sharia commercial bank that 95% of its financing customers are women</p> <p>The Company discloses measurable objectives for implementing its board diversity in achieving its objectives as role model of women leadership</p>
<b>(B)D.2</b>	<b>Board Structure</b>	
(B) D.2.1	Is the Nominating Committee comprise entirely of independent directors/commissioners?	The Nomination and Remuneration Committee comprises of Independent Commissioners

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(B) D.2.2	Does the Nominating Committee undertake the process of identifying the quality of directors aligned with the company's strategic directions?	The Nomination and Remuneration Committee undertakes the process of identifying the quality of directors aligned with the company's strategic directions
<b>(B)D.3</b>	<b>Board Appointments and Re-Election</b>	
(B) D.3.1	Does the company use professional search firms or 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?	The Company uses professional search firms or 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
<b>(B)D.4</b>	<b>Board Structure &amp; Composition</b>	
(B) D.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?	The Independent Commissioners make up more than 50% of the Board of Commissioners for a company with an Independent Chairman
<b>(B)D.5</b>	<b>Risk Oversight</b>	
(B) D.5.1	Does the company disclose that its Board identified key risk in relation to information technology including disruption, cyber security, and disaster recovery, to ensure that such risks are managed and integrated into the overall risk management framework?	The company discloses that its Board identified key risk in relation to information technology including disruption, cyber security, and disaster recovery, to ensure that such risks are managed and integrated into the overall risk management framework
<b>(B)D.6</b>	<b>Board Performance</b>	
(B) D.6.1	Does the company have a separate board level Risk Committee?	The company establish board level Risk Management Committee
<b>Level 2</b>	<b>PENALTY</b>	
(P) A	<b>Rights of Shareholders</b>	
(P) A.1	Basic Shareholders Rights	
(P) A.1.1	Did the company fail or neglect to offer equal treatment for share repurchases to all shareholders?	There is no share repurchase in 2023  The Company did not fail nor neglect to offer equal treatment for share repurchases to all shareholders

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(P) A.2	<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?	There is no evidence of barriers that prevent shareholders from communicating or consulting with other shareholders
(P) A.3	<b>Right to participate effectively in and vote in general shareholders meeting and should be informed of the rules, including voting procedures, that govern general shareholders meeting.</b>	
(P) A.3.1	Did the company include any additional and unannounced agenda item into the notice of AGM/EGM?	The Company did not include any additional and unannounced agenda item into the notice of AGM/EGM
(P) A.3.2	Was the Chairman of the Board and the Chairmen of all Board Committees and the CEO absent from the most recent General Meeting?	The Chairman of the Board and the Chairmen of all Board Committees and the CEO attended the most recent AGMS held in 2024
<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>	
	<i>Did the company fail to disclose the existence of:</i>	
(P) A.4.1	Shareholders agreement?	There is no shareholders agreement in 2023 to be disclosed
(P) A.4.2	Voting cap?	There is no Voting Cap
(P) A.4.3	Multiple voting rights?	There is no multiple voting rights
<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>	

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(P) A.5.1	Is a pyramid ownership structure and/ or cross holding structure apparent?	The pyramid ownership structure apparent: <ul style="list-style-type: none"> <li>• The website</li> <li>• 2023 Annual Report</li> </ul>
<b>(P)A.6</b>	<b>Insider trading and abusive self-dealing should be prohibited.</b>	
(P) A.6.1	Has there been any conviction of insider trading involving directors/commissioners, management and employees in the past three years?	There has no any conviction of insider trading involving directors/commissioners, management and employees in the past three years
(P) A.7	Protecting minority shareholder from abusive action	
(P)A.7. 1	Has there been any cases of non-compliance with the laws, rules and regulations pertaining to material related party transactions in the past three years?	There has no any cases of non-compliance with the laws, rules and regulations pertaining to material related party transactions in the past three years
(P)A.7. 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?	There were no any RPTs that can be classified as financial assistance (i.e not conducted at arms-length) to entities other than wholly-owned subsidiary companies
<b>(P)B.1</b>	<b>The rights of stakeholders that are established by law or through mutual agreements are to be respected.</b>	
(P) B.1.1	Have there been any violations of any laws pertaining to labour/employment/ consumer/insolvency/ commercial/competition or environmental issues?	There have been no any violations of any laws pertaining to labour/employment/ consumer/insolvency/ commercial/competition or environmental issues
<b>(P)B.2</b>	<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) B.2.1	Has the company faced any sanctions by regulators for failure to make announcements within the requisite time period for material events?	The company has faced no sanctions by regulators
(P) B.2.2	Is there any evidence that the company is engaging in greenwashing activities?	There is no evidence that the company is engaging in greenwashing activities

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<b>(P)C.</b>	<b>Disclosure and transparency</b>	
<b>(P)C.1</b>	<b>Sanctions from regulator on financial reports</b>	
(P) C.1.1	Did the company receive a "qualified opinion" in its external audit report?	The company receive a "qualified opinion" in its external audit report for financial year of 2023  <i>"Presented fairly, in all material respects, the consolidated financial position of the Group as of 31 December 2023 and its consolidated financial performance, cash flows, reconciliation of income and revenue sharing sources and distribution of zakat funds and sources and uses of qardhul hasan funds for the year then ended in accordance with Indonesian Financial Accounting Standards"</i>
(P) C.1.2	Did the company receive an "adverse opinion" in its external audit report?	
(P) C.1.3	Did the company receive a "disclaimer opinion" in its external audit report?	
(P) C.1.4	Has the company in the past year revised its financial statements for reasons other than changes in accounting policies?	The Company has no in the past year revised its financial statements for reasons other than changes in accounting policies
<b>(P)D.</b>	<b>Responsibilities of the Board</b>	
<b>(P)D.1</b>	<b>Compliance with listing rules, regulations and applicable laws</b>	
(P) D.1.1	Is there any evidence that the company has not complied with any listing rules and regulations over the past year?	There is no evidence that the company has not complied with any listing rules and regulations over the past year
(P) D.1.2	Have there been any instances where non-executive directors/commissioner have resigned and raised any issues of governance-related concerns?	There have been no any instances where Directors/Commissioner have resigned and raised any issues of governance-related concerns
<b>(P)D.2</b>	<b>Board structure</b>	
(P) D.2.1	Does the Company have any independent directors/commissioners who have served for more than nine years or two terms of five years each (which ever is higher) in the same capacity?	In compliance with the Article of Association of the Company, Directors/Commissioners/Sharia Supervisory Board serve the 3 year term of office and subject to re-appointment
	<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	

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(P) D.2.2	Did the company fail to identify who are the independent director(s) / commissioner(s)?	The Company has no fail to identify the independent Commissioners/Directors
(P) D.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?	There is no independent Commissioners/Directors who serve on a total of more five boards of publicly listed company
<b>(P)D.3</b>	<b>External Audit</b>	
(P) D.3.1	Is any of the directors or senior management a former employee or partner of the current external auditor (in the past 2 years)?	There is no any of the Directors or Senior Management a former employee or partner of the current external auditor (in the past 2 years)
<b>(P)D.4</b>	<b>Board structure and composition</b>	
(P) D.4.1	Has the chairman been the company CEO in the last three years?	The Chairman of Board of Commissioners has never been the Company CEO
(P) D.4.2	Do non-executive directors/commissioners receive options, performance shares or bonuses?	The Directors of the Company receive performance shares and bonuses.  The Commissioners of the Company receive no bonus other than the remuneration in compliance with the AGMS Resolution

<b>Appendix</b>		
	<b>Do shareholders have the right to participate in:</b>	In accordance to the Article of Association, the Shareholders has the right to participate in
A.2.1	Amendments to the company's constitution?	The amendments to the company constitution
A.2.2	The authorization of additional shares?	The authorization of additional shares
A.2.3	The transfer of all or substantially all assets, which in effect results in the sale of the company?	The transfer of all or substantially all assets, which in effect results in the sale of the company
B.1.1	Does the company's ordinary or common shares have one vote for one share?	The Company's ordinary or common shares has one vote for one share, in compliance with the Articles of Association
B.3.1	Does the company have policies and/or rules prohibiting	The Company has policies and/or rules prohibiting



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	directors/commissioners and employees to benefit from knowledge which is not generally available to the market?	Directors/Commissioners and employees to benefit from knowledge which is not generally available to the market, as stated in the following: <ul style="list-style-type: none"> <li>• GCG Manual</li> <li>• Company Regulation</li> <li>• Charter of the Board of Directors</li> <li>• Charter of the Board of Commissioners</li> <li>• Code of Conduct</li> </ul>
B.4.1	Does the company have a policy requiring directors /commissioners to disclose their interest in transactions and any other conflicts of interest?	The Company has policies requiring Directors /Commissioners to disclose their interest in transactions and any other conflicts of interest, as stated in the following: <ul style="list-style-type: none"> <li>• GCG Manual</li> <li>• Company Regulation</li> <li>• Charter of the Board of Directors</li> <li>• Charter of the Board of Commissioners</li> <li>• Code of Conduct</li> </ul>
D.2.6	Attendance details of each director/commissioner in all directors/commissioners meetings held during the year	Attendance details of each director/commissioner in all Directors/Commissioners meetings held during the year, as stated in the following: <ul style="list-style-type: none"> <li>• 2023 Annual Report – page 307-308, 364-368</li> </ul>