



PEDOMAN TATA KELOLA PERUSAHAAN UNTUK PERUSAHAAN PUBLIK [GRI 2-27]

CORPORATE GOVERNANCE GUIDELINES FOR PUBLIC COMPANIES [GRI 2-27]

Pedoman Perseroan dalam penerapan 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's implementation of GCG adheres to the provisions of OJK Regulation No. 21/POJK.04/2015 concerning the Implementation of Corporate Governance Guidelines for Public Companies, OJK Circular Letter (SEOJK) No. 32/SEOJK.04/2015 on Corporate Governance Guidelines, and SEOJK No. 16/SEOJK.04/2021 regarding the format and content of annual reports for issuers or public companies.

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

The Company implements 5 (five) core aspects, 8 (eight) principles of effective corporate governance, and 25 (twenty-five) recommendations issued by the 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 Principles	Rekomendasi Recommendations	Implementasi Implementations
Aspek 1 : Hubungan Perusahaan Terbuka dengan Pemegang Saham dalam Menjamin Hak-Hak Pemegang Saham Aspect 1 : The Relationship of the Public Company with Shareholders in Ensuring Shareholders' Rights		
Prinsip 1 Meningkatkan nilai penyelenggaraan Rapat Umum Pemegang Saham (RUPS)	1. Perseroan Terbuka memiliki cara atau prosedur teknis pengumpulan suara (<i>voting</i>) baik secara terbuka maupun tertutup yang mengedepankan independensi, dan kepentingan pemegang saham.	Terpenuhi. Prosedur pemungutan suara (<i>voting</i>) ini diatur dalam Tata Tertib RUPS yang dibacakan kepada pemegang saham pada setiap RUPS.
	2. Seluruh anggota Direksi dan anggota Dewan Komisaris Perseroan Terbuka hadir dalam RUPS Tahunan.	Terpenuhi. Seluruh anggota Dewan Komisaris hadir pada saat RUPS Tahunan, baik secara fisik maupun virtual.
	3. Ringkasan risalah RUPS tersedia dalam situs web Perseroan Terbuka paling sedikit selama satu (1) tahun.	Terpenuhi. Seluruh informasi tentang Risalah RUPS tersedia dalam situs resmi Perseroan, yaitu www.multipolar.com .
Principle 1 Enhancing the value of the General Meeting of Shareholders (GMS) implementation	1. The Public Company has technical procedures for vote collection (<i>voting</i>), either open or closed, that prioritize independence and the interests of shareholders.	Implemented and Complied. The voting procedure is regulated in the GMS Rules, which are read to shareholders at each GMS.
	2. All members of the Board of Directors and the Board of Commissioners of the Public Company are present at the Annual GMS.	Implemented and Complied. All members of the Board of Commissioners attended the Annual GMS, both physically and virtually.



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	3. A summary of the GMS minutes is available on the company's website for at least one (1) year.	Implemented and Complied. All information regarding the GMS minutes is available on the official company website, at www.multipolar.com .
Prinsip 2 Meningkatkan kualitas komunikasi Perseroan Terbuka dengan pemegang saham atau investor.	<ol style="list-style-type: none"> 1. Perseroan Terbuka memiliki suatu kebijakan komunikasi dengan pemegang saham dan investor. 2. Perseroan Terbuka mengungkapkan kebijakan komunikasi Perseroan Terbuka dengan pemegang saham atau investor dalam situs web. 	<p>Terpenuhi. Perseroan melakukan pembaruan informasi secara berkala terkait kinerjanya dan perkembangan aktivitas pengembangan usaha Perseroan dalam situs web dan <i>social media</i> Perseroan.</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>
Principle 2 Enhancing the quality of communication between the Public Company and shareholders or investors	<ol style="list-style-type: none"> 1. The Public Company has a communication policy with shareholders and investors. 2. The Public Company discloses its communication policy with shareholders or investors on its website. 	<p>Implemented and Complied. The company regularly updates information regarding its performance and business development activities on its website and social media.</p> <p>Implemented and Complied. The company provides documents for Financial Reports, webinar information, and other materials that can be downloaded from the company's website, ensuring equal access to information for all shareholders regarding communication with the company.</p>
Aspek 2 : Fungsi dan Peran Dewan Komisaris Aspect 2 : The Function and Role of the Board of Commissioners		
Prinsip 3 Memperkuat keanggotaan dan komposisi Dewan Komisaris.	<ol style="list-style-type: none"> 1. Penentuan jumlah anggota Dewan Komisaris mempertimbangkan kondisi Perseroan Terbuka. 2. Penentuan komposisi Dewan Komisaris memperhatikan keberagaman keahlian, pengetahuan, dan pengalaman yang dibutuhkan. 	<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>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>
Principle 3 Strengthening the membership and composition of the Board of Commissioners.	<ol style="list-style-type: none"> 1. The determination of the number of Board of Commissioners members takes into account the conditions of the Public Company. 2. The determination of the composition of the Board of Commissioners considers the diversity of skills, knowledge, and experience required. 	<p>Implemented and Complied. The number of Board of Commissioners members is in line with the company's conditions and complies with applicable regulations, the company's Articles of Association, and the Board of Commissioners' charter.</p> <p>Implemented and Complied. Each member of the Board of Commissioners possesses specialized expertise, contributing to the effective supervision of the company's operations.</p> <p>Information about the background and expertise of each Board member is available on the company's website.</p>



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<p>Prinsip 4 Meningkatkan kualitas pelaksanaan tugas dan tanggung jawab Dewan Komisaris.</p>	<ol style="list-style-type: none"> 1. Dewan Komisaris mempunyai kebijakan penilaian sendiri (<i>self-assessment</i>) untuk menilai kinerja Dewan Komisaris. 2. Kebijakan penilaian sendiri (<i>self-assessment</i>) untuk menilai kinerja Dewan Komisaris, diungkapkan dalam laporan tahunan Perusahaan Terbuka. 3. Dewan Komisaris mempunyai kebijakan terkait pengunduran diri anggota Dewan Komisaris apabila terlibat dalam kejahatan keuangan. 4. Dewan Komisaris atau Komite yang menjalankan fungsi nominasi dan remunerasi menyusun kebijakan suksesi dalam proses nominasi anggota Direksi. 	<p>Terpenuhi. Komite Nominasi dan Remunerasi melakukan evaluasi terhadap kinerja Dewan Komisaris.</p> <p>Terpenuhi. Kebijakan penilaian sendiri tidak berlaku karena evaluasi dilakukan oleh Komite Nominasi dan Remunerasi.</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>Terpenuhi. Komite Nominasi dan Remunerasi telah menjalankan fungsinya dalam menyusun kebijakan suksesi dalam proses nominasi anggota Direksi.</p>
<p>Principle 4 Enhancing the quality of the execution of the Board of Commissioners' duties and responsibilities.</p>	<ol style="list-style-type: none"> 1. The Board of Commissioners has a self-assessment policy to evaluate its performance. 2. The self-assessment policy to evaluate the Board of Commissioners' performance is disclosed in the Public Company's annual report. 3. The Board of Commissioners has a policy related to the resignation of its members if they are involved in financial crimes. 4. The Board of Commissioners or the Committee responsible for the nomination and remuneration function prepares a succession policy for the nomination process of Board of Directors members. 	<p>Implemented and Complied. The Nomination and Remuneration Committee conducts an evaluation of the Board of Commissioners' performance.</p> <p>Implemented and Complied. The self-assessment policy does not apply as the evaluation is carried out by the Nomination and Remuneration Committee.</p> <p>Implemented and Complied. According to the Company's Articles of Association, any member of the Board of Commissioners who fails to meet the qualifications to be a member, including involvement in financial crimes, will have their position annulled by law. If a member of the Board of Commissioners resigns, the decision will be made through the GMS mechanism.</p> <p>Implemented and Complied. The Nomination and Remuneration Committee has carried out its role in preparing the succession policy for the nomination process of Board of Directors members.</p>
<p>Aspek 3 : Fungsi dan Peran Direksi Aspect 3 : The Function and Role of the Board of Directors</p>		
<p>Prinsip 5 Memperkuat keanggotaan dan komposisi Direksi.</p>	<ol style="list-style-type: none"> 1. Penentuan jumlah anggota Direksi mempertimbangkan kondisi Perusahaan Terbuka serta efektivitas dalam pengambilan keputusan. 	<p>Terpenuhi. Kondisi Perseroan dan pengambilan keputusan yang efektif senantiasa menjadi dasar pertimbangan dalam menentukan jumlah anggota Direksi.</p>



Prinsip Principles	Rekomendasi Recommendations	Implementasi Implementations
	2. Penentuan komposisi anggota Direksi memperhatikan keberagaman keahlian, pengetahuan, dan pengalaman yang dibutuhkan.	Terpenuhi. Setiap anggota Direksi Perseroan memiliki keahlian mumpuni yang berbeda-beda untuk memaksimalkan tugas manajemen Direksi sesuai dengan lingkup usaha Perseroan. Informasi terkait latar belakang dan keahlian masing-masing anggota Direksi Perseroan tersedia dalam situs web Perseroan.
	3. Anggota Direksi yang membawahi bidang akuntansi atau keuangan memiliki keahlian dan/atau pengetahuan di bidang akuntansi.	Terpenuhi. Perseroan memiliki anggota Direksi yang membawahi bidang akuntansi dan keuangan.
Principle 5 Strengthening the Membership and Composition of the Board of Directors.	1. The determination of the number of Board of Directors members considers the condition of the Public Company and the effectiveness of decision-making.	Implemented and Complied. The condition of the Company and effective decision-making are always key considerations in determining the number of Board of Directors members.
	2. The determination of the composition of the Board of Directors takes into account the diversity of expertise, knowledge, and experience required.	Implemented and Complied. Each member of the Board of Directors possesses different areas of expertise to maximize the management functions in line with the Company's business scope. Information on the background and expertise of each Board member is available on the Company's website.
	3. Members of the Board of Directors overseeing accounting or finance functions have expertise and/or knowledge in accounting.	Implemented and Complied. The Company has Board members overseeing accounting and finance functions.
Prinsip 6 Meningkatkan kualitas pelaksanaan tugas dan tanggung jawab Direksi.	1. Direksi mempunyai kebijakan penilaian sendiri (<i>self-assessment</i>) untuk menilai kinerja Direksi.	Terpenuhi. Direksi memiliki kebijakan <i>self-assessment</i> yang dilakukan secara berkala berdasarkan KPI mereka, yang hasilnya ditinjau oleh Komite Nominasi dan Remunerasi.
	2. Kebijakan penilaian sendiri (<i>self-assessment</i>) untuk menilai kinerja Direksi diungkapkan melalui laporan tahunan Perusahaan Terbuka.	Terpenuhi. Perseroan sudah memiliki kebijakan terkait dan sudah diterapkan.
	3. Direksi mempunyai kebijakan terkait pengunduran diri anggota Direksi apabila terlibat dalam kejahatan keuangan.	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.
Principle 6 Enhancing the Quality of the Implementation of the Board of Directors' Duties and Responsibilities.	1. The Board of Directors has a self-assessment policy to evaluate its performance.	Implemented and Complied. The Board of Directors has a self-assessment policy that is conducted periodically based on their KPIs, and the results are reviewed by the Nomination and Remuneration Committee.
	2. The self-assessment policy for evaluating the Board of Directors' performance is disclosed in the Company's Annual Report.	Implemented and Complied. The Company has the policy in place and has implemented it.



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	3. The Board of Directors has a policy regarding the resignation of its members if they are involved in financial crimes.	Implemented and Complied. Based on the Company's Articles of Association, any member of the Board of Directors who no longer meets the qualifications for serving on the Board, including involvement in financial crimes, will have their position invalidated by law. If the Director resigns, the decision will be made through the General Meeting of Shareholders (GMS).

Aspek 4 : Partisipasi Pemangku Kepentingan
Aspect 4 : Stakeholder Participation

Prinsip 7 Meningkatkan aspek tata kelola perusahaan melalui partisipasi pemangku kepentingan.	1. Perusahaan Terbuka memiliki kebijakan untuk mencegah terjadinya <i>insider trading</i> .	Terpenuhi. Perseroan memiliki kebijakan untuk mencegah terjadinya <i>insider trading</i> dalam Pedoman Tingkah Laku yang ditandatangani oleh seluruh karyawan.
	2. Perusahaan Terbuka memiliki kebijakan anti korupsi dan anti-penipuan.	Terpenuhi. Kebijakan ini diatur dalam Pedoman Tingkah Laku yang ditetapkan Perseroan dan seluruh jajaran Direksi dan karyawan Perseroan menandatangani pedoman tersebut.
	3. Perusahaan Terbuka memiliki kebijakan tentang seleksi dan peningkatan kemampuan pemasok atau vendor.	Terpenuhi. Perseroan melakukan seleksi vendor/ pemasok berdasarkan SOP/kebijakan yang sudah ditetapkan Perseroan. Dan melakukan evaluasi vendor/pemasok berkala setiap 1 tahun sekali.
	4. Perusahaan Terbuka memiliki kebijakan tentang pemenuhan hak-hak kreditur.	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.
	5. Perusahaan Terbuka memiliki kebijakan sistem <i>whistleblowing</i> .	Terpenuhi. Perseroan memiliki kebijakan sistem <i>whistleblowing</i> sebagaimana tertera dalam <i>website</i> Perseroan pada bagian Tata Kelola Perusahaan.
	6. Perusahaan Terbuka memiliki kebijakan pemberian insentif jangka panjang kepada Direksi dan karyawan.	Terpenuhi. Perseroan memiliki kebijakan pemberian insentif jangka panjang kepada Direksi dan karyawan.
Principle 7 Enhancing Corporate Governance through Stakeholder Participation	1. The public company has a policy to prevent insider trading.	Implemented and Complied. The company has a policy to prevent insider trading, outlined in the Code of Conduct, which is signed by all employees.
	2. The public company has an anti-corruption and anti-fraud policy.	Implemented and Complied. This policy is included in the Code of Conduct established by the company, and signed by all members of the Board of Directors and employees.
	3. The public company has a policy on the selection and enhancement of suppliers or vendors.	Implemented and Complied. The company selects vendors/ suppliers based on established SOPs/policies. Vendor/ supplier evaluations are conducted annually.
	4. The public company has a policy on fulfilling creditors' rights.	Implemented and Complied. We have a policy to fulfill the rights of creditors. This is managed by the Finance Division, which oversees and manages creditor payments. These rights are also stated in legally binding agreements.
	5. The public company has a whistleblowing system policy.	Implemented and Complied. The company has a whistleblowing system policy, which is outlined on the company's website under the Corporate Governance section.



Prinsip Principles	Rekomendasi Recommendations	Implementasi Implementations
	6. The public company has a policy for providing long-term incentives to the Board of Directors and employees.	Implemented and Complied. The company has a policy for providing long-term incentives to both the Board of Directors and employees.
Aspek 5 : Keterbukaan Informasi Aspect 5 : Information Disclosure		
Prinsip 8 Meningkatkan pelaksanaan keterbukaan informasi.	1. Perusahaan Terbuka memanfaatkan penggunaan teknologi informasi secara lebih luas selain situs web sebagai media keterbukaan informasi. 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.	Terpenuhi. Selain menggunakan situs web dan pelaporan secara elektronik seperti IDXNet dan OJK <i>Reporting</i> , Perseroan juga menggunakan <i>platform</i> media sosial untuk mengungkapkan informasi tentang Perseroan. Terpenuhi. Dipaparkan dalam laporan tahunan ini.
Principle 8 Enhancing the Implementation of Information Disclosure	1. The public company utilizes information technology more broadly, aside from its website, as a medium for information disclosure. 2. The annual report of the public company discloses the ultimate beneficial owners of at least 5% (five percent) of the company's shares, in addition to the disclosure of the ultimate beneficial owners through major and controlling shareholders.	Implemented and Complied. In addition to using its website and electronic reporting channels such as IDXNet and OJK Reporting, the company also leverages social media platforms to disclose information about the company. Implemented and Complied. This is disclosed in this annual report.