



Pedoman Tata Kelola Perusahaan untuk Perusahaan Publik

[GRI 2-27]

Corporate Governance Guidelines for Public Companies

Perseroan berkomitmen penuh dalam penerapan dan penguatan GCG sesuai dengan ketentuan Peraturan OJK No. 21/POJK.04/2015 mengenai penerapan pedoman tata kelola perusahaan terbuka, dan Surat Edaran OJK (SEOJK) No. 32/SEOJK.04/2015 tentang pedoman tata kelola Perusahaan dan SEOJK No. 16/SEOJK.04/2021 tentang bentuk dan isi laporan tahunan emiten atau perusahaan publik.

The Company demonstrates an unwavering commitment to implementing and strengthening GCG practices in alignment with OJK Regulation No. 21/POJK.04/2015 regarding the implementation of governance guidelines for public companies, OJK Circular Letter (SEOJK) No. 32/SEOJK.04/2015 concerning corporate governance guidelines, and SEOJK No. 16/SEOJK.04/2021 regarding the form and content of annual reports for issuers or public companies.

Perseroan menerapkan lima (5) aspek utama, delapan (8) prinsip tata kelola Perusahaan yang efektif, dan dua puluh lima (25) rekomendasi dari OJK.

The Company implements five (5) main aspects, eight (8) principles of effective corporate governance, and twenty-five (25) recommendations from OJK.

Implementasi keseluruhan aspek dan prinsip ini dijalankan melalui pendekatan “*comply or explain*”.

The implementation of all these aspects and principles is carried out through a “*comply or explain*” approach.

Prinsip Principle	Rekomendasi Recommendation	Implementasi Implementation
Aspek 1: Hubungan Perusahaan Terbuka dengan Pemegang Saham dalam Menjamin Hak-Hak Pemegang Saham Aspect 1: Public Listed Company's Relationship with Shareholders in Ensuring Shareholders' Rights		
<p>Prinsip 1 Meningkatkan nilai penyelenggaraan Rapat Umum Pemegang Saham (RUPS).</p> <p>Principle 1 Increase the value of organising the General Meeting of Shareholders (GMS).</p>	<p>1. Perseroan Terbuka memiliki cara atau prosedur teknis pengumpulan suara (voting) baik secara terbuka maupun tertutup yang mengedepankan independensi, dan kepentingan pemegang saham.</p> <p>Public Listed Companies must have technical voting procedures, both open and closed, that prioritise independence and the interests of shareholders.</p>	<p>Terpenuhi. Prosedur pemungutan suara (voting) ini diatur dalam Tata Tertib RUPS yang dibacakan kepada pemegang saham pada setiap RUPS.</p> <p>Fulfilled. This voting procedure is regulated in the GMS Rules of Procedure which is read out to shareholders during each GMS.</p>
	<p>2. Seluruh anggota Direksi dan anggota Dewan Komisaris Perseroan Terbuka hadir dalam RUPS Tahunan.</p> <p>All members of the Board of Directors and Board of Commissioners of the Public Company should attend the AGMS.</p>	<p>Tidak Terpenuhi. Seluruh anggota Direksi dan Dewan Komisaris, kecuali Presiden Komisaris yang berhalangan karena sakit, hadir baik secara fisik maupun secara elektronik melalui aplikasi Electronic General Meeting System eASY KSEI yang disediakan oleh PT Kustodian Sentral Efek Indonesia dalam RUPST Perseroan tanggal 25 April 2024.</p> <p>Not Fulfilled. All members of the Company's Board of Directors and Board of Commissioners, except President Commissioner on sick-leave, were present both in-person and virtually through the KSEI Electronic General Meeting System eASY application provided by PT Kustodian Sentral Efek Indonesia during the Company AGMS dated 25 April 2024.</p>

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	<p>3. Ringkasan risalah RUPS tersedia dalam situs web Perseroan Terbuka paling sedikit selama satu (1) tahun.</p> <p>The summary of GMS minutes should be available on the Public Company's website for a period of at least one (1) year.</p>	<p>Terpenuhi. Seluruh informasi tentang Risalah RUPS tersedia dalam situs resmi Perseroan, yaitu www.multipolar.com.</p> <p>Fulfilled. All information on the minutes of the GMS is available on the Company's official website, www.multipolar.com.</p>
<p>Prinsip 2 Meningkatkan kualitas komunikasi Perseroan Terbuka dengan pemegang saham atau investor.</p> <p>Principle 2 Enhancing the quality of communication between public listed companies and shareholders or investors.</p>	<p>1. Perseroan Terbuka memiliki suatu kebijakan komunikasi dengan pemegang saham dan investor.</p> <p>Public listed companies should have established a communication policy with their shareholders and investors.</p>	<p>Terpenuhi. Perseroan melakukan pembaruan informasi secara berkala terkait kinerjanya dan perkembangan aktivitas pengembangan usaha Perseroan dalam situs web dan social media Perseroan.</p> <p>Fulfilled. The Company regularly provides and updates information concerning its performance and progress of its business development activities through the Company website and social media.</p>
	<p>2. Perseroan Terbuka mengungkapkan kebijakan komunikasi Perseroan Terbuka dengan pemegang saham atau investor dalam situs web.</p> <p>The public listed company must disclose its communication policy with shareholders or investors on the website.</p>	<p>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.</p> <p>Fulfilled. The Company provided documents regarding Financial Statements, webinar information, and other materials downloadable from the Company's website to provide equitable information to all shareholders on the implementation of communication policies by the Company.</p>



Prinsip Principle	Rekomendasi Recommendation	Implementasi Implementation
Aspek 2: Fungsi dan Peran Dewan Komisaris Aspect 2: Function and Role of the Board of Commissioners		
<p>Prinsip 3 Memperkuat keanggotaan dan komposisi Dewan Komisaris.</p> <p>Principle 3 Strengthen membership and composition of the Board of Commissioners.</p>	<p>1. Penentuan jumlah anggota Dewan Komisaris mempertimbangkan kondisi Perseroan Terbuka.</p> <p>The total number of members of the Board of Commissioners should take into consideration the condition of the public listed company.</p>	<p>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.</p> <p>Fulfilled. The number of members of the Board of Commissioners is consistent with the condition of the Company, and complies with prevailing laws and regulations, the Company Articles of Association and charter of the Board of Commissioners.</p>
	<p>2. Penentuan komposisi Dewan Komisaris memperhatikan keberagaman keahlian, pengetahuan dan pengalaman yang dibutuhkan.</p> <p>In determining the composition of the Board of Commissioners, it should take into account the diversity of required expertise, knowledge and experience.</p>	<p>Terpenuhi. Setiap anggota Dewan Komisaris Perseroan memiliki keahlian mumpuni yang berbeda-beda untuk memaksimalkan tugas pengawasan Dewan Komisaris sesuai dengan lingkup usaha Perseroan.</p> <p>Informasi terkait latar belakang dan keahlian masing-masing anggota Dewan Komisaris Perseroan tersedia dalam situs web Perseroan.</p> <p>Fulfilled. Each member of the Company's BOC has the required expertise to maximise its supervisory duties in accordance with the Company's business scope.</p> <p>Information regarding the background, knowledge and expertise of each member of the Board of Commissioners is available on the Company website.</p>
<p>Prinsip 4 Meningkatkan kualitas pelaksanaan tugas dan tanggung jawab Dewan Komisaris.</p> <p>Principle 4 Enhance the quality of the implementation of the Board of Commissioners' duties and responsibilities.</p>	<p>1. Dewan Komisaris mempunyai kebijakan penilaian sendiri (self-assessment) untuk menilai kinerja Dewan Komisaris.</p> <p><i>The BOC must maintain a self-assessment policy to evaluate its own performance.</i></p>	<p>Komite Nominasi dan Remunerasi melakukan evaluasi terhadap kinerja Dewan Komisaris</p> <p>The Nomination and Remuneration Committee evaluates the performance of the Board of Commissioners.</p>
	<p>2. Kebijakan penilaian sendiri (self-assessment) untuk menilai kinerja Dewan Komisaris, diungkapkan dalam laporan tahunan Perusahaan Terbuka.</p> <p>The self-assessment policy to evaluate the performance of the Board of Commissioners should be disclosed in the public listed company's annual report.</p>	<p>Kebijakan penilaian sendiri tidak berlaku karena evaluasi dilakukan oleh Komite Nominasi dan Remunerasi, oleh karena itu hasil penilaian tidak diungkapkan dalam laporan tahunan</p> <p>The self-assessment policy is not applicable because the evaluation is conducted by the Nomination and Remuneration Committee, Therefore, the assessment results are not disclosed in the annual report.</p>

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	<p>3. Dewan Komisaris mempunyai kebijakan terkait pengunduran diri anggota Dewan Komisaris apabila terlibat dalam kejahatan keuangan.</p> <p>The Board of Commissioners must have a policy regarding the resignation of any member of the Board of Commissioners in case that person has been involved in financial wrongdoing.</p>	<p>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.</p> <p>Fulfilled. The Company's Articles of Association states that if any member of the Board of Commissioners fails to fulfil the requirements to become a member for any reason including involvement in financial crimes, then his/her position as a member of the Board of Commissioners will be rendered null and void. Any resignation of the member of the Board of Commissioners will be decided through the GMS.</p>
	<p>4. Dewan Komisaris atau Komite yang menjalankan fungsi nominasi dan remunerasi menyusun kebijakan suksesi dalam proses nominasi anggota Direksi.</p> <p>The Board of Commissioners or the committee that carries out the nomination and remuneration function should develop a succession policy concerning the process of nominating members to the Board of Directors.</p>	<p>Terpenuhi. Komite Nominasi dan Remunerasi telah menjalankan fungsinya dalam menyusun kebijakan suksesi dalam proses nominasi anggota Direksi.</p> <p>Fulfilled. The Nomination and Remuneration Committee has developed a succession policy in the nomination process for membership in the Board of Directors.</p>



Prinsip Principle	Rekomendasi Recommendation	Implementasi Implementation
Aspek 3: Fungsi dan Peran Direksi Aspect 3: Function and Role of the Board of Directors		
<p>Prinsip 5 Memperkuat keanggotaan dan komposisi Direksi.</p> <p>Principle 5 Strengthen the membership and composition of the Board of Directors.</p>	<p>1. Penentuan jumlah anggota Direksi mempertimbangkan kondisi Perusahaan Terbuka serta efektivitas dalam pengambilan keputusan.</p> <p>The number of members of the Board of Directors should take into consideration the condition of the public listed company, as well as the effectiveness in making decisions.</p>	<p>Terpenuhi. Kondisi Perseroan dan pengambilan keputusan yang efektif senantiasa menjadi dasar pertimbangan dalam menentukan jumlah anggota Direksi.</p> <p>Fulfilled. The Company considers its condition and effective decision-making when determining the number of members of the Board of Directors.</p>
	<p>2. Penentuan komposisi anggota Direksi memperhatikan keberagaman keahlian, pengetahuan, dan pengalaman yang dibutuhkan.</p> <p>In determining the composition of the Board of Directors, it must consider the diversity of required expertise, knowledge and experience.</p>	<p>Terpenuhi. Setiap anggota Direksi Perseroan memiliki keahlian mumpuni yang berbeda-beda untuk memaksimalkan tugas manajemen Direksi sesuai dengan lingkup usaha Perseroan.</p> <p>Informasi terkait latar belakang dan keahlian masing-masing anggota Direksi Perseroan tersedia dalam situs web Perseroan.</p> <p>Fulfilled. Each member of the Company's Board of Directors has the required expertise, knowledge and experience to maximise the board's management duties in accordance with the scope of the Company's business.</p> <p>Information regarding the background, knowledge and expertise of each member of the Board of Directors is available on the Company website.</p>
	<p>3. Anggota Direksi yang membawahi bidang akuntansi atau keuangan memiliki keahlian dan/atau pengetahuan di bidang akuntansi.</p> <p>Any member of the Board of Directors who is in charge of accounting or finance must possess accounting expertise and/or knowledge.</p>	<p>Terpenuhi. Perseroan memiliki anggota Direksi yang membawahi bidang akuntansi dan keuangan.</p> <p>Fulfilled. The member of the Board of Directors who is in charge of accounting and finance has the required knowledge and expertise in accounting.</p>

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<p>Prinsip 6 Meningkatkan kualitas pelaksanaan tugas dan tanggung jawab Direksi.</p> <p>Principle 6 Improve the quality of the implementation of duties and responsibilities by the Board of Directors.</p>	<p>1. Direksi mempunyai kebijakan penilaian sendiri (self-assessment) untuk menilai kinerja Direksi.</p> <p>The Board of Directors must have a self-assessment policy to evaluate its own performance.</p>	<p>Terpenuhi. Direksi memiliki kebijakan self-assessment yang dilakukan secara berkala berdasarkan KPI mereka, yang hasilnya ditinjau oleh Komite Nominasi dan Remunerasi.</p> <p>Fulfilled. The Board of Directors has a self-assessment policy that is conducted periodically based on their respective KPIs, the results of which are reviewed by the Nomination and Remuneration Committee.</p>
	<p>2. Kebijakan penilaian sendiri (self-assessment) untuk menilai kinerja Direksi diungkapkan melalui laporan tahunan Perusahaan Terbuka.</p> <p>The self-assessment policy to assess the performance of the Board of Directors should be disclosed in the public listed company's Annual Report.</p>	<p>Dalam proses pemenuhan. Mengacu pada jawaban sebelumnya, Perseroan sudah memiliki kebijakan terkait tapi belum diungkapkan dalam laporan tahunan</p> <p>Fulfilled. The self-assessment and performance of the Board of Directors have been indicated and included in the Annual Report.</p>
	<p>3. Direksi mempunyai kebijakan terkait pengunduran diri anggota Direksi apabila terlibat dalam kejahatan keuangan.</p> <p>The Board of Directors must have a policy regarding the resignation of any member of the Board of Directors in case that person has been involved in financial wrongdoing.</p>	<p>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.</p> <p>Fulfilled. Based on the Company's Articles of Association, if any member of the Board of Directors fails to fulfil the requirements to become a member for any reason, including involvement in financial crimes, then his/her position as a member will be deemed null and void. Any resignation of a member of the Board of Directors will be decided through the GMS.</p>



Prinsip Principle	Rekomendasi Recommendation	Implementasi Implementation
Aspek 4: Partisipasi Pemangku Kepentingan Aspect 4: Stakeholder Participation		
Prinsip 7 Meningkatkan aspek tata kelola perusahaan melalui partisipasi pemangku kepentingan. Principle 7 Improve aspects of corporate governance through stakeholder participation.	<p>1. Perusahaan Terbuka memiliki kebijakan untuk mencegah terjadinya insider trading.</p> <p>The public listed company must have a policy to prevent insider trading.</p>	<p>Terpenuhi. Perseroan memiliki kebijakan untuk mencegah terjadinya insider trading dalam Pedoman Tingkah Laku yang ditandatangani oleh seluruh karyawan.</p> <p>Fulfilled. The Company has a policy to prevent insider trading as indicated in the Code of Conduct which is signed by all employees.</p>
	<p>2. Perusahaan Terbuka memiliki kebijakan anti korupsi dan anti-penipuan.</p> <p>The public listed company must have anti-corruption and anti-fraud policies.</p>	<p>Terpenuhi. Kebijakan ini diatur dalam Pedoman Tingkah Laku yang ditetapkan Perseroan dan seluruh jajaran Direksi dan karyawan Perseroan menandatangani pedoman tersebut.</p> <p>Fulfilled. These policies are stipulated in the Company's Code of Conduct which all Directors and employees must sign as testament of their compliance and commitment.</p>
	<p>3. Perusahaan Terbuka memiliki kebijakan tentang seleksi dan peningkatan kemampuan pemasok atau vendor.</p> <p>The public listed company must have a policy on the selection and upgrading of suppliers or vendors.</p>	<p>Terpenuhi. Perseroan melakukan seleksi vendor/pemasok berdasarkan SOP/kebijakan yang sudah ditetapkan Perseroan. Dan melakukan evaluasi vendor/pemasok berkala setiap 1 tahun sekali</p> <p>Fulfilled. The Company selects vendors/suppliers based on the Standard Operating Procedures established by the Company. These SOPs also require yearly reviews or evaluations of vendors/suppliers.</p>
	<p>4. Perusahaan Terbuka memiliki kebijakan tentang pemenuhan hak-hak kreditur.</p> <p>The public listed company must have a policy on the fulfilment of creditors' rights.</p>	<p>Terpenuhi. Kami 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</p> <p>Fulfilled. The Company policy, which refers to the rights of creditors, is managed by the Finance Division which organizes and manages the payment of creditors' rights. These rights are also stated in the agreement, which is legally binding.</p>
	<p>5. Perusahaan Terbuka memiliki kebijakan sistem whistleblowing.</p> <p>The public listed company must have a whistleblowing system policy.</p>	<p>Terpenuhi. Perseroan memiliki kebijakan sistem whistleblowing sebagaimana tertera dalam website Perseroan pada bagian Tata Kelola Perusahaan.</p> <p>Fulfilled. The Company has a whistleblowing system policy as stated in the Company's website, under the Corporate Governance section.</p>
	<p>6. Perusahaan Terbuka memiliki kebijakan pemberian insentif jangka panjang kepada Direksi dan karyawan.</p> <p>The public listed company should have a policy for providing long-term incentives to Directors and employees.</p>	<p>Terpenuhi. Perseroan memiliki kebijakan pemberian insentif jangka panjang kepada Direksi dan karyawan.</p> <p>Fulfilled. The Company has a policy for providing long-term incentives to Directors and employees.</p>

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Aspek 5: Keterbukaan Informasi Aspect 5: Information Transparency		
<p>Prinsip 8 Meningkatkan pelaksanaan keterbukaan informasi.</p> <p>Principle 8 Improve the implementation of information disclosure.</p>	<p>1. Perusahaan Terbuka memanfaatkan penggunaan teknologi informasi secara lebih luas selain situs web sebagai media keterbukaan informasi.</p> <p>Aside from its website, the public listed company must expand its use of information technology as a medium for information disclosure.</p>	<p>Terpenuhi. Selain menggunakan situs web dan pelaporan secara elektronik seperti IDXNet dan OJK Reporting, Perseroan juga menggunakan platform media sosial untuk mengungkapkan informasi tentang Perseroan.</p> <p>Fulfilled. In addition to the website and electronic reporting methods such as IDXNet and OJK Reporting, it uses social media platforms to disclose information about the Company.</p>
	<p>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.</p> <p>The annual report of a public listed company must disclose the ultimate beneficial owner in the shareholding of the public listed company of at least 5% (five per cent), in addition to the disclosure of the ultimate beneficial owner in the shareholding of the public listed company through the ultimate and controlling shareholders.</p>	<p>Terpenuhi. Dipaparkan dalam laporan tahunan ini</p> <p>Fulfilled. Such information is disclosed and detailed in this annual report</p>