

**CODE OF CONDUCT**  
**THE SECOND EXTRAORDINARY GENERAL MEETING OF SHAREHOLDERS (“Extraordinary GMS”)**  
**(“Meeting”)**  
**PT MINNA PADI INVESTAMA SEKURITAS Tbk (“the COMPANY”)**

1. The meeting shall be held in Indonesian.
  2. In accordance with the provisions of Article 21 paragraph 2 of the Company's Articles of Association, the Meeting is chaired by a member of the Company's Board of Directors.
  3. The Chairperson of the Meeting has the right to request that those present prove their authority to attend the Meeting.
  4. Those who are entitled to attend or be represented at the Meeting are:
    - a. Shareholders of the Company whose names are registered in the Register of Shareholders of the Company on July 22, 2021 until the end of the trading period or their legal proxies, who have the right to express opinions and vote at the Meeting.
    - b. Invitations are parties who are not shareholders who are present at the invitation of the Board of Directors and do not have the right to express opinions and vote in the Meeting, relating to the meeting agenda.
    - c. Shareholders and/or their proxies who are present after the Meeting is opened, can still participate in the Meeting but cannot vote in the Meeting.
    - d. Shareholders and/or their proxies who will be physically present at the Meeting are required to follow the health protocol for the public in public places and facilities in the context of preventing and controlling COVID-19 (“COVID-19 Health Protocol”) at the Meeting place that has been determined by the The Company, among others, are as follows:
      - 1) Shareholders or their proxies are required to have a certificate of rapid antigen test or COVID-19 PCR swab test with negative results obtained from hospital doctors, health centers or clinics, with sampling within a maximum period of 24 (twenty four) hours prior to Meeting.
      - 2) Must wear a medical mask while in the meeting area and venue.
      - 3) Shareholders and/or their proxies have a body temperature below 37.3 degrees C
      - 4) Use the hand sanitizer provided before entering the meeting room.
      - 5) This meeting applies the physical distancing policy.
      - 6) Shareholders and/or their proxies are also advised not to shake hands or in other ways come into direct contact.
- In the event that the Shareholders and/or their proxies do not to meet the requirements of numbers 1-6 above, the Company has the right to:
1. Prohibit or allow the Shareholders or their proxies to attend the Meeting;
  2. Request the Shareholders and/or their proxies to immediately leave the Meeting room and/or the building where the Meeting is being held; or
  3. Take other necessary actions in accordance with the health protocol.

5. In accordance with the provisions;  
Article 24 paragraph 3 letter c of the Company's articles of association and POJK 15/POJK.04/2020 Article 42 letter d, Extraordinary GMS, may be held if attended by the shareholders and/or their legal proxies, representing at least 3/ 5 part of the total shares with valid voting rights that have been issued by the Company.  
-and based on Article 24 paragraph 1 letter c of the Company's articles of association and POJK 15/POJK.04/2020 Article 42 letter d, a valid decision can be taken if it is approved by more than 1/2 of the number of votes legally cast in the Meeting.
6. In accordance with the Financial Services Authority ("OJK") regulations, the Company has provided an alternative for shareholders to grant power of attorney electronically through the eASY.KSEI system which is managed by PT Kustodian Sentral Efek Indonesia (KSEI) ("E-Proxy").  
Shareholders or their proxies can prove with a valid power of attorney that they are entitled to attend and speak and vote at the Meeting.
7. In every discussion of the Meeting agenda, the Chairperson of the Meeting will provide an opportunity to the Shareholders or their proxies who are present either electronically through the eASY system. KSEI or physically to ask questions, opinions, proposals and/or suggestions prior to voting and such questions, opinions, proposals and/or suggestions must be related to the agenda of the Meeting being discussed.
8. The submission of questions, opinions, proposals and/or suggestions is carried out in the following manner:
  - a. The Chairperson of the Meeting determines the time allotted for question and answer is a maximum of 5 minutes. For each agenda item, there will only be one stage for asking and/or giving opinions. The questions asked must relate to the agenda being discussed;
  - b. Those who attend electronically can enter a statement or question after logging in to the eASY system. KSEI in the available Opinion Statement Field.  
Meanwhile, Shareholders or their proxies who are physically present and want to ask questions and/or express their opinions are asked to raise their hands so that the officer can provide an Inquiry Form. The form must include the name of the Shareholder, the name of the proxy (if using a proxy) and the number of shares owned or represented, as well as questions or opinions. The question sheet is then taken by the officer and submitted to the Notary to examine its validity and then it will be handed back to the Chairperson of the Meeting;
  - c. After asking questions and/or opinions, the Chairperson of the Meeting will answer the questions or appoint another party to answer the questions;  
For statements or questions in the eAsy system. KSEI, the Chairperson of the Meeting will reach out to statements or questions that are included in the flow text book, as follows:
    1. On the E-Meeting Hall screen, select the desired agenda to be discussed. Continue by clicking the "Start Discussion" button. After the discussion on the agenda is opened, shareholders and proxies who participate in the implementation of the GMS electronically and access the E-Meeting Hall screen can submit questions and opinions. Incoming

- statements or questions can be seen in the Electronic Opinions column. The Chairperson of the Meeting opens the statement or question by clicking "Read"
2. If it will be responded to or followed up in the Meeting, then the question or opinion can be forwarded using the "Transfer to the flow text" button.
  3. To respond, responses to questions or opinions submitted by the Chairperson of the Meeting can also be entered into the General Meeting Flow Text Entry column so that all GMS participants who access the E-Meeting Hall can see it. Click "Send".
  4. When the discussion has ended, click "End of discussion".
- d. If there are questions, opinions, proposals and/or suggestions that have not been answered and/or responded to, then the questions, opinions, proposals and/or suggestions related to the agenda of the Meeting can be answered in writing by the Company's Board of Directors.
9. In accordance with the prevailing laws and regulations, each share gives the holder the right to cast 1 (one) vote. If a shareholder owns/represents more than 1 (one) share, then he/she is asked to vote 1 (one) time only and the vote represents the entire number of shares owned/represented.
  10. Direct voting per agenda at the implementation of the GMS may take place electronically or physically.  
For direct electronic voting (live voting), the system will set a voting time which will run backwards for 2 (two) minutes.  
Voting for those who are physically present is carried out by raising their hands in the following manner:
    - a. First, the Shareholders or their proxies who vote against are asked by the Chairperson of the Meeting to raise their hands;
    - b. Second, the Shareholders or their proxies who cast blank votes are asked by the Chairperson of the Meeting to raise their hands;Shareholders who vote against or give a blank vote will be given a ballot card.
  11. During the Meeting, so as not to interfere with the Meeting, it is expected not to activate mobile phones in the Meeting room and/or around the Meeting room.
  12. Shareholders and/or their proxies who are not present at the Meeting, including other Members of the Board of Directors and Board of Commissioners, can find out the results/developments of the Meeting through the Easy KSEI system, or publications/media made by the Company in connection with the implementation of the Meeting.
  13. For health reasons and in the context of controlling and preventing the spread of the COVID-19 Virus, the Company does not provide food and beverages, goody bag products/souvenirs, and does not provide the Annual Report in physical form to Shareholders and Shareholders' Proxies who attend the Meeting.
  14. Matters related to the Meeting, Company information and other supporting documents can be downloaded through the Company's website [www.minnapadi.com](http://www.minnapadi.com). The Company does not provide the Meeting materials in hardcopy or softcopy in the form of flash disks.

Jakarta, July 30, 2021