

COMMUNICATION POLICY WITH SHAREHOLDERS OR INVESTORS

PT WAHANA OTTOMITRA MULTIARTHA Tbk



WOMFinance
a member of  **Maybank** *group*

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1. Background

Along with the increasing business risks and challenges faced by the finance company industry, PT Wahana Ottomitra Multiartha Tbk ("Company") realizes that implementing Good Corporate Governance, hereinafter referred to as "GCG", is a must in maintaining and maintaining the sustainability of the company's business and maintaining the trust of shareholders and stakeholders in the Company.

In implementing GCG, the Company is required to always apply GCG principles which include:

a. Transparency

Openness in the decision making process and openness in the disclosure and provision of relevant information about the company that is easily accessed by stakeholders, in accordance with statutory regulations in the field of financing as well as the standards, principles and practices of conducting a healthy financing business.

b. Accountability

Clarity of functions and implementation of the responsibility of the company's organs, so that the company's performance can run transparently, naturally, effectively and efficiently.

c. Responsibility

The suitability of the company's management with the laws and regulations in the field of financing and ethical values as well as the standards, principles and practices of conducting a healthy financing business.

d. Independency

The condition of the company which is managed independently and professionally and free from conflicts of interest and influence or pressure from any party that is not in accordance with the laws and regulations in the field of financing and ethical values as well as standards, principles and practices of conducting a healthy financing business.

e. Equality and Fairness

Equality, balance and fairness in fulfilling the rights of stakeholders that arise based on agreements, laws and regulations, and ethical values as well as standards, principles, and practices of running a healthy financing business.

One form of commitment in implementing GCG principles, especially the principle of openness through communication with shareholders or investors, the Company developed a Communication Policy with Shareholders or Investors (hereinafter referred to as "Policy") to be a reference/guideline that applies for all members of the Board of Commissioners, Sharia Supervisory Board, Directors and employees of the Company, especially work units that deal with shareholders or investors in ensuring the following matters:

- a. Effective communication between the company and shareholders or investors.
- b. Availability of facilities for shareholders or investors to enhance their role and participation through effective and ongoing communication with the company, to support the achievement of the company's vision and mission.

2. Legal Foundation Guidelines

This guideline is compiled based on the applicable legal provisions and the Company's internal rules as follows:

- 2.1. Law Number 40 of 2007 concerning Limited Liability Companies.
- 2.2. Law Number 8 of 1995 concerning Capital Markets.
- 2.3. Financial Services Authority Regulations ("POJK") and Circular Letters
 - a. POJK No. 30/POJK.05/2014 dated 19 November 2014 concerning Good Corporate Governance for Financing Companies ("POJK No. 30/2014");
 - b. POJK No. 21/POJK.04/2015 dated 16 November 2015 concerning the Implementation of Guidelines for Public Corporate Governance;
 - c. POJK No. 31/POJK.04/2015 dated 16 December 2015 concerning Disclosure of Material Information or Facts by Issuers or Public Companies;
 - d. Financial Services Authority Regulation Number 32 / POJK.04 / 2014 dated 8 December 2014 concerning the Plans and Organizing of a Public Company General Meeting of Shareholders and their amendments as stated in Financial Services Authority Regulation Number 10 / POJK.04 / 2017;
 - e. SEOJK Number 32 /SEOJK.04/2015 dated 17 November 2015 concerning Guidelines for Public Corporate Governance.
- 2.4. The Company's Articles of Association and their amendments ("Company Articles of Association").

3. Communication Strategy

- 3.1 The company applies a balanced treatment to shareholders or investors in providing accurate and timely information in accordance with the Company's Articles of Association and applicable laws and regulations.
- 3.2 In accordance with the principles of openness and compliance with applicable laws and regulations relating to information disclosure, the company always submits the latest information related to the company's business performance and other information required by the regulator, so that it can help shareholders or investors in considering investment decisions to the company.

4. Timing of Communication

- 4.1 Communication with the company's shareholders or investors is carried out on an ongoing basis.
- 4.2 Communication to disclose information is carried out in the form of:
 - i. Periodic disclosures that are disclosed in certain periods in accordance with the provisions of the laws and regulations applicable to the company including monthly, quarterly, semester or yearly.
 - ii. Specific disclosures, i.e. disclosure of information which is done at any time as needed.

5. Communication Program

Every communication that will be carried out by the Company in the context of effective communication between the Company and shareholders or investors, must first be coordinated with the Corporate Secretary.

6. Communication Guidelines

- 6.1 The company, from time to time, will appoint representatives or certain parties as official spokesman to speak on behalf of the company.
- 6.2 Interviews with the media, speeches, or providing comments for the benefit of broadcasts, newspapers, magazines or any other forms related to the company's business interests may only be carried out by representatives or parties appointed by the company which are coordinated through the Corporate Secretary.
- 6.3 Every request to give interviews, speeches or comments or responses in the interests of electronic media or media relating to the company must be directed to the Corporate Secretary.
- 6.4 The company is obliged to submit reports of information or material facts about events, events, or facts that can affect the price of the Company's securities on the stock exchange and/or investors' decisions, prospective investors, or other parties concerned with such information or facts ("Material Information or Facts") to the Financial Services Authority and make an announcement to the public.
- 6.5 Material Information or Facts in reports and announcements as referred to in number 6.4 this policy shall at least contain:
 - a. Date of event;
 - b. Type of information or material facts;
 - c. Description of Information or Material Facts; and
 - d. Impact of material information or facts.
- 6.6 Submission of reports and announcements as referred to in number 6.4 shall be made as soon as possible at the latest at the end of the second working day after the availability of Information or Material Facts.

- 6.7 Format of the Information or material fact report to the Financial Services Authority is prepared using the report format as stated in the Financial Services Authority Regulation regarding the disclosure of Material Information or Facts.
- 6.8 Some communication channels and information delivery by the company to shareholders and/or investors are as follows:
- a. General Meeting of Shareholders (“GMS”)
 - i. GMS consists of :
 - The Annual General Meeting of Shareholders is held annually with the provisions no later than 6 (six) months after the closing of the company's fiscal year.
 - Other GMS, which in the Company's Articles of Association are called Extraordinary General Meeting of Shareholders which are held at any time based on need.
 - ii. The holding of the company's RUPS is a means of communication between the company and the company's shareholders to guarantee the rights of the company's shareholders, among others:
 - The right to attend and vote at the GMS.
 - Shareholders or their authorized proxies can ask questions or ask for clarification on problems that occur related to the agenda of the GMS to each member of the Board of Commissioners and Directors at the time of the GMS.
 - The Company's shareholders can submit proposed meeting agenda items at the GMS. The requirements for shareholders of the Company can propose the agenda of the meeting and the procedures as regulated in the Company's Articles of Association and the provisions of the applicable laws and regulations for the Company.
 - The shareholders of the Company have the right to request the holding of a GMS. Requirements for the Company's shareholders who can request the GMS and its procedures as determined in the Company's Articles of Association and the provisions of the applicable laws and regulations for the Company.
 - The company must provide rules for the GMS to the shareholders of the company present and the principles of the order are read out before the GMS.
 - At the opening of the GMS, the chairperson of the GMS must provide a brief explanation to the Company's shareholders regarding the general condition of the Company, the agenda of the meeting, the decision making mechanism related to the agenda of the meeting and the procedure for the use of shareholder rights to raise questions and / or opinions.
 - iii. The Company's General Meeting of Shareholders must be held in accordance with the applicable laws and regulations and the Company's Articles of Association.
 - iv. The availability of information regarding the GMS on the company's website is one form of company transparency to the company's shareholders.

v. In making decisions, the company's General Meeting of Shareholders must safeguard the interests of all parties, in particular the interests of debtors, creditors and the interests of minority shareholders.

b. Company Website

- i. The Company is obliged to use the company's website as a means to provide public information to stakeholders including the Company's shareholders and investors.
- ii. The Company's website will present information related to the Company's activities that can be provided in the form of announcements and / or reports and / or news and / or other forms of media by taking into account and subject to applicable laws and regulations.
- iii. News on the company's website must be regularly updated and reviewed by the Company's Corporate Services and Communication Department.
- iv. Stakeholders including the company's shareholders and investors can obtain information about the company through the company's website, which includes but is not limited to the following:
 - General Information of The Company;
 - Corporate Governance Information;
 - Corporate Social Responsibility Information;
 - Financial Statements;
 - Annual Report;
 - Other Informations such as GMS, stock, company's product dan service and others.

c. Public Expose

- i. Public exposure is carried out by the company at least once a year and at the request of the exchange.
- ii. Companies must submit public exposure material to the exchange.
- iii. In public expose, the Company's Directors explained which included the following matters:
 - A review of the latest financial and operating performance that can be disclosed;
 - Constraints encountered, including conditions of uncertainty, if any;
 - Efforts to improve Company performance;
 - Financial projections, if any;
 - Other matters deemed necessary to be disclosed to the public in accordance with applicable regulations.

- d. Information disclosure through the media
To implement GCG, the company submits information disclosure through media that is useful to be known to stakeholders including the company's shareholders and investors and to comply with applicable regulations, including:
- Publication of Financial Statements;
 - The implementation of GMS;
 - Press Release.
- e. Company E-mail
The shareholders or investor can submit questions, opinions via email : corporate_secretary@wom.co.id

7. Closing

- 7.1 If there is a difference between the provisions in this policy with the Company's Articles of Association or the provisions of the applicable laws and regulations, then the applicable Articles of Association or the provisions of the applicable laws and regulations.
- 7.2 This policy is effective after it is determined by the board of directors.
- 7.3 If there are things that have not been regulated in this policy, they will be regulated later.
- 7.4 This policy can be reviewed or updated periodically at the latest within a period of 2 (two) years or at any time if deemed necessary by taking into account the provisions of the applicable laws and regulations.