

The training programs carried out by Telkom during 2025 include:

1. Conducting training and understanding of Business Ethics as well as signing the annual Integrity Pact which is required for all employees.
2. Holding awareness training of ISO 37001:2016 Anti-Bribery Management System (SMAP) by expert to the scope team and FKAP Committee.
3. Extending Lead Auditor certificate of ISO 37001:2016 Anti-Bribery Management System (SMAP) through an external institution Professional Evaluation and Certification Board to the certificate owner.
4. Completing e-learning training of SNI ISO 37001:2016 Anti-Bribery Management System (SMAP).
5. Conducting Internal Auditor training of ISO 19011:2018 for new personnel within the certification scope of Anti-Bribery Management System and FKAP Committee.
6. Conducting internal audit of ISO 37001:2016 Anti-Bribery Management System.
7. Conducting e-learning on Strengthening Integrity for all Telkom employees which contains various materials including Business Ethics, Corporate Culture, Respectful Workplace, LHKPN, Gratification, SMAP, and Employee Discipline.
8. Conducting external surveillance audit II for ISO 37001:2016 Anti-Bribery Management System.
9. Holding a program to commemorate World Anti-Corruption Day (HAKORDIA) in TelkomGroup environment.

Through this socialization and training program, it is hope that it will create a conducive working environment in TelkomGroup and free from corruption practice.

Insider Trading Policy

Regarding insider trading, TelkomGroup has regulated this in several policies, including the following:

1. Resolution of the Board of Directors of the Limited Liability Company (Persero) PT Telekomunikasi Indonesia Tbk Number: KD.36/HK290/COP-D0053000/2009 regarding Integrity Pact.
2. Company Regulation PD.201.01/r.00/PS150/COP-B0400000/2014 regarding Business Ethics in TelkomGroup Environment.
3. Regulation of the Director of Human Capital Management of Limited Liability Company (Persero) PT Telekomunikasi Indonesia Tbk Number PR.209.05/r.02/HK250/COP-A0900000/2024 regarding Employee Discipline.
4. Regulation of the Director of Finance and Risk Management Number PR.705.02/r.00/HK270/COP-KOF00000/2024 regarding Insider Trading (Insider Trading policy).

In Insider Trading policy, the company defines insider trading as securities transactions of issuers or public companies conducted by insiders. The criteria for insiders as stipulated in Insider Trading policy are:

1. Commissioner, Director, or employee of issuer or public company.
2. Major shareholder of issuer or public company.
3. A party who, due to their position, profession, and/or business relationship with the issuer or public company, is in a position to obtain insider information.
4. A party that within the last 6 (six) months is no longer a party as referred to in point 1, 2, and 3.

Furthermore, Insider Trading policy prohibits insiders from tipping or providing information about issuers or public companies or other companies that conduct transactions with Telkom to other parties.