

**CODE OF CONDUCT
ANNUAL AND EXTRAORDINARY GENERAL MEETING OF SHAREHOLDERS
2020 (the "Meeting")
PT TRIMEGAH SEKURITAS INDONESIA TBK ("the Company")
JAKARTA, 26 Agustus 2020 – Gedung Artha Graha**

1. The Meeting will be conducted in Indonesian language.
2. In accordance with Article 27 of the Indonesian Financial Services Authority Regulation No. 15/POJK.04/2020 regarding the Plan and Implementation of General Meeting of Shareholders of Public Company ("POJK 15/2020"), the Company has provided an alternative to shareholders to grant power of attorney electronically through eASY.KSEI system which is managed by PT Kustodian Sentral Efek Indonesia (KSEI).
3. Considering the Emergency Status of Disease Outbreaks Due to Corona Virus stated by the Government, the Company strongly suggests the Shareholders not to physically attend the Meeting, but to provide power of attorney to an independent party i.e. PT Sinartama Gunita as the Company's Share Registrar through the eASY.KSEI Electronic General Meeting of Shareholders Representative Platform (e-Proxy). The Guidance in Granting the Power of Attorney through E-Proxy can be accessed through <https://www.trimegah.com/en/site/investor-relation/general-meeting-of-shareholders-?csrt=12013383108220591726#in2019>
4. Shareholders or their proxy who will physically attend the Meeting must comply with the Company's safety and health protocols as follows:
 - a. When registering, submit Health Declaration Form that can be downloaded from <https://www.trimegah.com/en/site/investor-relation/general-meeting-of-shareholders-?csrt=12013383108220591726#in2019>.
 - b. Wearing a mask at all times within the building area where the Meeting is held and during the Meeting.
 - c. Complying with the health checking procedures which will be conducted by the building management where the Meeting is held.
 - d. Implementing physical distancing policy in accordance with direction from the Company and building management where the Meeting is held.
 - e. Immediately leaving the building area where the Meeting is held after the Meeting is over.
5. The shareholders or their proxy who are experiencing fever with temperatures above 37.3° C, and/or cough, shortness of breath, headaches flu will not be permitted to attend the Meeting.
6. The Company has the right to prohibit shareholders or their proxy to attend or be present at the Meeting premise and/or the building area where the Meeting is held if the shareholders or their proxy do not comply with the prevailing safety and health protocols mentioned above.
7. In compliance with Article 13 paragraph 1 of the Company's Articles of Association, the Meeting will be chaired by a member of the Board of Commissioners appointed by the Board of Commissioners.
8. The Chairperson of the Meeting has the right to ask those who are present to prove their authority to attend the Meeting.
9. Those who are entitled to attend or be represented in the Meeting are:
 - a. The Company's shareholders whose names are registered in the Register of Shareholders of the Company at the closing of stock trading in the Indonesia Stock Exchange (IDX) on August 3, 2020,

- or its authorized attorney who has the right to voice opinions and vote at the Meeting.
- b. Invitees are parties who are not shareholders or their proxy who are present at the invitation of the Board of Directors, and have no right to express an opinion and to give a vote in the Meeting.
10. In accordance with article 14 of the Company's Article of Association, Annual General Meeting of Shareholders may be held when attended by shareholders representing more than 1/2 (a half) of the total shares with valid voting rights issued by the Company, and Extraordinary General Meeting of Shareholders may be held if attended by shareholders representing more than 2/3 (two-thirds) of the total shares with valid voting rights issued by the Company.
 11. After discussion of each meeting agenda, the Chairperson of the Meeting will give an opportunity to the shareholders or their proxies to raise questions, opinions, proposals or suggestions before voting on the agenda of that has been discussed.
 - a. Shareholders who wish to raise questions are requested to fill out the question form that has been distributed. After completing the question form, the shareholders can raise their hands to submit the form to our officer.
 - b. Our officer will take the question form from the shareholders, and submit it to the Chairperson of the Meeting.
 - c. Questions that can be addressed are only those directly related with the Meeting agenda.
 12. Voting Rights:
 - a. Only the Company's Shareholders whose names are registered in the Register of Shareholders of the Company on August 3, 2020 or their proxies are entitled to vote.
 - b. Each share entitles its holder to issue 1 (one) vote.
 13. Meeting Resolutions:
 - a. The Meeting Resolution shall be made through deliberation to reach a consensus, when deliberation for a consensus is not reached, then a voting is held.
 - b. Shareholders who votes not in favor or abstain will be requested to raise their hand. Then, we will count the number of shares who votes not in favor or abstain.
 - c. In accordance with Article 14 paragraph 2 point (1) c of the Company's Article of Association, the resolution on the first to the fifth agenda of Annual GMS is valid if it is approved by more than 1/2 (a half) of all shares with valid voting rights present at the Annual GMS, and the resolution of the single agenda of the Extraordinary GMS is valid if approved by more than 2/3 (two thirds) of all shares with valid voting rights present at the Meeting.
 14. During the meeting, mobile phones should be in silent mode in order not to disturb the Meeting.
 15. To ensure the Meeting is in order, the registration of shareholders or their proxies at the Meeting venue is closed 30 minutes prior to the Meeting, which is at 09:30 West Indonesia Time

Jakarta, August 4, 2020

Board of Directors