



Prosper with the Nation

POLICY ON COMMUNICATIONS WITH SHAREHOLDERS OR INVESTORS

PT Astra Agro Lestari Tbk

2020



A. Introduction

This document covers the policy of PT Astra Agro Lestari Tbk (the “**Company**”) in providing its shareholders or investors with the necessary information on the Company in relation to their investment decisions.

B. General Policy

As part of its Good Corporate Governance practices, the Company treats its shareholders or investors in a fair manner to provide accurate and timely information in accordance with the Articles of Association of the Company and the capital market regulations.

The Investor Relation Division of the Company has the responsibility to coordinate the production and dissemination of material and non-material information to the investment community.

C. Policy on Dissemination of Material Information

Information relating to an event, occurrence or fact that has the potential to influence the Company’s share price and/or the decision of its shareholders or investors (“**Material Information**”) must not be disclosed to media without the Material Information first being lodged with the Indonesian Financial Services Authority (“**OJK**”) and the Indonesia Stock Exchange (“**IDX**”), in accordance with the capital market regulations.

In order to avoid selective disclosure and a possible breach of disclosure regulation, the Company should not provide:

- Exclusive interviews of information to the media, shareholders or investors that contain Material Information which are not already in the public domain;
- Material Information which are not already in the public domain on the ‘off the record’ basis to the media, shareholders or investors.

In case of a leakage of Material Information, the Company will publish a release to the public via IDX. If there is a rumour in the media that is incorrect or misleading and that originate from the Company, the Company will likewise publish a release. In other circumstances, it is under the Company’s own consideration whether to confirm or deny rumours. In most situations, the Company will not to comment on market rumours regardless of whether the rumour is correct or not.

D. Authorized Spokespersons

The Company will, from time to time, appoint one or more authorized spokespersons to speak on behalf of the Company or to respond to specific inquiries from the investment community as appropriate.



Policy on Communications with Shareholders or Investors

Authorized spokespersons could include the President Director (Chief Executive Officer), Chief Financial Officer, other member of the Board of Directors (for specific areas under his/her control), Corporate Secretary, Chief of Corporate Communication function, or Investor Relations Division Head of the Company.

No other employee is entitled to speak with shareholders, investors, analysts or media, unless specifically so requested by one of the official spokespersons. In case employees are contacted by a shareholder, investor or an analyst, they are required to forward the request to the Investor Corporate Secretary and/or Relations Division Head. If contacted by the media, employees are required to forward the request to the Chief of Corporate Communication function.

Authorized spokespersons should liaise closely with the Investor Relation to ensure all proposed public comments are in compliance with capital market regulations.

E. Communication with the Investment Community

In communicating with the investment community, the Company undertakes regular activities, among others:

- Issuing Annual Report and Audited Full Year Financial Report
- Issuing Quarterly Financial Report and Half Year Financial Report
- Conducting Public Expose
- Issuing Press Release relating to quarterly financial highlights
- Conducting Analyst Gathering
- Conducting Media Briefing
- Conducting Domestic or International conference

The Company imposes 'quiet period' during which it does not make appointments with investment community. Exceptions may occur at the Company's discretion based on need to discuss breaking news or otherwise. During the quiet period, the Investor Relation Officers may provide answers to fact-based inquiries from investment community.

The quiet period usually commences at or soon after the end of the financial period and concludes when a company's results are announced. The quiet period for the Company is 21 days prior to the release of the Company's financial results.
