



CITATAH

**INSIDER TRADING PREVENTION POLICY
PT CITATAH TBK (the "COMPANY")**

A. INTRODUCTION

The Company has an Insider Trading Prevention Policy (the "**Policy**") to avoid any conflicts of interest in trading of the Company's securities by insiders trading or related parties with the Company. Insiders of the Company disallowed from trading the Company's securities based on material information or facts that have not disclosed yet to the public.

B. LEGAL BASIS

1. Law No. 8 of 1995 on Capital Market.
2. Regulation of Capital Market Supervisory Agency and Financial Institution No. III.A.10 on Securities Transaction.
3. Indonesia Stock Exchange Regulation No. II–A on Securities Trading.
4. Financial Services Authority Regulation No. 31/POJK.04/2015 on Disclosure on Material Information or Facts by Issuers or Public Companies.
5. Financial Services Authority Regulation No. 60/POJK.04/2015 on Information Disclosure of Certain Shareholders.
6. Financial Services Authority Regulation No. 78/POJK.04/2017 on Securities Trading That Are Not Prohibited For The Insider of The Company.

C. DEFINITION

1. **Affiliates** means:
 - a. Family relationships by marriage and descendant to the second degree, either horizontally or vertically;
 - b. A relationship between a Party and any of the employees, directors, or commissioners of that Party;
 - c. A relationship between 2 (two) companies in which one or more members of the Board of Directors or Board of Commissioners in common;
 - d. A relationship between a company and Party, whether direct or indirect, controlling or controlled by the said company;
 - e. A relationship between 2 (two) companies that are controlled, directly or indirectly, by the same Party; or
 - f. A relationship between a company and a major shareholder.
2. **Corporate Action** means any action initiated and/or engaged by the Company that has a direct impact on the shareholdings of the Shareholders.
3. **Securities** mean a promissory note, commercial papers, stocks, bonds, debt certificates, collective investment contract units, futures contracts on Securities, and any derivatives from Securities.
4. **Material Information or Facts** mean any critical information, facts, or relevant data concerning events which may affect the price of the Securities on the market and /or that may influence decisions of interested stakeholders on such information or facts.
5. **Insider Information** means Material Information or Facts owned by an insider that is not yet publicly available.

6. **Insider** means:
 - a. Commissioners, directors, or employees of the Company;
 - b. The Company's substantial shareholders;
 - c. An individual who, by his position or profession or business relationship with the Company allows such individual to obtain inside information; or
 - d. Other parties who within the last 6 (six) months are no longer parties as referred to in letter a, letter b, or letter c.
7. **The Blackout Period** means a specific period in which the Insider disallowed to conduct any transactions (either selling or buying) of the Company's Securities.

D. POLICY DURING BLACKOUT PERIOD

1. The Blackout Period Classification

There are 2 (two) types of Blackout Period, i.e.:

a. Regular Blackout Period

This period occurs for 1 (one) month before the Company release quarterly, mid-year, or annual financial statements to the public. The Regular Blackout Period will lapse 1 (one) day after the financial statements published to the public.

Illustration:

If the first quarter report announced on 30 April, then the Blackout Period is valid from 1 April until 30 April. The Insider's could do the transaction on 1 May.

b. Incidental Blackout Period

This period occurs when Insider have Insider Information on Corporate Action until the Material Information or Facts has been announced to the public through the stock exchange.

Illustration:

The Company has a Corporate Action in the form of acquisitions, mergers, issuance of new shares, and others. The Incidental Blackout period commences since the Insider know about the Material Information or Facts until the public knows about such matter through newspapers or stock exchange sites, the Financial Services Authority, and the Company's website.

2. Prohibition During The Blackout Period

Any Insider of the Company that has Insider Information or Facts are prohibited from taking the following actions during the Blackout Period:

- a. Conducting transaction (sale/purchase) on the Company's Securities;
- b. Influencing other parties to do the transaction on the Company's securities; or

- c. Providing Insider Information to any party suspected could use Material Information or Facts to conduct a transaction of the Company's Securities.

Any party who deliberately attempts unlawfully (such as stealing, persuading Insider, or forcing Insider through violence/threats) in obtaining and ultimately acquiring an Insider Information about the Company, is also subject to the same prohibitions as those applicable to Insider as referred to the above.

E. EXEMPTION OF SECURITIES TRADING DURING THE BLACKOUT PERIOD

The Insider can do Securities transactions during Blackout Period if:

1. **The Securities Transactions Carried Outside the Stock Exchange**, subject to the following conditions:

- a. The Securities Transaction is executed outside the Stock Exchange between the Company's Insiders on the same Insider Information; or
- b. The Securities Transactions are done outside the Stock Exchange by the Company's Insider with non-Insider with the following conditions:
 - 1). The Insider has provided all of the Insider Information to the non-Insider;
 - 2). The non-Insider will not use the Insider's Information other than to conduct a Securities transaction with such Insider;
 - 3). The non-Insider shall make a written statement to the Insider who provides Insider Information, states that he/she shall keep confidentiality of the received information as well as not to use the received information for any purpose other than for Securities transaction with the said Insider; and
 - 4). The non-Insider will not conduct any Securities transactions of the Company within 6 (six) months since received the information, aside to execute the Securities transaction with the said Insider.

2. **Securities Transactions Conducted In Stock Exchange**, with the following conditions:

An insider of the Company who has Insider Information may sell the Securities of the Company if it is done at the Stock Exchange or the public tender at the highest bid with the following conditions:

- a. The sale of Securities executed after there is a legally binding court decision or as a form of mortgage execution; or
- b. The Insider is unable to influence or controls the sale transaction and/or sale price of the Securities, either directly or indirectly and the decision about the sale transaction and sale price made by another party who does not have access to Insider Information.

F. SANCTION

1. The employees who are aware of any violation of this Policy shall report the matter to the Corporate Secretary.
2. The employees who do not comply with this Policy shall be liable to sanctions under a policy of the Company including termination sanctions.

G. CLOSING

This Policy may be updated if considered necessary by taking into account the provisions of applicable laws and regulations in Indonesia.

This Policy came into force on 2 October 2017.

Under the Article 4 paragraph (3) of the Financial Services Authority Regulation No. 8/POJK.04.2015 on Web Site of Issuers or Public Companies, in the event there is any difference of interpretation between Indonesia language and foreign language in the disclosed information thus Indonesia language shall prevail.