

INSIDER TRADING POLICY

(Does not apply to PT. APP Purinusa Ekapersada, only apply to subsidiaries and/or affiliates of PT. APP Purinusa Ekapersada that is a public company and/or bond issuer)

I. INTRODUCTION

This policy was prepared to prevent trading in shares or other securities (such as bonds) by Insiders who have access to non-public information about the Company ("Insider Trading").

Included in the Company Insiders category are:

1. Commissioners, directors, or employees of the Company;
2. The main shareholders of the Company;
3. An individual by its position or profession or because of its business relationship with the Company, allows that individual to obtain inside information; or
4. A party that within the last 6 (six) months is no longer a party , referring to point 1, point 2, or point 3.

II. GENERAL

The policy regarding Insider Trading has been stipulated in the Company's Code of Ethics, where it is stated that all employees of the Company based on their position or position, either directly or indirectly, will not use inside information to buy or sell, offer to buy or sell, or invite other people to buy or sell shares or other securities of the Company, regardless of whether the act was done for themselves or the benefit of others. By implementing policies related to Insider Trading in the Company's Code of Ethics, it is the Company's embodiment to avoid the following situations:

1. The sale or purchase of the Company's shares by Company Insiders either directly or through family members or other people due to illegally receiving information;
2. Not involved in any activities aimed to manipulating the share price of the Company;
3. Avoiding the disclosure, dissemination, and/or use of the Company's confidential information to unauthorized parties to obtain personal gain and/or benefit for other parties.

III. PENALTY

If there are a Company Insiders who are proven did Insider Trading. In this case, the Company will give sanctions to that party and will take legal action if necessary.