



**INSIDER TRADING POLICY  
PT CHANDRA DAYA INVESTASI TBK  
("CDI GROUP")**

## **I. BACKGROUND AND OBJECTIVES**

CDI Group, as a publicly listed company established under the laws of the Republic of Indonesia, is committed to ensuring that its stocks are fairly transacted in IDX pursuant to the prevailing laws and regulations including the regulations of the Financial Services Authority of the Republic of Indonesia (“OJK”). This commitment is made in order to protect the interest of CDI Group itself, all organs of CDI Group and its stakeholders, as well as to achieve a qualified Good Corporate Governance and information disclosure.

Consequently, the Company has adopted this Insider Trading Policy (“Policy”) to provide assistance and clear guidance to Insiders to comply with the insider trading regulations that prevail in Indonesia. It is expected that by publishing and enforcing the Policy, all Insiders will be aware of the regulation and comply with the reporting requirements from OJK.

## **II. LEGAL BASIS**

This Policy is prepared by considering the applicable laws and regulations of the Republic of Indonesia and CDI Group’s internal policy, including:

1. Law of the Republic of Indonesia No. 8 of 1995 on Capital Market and its amendments/addendums from time to time.
2. OJK Regulation No. 78/POJK.04/2017 on Unprohibited Stock Transaction for Insiders (“**POJK 78/2017**”).
3. OJK Regulation No. 31/POJK.04/2015 regarding Disclosure of Information.
4. CDI Group’s Code of Conduct.
5. CDI Group’s Whistleblowing Management Policy.

## **III. IDENTIFYING THE INSIDER AND INSIDER TRADING**

Any of the below persons/ entities can be identified as an Insider.

1. any member of CDI Group’s Board of Commissioners or Board of Directors;
2. CDI Group’s employee;
3. the controlling shareholders or main shareholders of CDI Group;
4. an individual who, due to his/her position, profession, or business relationship with CDI Group (e.g., auditor, legal consultant, agent, vendor, or customer enables that person to obtain material information that is not yet available to the public (“**Insider Information**”)); and/or
5. any party who within the last 6 (six) months is no longer become any party as defined above.

This Policy applies to any and all transactions involving CDI Group’s securities, including common stock, debt acknowledgement letters, commercial paper, warrants, bonds, proof of indebtedness, participation units under collective investment contracts, securities futures

contracts, and any derivatives of securities that CDI Group may have issue (“**CDI Group’s Securities**”).

Furthermore, a transaction will only be considered Insider trading if it involves the Material Information of an Insider that has not been available in the public domain. Considering that POJK 78/2017 does not provide a definition of Material Information, a reference is made to OJK Regulation No. 31/POJK.04/2015 regarding the Disclosure of Material Information or Fact by a Public Company (“**POJK 31/2015**”) which defines Material Information (or Fact) as crucial and relevant information or fact regarding an incident, event, or a fact that can affect a stock’s price in IDX and/or a decision of an investor, potential investor or other Parties. POJK 31/2015 further explains that the following information shall be considered Material Information:

1. business merger, business demerger, business consolidation, or establishment of a joint venture;
2. submission of offers for the purchase of securities of other companies;
3. purchase or sale of company shares whose value is material;
4. stock split or reverse stock split;
5. distribution of interim dividends;
6. delisting and re-listing of shares on the IDX;
7. revenue in the form of extraordinary dividends;
8. the acquisition or loss of important contracts;
9. new inventions or new products that provide added value to the company;
10. additional sales of securities to the public or in limited amounts which are material;
11. changes in the direct or indirect control of issuers or public companies;
12. changes in the members of the Board of Directors and/or Board of Commissioners;
13. repurchase or payment of debt securities and/or sukuk;
14. purchase or sale of important assets;
15. labor dispute that may disrupt the company’s operations;
16. legal case against issuers or public companies and/or members of the board of directors and members of the board of commissioners of issuers or public companies that has a material impact;
17. replacement of accountants who are being assigned to audit issuers of public companies;
18. replacement of the trustee,
19. replacement of the Securities Administration Bureau;
20. changes to the fiscal year of issuers or public companies;
21. changes in the use of reporting currency in financial statements;
22. issuers or public companies are under special supervision from the relevant regulators which may affect the business continuity of issuers or public companies;
23. limitation of business activities of issuers or public companies by the relevant regulators;
24. material changes or failure to achieve published financial projections;
25. any event that will lead to a material increase in financial liabilities or a decrease in revenue of issuers or public companies;
26. debt restructuring;
27. cessation or closure of part or all of the business segment;
28. material impact on issuers or public companies due to compelling events; and/or

29. other material information or facts.

#### **IV. PERMITTED INSIDER TRADING**

1. The Insiders are permitted from buying, selling, or trading CDI Group's Securities ("**CDI Group's Securities Transaction**"), if CDI Group's Securities Transaction is carried out outside the IDX:
  - (a) between Insiders who have the same Material Information; or
  - (b) by an Insider who has Material Information with a party who is not an Insider ("**Non-Insider**"), subject to the following conditions:
    - (i) the Insider has previously provided all Material Information to the Non-Insider;
    - (ii) the Non-Insider does not use Material Information other than to conduct CDI Group's Securities Transaction with the Insider;
    - (iii) the Non-Insider provides a written statement to the Insider who provides Material Information, stating that the Material Information to be received will be kept confidential and will not be used for any other purpose than to conduct CDI Group's Securities Transaction with the Insider; and
    - (iv) the Non-Insider does not conduct any share sale and purchase transaction within a period of 6 (six) months from the date of Material information is obtained, other than to conduct CDI Group's Securities Transaction with the Insider.
2. The Insiders are permitted to conduct CDI Group's Securities Transaction, if CDI Group's Securities Transaction is carried in IDX or a public auction venue on the highest bid, subject to the following conditions:
  - (a) it is made based on a court order that has obtained a permanent legal force or the execution of a pledge; or
  - (b) the Insider cannot, directly or indirectly, influence or control the selling time or price of CDI Group's Securities, and the decision regarding the time and price of selling is made by a Non-Insider.

#### **V. PROHIBITED ACTIVITIES OF INSIDERS**

1. Trading of the Company's Securities
  - a. No Insider is permitted to purchase, sell, or otherwise trade in the Company's securities if he or she is in possession of material non-public information regarding the Company.
  - b. No Insider is permitted to purchase, sell, or otherwise trade in the Company's including the General Meeting of Shareholders (GMS) and the publication of the Financial Statement (blackout period) applicable to Insiders as determined by the Corporate Secretary.

2. Tipping

Providing material non-public information to other parties to conduct or recommend transactions (tipping) is prohibited. Therefore, Insiders are not permitted to tip or share material non-public information with any party, other than the Company's Directors, officers, or employees, unless necessary for the performance of their duties and with the approval of the Corporate Secretary.

3. Providing Trading Advice

Insiders are prohibited from providing advice in any form regarding transactions in the Company's securities to any party, regardless of whether the person concerned has material non-public information or not, except to remind other Insiders not to carry out transactions that have the potential to violate the law or this Policy.

**VI. INSIDER'S REPORTING OBLIGATION**

An Insider who conducts a CDI Group's Securities Transaction shall report such transaction to OJK at the latest 10 (ten) days after such transaction is made.

**VII. COMPLIANCE & PENALTY**

1. The Insiders may only conduct securities transactions, foreign exchange transactions, derivative transactions, and other transactions in their interests if there is no conflict of interest nor violation of any regulations laid down by the regulatory bodies, or any other relevant laws and regulations.
2. The Insiders must hold on the the values in CDI Group's Code of Conduct.
3. Any Insider in violation of this Policy may be subject to disciplinary actions and/or sanctions based on the discretion of CDI Group and the applicable laws and regulations.
4. Any information regarding non-compliance or possible breach of this Policy shall be submitted to CDI Group's management through any of the below Whistleblower Channels:

- a) Hotline Email : [whistleblower.channels@capcx.com](mailto:whistleblower.channels@capcx.com)
- b) Hotline Phone : 021-5307950/ 0254-601501/ 0254-5750080
- c) Dropbox at :
  - Head Office  
Wisma Barito Pacific Tower A, 5th Floor  
Jalan Let. Jend. S. Parman Kav. 62-63, Jakarta 11410
  - Chandra Asri Plant, Ciwandan Site  
Admin Building, 4<sup>th</sup> Floor  
Jalan Raya Anyer KM. 123  
Ciwandan, Cilegon, Banten 42447
  - Chandra Asri Plant, Puloampel Site



# Chandra Daya Investasi

Admin Buidling, 1<sup>st</sup> Floor  
Desa Mangunreja, Puloampel, Banten 42456

**Main Office**