



**PT PERTAMINA ROSNEFT
PENGOLAHAN & PETROKIMIA**

INFORMATION POLICY

No. PED-002/PRPP-130/2021-S0

Revision Number 0 1 2 3 4

**COMPLIANCE
PT PERTAMINA ROSNEFT PENGOLAHAN DAN PETROKIMIA**

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Approval & Stipulation Sheet

Approved

Board of Commissioners

| No. | Title | Name | Signature |
|-----|---|---------------------|-----------|
| 1 | President Commissioner/ Independent Commissioner | Alexander Romanov | |
| 2 | Vice President Commissioner | Budi Santoso Syarif | |
| 3 | Commissioner | Amir Hamzah Siagian | |
| 4 | Commissioner | Alexander Zubchenko | |
| 5 | Commissioner | Beni Syarif Hidayat | |

Stipulated

Board of Directors

| No. | Title | Name | Signature |
|-----|-------------------------|-------------------|-----------|
| 1 | President Director | Kadek Ambara Jaya | |
| 2 | Director of Finance | Pavel Vagero | |
| 3 | Director of Development | Eriyadi | |

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INTRODUCTORY PROVISIONS

PURPOSE

This Policy sets the framework for external communications and the requirements in PT Pertamina Rosneft Pengolahan dan Petrokimia (“Company”, “PRPP”), for:

- exchanging information with shareholders, investors, mass media, stakeholders, etc.;
- a single approach to such interaction within a system of prompt management and response to:
 - events that may cause information dissemination / reputational risks;
 - emergency situations and incidents;
 - other significant events in the Company.

The Policy was developed in alignment with the Company’s Joint Venture Agreement, Articles of Association, Code of Corporate Governance, Code of Conduct.

SCOPE

This Policy is binding upon the Company’s employees and members of governing bodies of the Company.

The Policy is implemented by the Company’s executive bodies and enforced by the Board of directors.

No internal regulations and other internal documents shall contradict this Policy.

VALIDITY AND AMENDMENT PROCEDURE

This Policy is a permanent internal regulating document.

This Policy shall be approved or recognized invalid and/or amended by the resolution of the Board of Directors after Board of Commissioners’ approval.

Amendments to this Policy can be initiated by the members of the Board of Commissioners, the Board of Directors, top management of the Company, and Compliance Manager.

Amendments to the Policy can be made in case of changes in the laws of Indonesia, in mass media, IT and advertising regulations, as well as organizational changes in the Company’s leadership.

1. TERMS AND DEFINITIONS

TERMS AND DEFINITIONS FROM THE CORPORATE GLOSSARY

ACCOUNTING (FINANCIAL) STATEMENTS - information on the financial standing of the Company, financial results of its activities, and cash flow for the accounting period arranged in compliance with requirements in the laws of Indonesia.

EMPLOYEE – an individual, who entered into employment relations with the Company.

INFORMATION DISCLOSURE - ensuring availability of information to the persons interested in such information irrespective of the purposes in compliance with the procedure guaranteeing its retrieval and obtaining.

INFORMATION POLICY - a set of actions related to information disclosure and conveying information to shareholders, investors and other stakeholders to the extent

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required for making balanced investment and management decisions, or taking other actions that may affect the financial and economic activities of the Company.

MASS MEDIA - printed periodical publications, online media, TV channels, radio channels, TV programs, radio programs, video programs, film documentaries, other forms of periodic mass dissemination of information under a permanent name.

NEWS BULLETIN - an information resource updated in real time and provided by a news agency having the status of information disseminator in the security market.

PRESS RELEASE - an official report prepared for mass media and the public about an event, an action or any other essential news topic.

COMPANY'S EXECUTIVE - a person permanently or temporarily holding a position in the Company, related to the accomplishment of organizational, administrative and business functions, or performing such functions in the Company under special authority.

COMPANY'S OFFICIAL WEBSITE - a website on the Internet containing information on the Company's activities, being a component of the Company's information resources, and comprising a set of technical and organizational solutions, access to which is provided by means of Internet with the domain name <https://prpp.pertamina.com/>.

STAKEHOLDERS - partners and contracting parties of the Company, industry business communities, non-profit and public organizations, educational institutions, Company's employees, general public and other persons interested in interaction with the Company or dependent to various extents on the Company's activities, except for public and administrative authorities.

2. DESIGNATIONS AND ABBREVIATIONS

COMPANY'S EXECUTIVE BODIES – Company's Board of Directors, President-Director.

COMPANY'S GOVERNING BODIES – Company's General Meeting of Shareholders, Board of Commissioners, Board of Directors, President-Director.

TOP MANAGERS – Company's Deputy Directors, Vice Presidents, Function Managers and Chiefs, advisers and heads of structural units.

COMPANY – PT Pertamina Rosneft Pengolahan dan Petrokimia (or abbreviated PRPP).

3. PRINCIPLES

The Company's information policy basic principles are:

- **Regularity** – constant and systematic representation of information about the Company to shareholders, investors, and stakeholders by use of all communication means available to the Company;
- **Efficiency** – ensuring informing of shareholders, investors and stakeholders within the shortest time possible about essential events and facts that may affect the Company's financial and economic activities and shareholders' interests, as well as investors and/or stakeholders and ensuring prompt response (presenting the Company's position) on rumors or fraudulent information that may damage the Company's reputation;

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- **Availability** – using various channels and methods of dissemination of information about the Company, providing free, easy and least costly access to disclosed information for shareholders, investors and stakeholders;
- **Reliability** – presentation of relevant information to shareholders, investors and stakeholders, and ensuring that the information disseminated by the Company was not distorted or erroneous;
- **Completeness** – provision of information to the shareholders, investors and stakeholders sufficient for obtaining the most complete view on the particular matters of interest;
- **Balance** – provision of a reasonable balance between openness and transparency and confidentiality to guarantee shareholders and stakeholders exercise their rights for information and the Company's rights for protection of commercial and other confidential information;
- **Equality** - securing equal rights and opportunities of all the shareholders for obtaining information in compliance with the laws of Indonesia;
- **Information security** – ensuring protection of confidential information and limited access thereto in compliance with applicable laws and internal regulations;
- **Confidentiality** – ensuring secure handling of the Company's confidential information and that of the Company partners', access to which the Company obtains when working with them;
- **Objectivity and neutrality** – ensuring disclosure of information about the Company's activities to shareholders, investors and stakeholders, irrespective of the effect on the Company's activities and of the interests of any persons or their groups;
- **Consistency** – ensuring disclosure of information on the Company's activities, consistent with the information published by the Company earlier, similar in content both in Indonesia and abroad.

The Company's executive bodies shall be held responsible for disclosure of information about the Company and its activities in compliance with the principles above.

4. OBJECTIVES

Information Policy is focused on ensuring complete implementation of the shareholders', investors' and stakeholders' rights for obtaining information, essential for making investment and management decisions.

The core objectives of the Policy are:

- ensuring availability of the information about the Company to shareholders, investors and stakeholders;
- preventing disclosure of unreliable and/or incorrect information about the Company's activities;
- ensuring information transparency and high level of corporate management;
- compliance with the laws of Indonesia and Company's internal regulations;

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- ensuring qualified and professional interaction with mass media;
- mitigation of risks (including informational, reputational).

5. PUBLIC STATEMENTS ON BEHALF OF THE COMPANY

Persons having the right to make public statements and make comments concerning the Company's activities are:

- President-Director;
- top managers subject to prior approval by the President-Director.
- other Company's officials subject to President-Director's prior approval.

The above persons have an exclusive right to make public statements concerning the Company's activities on forums, conferences, meetings, seminars held in Indonesia and abroad, at the meetings of the ministerial executive bodies and departments, bodies of executive and legislative branches of Indonesian Government and provincial governments, other public events; to participate in press conferences, briefings, telephone and video conferences; to give interviews; to provide comments to Indonesian and foreign mass media, financial and investment companies, in compliance with applicable laws of Indonesia.

Information shall be disclosed by the members of the Board of Commissioners, the Board of Directors and officials in compliance with this Policy, other relevant Company's internal regulations and applicable laws of Indonesia regulating circulation of sensitive and confidential national and commercial information, as well as insider information.

The Company's President-Commissioner and the Chairman of the Company's Board of Directors shall have the right to make official comments on the decisions of the Board of Commissioners and the Board of Directors and to state the point of view thereof (in the telephone conferences, in an interview, etc.) on the issues reviewed at meetings of the respective Boards in compliance with the applicable laws and Company's internal regulations.

Members of the Board of Commissioners and the Board of Directors have the right to state publicly the personal point of view on the issues reviewed and decided at meetings of the respective Boards in compliance with the restrictions implied by the Company's internal regulations on protection of confidential information and the applicable laws.

Chairmen of the Board of Commissioners' subcommittees and the Board of Directors' subcommittees shall have the right to comment and inform stakeholders on the decisions made at the subcommittees' meetings in compliance with the restrictions implied by the Company's internal regulations on protection of confidential information and the applicable laws.

Members of the Board of Commissioners' subcommittees and the Board of Directors' subcommittees shall have the right to publicly express personal opinion on the decisions and issues reviewed at the meetings of the relevant subcommittees in compliance with the restrictions implied by the Company's internal regulations on protection of confidential information and the applicable laws.

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6. INFORMATION DISCLOSURE

The Company ensures compliance with the requirements of the applicable laws and regulations on information disclosure, providing operational transparency for shareholders, investors and stakeholders.

The Company may disclose essential information on its activities, even if such disclosure isn't stipulated by the laws, within the limits set by the applicable laws of Indonesia and Company's internal regulations on protection of confidential information.

6.1 DISCLOSED INFORMATION

The Company is not required by any laws of Indonesia to disclose information on a mandatory basis.

At its own initiative the Company may disclose information on the Company's essential activities or disclose certain documents even though such disclosure is not required by any laws of Indonesia.

The Company may disclose the following information:

- on development strategy, the prospects of development, corporate values;
- core activities;
- key operational and financial performance;
- essential events, transactions/projects which may affect the Company's financial and economic activities and/or having essential value;
- operational structure;
- Company's organization;
- Company's executive bodies with description of structure thereof, the executive body's chairman and his/her deputy, bio data of executive bodies' members (including their age, education, qualification, experience), data on positions which they hold in other legal entities;
- Company's Board of Commissioners structure with indication of the President-Commissioner/independent Commissioner, bio data of the members of the Board of Commissioners (including their age, education, qualification, experience, current place of employment);
- Company's policies in the area of social responsibility and health, safety and environment protection;
- Company's anti-corruption policy and the Code of Conduct;
- other essential information subject to approval by the Company's Board of Directors.

6.2 WAYS FOR DISCLOSURE OF INFORMATION

The Company can disclose information or publish documents by the following methods:

- publishing in mass media, including news bulletins;

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- uploading on the Company's official Internet website;
- publishing in printed periodical publications;
- providing access to information/documents for shareholders and providing copies of documents in compliance with the applicable laws and Company's internal regulations;
- publishing in brochures, booklets and other printed editions;
- holding press conferences, briefings, meetings with shareholders, investors and stakeholders;
- other methods approved by the Company's Board of Commissioners.

6.2.1 PUBLISHING INFORMATION IN ELECTRONIC AND PRINTED MASS MEDIA

Subject to approval by the Board of Directors the Company may publish press releases, messages and other essential information in electronic mass media and/or printed media, distributed in Indonesia and/or abroad, in compliance with the requirements of the Company's internal regulations governing the use and confidentiality of information.

6.2.2 PUBLISHING INFORMATION ON THE INTERNET

Subject to approval by the Board of Directors the Company may upload press releases, messages, articles, interviews, promotional materials and other public information to the Company's official website.

The below information may be uploaded by the Company to its official website:

- relevant internal documents regulating activities of Company's governing bodies Company profile, including composition and information on the Company's Board of Commissioners, the Board of Directors and top management;
- information on essential facts;
- information on development strategy;
- notices of invitation to tender;
- job vacancies;
- this Policy;
- Code of Conduct;
- other documents and materials, stipulated for publishing in the decisions of the Company's Board of Directors, and/or the Company's internal regulations;

6.2.3 PUBLICATION OF INFORMATION IN PRINTED MEDIA AND CONFERENCES

Subject to approval by BoD the Company issues press releases, messages, articles, interviews, promotional materials, the presentations about activities and other information in the printed media The Company may participate in

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conferences and various industry meetings subject to approval by President-Director.

6.2.4 ACCESS TO INFORMATION BY SHAREHOLDERS

Company provides shareholders with documents in accordance with Indonesian law and Company's internal regulations.

The shareholder right for information access shall be exercised on the basis of preserving information confidentiality.

7. CONFIDENTIAL AND INSIDER INFORMATION SECURITY

The Company protects confidential and insider information in compliance with the procedures stipulated in the laws of Indonesia and internal regulations.

8. REFERENCES

1. Law No. 40/2007 on Limited Liability Company;
2. Law No.11/2008 as amended by Law No.19/2016 on Electronic Information and Transaction;
3. Law No.14/2008 on Public Information Openness;
4. Law No. 40 of 1999 on the Press
5. Law No. 20/2016 on Protection of Personal Data in an Electronic System;
6. Government Regulation No.71/2019 on Administering of Electronic Systems and Transactions;
7. The Company's Joint Venture Agreement;
8. The Company's Articles of Association;
9. The Company's Code of Corporate Governance;
10. The Company's Code of Conduct.

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|--------------------|--------------------|
| Prepared by: | Approved by: |
| Compliance Manager | President Director |
| Vladislav Smetanin | Kadek Ambara Jaya |
| Date: 12/01/2021 | Date: 12/01/2021 |