

DIVIDEND POLICY GUIDELINES

PT Hanjaya Mandala Sampoerna Tbk.

This dividend policy governs the management of shareholders' rights regarding dividends in a transparent manner and in accordance with applicable regulations. This policy is implemented while prioritizing the principle of prudence to maintain the Company's financial condition and resilience.

Effective as of December 19, 2025, based on the resolution of the Board of Directors PT Hanjaya Mandala Sampoerna Tbk. dated December 19, 2025.

A. Legal Basis

1. Law No. 40 of 2007 regarding Limited Liability Companies, as amended by Law No. 6 of 2023 concerning the Stipulation of Government Regulation in Lieu of Law No. 2 of 2022 on Job Creation into Law;
2. Law No. 36 of 2008 concerning the Fourth Amendment to Law No. 7 of 1983 on Income Tax as amended by Law No. 7 of 2021 concerning Harmonization of Tax Regulations;
3. Government Regulation No. 9 of 2021 concerning Tax Treatment to Support Ease of Doing Business, as lastly amended by Government Regulation No. 55 of 2022;
4. OJK Regulation No. 15/POJK.04/2020 regarding the Planning and Convening of General Meetings of Shareholders of Public Companies;
5. OJK Regulation No. 31/POJK.04/2015 regarding Disclosure of Material Information or Facts by Issuers or Public Companies;
6. OJK Circular No. 16/SEOJK.04/2021 regarding the Form and Content of Annual Reports of Issuers or Public Companies;
7. Decision of the Board of Directors of PT Bursa Efek Indonesia No. Kep-00023/BEI/03-2015 regarding the Determination of Cash Dividend Schedules;
8. Decision of the Board of Directors of PT Bursa Efek Indonesia No. Kep-00077/BEI/09-2021 regarding Amendments to the Implementation Provisions of Stock Dividend Distribution, Bonus Shares Distribution, and Interim Dividend Distribution; and
9. Articles of Association of PT Hanjaya Mandala Sampoerna Tbk., as may be amended from time to time.

B. Objective of the Policy

This Policy is intended to set forth the framework by which the Company administers and honors shareholders' entitlements relating to dividends, ensuring the observance of lawful, transparent, and sound governance practices while maintaining overall corporate prudence and financial resilience.

C. Definitions

For clarity and uniform application of this Policy, the following terms shall bear the meanings ascribed below:

"AoA" means the Articles of Association of the Company.

"Board of Commissioners" denotes the supervisory organ of the Company charged with providing oversight, whether general or specific in nature, and with furnishing recommendations or guidance to the Board of Directors.

“Board of Directors” denotes the organ entrusted with full management authority over the Company’s affairs, empowered to act for and on behalf of the Company both judicially and extrajudicially.

“Business Day” means any day on which securities trading is conducted on the Stock Exchange, excluding national holidays and Exchange-declared holidays.

“Company” refers to PT Hanjaya Mandala Sampoerna Tbk.

“Dividend” signifies the portion of net profits, after statutory reserves have been set aside, which may be allocated for distribution to shareholders as resolved by the General Meeting of Shareholders.

“General Meeting of Shareholders” or **“GMS”** denotes the organ of the Company vested with residual authority not conferred upon the Board of Directors or Board of Commissioners under applicable law.

“Interim Dividend” signifies a provisional dividend approved by the Board of Commissioners and declared by the Board of Directors prior to the close of the financial year.

“Shareholder” refers to any party—individual, corporate entity, or business group—holding shares in the Company directly or indirectly.

“Special Reserve” refers to a designated account within the Company’s equity in which unclaimed dividends are placed, and which serves as the repository for such amounts until either claimed by entitled shareholders or, upon expiration of the further prescribed period, deemed forfeited and vested in the Company.

D. Core Principles Governing Dividend Allocation

1. The determination of net profit usage, including statutory reserve allocation, rests exclusively with the GMS, and remaining profits shall be distributable as dividends unless the GMS resolves otherwise.
2. Dividend distributions must be aligned with prudent corporate management, sustaining the Company’s long-term operational and financial soundness.
3. Profit figures used to calculate dividends must reflect earnings generated through regular business activities.
4. A dividend may be declared only when the Company maintains a positive retained earnings balance.
5. All decisions and actions relating to dividend distributions must conform to applicable laws and the Company’s AoA.

E. Corporate Considerations Related to Dividend Decisions

1. General Parameters

Dividend planning must recognize shareholder entitlements while ensuring that the Company's strategic priorities and financial stability remain intact.

2. Criteria for Assessment

a. **External considerations include:** macroeconomic trends, systemic risk exposures, regulatory requirements, supervisory directives, and shareholder expectations.

b. **Internal considerations include:** realized performance, strategic growth objectives, profitability outlook, capital adequacy, internal risk exposures, and forward-looking capital needs.

3. Requirements for Interim Dividends

Interim dividends may be declared only if supported by financial statements evidencing sufficient net profit and only when such issuance does not undermine the Company's asset position or business continuity.

F. Type of Dividends

Cash Dividends, representing monetary distributions, paid directly to shareholders in cash as the sole form of dividend permitted under this Policy.

G. Dividend Sizing

1. Net profits remaining after statutory allocations are generally distributed as dividends in accordance with GMS decisions.
2. Dividends may be allocated only when retained earnings are positive.
3. The proportion of annual net profits to be distributed as dividends shall be determined entirely by resolution of the GMS.
4. Dividend sizing must reflect the considerations listed in Section D of this Policy.

H. Approval and Declaration Process

1. Final Dividend Procedure

The Company shall formulate projected dividend targets, assess distributable profits, secure approvals from the Board of Directors and Board of Commissioners, and submit the final proposal to the GMS for determination.

2. Interim Dividend Procedure

Interim dividends may be initiated at shareholder request (meeting minimum share thresholds) and declared following assessments of profit projections, capital sufficiency, and financial resilience. Any interim dividends must be returned should the Company incur year-end losses.

3. Unclaimed Dividend Procedure

- a. The Company shall promptly deposit any dividends that cannot be transferred to the bank account of the relevant shareholders as recorded in the Company's register after the payment date of the dividends into the Special Reserve.
- b. Dividends placed in the Special Reserve may be claimed by the entitled shareholders upon submission to the Company of a request for dividend disbursement, accompanied by the supporting documentation required under applicable laws and regulations and deemed acceptable by the Board of Directors, within the period stipulated in Section I of this Policy.
- c. Any interest, accretion, or other earnings generated from the placement of unclaimed dividends in the Special Reserve shall accrue exclusively to the Company and shall not, under any circumstances, be claimable by any shareholder or third party. For the avoidance of doubt, the Company shall be prohibited from utilizing, withdrawing, or otherwise applying any portion of the unclaimed dividends held in the Special Reserve for any purpose whatsoever until the retention period stipulated in Section I(3)(b) of this Policy has lapsed.

I. Distribution Timelines

1. Final Dividends

Final dividends must be disbursed within 30 days following publication of the GMS summary, and record dates must be set within 8 Business Days of the GMS.

2. Interim Dividends

Interim dividend schedules must be announced promptly after Board approval, and payments must be completed within 30 days of such announcement.

3. Unclaimed Dividends

- a. Unclaimed dividends placed in the Special Reserve may be claimed by the entitled shareholders in accordance with the provisions stipulated in Section H(3)(b), within 15 years from the payment date of the relevant dividends.
- b. The Company shall have the right to reclaim dividends that remain unclaimed by shareholders for 15 years from the payment date of the relevant dividends, and shall record them in accordance with the requirements stipulated under the prevailing laws and regulations.

J. Tax Treatment

Tax obligations relating to dividend distributions shall follow applicable rules for domestic individuals, domestic corporate taxpayers, and foreign taxpayers,

including withholding requirements, exemptions, treaty applications, record-date taxation rules, and filing obligations.

K. Regulatory Authority in Extraordinary Circumstances

The Financial Services Authority (OJK) may direct the Company to delay, modify, or cancel dividend distributions. The Company may likewise seek GMS approval to defer or suspend dividend payments in situations involving financial distress, capital adequacy pressures, or regulatory directives.

L. Communication of Policy

This Policy shall be communicated through publicly accessible corporate channels, including the Company's website.

M. Amendments and Updates

This Policy shall be reviewed and updated periodically to reflect changes in applicable law, regulatory directives, or the Company's strategic needs, ensuring alignment with governance and risk management principles.
