

Policy

Prohibition of Transactions by Insiders PT Bank JTrust Indonesia Tbk.

<i>Document Number</i>	POL-CSD-05
<i>Revision Number</i>	00
<i>Effective Date</i>	30 March 2022
<i>Applicable Department</i>	<i>All Management & Employee</i>
<i>Primary Responsible Department</i>	<i>Corporate Secretary Division (CSD)</i>

PT Bank JTrust Indonesia Tbk

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Policy Material

1. All members of the Board of Commissioners, Directors and Employees are prohibited from conducting short-term speculative trading or short selling of Bank shares. Investment decisions regarding the Bank's shares must be based on long-term considerations.
2. The practice of transactions by insiders is declared to have occurred if three elements have been met, namely:
 - 1) The presence of an insider;
 - 2) The inside information is material and has not been made public; as well as
 - 3) There is a Securities trading transaction by an insider based on that information.
3. Insiders who have Inside Information are prohibited from taking the following actions:
 - a. Make purchases or sales of Bank Securities or other companies that conduct transactions with the Bank, including but not limited to Customers, Debtors, companies involved in corporate actions with the Bank, etc.
 - b. Influence other parties including family members and co-workers to buy or sell Bank Securities or other companies that conduct transactions with the Bank;
 - c. Providing Inside Information to other parties that reasonably suspect can be used to make purchases or sales of Bank Securities or other companies conducting transactions with the Bank. Such other parties include spouses, family members, co-workers, securities companies, etc.
 - d. Attempting to obtain Inside Information unlawfully such as threatening, stealing data, persuading, violence, and other unlawful acts, which in turn obtains Inside Information.
 - e. Discussing Inside Information in public places (such as elevators, taxis, public transportation, etc.).
 - f. Submitting Inside Information related to Bank Securities to other employees.
4. Insiders can provide Inside Information to other parties with the aim of providing consideration for the other party to conduct transactions in Bank Securities or other companies involved in transactions with the Bank, from the said Insider by fulfilling the following provisions:

- a. The non-Insider does not use the Insider Information other than to conduct Securities transactions with the said Insider;
 - b. The non-Insider party shall make a written statement to the Insider providing the information stating that the information to be received will be kept confidential and will not be used for any other purpose than to conduct Securities transactions with the said Insider; and
 - c. The party who is not an Insider does not conduct securities transactions with the Bank or other companies that conduct transactions with the said Bank within a period of 6 (six) months after the information is obtained, other than for conducting Securities transactions with the said Insider.
5. The Bank imposes a prohibition period or Blackout of Bank Securities transactions where Insiders are not allowed to conduct Bank Securities transactions during the following period:
- a. 10 (ten) working days before the Bank submits monthly and quarterly financial publication reports; as well as
 - b. 30 (thirty) days before the Bank submits the annual financial publication report up to 2 (two) working days after the publication of the financial report.
 - c. Other periods determined by the Board of Directors at any time in connection with the submission of information disclosure regarding corporate actions taken by the Bank.
6. The provisions in point 5 also apply to Securities originating from the Employee and/or Management Share Ownership program (Employee/Management Stock Option Plan-E/MSOP) or other similar programs accompanied by transactions for the said Securities.
7. Members of the Board of Directors or members of the Board of Commissioners are required to submit information to the Corporate Secretary Division no later than 3 (three) working days after the occurrence of ownership or any change in ownership of Bank shares to be reported to the Financial Services Authority no later than 10 (ten) days after the occurrence of the transaction, which at least contain:
- a. Name, residence and nationality;
 - b. Name of the Bank's shares;
 - c. Number of shares and percentage of share ownership before and after the transaction;
 - d. Number of shares bought or sold;
 - e. The purchase or sale price per share;
 - f. Transaction date;
 - g. The purpose of the transaction;
 - h. Share ownership status (direct or indirect); and
 - i. In the case of indirect share ownership, information regarding shareholders registered in the Bank's shareholder register is disclosed for the benefit of the beneficial owners.
8. In the event that the report submission deadline as referred to in point 7 falls on a holiday, the report submission must be submitted no later than the next working day.

9. The obligations as referred to in points 7 and 8 also apply to any Party that owns shares of the Bank, either directly or indirectly, at least 5% (five percent) of the Bank's paid-up capital or for any change in ownership of at least 0.5% (zero point five percent) of the Bank's paid-up shares either in 1 (one) or several transactions for each Party that owns the Bank's shares.
10. The form and content of the report as referred to in point 7 must be prepared in accordance with the format of the Ownership Report or Any Change in Share Ownership of a Public Company as contained in the attachment to this policy.
11. The Corporate Secretary Division submits a report to the Financial Services Authority after ownership or any change in ownership of a member of the Board of Directors or a member of the Board of Commissioners of the Bank's shares as referred to in point 7, and for each Party that owns the Bank's shares, either directly or indirectly, at least 5% (five percent) of the Bank's paid-up capital or on any change in ownership of at least 0.5% (zero point five percent) of the shares paid up by the Bank either in 1 (one) or several transactions as referred to in point 9.
12. Without prejudice to criminal provisions in the capital market sector, the Financial Services Authority is authorized to impose administrative sanctions on any party violating this Policy.
13. Employees who are aware of a violation of this policy must report the violation to the Management or can report the violation through the whistleblowing system implemented at the Bank.

Chapter 4. Closing

1. This Prohibition of Insider Transactions Policy is effective as of the stipulation of this provision.
2. This policy was prepared in order to apply the principles of good corporate governance;
3. All Bank organs are required to comply with this policy;
4. All deviations from the provisions in the preparation of these provisions must obtain the approval of the Board of Directors.
5. This policy is evaluated periodically and can be revised to comply with the prevailing laws and regulations, economic conditions, capital market conditions, and the needs of the Bank without reducing and/or eliminating the essence of the implementation of good corporate governance.
6. In order to maintain effectiveness, this policy will be reviewed periodically by the Corporate Secretary Division (CSD) as the Initiator Work Unit and sent to HOPD - Centralized Policy & Procedure at least once every 2 (two) years or in the event that it is deemed necessary to harmonize the suitability of the implementation of this policy. with the prevailing internal conditions of the Bank.

Attachment

Appendix 1

Ownership Report Format or Any Change in Public Company Share Ownership

**STATEMENT OF OWNERSHIP OR ANY CHANGES IN
SHARE OWNERSHIP OF A PUBLIC COMPANY**

Jakarta, (insert date of month year) Dear
Dear. Chief Executive of Capital Market
Supervisor
Financial Services
Authority, in Jakarta

I, the undersigned: Name :
Complete address :
Jakarta (insert postal code)
Phone number :
Citizenship :

In accordance with Article 2 of the Financial Services Authority Regulation Number 11/POJK.04/2017 Regarding Disclosure of Information of Certain Shareholders, report that I already own shares of a Public Company with the following details:

1	Share name of Public Company	BCIC
2	Number of shares and percentage of share ownership before and after the transaction	Before transaction: number of shares .. or ..%. After transaction: number of shares .. Or ..%.
3	Number of shares bought or sold	
4	Purchase or sale price per share	
5	Transaction date	
6	Purpose of the transaction	
7	Share ownership status	<input type="checkbox"/> Direct

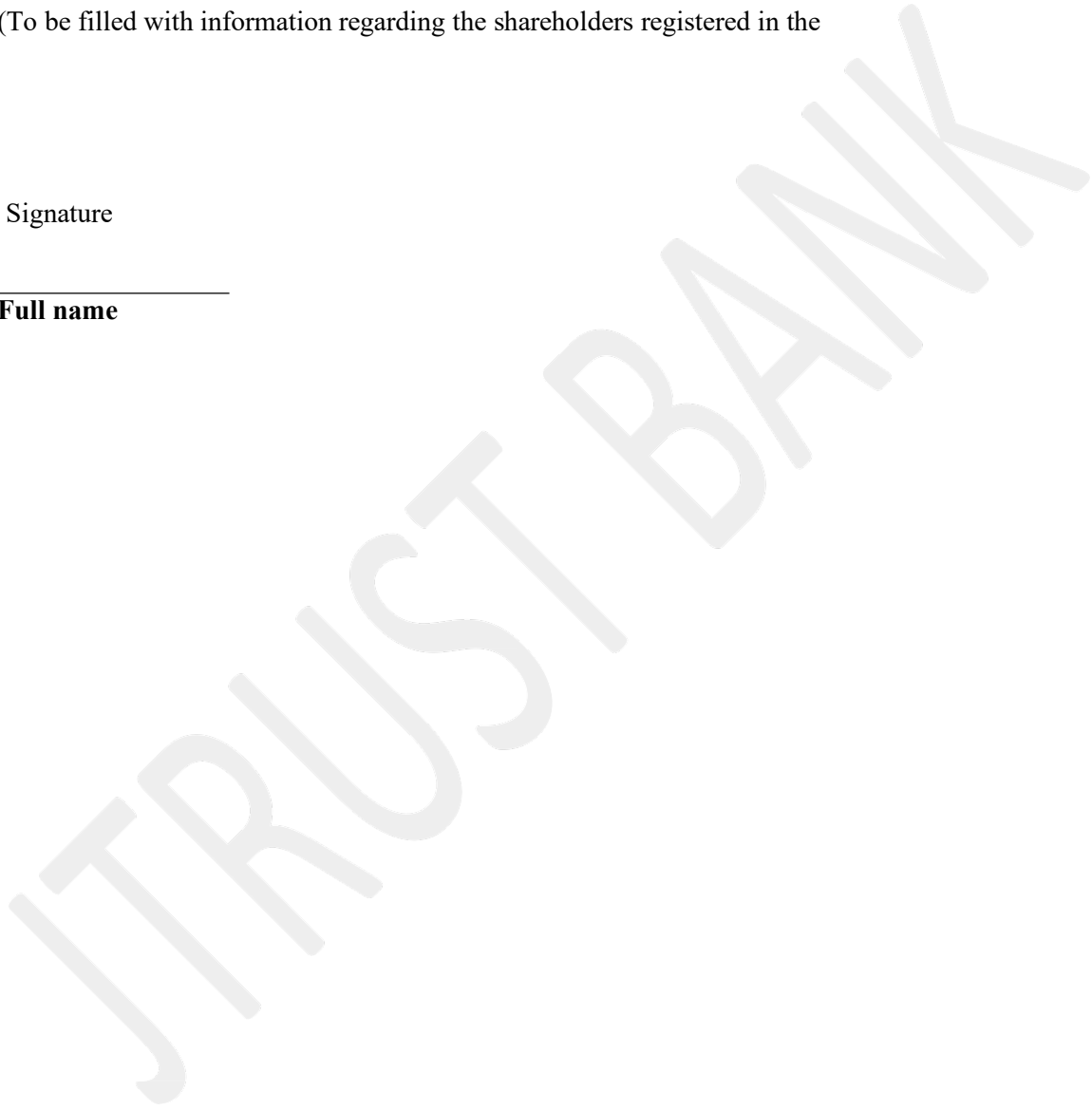
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		<input type="checkbox"/> Indirect Explanation:
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(To be filled with information regarding the shareholders registered in the

Signature

_____ **Full name**



Verified :

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Appendix 2

Explanation of Policy Material Point 5

Illustration with March and April calendars with the caption: March 3 and April 15 are holidays.

March

Sun	Mon	Tue	Wed	Thu	Fri	Sat
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

April

Sun	Mon	Tue	Wed	Thu	Fri	Sat
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30

The Bank imposes a prohibition period or Blackout of Bank Securities transactions where Insiders are not allowed to conduct Bank Securities transactions during the following period:

a. Monthly financial publication reports.

The Bank's monthly financial publication report must be submitted no later than the end of the following month after the position at the end of the reporting month. For example, if the Bank's monthly financial statements for the position of the end of February 2021 will be submitted on March 28, 2021, then it is not allowed to conduct Bank Securities transactions on: March 14-25 and March 29-30 2021.

Quarterly financial publication reports;

The Bank's quarterly financial publication report must be submitted no later than the end of the following month after the position at the end of the reporting month. For example, if the Bank's quarterly financial report for the position of the end of March will be submitted on April 25, 2021, then it is not allowed to conduct Bank Securities transactions on: April 8-22 and April 26-27 2021.

c. Annual financial publication report.

The Bank's annual financial publication report must be submitted no later than 4 (four) months after the end of the Financial Year (April).

If the Bank's annual financial publication report is submitted on April 30, 2021, it is not allowed to conduct Bank Securities transactions on: March 31 – April 29 and May 4-5, 2021.

The illustration of the period cannot be used as an absolute reference because it adjusts to the date of submission of financial publication reports by the Bank.