



PEDOMAN TATA KELOLA PERUSAHAAN UNTUK PERUSAHAAN PUBLIK

Corporate Governance Guidelines for Public Companies

Implementasi Aspek dan Prinsip Tata Kelola Perusahaan sesuai dengan ketentuan POJK 21/2015.

Implementation of the Aspects and Principles of Good Corporate Governance in accordance with the provisions of POJK 21/2015.

Prinsip dan Rekomendasi Principles and Recommendations

Penerapan di Perseroan Company Implementation

Aspek 1: Hubungan Perusahaan Terbuka dengan Pemegang Saham dalam Menjamin Hak-Hak Pemegang Saham Aspect 1: Public Company Relations with Shareholders in Assuring Shareholders' Rights

Prinsip 1

Meningkatkan nilai penyelenggaraan Rapat Umum Pemegang Saham (RUPS).

Principle 1

Increase value of General Meetings of Shareholders (GMS)

1. Perusahaan Terbuka memiliki cara atau prosedur teknis pengumpulan suara (*voting*) baik secara terbuka maupun tertutup yang mengedepankan independensi dan kepentingan pemegang saham.

The Public Company possesses both open and closed methods or technical procedures for voting prioritizing the independence and interests of shareholders.

Terpenuhi. Prosedur pemungutan suara (*voting*) ini diatur dalam Tata Tertib RUPS yang dibagikan kepada pemegang saham pada setiap RUPS.

Full Compliance. Voting procedures are stated within the GMS Code of Conduct, which is distributed to shareholders prior to every RUPS.

2. Seluruh Anggota Direksi dan anggota Dewan Komisaris Perusahaan Terbuka hadir dalam RUPS Tahunan.

Terpenuhi. Sebagai wujud dari kepatuhan Perseroan terhadap kebijakan yang ditetapkan oleh Pemerintah Republik Indonesia dalam melaksanakan upaya preventif dan pencegahan penyebaran Coronavirus Disease (COVID-19), serta menimbang arahan dari Pemerintah Republik Indonesia dengan melakukan *Social/Physical Distancing* dalam masa Pembatasan Sosial Berskala Besar ("PSBB") dan SEOJK S-124/2020 tanggal 24 April 2020 mengenai Kondisi Tertentu dalam Pelaksanaan Rapat Umum Pemegang Saham Perusahaan Terbuka Secara Elektronik, Perseroan mengadakan RUPS secara elektronik dan melakukan pembatasan kehadiran pemegang saham. Oleh karena itu kehadiran fisik Direksi dan Dewan Komisaris pada RUPS Tahunan yang diadakan pada tanggal 30 April 2021 dibatasi.

Prinsip dan Rekomendasi
Principles and Recommendations

Penerapan di Perseroan
Company Implementation

Members of the Board of Directors and Board of Commissioners attends the Annual General Meeting of Shareholders (AGMS)

Full Compliance. In accordance with the policies set by the Government of the Republic of Indonesia to implement preventive efforts in mitigating the spread of Coronavirus Disease (COVID-19), and with consideration to the direction provided by the Government of the Republic of Indonesia in conducting Social/Physical Distancing during the Large-Scale Social Restriction period ("PSBB"), and SEOJK S-124/2020 dated 24 April 2020 regarding Certain Conditions that allow the Implementation of the General Meeting of Shareholders of a Publicly Listed Company Electronically, the Company held an electronic GMS with restricted attendance of shareholders. Therefore, physical presence of the Board of Directors and Board of Commissioners members during the AGMS held on 30 April 2021 were also restricted.

3. Ringkasan risalah RUPS tersedia dalam Situs Web Perusahaan Terbuka paling sedikit selama 1 (satu) tahun.

Terpenuhi. Ringkasan risalah RUPS tersedia dalam situs resmi Perseroan, yaitu www.multipolar.com selama lebih dari 1 (satu) tahun.

Transcripts of the minutes of the GMS are publicly accessible through the Public Company's website for at least one (1) year.

Full Compliance. The minutes of the GMS are accessible for more than one (1) year through the Company's official website www.multipolar.com.

Prinsip 2
Meningkatkan kualitas komunikasi perusahaan terbuka dengan Pemegang Saham.

1. Perusahaan Terbuka memiliki suatu kebijakan komunikasi dengan pemegang saham atau investor.

Terpenuhi. Perseroan melakukan pembaruan informasi secara rutin terkait kinerjanya dan aktivitas pengembangan usaha Perseroan dalam situs web dan *social media*.

Principle 2
Enhance the quality of communications between public companies and their Shareholders.

The Public Company implements policies for communication with shareholders or investors.

Full Compliance. The Company routinely updates information on its performance and business development activities through the Company website and social media accounts

2. Kebijakan komunikasi harus diungkapkan di situs web.

Terpenuhi. Perseroan telah menyediakan dokumen untuk Laporan Keuangan, informasi webinar, serta materi lainnya yang dapat diunduh dari situs web Perseroan untuk memberikan kesetaraan informasi kepada seluruh pemegang saham atas pelaksanaan komunikasi dengan Perseroan.

Communication policies must be disclosed through the Website.

Full Compliance. The Company prepares documents for Financial Reports, information on webinars, as well as other material available for download through the Company's website to ensure overall access for all Shareholders regarding Company communication policies.

Aspek 2: Fungsi dan Peran Dewan Komisaris
Aspect 2: Function and Roles of the Board of Commissioners

Prinsip 3
Memperkuat keanggotaan dan komposisi Dewan Komisaris.

Principle 3
Strengthen the membership and composition of the Board of Commissioners.

1. Kondisi Perseroan senantiasa menjadi landasan pertimbangan dalam menentukan jumlah anggota Dewan Komisaris.

The Conditions of the Company is a consistent basis for determining the number of members in the Board of Commissioners.

Terpenuhi. Jumlah anggota Dewan Komisaris telah sesuai dengan kondisi Perseroan, dan mengacu pada peraturan perundang-undangan yang berlaku, Anggaran Dasar Perseroan dan piagam Dewan Komisaris.

Full Compliance. The number of members in the Board of Commissioners is in accordance with the Company's condition, with reference to prevailing laws, the Articles of Association and the Board of Commissioners' Charter.

2. Penentuan komposisi Dewan Komisaris memperhatikan keragaman keahlian, pengetahuan dan pengalaman yang dibutuhkan.

The composition of the Board of Commissioners takes into account diversity in expertise, knowledge and experience required.

Terpenuhi. Jumlah anggota Dewan Komisaris telah memperhatikan latar belakang keahlian, pengetahuan, dan pengalaman yang dibutuhkan oleh Perseroan.

Full Compliance. The number of members in the Board of Commissioners has taken into account the expertise, knowledge and experience needed to fulfill the Company's requirements.

Prinsip 4
Meningkatkan kualitas pelaksanaan tugas dan tanggung jawab Dewan Komisaris.

Principle 4
Improving the implementation quality of the duties and responsibilities of the Board of Commissioners.

1. Dewan Komisaris mempunyai kebijakan penilaian sendiri (*self-assessment*) untuk menilai kinerja Dewan Komisaris.

The Board of Commissioners has a self-assessment policy for performance evaluation.

Komite Nominasi dan Remunerasi melakukan evaluasi terhadap kinerja Dewan Komisaris

The Nomination and Remuneration Committee evaluates the performance of the Board of Commissioners.

2. Kebijakan penilaian sendiri (*self-assessment*) untuk menilai kinerja Dewan Komisaris, diungkapkan dalam Laporan Tahunan Perusahaan Terbuka.

The self-assessment policy for performance evaluation of the Board of Commissioners is disclosed in the Public Company Annual Report.

Dalam proses pemenuhan. Karena evaluasi kebijakan sedang dilakukan oleh Komite Nominasi dan Remunerasi, maka hasil penilaian belum diungkapkan dalam Laporan Tahunan

In the process of compliance. Because the policy evaluation by the Nomination and Remuneration Committee is ongoing, hence the results are not disclosed yet in the Annual Report

Prinsip dan Rekomendasi
Principles and Recommendations

Penerapan di Perseroan
Company Implementation

3. Dewan Komisaris mempunyai kebijakan terkait pengunduran diri anggota Dewan Komisaris apabila terlibat dalam kejahatan keuangan.

The Board of Commissioners has a policy regarding resignation of Board members if they are involved in financial crime.

Terpenuhi. Berdasarkan Anggaran Dasar Perseroan, setiap anggota Dewan Komisaris yang tidak memenuhi syarat untuk menjadi anggota Dewan Komisaris dengan alasan apapun termasuk di dalamnya adalah terlibat kejahatan keuangan maka jabatannya sebagai Dewan Komisaris akan batal demi hukum. Dalam hal anggota Dewan Komisaris tersebut mengundurkan diri maka akan diputuskan dalam mekanisme RUPS.

Full Compliance. Stated in the Company's Articles of Association, any member of the Board of Commissioners who does not meet member requirements, for any reason including involvement in a financial crime, will have his position null and void. In the event that the member resigns, it will be decided in the GMS.

4. Dewan Komisaris atau Komite yang menjalankan fungsi Nominasi dan Remunerasi menyusun kebijakan suksesi dalam proses Nominasi Anggota Direksi.

The Board of Commissioners or the Committee that carries out the Nomination and Remuneration function shall formulate a succession policy for the process of nominating members of the Board of Directors.

Terpenuhi. Komite Nominasi dan Remunerasi telah menjalankan fungsinya dalam menyusun kebijakan suksesi dalam proses nominasi anggota Direksi.

Full Compliance. The Nomination and Remuneration Committee has fulfilled its function in formulating succession policies in nomination procedures for members of the Board of Directors.

Aspek 3: Fungsi dan Peran Direksi

Aspect 3: Functions and Roles of the Board of Directors

Prinsip 5
Memperkuat keanggotaan dan komposisi Direksi.

Principle 5
Strengthening membership and composition of the Board of Directors.

1. Penentuan jumlah anggota Direksi mempertimbangkan kondisi Perusahaan Terbuka serta efektivitas dalam pengambilan keputusan.

In determining the number of members of the Board of Directors, the condition of the Public Company and the effectiveness of the number in decision making is taken into account.

Terpenuhi. Kondisi Perseroan dan pengambilan keputusan yang efektif senantiasa menjadi dasar pertimbangan dalam menentukan jumlah anggota Direksi.

Full Compliance. The condition of the Company and effectiveness of the decision-making process have always been the basis for consideration in determining the number of members of the Board of Directors.

2. Penentuan komposisi anggota Direksi memperhatikan keberagaman keahlian, pengetahuan, dan pengalaman yang dibutuhkan.

The composition of the Board of Directors takes into account diversity in expertise, knowledge and experience required.

Terpenuhi. Komposisi Direksi saat ini sudah mencerminkan keberagaman keahlian, pengetahuan dan pengalaman yang dibutuhkan oleh Perseroan.

Full Compliance. The number of members in the Board of Directors reflect diverse expertise, knowledge and experience needed to fulfill the Company's requirements.

Prinsip dan Rekomendasi
Principles and Recommendations

Penerapan di Perseroan
Company Implementation

3. Anggota Direksi yang membawahi bidang akuntansi atau keuangan memiliki keahlian dan/atau pengetahuan di bidang akuntansi.

The member of the Board of Directors in charge of accounting or finance has expertise and/or knowledge in accounting.

Terpenuhi. Perseroan memiliki anggota Direksi yang memiliki keahlian dan/atau pengetahuan di bidang akuntansi.

The Company's Board of Directors member in charge of accounting and finance has expertise and knowledge in accounting.

Prinsip 6
Meningkatkan kualitas pelaksanaan tugas dan tanggung jawab Direksi.

Principle 6
Improving the implementation quality of the duties and responsibilities of the Board of Directors.

1. Direksi mempunyai kebijakan penilaian sendiri (*self-assessment*) untuk menilai kinerja Direksi.

The Board of Directors has a self-assessment policy for performance evaluation.

Terpenuhi. Direksi memiliki kebijakan self-assessment yang dilakukan secara berkala berdasarkan KPI mereka, yang hasilnya ditinjau oleh Komite Nominasi dan Remunerasi.

Full Compliance. The Board of Directors has a self-assessment policy, evaluations are conducted periodically based on the Board's KPI, and the results are monitored by the Nomination and Remuneration Committee.

2. Kebijakan penilaian sendiri (*self-assessment*) untuk menilai kinerja Direksi diungkapkan melalui laporan tahunan Perusahaan Terbuka.

The self-assessment policy for performance evaluation of the Board of Directors is disclosed in the Public Company Annual Report.

Dalam proses pemenuhan. Mengacu pada jawaban sebelumnya, Perseroan sudah memiliki kebijakan terkait tapi belum diungkapkan dalam laporan tahunan

In the process of compliance. With reference to the previous answer, the Company already has a self-assessment policy but it has not yet been disclosed in the annual report

3. Direksi mempunyai kebijakan terkait pengunduran diri anggota Direksi apabila terlibat dalam kejahatan keuangan.

The Board of Commissioners has a policy regarding resignation of Board members if they are involved in financial crime.

Terpenuhi. Berdasarkan Anggaran Dasar Perseroan, setiap anggota Direksi yang tidak memenuhi syarat untuk menjadi anggota Direksi dengan alasan apapun, termasuk dalam hal keterlibatan kejahatan keuangan maka jabatannya sebagai Direksi akan batal demi hukum. Dalam hal anggota Direksi tersebut mengundurkan diri maka akan diputuskan dalam mekanisme RUPS.

Full Compliance. Stated in the Company's Articles of Association, any member of the Board of Directors who does not meet member requirements for any reason, including involvement in a financial crime, will have his/her position null and voided. In the event that the member resigns, it will be decided in the GMS

Aspek 4: Partisipasi Pemangku Kepentingan
Aspect 4: Participation of Stakeholders

Prinsip 7

Meningkatkan aspek tata kelola perusahaan melalui partisipasi pemangku kepentingan.

Principle 7

Improve corporate governance aspects through stakeholder participation.

1. Perusahaan Terbuka memiliki kebijakan untuk mencegah terjadinya *insider trading*.

The Public Company implements a policy to prevent insider trading.

2. Perusahaan Terbuka memiliki kebijakan anti korupsi dan anti-penipuan.

The Public Company has an anti-corruption and anti-fraud policy.

3. Perusahaan Terbuka memiliki kebijakan tentang seleksi dan peningkatan kemampuan pemasok atau vendor.

The Public Company has a policy regarding selection and capacity building of suppliers or vendors.

4. Perusahaan Terbuka memiliki kebijakan tentang pemenuhan hak-hak kreditur.

The Public Company has a policy on the fulfillment of creditors' rights.

Terpenuhi. Perseroan memiliki kebijakan untuk mencegah terjadinya kegiatan ilegal (dalam hal ini dapat termasuk *insider trading*) dalam *Corporate Business Conduct* yang ditandatangani oleh setiap karyawan.

Full compliance. The Company has a policy to prevent illegal activities (include insider trading) stated within its Corporate Business Conduct, signed by every employee.

Terpenuhi. Kebijakan ini diatur dalam Pedoman Etika Bisnis & Tata Perilaku yang ditetapkan Perseroan dan seluruh jajaran Direksi dan karyawan Perseroan menandatangani pedoman tersebut.

Full compliance. The Company regulates this policy through its Corporate Business Conduct, which has been signed by all levels from the Board of Directors to employees.

Terpenuhi. Perseroan melakukan seleksi vendor/pemasok berdasarkan SOP/kebijakan yang sudah ditetapkan Perseroan. Dan melakukan evaluasi vendor/pemasok berkala setiap 1 tahun sekali

Full compliance. The Company selects vendors/suppliers based on SOP/policies established by the Company and evaluates vendors/suppliers periodically every year.

Terpenuhi. Perseroan memiliki kebijakan untuk memenuhi hak-hak dari kreditur. Hal ini dikelola oleh Divisi Keuangan yang mengatur dan mengelola pembayaran hak-hak kreditur. Hak-hak ini juga dinyatakan dalam perjanjian, yang mengikat secara hukum

Full Compliance. The Company has a policy in place regarding fulfillment of creditors' rights. This is implemented and managed by the Finance Division, and also stated in legally binding agreements.

Prinsip dan Rekomendasi
Principles and Recommendations

Penerapan di Perseroan
Company Implementation

5. Perusahaan Terbuka memiliki kebijakan sistem *whistleblowing*.

The Public Company has a policy for a whistleblowing system.

Terpenuhi. Perseroan memiliki kebijakan sistem *whistleblowing* sebagaimana tertera dalam *website* Perseroan pada bagian Tata Kelola Perusahaan.

Full compliance. The Public Company has a policy for a whistleblowing system, as stated in the Company's website under Corporate Governance.

6. Perusahaan Terbuka memiliki kebijakan pemberian insentif jangka panjang kepada Direksi dan karyawan.

The Public Company has a long-term incentive policy for the Board of Directors and employees.

Terpenuhi. Perseroan memiliki kebijakan pemberian insentif jangka panjang kepada Direksi dan karyawan.

Full compliance. The Company implements a long-term incentive to the Board of Directors and employees.

Aspek 5: Keterbukaan Informasi
Aspect 5: Transparency through Full Information Disclosure

Prinsip 8
Meningkatkan pelaksanaan keterbukaan informasi.

1. Perusahaan Terbuka memanfaatkan penggunaan teknologi informasi secara lebih luas selain situs web sebagai media keterbukaan informasi.

Terpenuhi. Selain menggunakan situs web dan pelaporan secara elektronik seperti SPEIDX-Net *Reporting*, Perseroan juga menggunakan *platform* media sosial untuk mengungkapkan informasi tentang Perseroan.

Principle 8
Improve the implementation transparency through full information disclosure.

The Public Company utilizes a wide range of information technology aside from websites as a medium to disclose information.

Full compliance. In addition to using websites and electronic reporting such as SPEIDX-Net Reporting, the Company also uses social media platforms to disclose information about the Company.

2. Laporan Tahunan Perusahaan Terbuka mengungkapkan pemilik manfaat akhir dalam kepemilikan saham Perusahaan Terbuka paling sedikit 5% (lima persen), selain pengungkapan pemilik manfaat akhir dalam kepemilikan saham Perusahaan Terbuka melalui pemegang saham utama dan pengendali.

The Public Company's Annual Report discloses the ultimate beneficial owner of the Public Company's shareholdings of at least 5% (five percent), in addition to disclosure of the final beneficial owner in the Public Company's shareholdings through major and controlling shareholders.

Terpenuhi. Perseroan telah mengungkapkan pemilik manfaat akhir dalam kepemilikan saham Perseroan paling sedikit 5% dalam Laporan Tahunan ini.

Full compliance. The Company has disclosed the ultimate beneficial owner of shareholdings of at least 5% in this Annual Report.