

KEBIJAKAN PERIODE BLACKOUT

BLACKOUT PERIOD POLICY



PT SELAMAT SEMPURNA Tbk
MEMBER OF ADR GROUP

Dokumen ini memuat kebijakan PT Selamat Sempurna Tbk ("Perseroan") untuk memastikan tidak adanya pelanggaran Tata Kelola Perusahaan maupun peraturan perundang-undangan terkait Orang Dalam Perseroan yang hendak melakukan Transaksi Saham termasuk juga Affiliasinya. Tujuan dari Kebijakan Blackout ini adalah untuk membantu Personil Perseroan (sebagaimana didefinisikan di bawah) dalam memenuhi kewajiban mereka selama periode pelarangan perdagangan dimana terdapat risiko atau persepsi yang tinggi bahwa Dewan Komisaris, Direksi, karyawan Perseroan dan Entitas Anaknya berada dalam posisi hendak memperdagangkan saham SMSM dan memiliki informasi material mengenai korporasi yang belum tersedia untuk umum.

This document covers the policy of PT Selamat Sempurna Tbk (the "Company") to ensure that there are no violation of Corporate Governance or laws & regulation related to Insiders of the Company whom wish to do Stock Transaction including its Affiliates. The purpose of this Blackout Policy is to assist the Company Personnel (as defined below) in complying with their obligation during the prohibited trading periods whereas there is a heightened risk or perception that the Board of Commissioners, Board of Directors, employees of the Company and Its subsidiaries are in the position to trade SMSM Share and have material information regarding corporation that not yet available to the public.

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A. Pengantar

PT Selamat Sempurna Tbk (selanjutnya disebut Perseroan) sebagai perusahaan publik di bawah Hukum Indonesia, Perseroan wajib melindungi hak-hak seluruh pemegang saham. Salah satu cara praktik untuk mewujudkannya adalah dengan menerapkan Kebijakan Periode Blackout terkait Saham SMSM untuk mencegah terjadinya Insider Trading.

B. Definisi

1. "Afiliasi" adalah
 - a. Hubungan keluarga karena perkawinan dan keturunan sampai derajat kedua, baik secara horizontal maupun vertikal;
 - b. Hubungan antara Pihak dengan pegawai, direktur, atau komisaris dari Pihak tersebut;
 - c. Hubungan antara dua (2) perusahaan dimana terdapat satu atau lebih anggota direksi atau dewan komisaris yang sama;
 - d. Hubungan antara perusahaan dan Pihak, baik langsung maupun tidak langsung, mengendalikan atau dikendalikan oleh perusahaan tersebut;
 - e. Hubungan antara dua (2) perusahaan yang dikendalikan, baik langsung maupun tidak langsung, oleh Pihak yang sama; atau
 - f. Hubungan antara perusahaan dan pemegang saham utama
2. Aksi Korporasi adalah tindakan yang diambil Perseroan yang berdampak langsung pada harga dan/atau kepemilikan saham para pemegang saham (investor), diantaranya mencakup: hasil keuangan triwulanan/tengah-tahunan/tahunan, IPO, Right Issue, Stock Split, Dividen.
3. BEI adalah Bursa Efek Indonesia
4. Informasi Material adalah informasi-informasi atau fakta penting dan relevan mengenai peristiwa, kejadian atau fakta yang dapat mempengaruhi harga sekuritas pada bursa Efek

A. Introduction

PT Selamat Sempurna Tbk (herein referred the Company) as a public company under Indonesian Law, the Company is obliged to protect the rights of all shareholders. One of practice to reach that is by implementing Blackout Period Policy for Transaction of SMSM Shares to prevent Insider Trading.

B. Definitions

1. "Affiliation" shall means
 - a. Family relationship by marriage and descendent to the second degree, horizontally as well as vertically;
 - b. Relationship between a Party and its employees, directors or commissioners;
 - c. Relationship between two companies with one or more directors or commissioners in common;
 - d. Relationship between a company and a Party having direct or indirect controls or is controlled by the said company;
 - e. Relationship between two companies that are controlled directly or indirectly by the same Party; or
 - f. Relationship between a company and a substantial shareholder.
2. Corporate Actions shall means to actions initiated and/or engaged by the Company that have direct impact on investors' share price and/or ownership, including amongst others: quarter/mid-year/yearly financial result, IPO, Right Issue, Stock Split, Dividend.
3. IDX shall means Indonesia Stock Exchange
4. Material information shall means Information or material facts or information regarding important and relevant events, events, or facts that may

dan/atau keputusan pemodal, calon pemodal, atau Pihak lain yang berkepentingan atas informasi atau fakta tersebut”.

5. Informasi Orang Dalam berarti setiap Informasi Material yang dapat diakses atau diketahui oleh Orang Dalam tetapi belum tersedia untuk umum.
6. Informasi Rahasia adalah semua data atau informasi atau fakta mengenai Perseroan dan/atau Entitas Anak Perseroan yang tidak ditujukan untuk umum, termasuk namun tidak terbatas pada data/informasi/fakta yang bersifat komersial, keuangan, teknis, serta data terkait, vendor, supplier, rekanan bisnis, baik tertulis maupun tidak tertulis, machine readable, direkam secara elektronik ataupun dalam bentuk lainnya yang dinyatakan secara tertulis sebagai informasi rahasia ataupun secara alamiah dan/atau menurut peraturan perundang-undangan secara jelas harus diperlakukan rahasia, atau secara umum patut diperlakukan rahasia.
7. Kebijakan adalah Kebijakan *Blackout Period* PT Selamat Sempurna Tbk
8. Transaksi Saham adalah transaksi penjualan, pembelian atau pengalihan saham PT Selamat Sempurna Tbk melalui BEI.
9. OJK adalah Otoritas Jasa Keuangan
10. Orang Dalam adalah
 - a. Komisaris, Direktur atau pegawai Perseroan;
 - b. Pemegang Saham utama Perseroan;
 - c. Individu yang karena kedudukan, profesi atau hubungan bisnisnya terkait dengan Perseroan yang memungkinkan individu tersebut memperoleh dan/atau memiliki hak istimewa untuk mendapatkan akses

affect the price of the Securities on the Stock Exchange and/or the decisions of investors, potential investors or other interested parties on such information”.

5. Insider Information shall means any Material Information accessible or known to the Insiders but not yet available to the public.
6. Confidential Information shall means all data or information or facts about the Company and/or the Company's Subsidiaries that are not intended for the public, including but not limited to commercial, financial, technical, and related data/information/facts, vendors, suppliers, business partners, whether written or unwritten, machine readable, recorded electronically or in any other form that is stated in writing as confidential information or naturally and/or according to laws and regulations, it must be treated as a confidential, or in general it should be treated as a confidential.
7. Policy shall means Policy of Blackout period of PT Selamat Sempurna Tbk
8. Shares Transaction shall means transaction of selling, purchasing or otherwise acquiring of transferring shares of PT Selamat Sempurna Tbk through IDX.
9. OJK shall means Financial Services Authority
10. Insider shall means:
 - a. Commissioner, Director or employee of the Company;
 - b. Major shareholders of the Company;
 - c. An individual who due his/her position, profession or business relationship with the Company enable such individual to obtain and/or privileged to gain access insider's information;

informasi orang dalam.

- d. Pihak yang dalam waktu enam (6) bulan terakhir tidak lagi menjadi pihak sebagaimana dimaksud dalam huruf a, b dan c.
11. Pemegang Saham Utama adalah pihak yang, baik secara langsung maupun tidak langsung, memiliki paling sedikit 20% (dua puluh persen) hak suara dari seluruh saham yang mempunyai hak suara yang dikeluarkan oleh suatu perusahaan.
12. Periode Blackout adalah periode tertentu dimana Orang Dalam Perseroan yang memiliki informasi Material dilarang melakukan transaksi atau jual beli saham.
13. Perseroan adalah PT Selamat Sempurna Tbk
14. Perusahaan Pengendali yang dimaksud di sini adalah Perusahaan yang berperan sebagai Pemegang Saham Utama Perseroan, yakni PT Adrindo IntiPerkasa.
15. Perusahaan Terkendali adalah suatu perusahaan yang dikendalikan baik secara langsung maupun tidak langsung oleh Perseroan.
16. Pihak Terafiliasi Perseroan meliputi:
- a. Karyawan, Direktur, atau Komisaris Perseroan;
 - b. Seseorang yang memiliki hubungan keluarga karena perkawinan dan keturunan sampai derajat kedua, baik secara horizontal maupun vertikal dengan anggota Direksi Perseroan, atau dengan anggota Dewan Komisaris Perseroan, dan/atau dengan pemegang saham utama Perseroan (apabila pemegang saham utama Perseroan adalah individu);
 - c. Direktur atau Komisaris dari Pemegang Saham Utama Perseroan apabila Pemegang
- d. A party which within the last 6 (six) months is no longer a party as defined in either (a), (b), nor (c).
11. A Major Shareholder shall means a party who, either directly or indirectly, owns at least 20% (twenty percent) of all voting rights of all shares that have voting rights issued by a company.
12. Blackout Period shall means a certain period of time which Insiders of the Company whom have Material Information are prohibited from conducting transactions or buying and selling of shares.
13. The Company shall means PT Selamat Sempurna Tbk
14. The Controlling Company referred to the Company that acts as the Company's Major Shareholders, namely PT Adrindo IntiPerkasa.
15. Controlled Company shall means a company that is controlled either directly or indirectly by the Company.
16. Affiliated Parties of the Company, including:
- a. Employees, Directors, or Commissioners of the Company;
 - b. A person who is related to a member of the Company's Board of Directors or Commissioners by marriage and descent to the second degree, either horizontally or vertically, and/or to the Company's major shareholder (if the Company's major shareholder is an individual);
 - c. Director or Commissioner of the Company's Major Shareholder if the

Saham Utama Perseroan adalah korporasi;

- d. Suatu perusahaan yang mempunyai satu atau lebih Direktur atau Komisaris yang menjabat/merangkap jabatan sebagai Direktur atau Komisaris Perseroan;
- e. Pemegang Saham Pengendali atau Pemegang Saham Utama Perseroan;
- f. Perusahaan Terkendali dari Perseroan;
- g. Perusahaan Terkendali dari Pemegang Saham Utama Perseroan;
- h. Perusahaan dimana Direktur atau Komisaris Perseroan bertindak sebagai Pemegang Saham Utama.

17. Waktu Perdagangan Efek Bersifat Ekuitas adalah Perdagangan Efek dilakukan selama jam perdagangan setiap Hari Bursa dengan berpedoman pada waktu JATS, sesuai Surat Keputusan Direksi PT Bursa Efek Indonesia Nomor: Kep-00055/BEI/03-2023 Perihal Peraturan Nomor II-A tentang Perdagangan Efek Bersifat Ekuitas.

Company's Major Shareholder is the Corporation;

- d. Companies with one or more Directors or Commissioners who serve/concurrently serve as Directors or Commissioners of the Company;
- e. Controlling Shareholders or Major Shareholders of the Company;
- f. Controlled Company of the Company;
- g. Controlled Company of the Company's Major Shareholders;
- h. Companies with the Director or Commissioner of the Company serve/concurrently serve as a major Shareholder.

17. Trading Hours of Equity Securities shall mean Securities trading which be conducted during the Trading Hours on every Exchange Day referring to the JATS time, in accordance with Decree of the Board of Directors of PT Bursa Efek Indonesia Number: Kep-00055/BEI/03-2023 Regarding Rule Number II-A concerning Trading of Equity Securities.

C. Dasar Hukum

1. Undang Undang Nomor 8 Tahun 1995 tentang Pasar Modal;
2. Undang-Undang Nomor 40 Tahun 2007 tentang Perseroan Terbatas;
3. Peraturan Otoritas Jasa Keuangan ("OJK")
 - Peraturan OJK No.21/POJK.04/2015 tentang Penerapan Pedoman Tata Kelola Perusahaan Terbuka;
 - Peraturan OJK No.31/POJK.04/2015 tentang Keterbukaan Informasi atau Fakta Material oleh Emiten Perusahaan Publik;
 - Peraturan Otoritas Jasa Keuangan No.78/POJK.04/2017 tentang Transaksi Efek yang Tidak Dilarang Bagi Orang Dalam.

C. Legal Base

1. Law Number 8 of 1995 concerning Capital Market;
2. Law Number 40 of 2007 concerning Limited Liability Company;
3. Financial Services Authority Regulation ("OJK")
 - OJK Regulation No.21/POJK.04/2015 regarding The Implementation of Public Companies' Corporate Governance Guidelines;
 - OJK Regulation No.31/POJK.04/2015 regarding Disclosure of Material Information or Facts by Issuer or Public Company;
 - Regulation of the Financial Services Authority No.78/POJK.04/2017 on Securities Transactions Not Prohibited

- Peraturan Otoritas Jasa Keuangan No.4/POJK/2024 tentang Laporan Kepemilikan Atau Setiap Perubahan Kepemilikan Saham Perusahaan Terbuka Dan Laporan Aktivitas Menjaminkan Saham Perusahaan Terbuka.

4. Peraturan Bursa Efek Indonesia (“IDX”)

- Peraturan IDX No.Kep-00101/BEI/12-2021 mengenai Perubahan Peraturan No.I-A tentang Pencatatan Saham dan Efek bersifat Ekuitas Selian Saham yang Diterbitkan oleh Perusahaan Tercatat.
- Peraturan IDX No.Kep-00066/BEI/09-2022 mengenai Perubahan Peraturan No.I-E tentang Kewajiban Penyampaian Informasi

for Insiders.

- Regulation of the Financial Services Authority No.4 of 2024, dated February 28, 2024, regarding the Reporting of Share Ownership or Any Changes in Ownership in Public Companies and Reporting on Activities for Pledging Shares in Public Companies

4. Indonesia Stock Exchange Regulation (“IDX”)

- IDX Regulation No.Kep-00101/BEI/12-2021 regarding the Amendment to the Rule Number I-A concerning Listing of Shares (Stock) and Equity-Type Securities Other Than Stock Issued by the Listed Company.
- IDX Regulation Kep-00066/BEI/09-2022 on the Amendment to the Rule Number I-E regulation regarding an Obligation of Information Disclosure

D. Tujuan

Tujuan dari Kebijakan Periode Blackout ini antara lain adalah untuk membantu personil dalam Perseroan (Direktur/Komisaris, Top Management, dan Karyawan terkait) dalam memenuhi kewajiban mereka selama periode perdagangan yang dilarang di mana ada risiko atau persepsi yang tinggi terhadap karyawan, pejabat berwenang, Direktur atau Komisaris Perseroan, atau salah satu Entitas Anak Perseroan berada dalam posisi untuk bertransaksi dan disertai dengan memiliki informasi material non-publik. Pembatasan bertransaksi yang diatur dalam kebijakan ini juga berlaku untuk pasangan individu yang dilindungi, anak-anak, anggota keluarga yang sudah dewasa yang tinggal dalam rumah yang sama, atau individu lain dimana orang tersebut memiliki kendali substansial atas keputusan perdagangan sekuritasnya. Kebijakan ini merupakan perpanjangan dan penjabaran dari ketentuan dalam Kode Etik Perseroan.

D. Objectives

The aim of Blackout Period Policy, among others is to assist Company Personnel (Board, Top Executives, and Related Employees) in complying with their obligation during the prohibited trading periods where there is a heightened risk or perception that employees, contractors, officers, Directors or Commissioners of the Company, or any of its subsidiaries are in a position to trade while in the possession of material non-public information. The trading restrictions contained in this policy also apply to a covered individual's spouse, minor children, adult family members sharing the same household, or any other individual over whom such person exercises substantial control over his or her securities trading decisions. This Policy is an extension and elaborated version of stipulations under the Company's Code of Conduct.

E. Prinsip Dasar Periode *Blackout*

1. Selama Periode *Blackout*, Orang Dalam yang dengan cara apapun memiliki Informasi Orang Dalam dilarang untuk melakukan transaksi saham termasuk namun tidak terbatas pada:
 - a. Memberikan perintah/instruksi untuk melakukan Transaksi Saham.
 - b. Mempengaruhi pihak lain untuk melakukan Transaksi Saham dengan cara memberikan Informasi Orang Dalam yang dimiliki untuk keuntungan pribadinya.
 - c. Memberi Informasi Orang Dalam kepada pihak lain yang patut diduga dapat memanfaatkan Informasi Orang Dalam untuk melakukan Transaksi Saham.
2. Pada saat pengumuman Periode *Blackout*, orang Dalam yang masih memiliki perintah Transaksi Saham yang belum dilaksanakan wajib membatalkan perintah tersebut.

Sesuai dengan ketentuan yang diatur dalam Undang-Undang Nomor 8 tahun 1995 tentang Pasar Modal, Pasal 95 sampai dengan Pasal 99, setiap pihak yang dengan sengaja berusaha secara melawan hukum untuk memperoleh dan pada akhirnya memperoleh informasi orang dalam mengenai Perseroan, juga dikenakan larangan yang sama seperti yang berlaku bagi orang dalam sebagaimana dimaksud di atas. Adapun contoh perbuatan melawan hukum, antara lain:

1. Berusaha memperoleh informasi orang dalam dengan cara mencuri.
2. Berusaha memperoleh informasi orang dalam dengan cara membujuk orang dalam.
3. Berusaha memperoleh informasi orang dalam dengan cara kekerasan atau ancaman.

E. Basic Principles of *Blackout* Period

1. During the *Blackout* Period, the Insider(s) in whatsoever manner/means, possess an Insider Information, is prohibited to enter into Shares Transaction including but not limited:
 - a. To give any order/instruction to conduct the Shares Transaction
 - b. Influencing any other party to enter into Shares Transaction by sharing his/her Insider Information, for the purposes of their sole interest.
 - c. Providing any Insider Information to the other party who shall be suspected of being able to use the Insider Information to Shares Transaction.
2. At the time of *Blackout* Period announcement, insiders who still have Share Transaction order that has not been executed must cancel the order.

In accordance with the provisions stipulated in Law Number 8 of 1995 concerning the Capital Market, Articles 95 to 99, any party who deliberately tries to unlawfully obtain and ultimately obtains inside information regarding the Company, is also subject to the same prohibition as applies to insiders as referred to above. Examples of unlawful acts include:

1. Attempting to obtain any Insider Information by stealing.
2. Attempting to obtain any Insider Information by persuading the Company's Internal/Insider Party.
3. Attempting to obtain any Insider Information by means of violence or threats.

F. Jenis Periode Blackout

1. Periode Blackout Berkala

Periode BlackOut Berkala dilaksanakan 21 hari sebelum Laporan Keuangan Perseroan baik triwulanan, tengah tahunan atau tahunan di rilis ke publik. Periode BlackOut Berkala akan berakhir pada satu (1) hari perdagangan penuh setelah Laporan Keuangan Perseroan diumumkan kepada OJK dan BEI serta diungkapkan kepada publik.

Ilustrasi:

Apabila Laporan Keuangan Tengah Tahunan diumumkan pada tanggal 30 Juli, maka Periode BlackOut dimulai pada tanggal 09 Juli sampai dengan 30 Juli. Orang Dalam dapat melakukan Transaksi Saham pada tanggal 31 Juli.

2. Periode BlackOut Insidental

Periode BlackOut Insidental dimulai pada saat Informasi Material terkait Aksi Korporasi dimiliki oleh Orang Dalam melalui cara apapun, sampai dengan tanggal dilakukannya pengumuman dan/atau keterbukaan Informasi Material terkait Aksi Korporasi tersebut ke masyarakat melalui BEI dan dilaporkan ke OJK.

Ilustrasi:

Penawaran Umum, Rights Issue, Private Placement, Akuisisi, Merger, Transaksi Material, dan lainnya oleh Perseroan. Periode Blackout Insidental dimulai saat aksi korporasi disetujui oleh Dewan Komisaris dan Direksi, sampai dengan informasi aksi korporasi tersebut dirilis kepada publik melalui Keterbukaan Informasi di Koran dan/atau Situs BEI dan Situs Perseroan serta juga disampaikan kepada OJK. Terkait dengan dilakukannya suatu tindakan korporasi (corporate action) yang perlu mendapatkan persetujuan Rapat Umum Pemegang Saham sejak pemberitahuan Rapat Umum Pemegang Saham sampai dengan pengumuman hasil Rapat Umum Pemegang Saham tersebut.

F. Type of Blackout Period

1. Regular BlackOut Period

BlackOut period commence 21 days prior to the Company's Financial Statements, either quarterly, mid-year or annually, are released to the public. The Regular Blackout Period will be ended one (1) full trading day after the Company's Financial Statement is announce to OJK and IDX as well as publicly disclosed.

Illustration:

If the Mid-Year Financial Statements are announced on July 30th, then the BlackOut Period commence from July 09th to July 30th. The Insiders could conduct Share Transactions on July 31st.

2. Incidental BlackOut Period

Incidental BlackOut Period, immediately commence after Material Information with regard to the Corporate Actions, in whatsoever manner being possessed by the Insiders, until the date of announcement and/or disclosure of Material Information of such Corporate Action has been made to the public through IDX and submitted to OJK.

Illustration:

Public Offerings, Right Issue, Private Placement, Acquisition, Merger, Material Transaction, etc conduct by the Company. The Incidental BlackOut Period shall commence as at the corporate action been approved by the Board of Commissioners and Board of Directors, until information of such corporate actions is released to the public through Information Dissclosure in the Newspaper and/or IDX Websites and Company's Website as well as submitted to OJK. Related to a corporate action that must obtain approval from the General Meeting of Shareholders, the Blackout Period prevails from the date of notification

the General Meeting of Shareholders to the date of announcement of the resolution of the General Meeting of Shareholders.

G. Pemberitahuan Periode Blackout

Corporate Secretary akan merilis “Pemberitahuan Periode Blackout”, sebelum Waktu Perdagangan Efek Bersifat Ekuitas di BEI dibuka (sesi 1) yang menguraikan permulaan dan perkiraan tanggal berakhir (jika tanggal diketahui dalam hal rilis Laporan Keuangan triwulanan/tengah-tahunan/tahunan), kepada Orang Dalam dan/atau pihak lain sebagaimana ditentukan oleh Direksi. Pemberitahuan Periode Blackout akan dilakukan dalam tiga (3) tahap:

1. Pengingat awal – Periode BlackOut, dilakukan pada awal periode bulan pelaporan, dalam hal terkait Laporan Keuangan Triwulanan/Tengah-Tahunan/Tahunan, untuk memastikan Orang Dalam memiliki cukup waktu untuk membatalkan dan/menarik instruksi perdagangan yang belum diselesaikan atau masih open ke pialang/perusahaan sekuritas. Format Pengingat awal – Periode BlackOut, dapat dilihat di Lampiran 1.

Ilustrasi:

Apabila Laporan Keuangan Tengah Tahunan diumumkan pada tanggal 30 Juli, maka Pengingat Awal Blackout Period akan diumumkan pada 01 Juli.

2. Pengingat Kedua – Periode Blackout, dilakukan pada H-1 menjelang Periode BlackOut dimulai. Format Pengingat Kedua – Periode BlackOut, dapat dilihat di Lampiran 2.

Ilustrasi:

Apabila Laporan Keuangan Tengah Tahunan diumumkan pada tanggal 30 Juli, maka:

- Pengingat Awal pada 01 Juli.
- Pengingat Kedua pada 08 Juli.

G. Blackout Period Notice

The *Corporate Secretary* shall release a “Blackout Period Notice”, before the Trading Hours of Equity Securities at IDX opens (session 1) outlining commencement and estimated ended period (if known in a case of quarterly/mid-year/annual financial statement release), to Insiders and/or other parties as determined by the Board of Directors. Blackout Period Notice will be carried out in three (3) steps:

1. Early Reminder – BlackOut Period, conducted at the beginning of the reporting month period, in relation to the Quarterly/Mid-Yearly/Annual Financial Statements, to ensure the Insiders have ample time to cancel and/or withdraw any outstanding or open trade order(s) to their broker/securities company. Template for Early Reminder – BlackOut Period can be found on Appendix 1.

Illustration:

If the Mid-Year Financial Statements are announced on July 30th, then the Early Reminders of Blackout Period shall be announced on July 01st.

2. The Second Reminder - BlackOut Period, is carried out on D-1 ahead of the BlackOut Period commence. Template for Second Reminder - BlackOut Period can be found on Appendix 2.

Illustration:

If the Mid-Year Financial Statements are announced on July 30th, then

- Early Reminders on July 01st.
- Second Reminders on July 08th.

- Periode BlackOut pada 09 Juli – 30 Juli.

3. Pemberitahuan Akhir – Periode Blackout
Corporate Secretary juga harus mengeluarkan pemberitahuan bahwa Periode Blackout berakhir dengan “Pemberitahuan Akhir Periode Blackout” pada tanggal berakhirnya Periode Blackout yang merupakan akhir dari satu (1) hari bursa penuh, segera setelah pengumuman dan/atau pengungkapan Laporan Keuangan dan/atau Informasi Material. Format Pemberitahuan Akhir – Periode BlackOut, dapat dilihat di Lampiran 3.

- BlackOut Period on July 09th – July 30th.

3. End Notice – Blackout Period
The Corporate Secretary shall release a notice whereas the Blackout period ends with a “Blackout Period End Notice” at the end of Blackout Period which is the end of one (1) full trading day, immediately following the time of the announcement and/or disclosure of Financial Statement and/or Material Information. Template for End Notice - BlackOut Period can be found on Appendix 3.

H. Pengecualian Transaksi Saham Dalam Periode Blackout

Berdasarkan POJK No.78/POJK.04/2017, transaksi saham yang tidak dilarang bagi Orang Dalam antara lain apabila:

1. Transaksi saham tersebut dilakukan antar Orang Dalam Perseroan yang saham yang mempunyai Informasi Material Orang Dalam yang sama dan dilaksanakan di luar Bursa.
2. Transaksi Efek dilakukan oleh Orang Dalam Perseroan yang mempunyai Informasi Orang Dalam dengan Pihak yang bukan Orang Dalam yang melakukan transaksi dengan Perseroan dimaksud dan dilaksanakan di luar bursa dengan ketentuan sebagai berikut:
 - a. Orang Dalam yang dimaksud telah terlebih dahulu memberikan seluruh informasi Orang Dalam kepada pihak yang bukan Orang Dalam tersebut;
 - b. Pihak yang bukan Orang Dalam dimaksud tidak menggunakan Informasi Material Orang Dalam tersebut selain untuk melakukan Transaksi Saham dengan Orang Dalam dimaksud;
 - c. Pihak yang bukan Orang Dalam dimaksud membuat pernyataan tertulis kepada Orang Dalam yang memberikan Informasi Material tersebut yang menyatakan bahwa informasi

H. Exemptions of Share Trading in the Blackout Period

Based on POJK No.78/POJK.04/2017, share transactions that are not prohibited for Insiders including:

1. The Share Transaction is conducted by and between the Company’s Insiders, whom have access to the same Insider Information, and the transaction is conducted off the Stock Exchange
2. The Share Transaction is conducted between an Insider of the Company having Insider Information and a non-Insider conducts a transaction with the Company and the transaction is conducted off the stock exchange, provided that:
 - a. The Insider of the Company has previously provided all the Insider Information to the non-Insider of the Company;
 - b. The non-Insider of the Company does not use such Insider Information except for conducting a Share transaction with the Insider of the Company;
 - c. The non-Insider of the Company makes a written statement to the Insider of the Company that provides the information that the nonInsider of the

yang akan diterima akan dirahasiakan dan tidak akan digunakan untuk tujuan lain selain untuk melakukan Transaksi Saham dengan Orang Dalam dimaksud;

- d. Pihak yang bukan Orang Dalam dimaksud tidak melakukan Transaksi Saham dalam jangka waktu 6 (enam) bulan sejak Informasi Material diperoleh, selain untuk melakukan Transaksi Saham dengan Orang Dalam dimaksud.

Company will keep the confidentiality of the information and will not use it for purposes other than conducting a Share Transaction with the relevant Insider of the Company;

- d. The non-Insider of the Company does not conduct a Share transaction in the last 6 (six) months from the time at which the information is obtained, except for conducting a Share Transaction with the Insider of the Company.

I. Kewajiban Pelaporan Transaksi Saham

Pemegang Saham Utama, Anggota Dewan Komisaris, Anggota Direksi dan pihak lainnya yang termasuk dalam kategori Orang Dalam Perseroan diatas wajib melaporkan kepemilikan saham kepada Corporate Secretary paling lambat dalam jangka waktu 3 (tiga) hari setelah terjadinya transaksi pembelian atau penjualan saham.

Perseroan meminimumkan peluang Insider Trading pada Periode Blackout antara lain dengan cara:

- Memisahkan secara tegas data atau informasi yang dikategorikan Informasi Orang Dalam dengan data atau informasi yang bersifat publik,
- Membagi tugas dan tanggung jawab atas pengelolaan informasi dimaksud, dan
- Menandatangani non-disclosure agreement pada saat melakukan kerja sama dengan pihak ketiga.
- Menerapkan Periode BlackOut terkait Transaksi Saham bagi pihak internal Perseroan.

I. Obligation for Reporting Share Transactions

Major Shareholders, Members of the Board of Commissioners, Members of the Board of Directors and other parties included in the category of Company Insiders/Internal Parties above are required to report share ownership to the Corporate Secretary no later than 3 (three) days after the transaction of buying or selling shares.

The Company shall minimize any chance of Insider Trading within the Blackout Period with the followings:

- Separating data or information categorized as Insider Information from public data or information;
- Separating duties and responsibilities of the management of such information; and
- Executing non-disclosure agreement at the time of cooperation with third party.
- Implementing a BlackOut Period related to Share Transaction for the Company's internal parties.

J. Lainnya

1. Kebijakan ini disusun dengan penuh itikad baik untuk mewujudkan tata kelola perusahaan yang baik;
2. Kebijakan ini dievaluasi secara berkala dan dapat direvisi untuk menyesuaikan dengan peraturan perundang-undangan yang berlaku, dan kebutuhan Perseroan dan Entitas Anaknya Perseroan tanpa menghilangkan esensi tata kelola perusahaan yang baik.

J. Others

1. This policy is prepared with in good faith in order to implement the good corporate governance;
2. This policy will be evaluated periodically and can be amended according to the applicable law, and the need of Company and its Subsidiaries without eliminating the essence of the good corporate governance.

Early Notice Blackout Period

Dear Respective Board Members of PT Selamat Sempurna Tbk,

- Board of Commissioners
- Board of Directors

cc: Audit Committee

This email serves as early reminder to all Board Members of PT Selamat Sempurna Tbk for the coming Blackout Period for the Q2-2024 Consolidated Financial Statement, which is scheduled to be release on Tuesday, July 30th, 2024.

Taking in to account of Capital Market Law and uphold the Good Corporate Governance, PT Selamat Sempurna Tbk will impose restrictions during certain period whereby share trading/transaction of SMSM shares owned by the Board are prohibited. The blackout period shall begin 21 days prior to the release and will be ended one (1) full trading day after the Q2-2024 financial result is announce to OJK and IDX as well as publicly disclosed.

There will be further notice (D-1) from Corporate Secretary in relation to commencement date and end of the blackout period.

About Blackout Period:

PT Selamat Sempurna Tbk as a public company under Indonesian Law, the Company is obliged to protect the rights of all shareholders. One of practice to reach that is by implementing Policy of Period of Blackout For Transaction of Sale and Purchase of SMSM Shares to prevent Insider Trading.

The Blackout period is a limitation for Insiders whom are inside the Company, whom are aware of Material Information that has not been published. The Blackout period policy is the basis of the Company to ensure that there are no violation of Corporate Governance or laws & regulation related to Insiders of the Company whom wish to do Stock Transaction including its Affiliates. During the Blackout Period, Insiders of the Company whom possess Material Information are prohibited from conducting Share Transaction, including but not limited to: a) Give orders/instructions to execute selling or buying of SMSM shares; b) Influencing other parties to conduct Share Transaction by providing Material Information as the Insiders for personal benefit. At the time of the Blackout Period announcement, insiders whom still have Share Transaction order that has not been executed must cancel the order.

Every member of Board of Commissioners and Board of Directors of the Company should report wherever he/she perform Company's shares transaction as well as his/her Company's shares ownership accordance to OJK Regulation No. 4 of 2024 regarding the Reporting of Share Ownership or Any Changes in Ownership in Public Companies and Reporting on Activities for Pledging Shares in Public Companies.

Notice Blackout Period

Dear Respective Board Members of PT Selamat Sempurna Tbk,

- Board of Commissioners
- Board of Directors

cc: Audit Committee

This email serves as notification to all Board Members of PT Selamat Sempurna Tbk with regards to Blackout Period concerning with the release of Q2-2024 Consolidated Financial Statement.

Taking in to account of Capital Market Law and uphold the Good Corporate Governance, PT Selamat Sempurna Tbk impose restrictions of blackout period. During the blackout period, you are prohibited from purchasing, selling, or otherwise acquiring or transferring SMSM stock. This prohibition applies to all board members, either direct or indirect financial interest you may have in such securities, such as SMSM stock held by immediate family members, in trust, or by controlled partnerships or corporations.

The Q2-2024 Consolidated Financial Statement is scheduled to be release on Tuesday, July 30th, 2024, therefore the Blackout Period is expected commence on tomorrow, Tuesday, July 09th, 2024 and will be ended one (1) full trading day on Tuesday, July 30th, 2024.

Any extension and/or release of Blackout Period will be informed in due course. There will be further notice from Corporate Secretary in relation to end of the blackout period.

Should you have any outstanding sell an/or purchase order with your broker/securities company, please immediately cancel such order. In the meantime, please contact us directly if you may have questions regarding this notice.

About Blackout Period:

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End Notice Blackout Period

Dear Respective Board Members of PT Selamat Sempurna Tbk,

- Board of Commissioners
- Board of Directors

cc: Audit Committee

This email serves as notification to all Board Members of PT Selamat Sempurna Tbk with regards to Blackout Period concerning with the release of Q2-2024 Consolidated Financial Statement.

Herewith the release of the Company Q2-2024 Consolidated Financial Statement on Tuesday, July 30th,2024, the Blackout Period has Ended and Share Transaction in now permitted.

In the meantime, please contact us directly if you may have questions regarding this notice.

About Blackout Period:

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Every member of Board of Commissioners and Board of Directors of the Company should report wherever he/she perform Company's shares transaction as well as his/her Company's shares ownership accordance to OJK Regulation No. 4 of 2024 regarding the Reporting of Share Ownership or Any Changes in Ownership in Public Companies and Reporting on Activities for Pledging Shares in Public Companies.