No.	Main Point		Type of Violation	Sanction
1.	Employee Work Ethics	1.	Misdemeanor	Minor Disciplinary Sanction
		2.	Moderate Violation	Moderate Disciplinary Sanction
		3.	Serious Violation	Severe Disciplinary Sanction
2.	Business Ethics	1.	Insider Trading	Integrity Committee Decision
		2.	Conflict of Interest	Employee Discipline Committee Decision
		3.	Window Dressing	Integrity Committee Decision
		4.	Gratification	Employee Discipline Committee Decision

Code of Conduct Implementation Report

In 2025, Telkom processed 19 cases of violations of the code of conduct and employee discipline involving 93 perpetrators. Of these, 17 cases have been resolved while 3 other cases are still in process. Employees who have received decisions are 86 perpetrators while 7 other perpetrators are still in process. This number shows a significant increase in case resolution compared to the previous year, where out of 12 cases with 131 perpetrators, there were still 5 cases involving 27 employees that were still in process. Therefore, Telkom continues to make various efforts to improve the quality of internal control to reduce the number of code of conduct violations in the future.

Enforcement of Code of Conduct in 2025

No.	Form of Code Violation	Number of Code Violation	Sanction Given	
1.	Misuse of Goods/Assets/Money/ Authority-Position	11 cases	Disciplinary Sanction	
			Minor	: 0
			Medium	: 7
			Severe	: 41
			Cleared/Warning Issued	: 30
			In Progress	: 7
2.	Absenteeism	5 cases	Resigned Voluntarily	: 1
			Cleared/Warning Issued	: 0
			Severe	: 4
3.	Criminal Case	1 case	Severe	: 1
4.	Violations of Moral Norms	2 cases	Severe	: 2
5.	Others	0 case	Disciplinary Sanction	
			Minor	: 0
			Medium	: 0
			Severe	: 0
			Cleared/Warning Issued	: 0
			In Progress	: 0

Employee Stock Ownership Program

Telkom has a policy of providing long-term performance-based compensation for employees and management through share ownership program, namely the Employee Stock Ownership Program (ESOP) and Management Stock Ownership Program (MSOP). The program aims to foster a sense of belonging and retain and appreciate employee contribution. This share ownership program started in 1995 when Telkom conducted an Initial Public Offering (IPO) and was carried out again on June 14, 2013. The conditions for implementing the ESOP carried out in 2013 were:

1. **Number of Shares**

   Number of shares offered during ESOP program period in 2013 was 64,284,000 Series B stock which were the result of buyback phase III or Treasury Stock. The amount was allocated to each participant under the following conditions:

   a. Participants have an active status, referring to the Band Position level, Role Category, and participant's contribution period as of December 31, 2012; temporary

   b. Participants have a non-active status, referring to the Band Position level and the contribution period during 2012, however, if the participant has passed away, contributions are calculated at 100%.

   Regarding the stock transfer process, employees who become program participants are subject to the provisions of the Lock-Up Period based on the following levels:

   a. Level BP I and II are subject to a Lock Up Period of 12 (twelve) months.

   b. Level BP III and IV are subject to a Lock Up Period of 6 (six) months.

   c. Levels BP V to VII are subject to a Lock Up Period of 3 (three) months.

2. **Execution Time**

   Telkom stock ownership program by employees and/or management was implemented on June 14, 2013.

3. **Employee and/or Management Requirements in Telkom Stock Ownership Program**

   a. Meet Eligibility Criteria:

      i. Employees of company and Employees of subsidiaries/affiliates whose financial statements are consolidated in Telkom Financial Statements.

      ii. Directors of subsidiaries/affiliates whose financial statements are consolidated, except BOD/BOC Telkom and Telkomsel.

   b. Have contributed at least 1 month in 2012;

   c. If employee has an inactive status in 2013, then:

      i. The person concerned is still entitled to participate in the program, with the allocation of stock calculated proportionally according to the contribution of the person concerned in 2012.

      ii. The person concerned is still entitled to participate in the program if he/she does not resign at his/her own request (APS), is dismissed due to serious employee disciplinary violations, and/or resigns due to being appointed as a Director of a SOE.

   d. The program is an option with the provisions that the right to purchase cannot be transferred and expires if it is not used during the offer period.

4. **Exercise Price or Price Determination**

   Whereas in the implementation of employee stock ownership program in 2013, Telkom set a stock transfer price of Rp10,714 (ten thousand seven hundred and fourteen rupiah), which is 90% of the average closing price of stock trading for a period of 25 days prior to the price fixing date.

No.	Date	Number of Employees	Number of Shares	Stock Value
1.	November 14, 1995	43,218	116,666,475 shares	Rp239 billion
2.	June 14, 2013	24,993	59,811,400 shares (equivalent to 299,057,000 shares after a stock split)	Rp661 billion

Eligibility criteria for ESOP participants are as follows:

1. Company or Telkom Employees.
2. Telkom employees who are seconded or employed in TelkomGroup or outside TelkomGroup.
3. Employees of subsidiaries whose financial report are consolidated into Telkom's Financial Reports.
4. Employees of indirect subsidiaries whose financial statement are consolidated into Telkom subsidiaries' Financial Statements.
5. Directors of subsidiaries and Directors of indirect subsidiaries whose financial statement are consolidated, but not included:
    a. Members of the Board of Directors and Board of Commissioners of the company.
    b. Members of the Board of Directors and Board of Commissioners of PT Telekomunikasi Seluler Indonesia.
6. Contract employees at a certain level who are still active in TelkomGroup.

Policy Regarding Reporting Share Ownership of Directors and Commissioners

Each member of the Board of Directors and Board of Commissioners of Telkom has reported to the Financial Services Authority, either directly or indirectly, regarding ownership and any changes in ownership of Public Company shares in accordance with the provisions of OJK Regulation No. 4 Year 2024 regarding Reporting of Share Ownership and Share Pledging Activities at the Public Companies. Provisions regarding reporting of share ownership are also regulated internally in the Board Manual for the Board of Directors and Board of Commissioners as stated in the Joint Regulation of the Board of Commissioners and Directors No. 05/KEP/DK/2022 and No. PD.620.00/r.01/HK200/COP-M4000000/2022 regarding Guidelines for the Work Procedures of the Board of Commissioners and Directors (Board Manual) of the Company (Persero) PT Telekomunikasi Indonesia, Tbk.

The Company routinely reports on the share ownership of members of the Board of Directors and members of the Board of Commissioners every month. It is disclosed in the Annual Report and Financial Report. In the Annual Report for 2025 Financial Year, Telkom reports information on share ownership by members of the Board of Directors and Board of Commissioners, as well as changes in the "Shareholder Composition" section.

All members of the Board of Directors and Board of Commissioners are required to report changes in their share ownership no later than three working days after the occurrence of ownership or changes in ownership of Public Company shares. This policy applies to all members of the Board of Directors and Board of Commissioners. In 2023 and 2024, several members of the Board of Directors and Board of Commissioners received Long-Term Incentive (LTI) and deferred Tantiem in the form of Telkom shares.