


Policy
Prohibition of Transactions by Insiders
PT Bank JTrust Indonesia Tbk.

PT Bank JTrust Indonesia Tbk

This document is confidential and all copyrights belong to PT Bank JTrust Indonesia Tbk. No part of this document may be transmitted, transcribed, stored (in a retrieval system or otherwise), translated into any language or reproduced in any form or by any means (electronic, mechanical, magnetic, optical, manual or others) without prior written permission from PT Bank JTrust Indonesia Tbk

 J TRUST BANK ジュストロスト銀行	Policy
	Prohibition of Insider Transactions

Chapter 1. Introduction

1.1. Background

The preparation of this Policy is in order to protect stakeholders and improve compliance with regulatory regulations and applicable laws and regulations as well as the implementation of good corporate governance, including the prevention of insider trading which can cause injustice due to parties who have information that cannot be obtained. accessed by the public can attract the maximum profit so as to result in the loss of confidence of shareholders and/or the public in general to PT Bank JTrust Indonesia Tbk.

For this, it is necessary to regulate internal regulations as a manifestation of the Bank's commitment to implementing good governance consistently in the context of managing the Bank to carry out the mission and achieve the vision that has been set.

1.2. Purpose and objectives

The Policy on Prohibition of Insider Transactions is formulated to prevent the misuse of information by insiders of PT Bank JTrust Indonesia Tbk. Which may affect the Company's share price on the Stock Exchange. This policy also serves as a basic guide in carrying out business activities, including for the personal interests of each member of the Board of Commissioners, Board of Directors, and Employees of PT Bank JTrust Indonesia Tbk.


In addition, to provide clarity and certainty regarding the regulation of transactions that are prohibited for Insiders and to improve the application of good corporate governance principles based on the prevailing laws and regulations, especially in the banking sector.

1.3. Scope

The scope of this Policy on Prohibition of Insider Transactions includes the regulation of all Securities transaction policies carried out, and must be used as a reference and legal basis in every Securities transaction activity by Insiders of PT Bank JTrust Indonesia Tbk.

1.4. Legal Foundation

1. Law of the Republic of Indonesia Number 8 of 1995 concerning the Capital Market.
2. Law of the Republic of Indonesia Number 40 of 2007 concerning Limited Liability Companies.
3. Law of the Republic of Indonesia No. 11 of 2008 concerning Information and Electronic Transactions as amended by Law no. 19 of 2016.
4. OJK Regulation No. 31/POJK.04/2015 Regarding Disclosure of Information or Material Facts by Issuers or Public Companies.
5. OJK Regulation No. 21/POJK.04/2015 Concerning the Implementation of Public Company Governance Guidelines.
6. OJK Regulation Number 55/POJK.03/2016 Concerning the Implementation of Governance for Commercial Banks;

	Policy
	Prohibition of Insider Transactions

7. OJK Regulation No. 11/POJK.04/2017 Regarding Ownership Report or Any Change in Share Ownership of a Public Company;
8. OJK Regulation No. 78/POJK.04/2017 Concerning Securities Transactions that are Not Prohibited for Insiders;
9. OJK Circular Letter No. 32/SEOJK.04/2015 Regarding Guidelines for Public Company Governance;
10. Articles of Association of PT Bank JTrust Indonesia Tbk;
11. Corporate Ethics of PT Bank JTrust Indonesia Tbk; and
12. PT Bank JTrust Indonesia Tbk Code of Conduct Market.
13. SOP-CPD-01 Applicable Good Corporate Governance (GCG) and its amendments (if any)
14. SOP of the applicable Internal Provisions Architecture of PT Bank JTrust Indonesia Tbk and its amendments (if any)


1.5. Definition

1. **Bank** is PT Bank JTrust Indonesia Tbk.
2. **The Board of Commissioners** is an organ of the Bank that is tasked with conducting general and/or specific supervision in accordance with the Articles of Association and providing advice to the Board of Directors.
3. **The Board of Directors** is an organ of the Bank that is authorized and fully responsible for the management of the Bank for the benefit of the Bank, in accordance with the aims and objectives of the Bank and represents the Bank, both inside and outside the court in accordance with the provisions of the Articles of Association.
4. **Securities** are securities, namely debt acknowledgments, commercial securities, shares, bonds, proof of debt, participation units in collective investment contracts, futures contracts on Securities, and any derivatives of Securities.
5. **Material Information or Facts** are important and relevant information or facts regarding events, occurrences, or facts that may affect the price of Securities on the Stock Exchange and/or the decisions of investors, potential investors, or other parties with an interest in such information or facts.
6. **Confidential Information** is all data or information or facts regarding the Company and/or its Subsidiaries that are not intended for public use, including but not limited to commercial, financial, technical or other data/information/facts regarding customers, vendors, suppliers, distributors, business partners, both written and unwritten and recorded electronically or in other forms which are stated in writing as confidential information or naturally and/or according to the laws and regulations clearly must be treated as confidential, or in general should be treated as confidential.
7. **Insider Information** is material information about the Bank held by Insiders that is not yet available to the public which can have a material impact on the stock price of the Bank or the stock price of other public companies that may influence investors in making decisions to

buy/sell or hold. Some examples of Inside Information include but are not limited to:

- a. Profits, earnings and dividends;
- b. Restructuring plan;
- c. Changes in the composition of the management;
- d. Material legal process.

8. **Employees** are all employees of the Bank, both permanent and non-permanent employees.
9. **Insiders are:**
 - a. Commissioners, Directors, and SEVP/EVP (hereinafter referred to as "Management"), and/or Bank Employees;
 - b. Major shareholders of the Bank;
 - c. An individual who because of his position or profession or because of his business relationship with the Bank enables that person to obtain Inside Information; or
 - d. A party which within the last 6 (six) months is no longer a party as referred to in letter a, letter b, or letter c.
10. **Public Company** is a company whose shares are owned by at least 300 (three hundred) shareholders and has paid-up capital of at least Rp. 3,000,000,000 (three billion rupiah) or a number of shareholders and paid-up capital as stipulated by a Government Regulation in accordance with Law of the Republic of Indonesia No. 8 of 1995 concerning the Capital Market.
11. **Parties** are natural persons, companies, joint ventures, associations, or organized groups.
12. **Transactions by Insiders** are trading activities of Bank Securities, by internal parties of the Company who have material information in the form of plans or decisions of the Bank that have not been or are not published by the Bank, so that they are categorized as illegal activities in the financial market environment to seek certain profits which are usually done by utilizing internal information.
13. **Securities Transaction** is any activity or contract in order to obtain, release, or use Securities which results in a transfer of ownership or does not result in a transfer of ownership.

 J TRUST BANK ジュストロスト銀行	Policy
	Prohibition of Insider Transactions

Chapter 2. 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. Provide inside information to other parties that potentially can be used to make purchases or sales of Bank Securities or other companies which affiliated (or having transactions) with the Bank. Such other parties are including 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:

Prohibition of Insider Transactions

- 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

 J TRUST BANK ジュストバンク	Policy
	Prohibition of Insider Transactions

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 3. 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 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.