IMPORTANT NOTICE

THIS OFFERING IS AVAILABLE ONLY TO INVESTORS WHO ARE OUTSIDE OF THE UNITED STATES

IMPORTANT: You must read the following before continuing. The following applies to the offering circular following this page, and you are therefore advised to read this carefully before reading, accessing or making any other use of the offering circular. In accessing the offering circular, you agree to be bound by the following terms and conditions, including any modifications to them, any time you receive any information from us as a result of such access.

NOTHING IN THIS ELECTRONIC TRANSMISSION CONSTITUTES AN OFFER OF SECURITIES FOR SALE OR SOLICITATION IN ANY JURISDICTION WHERE IT IS UNLAWFUL TO DO SO. THE SECURITIES DESCRIBED IN THE OFFERING CIRCULAR HAVE NOT BEEN, AND WILL NOT BE, REGISTERED UNDER THE U.S. SECURITIES ACT OF 1933, AS AMENDED (THE "SECURITIES ACT"), OR THE SECURITIES LAWS OF ANY STATE OF THE UNITED STATES OR OTHER JURISDICTION AND THEREFORE SECURITIES MAY NOT BE OFFERED OR SOLD WITHIN THE UNITED STATES, EXCEPT PURSUANT TO AN EXEMPTION FROM, OR IN A TRANSACTION NOT SUBJECT TO, THE REGISTRATION REQUIREMENTS OF THE SECURITIES ACT AND APPLICABLE STATE OR LOCAL SECURITIES LAWS.

THE FOLLOWING OFFERING CIRCULAR MAY NOT BE FORWARDED OR DISTRIBUTED TO ANY OTHER PERSON AND MAY NOT BE REPRODUCED IN ANY MANNER WHATSOEVER. ANY FORWARDING, DISTRIBUTION OR REPRODUCTION OF THIS DOCUMENT IN WHOLE OR IN PART IS UNAUTHORIZED. FAILURE TO COMPLY WITH THIS DIRECTIVE MAY RESULT IN A VIOLATION OF THE SECURITIES ACT OR THE APPLICABLE LAWS OF OTHER JURISDICTIONS. ANY INVESTMENT DECISION SHOULD BE MADE ON THE BASIS OF THE FINAL TERMS AND CONDITIONS OF THE SECURITIES AND THE INFORMATION CONTAINED IN THIS OFFERING CIRCULAR. IF YOU HAVE GAINED ACCESS TO THIS TRANSMISSION CONTRARY TO ANY OF THE FOREGOING RESTRICTIONS, YOU ARE NOT AUTHORIZED AND WILL NOT BE ABLE TO PURCHASE ANY OF THE SECURITIES DESCRIBED THEREIN.

Confirmation of your Representation: In order to be eligible to view this offering circular or make an investment decision with respect to the securities, investors must be outside the United States. This offering circular is being sent at your request and by accepting the e-mail and accessing this offering circular, you shall be deemed to have represented to us and the initial purchasers (defined below) that (1) you are outside the United States and that the electronic mail address that you gave us and to which this e-mail has been delivered is not located in the United States and, to the extent you purchase the securities described in this offering circular, you will be doing so in an offshore transaction, as defined in Regulation S under the Securities Act ("Regulation S"), in compliance with Regulation S and (2) that you consent to delivery of this offering circular by electronic transmission.

You are reminded that this offering circular has been delivered to you on the basis that you are a person into whose possession this offering circular may be lawfully delivered in accordance with the laws of the jurisdiction in which you are located and you may not, nor are you authorized to, deliver or disclose this offering circular to any other person.

The materials relating to the offering do not constitute, and may not be used in connection with, an offer or solicitation in any place where offers or solicitations are not permitted by law. If a jurisdiction requires that the offering be made by a licensed broker or dealer and the initial purchasers (as defined below) or any affiliate of the initial purchasers is a licensed broker or dealer in that jurisdiction, the offering shall be deemed to be made by the initial purchasers or such affiliate on behalf of PT Tower Bersama Infrastructure Tbk (the "Issuer") in such jurisdiction. This offering circular has been sent to you in an electronic form. You are reminded that documents transmitted via this medium may be altered or changed during the process of electronic transmission and consequently none of Barclays Bank PLC, Singapore Branch, BNP Paribas, Crédit Agricole Corporate and Investment Bank, Singapore Branch, DBS Bank Ltd., The Hongkong and Shanghai Banking Corporation Limited, Singapore Branch, Mizuho Securities Asia Limited, Oversea Chinese Banking Corporation Limited, United Overseas Bank Limited, Australia and New Zealand Banking Group Limited, CIMB Bank Berhad, Singapore Branch, MUFG Securities Asia Limited Singapore Branch and SMBC Nikko Securities (Hong Kong) Limited (together, the "initial purchasers") or the Issuer, nor any person who controls any initial purchaser or the Issuer, or any affiliate of any such person, accepts any liability or responsibility whatsoever in respect of any difference between the offering circular distributed to you in electronic format and the hard copy version available to you on request from the initial purchasers or the Issuer.

This offering circular has been prepared on the basis that any offer of securities in any Member State of the European Economic Area ("EEA") will be made pursuant to an exemption under the Prospectus Regulation from the requirement to publish a prospectus for offers of securities. The expression Prospectus Regulation means Regulation (EU) 2017/1129 (as amended or superseded).

This offering circular has been prepared on the basis that any offer of securities in the United Kingdom ("UK") will be made pursuant to an exemption under the FSMA from the requirement to publish a prospectus for offers of securities. The expression FSMA means the Financial Services and Markets Act 2000 (as amended).

Prohibition of sales to EEA retail investors — The securities are not intended to be offered, sold or otherwise made available to and should not be offered, sold or otherwise made available to any retail investor in the EEA. For these purposes, a retail investor means a person who is one (or more) of: (i) a retail client as defined in point (11) of Article 4(11) of Directive 2014/65/EU (as amended, "MiFID II"); or (ii) a customer within the meaning of Directive 2016/97/EU (as amended, the "Insurance Distribution Directive"), where that customer would not qualify as a professional client as defined in point (10) of Article 4(1) of MiFID II. Consequently, no key information document required by Regulation (EU) No 1286/2014 (as amended, the "PRIIPs Regulation") for offering or selling the securities or otherwise making them available to retail investors in the EEA has been prepared and therefore offering or selling the securities or otherwise making them available to any retail investor in the EEA may be unlawful under the PRIIPs Regulation.

Prohibition of sales to UK retail investors — The securities are not intended to be offered, sold or otherwise made available to and should not be offered, sold or otherwise made available to any retail investor in the UK. For these purposes, a retail investor means a person who is one (or more) of (i) a retail client, as defined in point (8) of Article 2 of Regulation (EU) No 2017/565 as it forms part of domestic law by virtue of the European Union (Withdrawal) Act 2018 ("EUWA"); or (ii)a customer within the meaning of the provisions of the FSMA and any rules or regulations made under the FSMA to implement Directive (EU) 2016/97, where that customer would not qualify as a professional client, as defined in point (8) of Article 2(1) of Regulation (EU) No 600/2014 as it forms part of domestic law by virtue of the EUWA. Consequently no key information document required by Regulation (EU) No 1286/2014 as it forms part of domestic law by virtue of the EUWA (the "UK PRIIPs Regulation") for offering or selling the notes or otherwise making them available to retail investors in the UK has been prepared and therefore offering or selling the notes or otherwise making them available to any retail investor in the UK may be unlawful under the UK PRIIPs Regulation.

This offering circular is for distribution only to persons who (i) fall within Article 43(2)(b) of the Financial Services and Markets Act 2000 (Financial Promotion) Order 2005 (as amended, the "Financial Promotion Order"), (ii) have professional experience in matters relating to investments falling within Article 19(5) of the Financial Promotion Order, (iii) are persons falling within Article 49(2)(a) to (d) ("high net worth companies, unincorporated associations etc") of the Financial Promotion Order, (iv) are outside the United Kingdom, or (v) are persons to whom an invitation or inducement to engage in investment activity (within the meaning of section 21 of the Financial Services and Markets Act 2000) in connection with the issue or sale of any securities may otherwise lawfully be communicated or caused to be communicated (all such persons together being referred to as "relevant persons"). This offering circular is directed only at relevant persons and must not be acted on or relied on by persons who are not relevant persons. Any investment or investment activity to which this offering circular relates is available only to relevant persons and will be engaged in only with relevant persons.

If you receive this document by e-mail, you should not reply by e-mail to this announcement, and you may not purchase any securities by doing so. Any reply e-mail communications, including those you generate by using the "Reply" function on your e-mail software, will be ignored or rejected. If you receive this document by e-mail, your use of this e-mail is at your own risk and it is your responsibility to take precautions to ensure that it is free from viruses and other items of a destructive nature.

The information in this offering circular is not complete and may be changed. This offering circular is not an offer to sell the securities, nor a solicitation to buy the securities, in any jurisdiction where the offer or sale is not permitted.

NOT FOR DISTRIBUTION
IN THE UNITED STATES
STRICTLY CONFIDENTIAL

PT Tower Bersama Infrastructure Tbk

(incorporated in the Republic of Indonesia with limited liability)

US$400,000,000
2.80% Senior Unsecured Notes due 2027

PT Tower Bersama Infrastructure Tbk (the "Issuer" or the "Company"), a company incorporated with limited liability under the laws of the Republic of Indonesia, is offering US$400,000,000 2.80% Senior Unsecured Notes due 2027 (the "notes" or "Notes"). The notes will mature on May 2, 2027. The notes will bear interest at the rate of 2.80% per annum. Interest on the notes is payable on May 2 and November 2 of each year, beginning on May 2, 2022.

At any time on or after November 2, 2026, the Par Call Date, the Issuer may redeem the notes, in whole or in part, at 100% of their principal amount plus accrued and unpaid interest, if any, to the redemption date. At any time and from time to time prior to the Par Call Date, the Issuer may redeem the notes, in whole or in part, at a redemption price equal to 100% of their principal amount plus the Applicable Premium (as defined) as of, and accrued and unpaid interest, if any, to the redemption date as described under the heading "Description of the Notes — Optional Redemption." Within 10 days following a Change of Control Triggering Event (as defined in "Description of the Notes"), the Issuer will make an offer to repurchase all outstanding notes at a purchase price equal to 101% of their principal amount plus accrued and unpaid interest, if any, to (but not including) the Change of Control Payment Date (as defined in "Description of the Notes").

The notes are subject to redemption in whole but not in part at 100% of their principal amount, together with accrued and unpaid interest to the redemption date, at the option of the Issuer at any time in the event of certain changes affecting taxes of the Republic of Indonesia. See "Description of the Notes — Redemption for Changes in Taxes." Payments on the notes will be made in U.S. dollars without deduction for or on account of taxes imposed or levied by the Republic of Indonesia (and certain other jurisdictions) to the extent described under "Description of the Notes — Additional Amounts."

The notes will be unsubordinated obligations of the Issuer and will rank *pari passu* in right of payment with all its other unsecured and unsubordinated indebtedness. For a more detailed description of the notes, see "Description of the Notes" beginning on page 169. The notes are expected to be rated "BBB-" by Fitch Ratings Ltd. ("**Fitch**"). A security rating is not a recommendation to buy, sell or hold securities and may be subject to suspension, reduction or withdrawal at any time by the assigning rating agency.

Investing in the notes involves risks that are described under the "Risk Factors" section beginning on page 24 of this offering circular.

Offering Price: 100%

Approval in-principle has been received for the listing and quotation of the notes on the Official List of the Singapore Exchange Securities Trading Limited (the "SGX-ST"). The SGX-ST assumes no responsibility for the correctness of any of the statements made or opinions expressed or reports contained herein. Admission of the notes to the Official List of the SGX-ST is not to be taken as an indication of the merits of the notes or our Company.

The notes have not been and will not be registered under the U.S. Securities Act of 1933, as amended (the "Securities Act"), or the securities laws of any other jurisdiction. The notes are being offered and sold in offshore transactions outside the United States in reliance on Regulation S under the Securities Act ("Regulation S"). See "Plan of Distribution" and "Transfer Restrictions" for additional information about eligible offerees and transfer restrictions. This offering does not constitute a public offering or private offering in Indonesia under Law Number 8 of 1995 regarding Capital Markets and its implementing regulations. The notes may not be offered or sold in Indonesia or to Indonesian citizens, wherever they are domiciled, or to Indonesian residents and institutions, in a manner which constitutes a public offering or private offering under the laws and regulations of Indonesia.

It is expected that delivery of the notes will be made on or about November 2, 2021 (the "Closing Date"), being the fifth business day following the date of pricing of the notes ("T+5"). The notes will be issued only in registered form in minimum denominations of US$200,000 and integral multiples of US$1,000 in excess thereof, registered in the name of a nominee of and deposited with a common depositary for Euroclear Bank SA/NV ("Euroclear") and Clearstream Banking S.A. ("Clearstream") on or about the Closing Date for the accounts of their respective accountholders.

Joint Global Coordinators

Barclays | **BNP PARIBAS** | **Crédit Agricole CIB** | **DBS Bank Ltd.** | **HSBC** | **Mizuho Securities** | **OCBC Bank** | **United Overseas Bank Limited**

Joint Bookrunners and Joint Lead Managers

Barclays | **BNP PARIBAS** | **Crédit Agricole CIB** | **DBS Bank Ltd.** | **HSBC** | **Mizuho Securities**

OCBC Bank | **United Overseas Bank Limited** | **ANZ** | **CIMB** | **MUFG** | **SMBC Nikko**

The date of this offering circular is October 26, 2021

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NOTICE TO INVESTORS

This offering circular does not constitute an offer to sell to, or a solicitation of an offer to buy from, any person in any jurisdiction to whom it is unlawful to make the offer or solicitation in such jurisdiction. Neither the delivery of this offering circular nor any sale made hereunder shall, under any circumstances, create any implication that there has been no change in our affairs since the date of this offering circular or that the information contained in this offering circular is correct as of any time after that date.

You should rely only on the information in this offering circular or to which we have referred you in making an investment decision with respect to the notes. None of us or any of the initial purchasers (as defined below) have authorized anyone to provide you with any additional or different information. This offering circular may only be used where it is legal to sell the notes. The information in this offering circular may be accurate only on the date of this offering circular.

We are relying on an exemption from registration under the Securities Act for offers and sales of securities outside the United States that do not involve a public offering. The notes offered hereby have not been registered under the Securities Act or under any other securities laws. Unless they are registered, the notes may be offered only in transactions that are exempt from these securities laws.

This offering circular has been prepared by us solely for use in connection with the issue and offering of notes as described herein. We have not authorized its use for any other purpose. This offering circular may not be copied or reproduced in whole or in part. This offering circular is personal to each offeree and does not constitute an offer to any other person or to the public generally to subscribe for or otherwise acquire the notes. Distribution of this offering circular to any person other than the offeree and those persons, if any, retained to advise such offeree with respect thereto is unauthorized, and any disclosure of any of its contents, without prior written consent, is prohibited. By accepting delivery of this offering circular, you agree to these restrictions.

By purchasing the notes, you will be deemed to have made the acknowledgments, representations, warranties and agreements described in "Transfer Restrictions." You will be required to bear the financial risks of your investment which may be for an indefinite period of time.

This offering circular is highly confidential. This offering circular has been prepared by us solely for use in connection with the proposed offering of the notes described in this offering circular. This offering circular is personal to the offeree to whom it has been delivered and does not constitute an offer to any other person or to the public in general to subscribe for or otherwise acquire the notes. We are providing it solely for the purpose of enabling you to consider a purchase of the notes. You should read this offering circular before making a decision whether to purchase the notes. You must not use this offering circular for any other purpose, or disclose any information in this offering circular to any other person.

Each person receiving this offering circular acknowledges that: (i) such person has been afforded an opportunity to request from us and to review, and has received, all additional information considered by it to be necessary to verify the accuracy of, or to supplement, the information contained herein; (ii) such person has not relied on the initial purchasers or any person affiliated with the initial purchasers in connection with any investigation of the accuracy of such information or its investment decision; and (iii) no person has been authorized to give any information or to make any representation concerning us, our affiliates or the notes (other than as contained herein) and, if given or made, any such other information or representation should not be relied upon as having been authorized by us or the initial purchasers.

The information contained in this offering circular has been provided by us and the other sources identified herein. Barclays Bank PLC, Singapore Branch, BNP Paribas, Crédit Agricole Corporate and Investment Bank, Singapore Branch, DBS Bank Ltd., The Hongkong and Shanghai Banking Corporation Limited, Singapore Branch, Mizuho Securities Asia Limited, Oversea Chinese Banking Corporation Limited, United Overseas Bank Limited, Australia and New Zealand Banking Group Limited, CIMB Bank Berhad, Singapore Branch, MUFG Securities Asia Limited Singapore Branch and SMBC Nikko Securities (Hong Kong) Limited (together, the "initial purchasers") and The Bank of New York Mellon, London Branch as trustee (the "Trustee") and as paying agent (the "Paying Agent") and The Bank of New York Mellon SA/NV, Dublin Branch as transfer agent (the "Transfer Agent") and as registrar (the "Registrar" and, together with the Paying Agent and the Transfer Agent, the "Agents") have not verified, and make no representation or warranty, express or implied, as to the accuracy or completeness of, the information in this offering circular. To the fullest extent permitted by law, the initial purchasers do not accept any responsibility for the content of this offering circular or any other statement in connection with the issue and offering of the notes made or purported to be made by the initial purchasers or on their behalf. The initial purchasers, the Trustee and the Agents accordingly disclaim all and any liability whether arising in tort or contract or otherwise which they might otherwise have in respect of this offering circular or any such statement. In making an investment decision, you must rely on your own examination of us and the terms of this offering, including the merits and risks involved. By accepting delivery of this offering circular, you acknowledge that you have not relied on the initial purchasers, the Trustee, the Agents or any of their respective affiliates in connection with your investigation of the accuracy of the information in this offering circular or your investment decision.

None of us or the initial purchasers are making any representation to any purchaser of the notes regarding the legality of an investment in the notes by such purchaser under any investment or similar laws or regulations. You should not consider any information in this offering circular to be legal, business, financial or tax advice. You should consult your own attorney, business advisor and tax advisor for legal, business, financial and tax advice and related aspects regarding an investment in the notes.

We are not, and the initial purchasers are not, making an offer to sell the notes in any jurisdiction except where an offer or sale is permitted. The distribution and possession of this offering circular and the purchase, offer and sale of the notes in certain jurisdictions may be restricted by law. Persons to whom a copy of this document has been issued shall not circulate to any other person, reproduce or otherwise distribute this document or any information herein for any purpose whatsoever nor permit or cause such circulation, reproduction or distribution to occur. Each purchaser of the notes must comply with all applicable laws and regulations in force in each jurisdiction in which it purchases, offers or sells such notes or possesses or distributes this offering circular and must obtain any consent, approval or permission required by it for the purchase, offer or sale by it of such notes under the laws and regulations in force in any jurisdictions to which it is subject or in which it makes such purchases, offers or sales. None of us or the initial purchasers shall have any responsibility therefor. For a description of the restrictions on offers, sales and resales of the notes and distribution of this offering circular, see "Transfer Restrictions" and "Plan of Distribution."

The notes have not been approved or disapproved by the U.S. Securities and Exchange Commission, the Monetary Authority of Singapore, the SGX-ST or any state or foreign securities commission or regulatory authority. The foregoing authorities have not confirmed the accuracy or determined the adequacy of this offering circular, nor have they passed upon or endorsed the merits of the offering of the notes. Any representation to the contrary is a criminal offense in the United States and may be a criminal offense in other jurisdictions.

Section 309B(1) Notification — the Company has determined, and hereby notifies all persons (including all relevant persons (as defined in Section 309A(1) of the Securities and Futures Act, Chapter 289 of Singapore)) that the notes are prescribed capital markets products (as defined in the Securities and Futures (Capital Markets Products) Regulations 2018) and Excluded Investment Products (as defined in MAS Notice SFA 04-N12: Notice on the Sale of Investment Products and MAS Notice FAA-N16: Notice on Recommendations on Investment Products).

Prohibition of sales to EEA retail investors — The securities are not intended to be offered, sold or otherwise made available to and should not be offered, sold or otherwise made available to any retail investor in the EEA. For these purposes, a retail investor means a person who is one (or more) of: (i) a retail client as defined in point (11) of Article 4(11) of Directive 2014/65/EU (as amended, "MiFID II"); or (ii) a customer within the meaning of Directive 2016/97/EU (as amended, the "Insurance Distribution Directive"), where that customer would not qualify as a professional client as defined in point (10) of Article 4(1) of MiFID II. Consequently no key information document required by Regulation (EU) No 1286/2014 (as amended, the "PRIIPs Regulation") for offering or selling the securities or otherwise making them available to retail investors in the EEA has been prepared and therefore offering or selling the securities or otherwise making them available to any retail investor in the EEA may be unlawful under the PRIIPs Regulation.

Prohibition of sales to UK retail investors — The securities are not intended to be offered, sold or otherwise made available to and should not be offered, sold or otherwise made available to any retail investor in the UK. For these purposes, a retail investor means a person who is one (or more) of (i) a retail client, as defined in point (8) of Article 2 of Regulation (EU) No 2017/565 as it forms part of domestic law by virtue of the European Union (Withdrawal) Act 2018 ("EUWA"); or (ii)a customer within the meaning of the provisions of the FSMA and any rules or regulations made under the FSMA to implement Directive (EU) 2016/97, where that customer would not qualify as a professional client, as defined in point (8) of Article 2(1) of Regulation (EU) No 600/2014 as it forms part of domestic law by virtue of the EUWA. Consequently no key information document required by the UK PRIIPs Regulation for offering or selling the notes or otherwise making them available to retail investors in the UK has been prepared and therefore offering or selling the notes or otherwise making them available to any retail investor in the UK may be unlawful under the UK PRIIPs Regulation.

We reserve the right to withdraw the offering of the notes at any time, and the initial purchasers reserve the right to reject any commitment to subscribe for the notes in whole or in part and to allot to any prospective purchaser less than the full amount of the notes sought by such purchaser. The initial purchasers and certain related entities may acquire for their own account a portion of the notes.

In connection with this offering, The Hongkong and Shanghai Banking Corporation Limited, Singapore Branch, as stabilizing manager, or any person acting for it, may purchase and sell the notes in the open market. These transactions may, to the extent permitted by applicable laws and regulations, include short sales, stabilizing transactions and purchases to cover positions created by short sales. These activities may stabilize, maintain or otherwise affect the market price of the notes. However, The Hongkong and Shanghai Banking Corporation Limited, Singapore Branch, or anyone acting for it, is not obligated to do this. If these actions are commenced, they shall be conducted in accordance with applicable laws and regulations and, as a result thereof, the price of the notes may be higher than the price that otherwise might exist in the open market. If these activities are commenced, they may be discontinued at any time and must in any event be brought to an end after a limited time that is no later than the earlier of 30 days after the issue date of the notes and 60 days after the date of allotment of the notes.

This offering circular has been prepared on the basis that any offer of notes in any Member State of the European Economic Area will be made pursuant to an exemption under Regulation (EU) 2017/1129 (the "Prospectus Regulation") from the obligation to publish a prospectus for offers of notes.

This offering circular has been prepared on the basis that any offer of securities in the UK will be made pursuant to an exemption under the FSMA from the requirement to publish a prospectus for offers of securities. The expression FSMA means the Financial Services and Markets Act 2000 (as amended).

CERTAIN DEFINED TERMS AND CONVENTIONS

We have prepared this offering circular using a number of conventions, which you should consider when reading information contained herein. All references to the "Issuer" and the "Company" are references to PT Tower Bersama Infrastructure Tbk.

All references to "we," "us," "our," "Tower Bersama Group," and "our group" are references to the Company and its subsidiaries taken as a whole.

All references herein to "Indonesia" are references to the Republic of Indonesia. All references herein to "Government" are to the Government of the Republic of Indonesia. All references to the "United States" or "U.S." are to the United States of America. All references to "Singapore" are to the Republic of Singapore.

All references to "Financial Services Authority" or "OJK" are references to the Indonesian Financial Services Authority (*Otoritas Jasa Keuangan*) an independent agency as referred to in Law No. 21 of 2011 on Financial Services Authority (the "OJK Law") whose duties and authorities includes regulating and monitoring of financial services activities in banking, capital market, insurance, pension funds, financing institutions and financial institutions sectors. As of December 31, 2012, OJK is the institution that replaces and receives rights and obligations to perform regulatory and supervisory functions of Bapepam and/or Bapepam & LK in accordance with Article 55 (1) of the OJK Law.

All references herein to the "2017 RLF," the "2017 RLF Agreement" and the "2017 Subordination Deed" are to our US$200.0 million revolving loan facility, with a final repayment date in June 2022, the related facility agreement dated March 30, 2017 and the related subordination deed dated March 30, 2017, respectively; all references herein to the "2018 RCF" and the "2018 RCF Agreement" are to PT Gihon Telekomunikasi Indonesia Tbk's Rp.150,000 million revolving credit facility and the related facility agreement dated October 31, 2018, as amended from time to time and as most recently amended on March 9, 2021; all references herein to the "2019 RLF," the "2019 RLF Agreement" and the "2019 Subordination Deed" are to our US$375.0 million revolving loan facility, with a final repayment date in January 2025, the related facility agreement dated June 28, 2019 and the related subordination deed dated June 28, 2019, respectively; all references herein to the "2021 RLF," and the "2021 RLF Agreement" are to our US$275.0 million revolving loan facility, with a final repayment date in June 2026, the related facility agreement dated January 20, 2021 and the related subordination deed dated January 20, 2021, respectively; all references herein to the "Credit Facilities," the "Credit Facilities Agreement" and the "2014 Subordination Deed" are to our US$1.0 billion credit facilities, the related facility agreement dated November 21, 2014, as amended and restated thereby on November 6, 2015, as further amended by an amendment and waiver letter dated March 17, 2017 and an amendment letter dated March 11, 2020, and the related subordination

deed dated November 21, 2014, respectively; all references herein to "Facility A," "Facility B" and "Facility D" are to the US$400.0 million term loan facility with maturity date in January 2020, the US$100.0 million revolving loan facility with a final repayment date in June 2022 and the US$275.0 million term loan facility with a final repayment date in June 2021, respectively, under the Credit Facilities; all references herein to the "2020 RCF" and the "2020 RCF Agreement" are to PT Bank UOB Indonesia's Rp.200,000 million revolving credit facility; all references herein to the "2020 TLF" and the "2020 TLF Agreement" are to PT Bank QNB Indonesia Tbk's Rp.50,000 million term loan facility; all references herein to "IDR Bonds" are to the various continuous bonds issued by the Company; all references to "2025 Existing USD Notes" are to the US$350.0 million 4.25% Senior Unsecured Notes due 2025 issued by the Company; all references to "2026 Existing USD Notes" are to the US$300.0 million 2.75% Senior Unsecured Notes due 2026 issued by the Company; and all references to "Existing USD Notes" are to the 2025 Existing USD Notes and the 2026 Existing USD Notes. Each of the terms "Credit Facilities," "Credit Facilities Agreement," "Facility A," "Facility B," "Facility D," "IDR Bonds," "2014 Subordination Deed," "2017 RLF," "2017 RLF Agreement," "2017 Subordination Deed," "2018 RCF," "2018 RCF Agreement," "2019 RLF," "2019 RLF Agreement," "2019 Subordination Deed," "2020 RCF," "2020 RCF Agreement," "2020 TLF," "2020 TLF Agreement," "2021 RLF," "2021 RLF Agreement," "2021 Subordination Deed," "2025 Existing USD Notes," "2026 Existing USD Notes" and "Existing USD Notes" are defined and more particularly described under "Description of Material Indebtedness" in this offering circular.

Unless otherwise indicated or otherwise required by the context, all references in this offering circular to "Rupiah" or "Rp." are to Indonesian Rupiah, the lawful currency of Indonesia. References to "U.S. dollar(s)" or "US$" are to United States dollars, the lawful currency of the United States.

We use certain terms in this offering circular which are used in the telecommunications industry in Indonesia in general to analyze companies, although they may be defined in different ways. In this offering circular, the following key terms have the following meanings:

- "3G" means the third generation mobile network as defined by the International Telecommunications Union;
- "4G" means the fourth generation mobile network as defined by the International Telecommunications Union;
- "5G" means the fifth generation mobile network as defined by the International Telecommunications Union;
- "average remaining life" of certain agreements means the average of the periods through expiration of the term under all such agreements;
- "BTS" means a base transceiver station, a mobile phone base station comprised of transceivers used for transmitting and receiving voice and data to and from mobile phones in a particular area;
- "build-to-suit" means sites constructed by our group on order by a telecommunications operator;
- "CAGR" means compound annual growth rate;
- "CME" or "construction, mechanical and electrical" is the function of constructing the tower site and includes preparation of the physical site for construction, preparation of construction designs and drawings, laying foundations, tower erection, construction of yard

and fence (for ground-based towers), installation of shelter, air conditioning and other supporting equipment (if required by a telecommunications operator), laying of electrical wiring and connection of electricity;

- "co-location" means the sharing of tower space by multiple customers on the same tower;

- "contracted revenue" means revenue contracted under our leasing agreements under all site tenancies, assuming no escalation of maintenance fees and no renewal upon the expiry of the current term;

- "DAS network" means a distributed antenna system installed in a building for wireless communications;

- "genset" refers to the combination of an electrical generator and an engine mounted together to form a single piece of equipment, whose function is to convert heat capacity into mechanical energy and then into electrical energy;

- "independent tower company" means a tower leasing company which is not affiliated with a telecommunications operator;

- "LTE" means Long-Term Evolution, which is a standard for wireless broadband communication for mobile devices and data terminals, and is commonly referred to as "4G LTE and Advance 4G";

- "shelter-only sites" means a shelter constructed and owned by us, to enable installation of BTS on a tower owned by a telecommunications operator, and located on real property which is owned or leased by the telecommunications operator;

- "SITAC" or "site acquisition" means the function of identifying and procuring the right to use a selected plot of real property (a site) and obtaining the required permits and licenses necessary for the construction and operation of a site on such real property;

- "telecommunications operator" means a company licensed by the Government to provide voice and data communications services in Indonesia;

- "telecommunications sites" or "sites" means each of (i) a tower site, (ii) a shelter-only site and (iii) a DAS network;

- "tenancy" means either (i) tower space leased for installation of a BTS, (ii) a shelter-only site leased to PT Telekomunikasi Indonesia Tbk or (iii) licensed access to a DAS network;

- "tenancy ratio" is the total number of tower tenancies divided by the total number of our towers as of a given date; and

- "tower sites" means ground-based towers and rooftop towers and installations constructed and owned by us on real property (including a rooftop) which is generally owned or leased by us.

Our customers as well as certain other telecommunications operators named in this offering circular are generally referred to, in this offering circular, by their trade names. Our contracts with these customers are typically with an entity or entities in that customer's group of companies.

PRESENTATION OF FINANCIAL INFORMATION

We have prepared and presented our consolidated financial statements as of and for the years ended December 31, 2018, 2019 and 2020 and unaudited interim consolidated financial statements as of June 30, 2021 and for the six months ended June 30, 2020 and 2021 included in this offering circular.

Effective January 1, 2020, we applied PSAK 71 "Financial Instruments," PSAK 72 "Revenue from Contracts with Customers" and PSAK 73 "Leases." In accordance with the transitional provision, the cumulative impact of these standards were applied to the beginning balance of the retained earnings at January 1, 2020, hence we did not restate the comparative information. Initial application of these standards produced a cumulative impact of Rp.(806) million, comprising Rp.7,232 million from the recognition of expected credit losses and Rp.(8,038) million from the recognition of the accumulated interest charges on lease and the difference between the accumulated depreciation of the right of use assets and the accumulated rental expenses.

Our consolidated financial statements are presented in Rupiah and have been prepared in accordance with Indonesian Financial Accounting Standards ("Indonesian FAS"), which differ in certain respects from the International Financial Reporting Standards ("IFRS") as issued by the International Accounting Standards Board. In making an investment decision, you should rely upon your own examination of the terms of this offering of the notes and the financial information contained in this offering circular. You should consult your own professional advisors for an understanding of the differences between Indonesian FAS and IFRS, and how those differences could affect the financial information contained in this offering circular. For a summary of certain differences between Indonesian FAS and IFRS, see "Summary of Certain Differences Between Indonesian FAS and IFRS" included elsewhere in this offering circular.

Our reporting currency is Rupiah. Solely for the convenience of the reader, unless otherwise indicated, certain Rupiah amounts in this offering circular have been translated to U.S. dollars for convenience purposes only and based on the average middle exchange rate announced by Bank Indonesia as of June 30, 2021, which was Rp.14,496 = US$1.00. No representation is made that the Rupiah or U.S. dollar amounts referred to in this offering circular could have been or could be converted into U.S. dollars or Rupiah, as the case may be, at any particular rate or at all. See "Exchange Rates and Exchange Controls."

Rounding adjustments have been made in calculating some of the financial and operating information included in this offering circular. As a result, numerical figures shown as total amounts in some tables may not be exact arithmetic aggregations of the figures that make up such total amounts.

Unless otherwise indicated, all amounts in relation to our group presented and discussed in this offering circular are presented on a consolidated basis.

STATISTICAL DATA AND NON-GAAP FINANCIAL MEASURES

We have included in this offering circular statistical data relating to our tower leasing services, such as the number of sites, number of tower spaces leased, tenancy ratio, contracted revenue and average remaining life of our lease agreements with customers. We have described the manner in which we calculated this data in this offering circular. This data is derived from management estimates and is not part of our consolidated financial statements and has not been audited or reviewed by auditors, consultants or experts. You should note, however, that other companies in the tower leasing industry may calculate and present this data in a different manner and, therefore, you should use caution in comparing our data with data presented by other companies, as the data may not be directly comparable.

EBITDA as well as the related ratios and certain measures, including capital expenditures, gross debt and net debt, presented in this offering circular are supplemental measures of our performance that are not required by, or presented in accordance with, Indonesian FAS or IFRS. We define EBITDA as income from operations plus depreciation of property and equipment plus depreciation of right of use assets plus amortization of land leases and amortization of licenses. EBITDA is not a measurement of financial performance or liquidity under Indonesian FAS or IFRS and should not be considered as an alternative to net profit, income from operations or any other performance measures derived in accordance with Indonesian FAS or IFRS or as an alternative to cash flow from operating activities as a measure of liquidity. In addition, EBITDA is not a standardized term and as a result, a direct comparison between companies using such a term may not be possible.

We believe that EBITDA facilitates comparisons of operating performance from period to period and company to company by eliminating potential differences caused by variations in capital structures (affecting interest and finance charges), tax positions (such as the impact on periods or companies of changes in effective tax rates or net operating losses) and the age and booked depreciation (affecting relative depreciation and amortization of expense). EBITDA has been presented because we believe that it is frequently used by securities analysts, investors and other interested parties in evaluating similar companies, many of whom present such non-GAAP financial measures when reporting their results.

In addition, certain financial information and ratios, such as Last Quarter Annualized ("LQA") EBITDA, gross debt (excluding lease liabilities — right of use assets) over LQA EBITDA, net debt (excluding lease liabilities — right of use assets) over LQA EBITDA, total net senior debt over LQA EBITDA, gross debt after taking into account our hedging arrangements (excluding lease liabilities — right of use assets) over LQA EBITDA and net debt after taking into account our hedging arrangements (excluding lease liabilities — right of use assets) over LQA EBITDA, have also been presented in this offering circular that are supplemental measures of our performance that are not required by, or presented in accordance with, Indonesian FAS or IFRS. KAP Tanubrata Sutanto Fahmi Bambang & Rekan has not examined, compiled nor performed any procedures with respect to such financial information contained in this offering circular and accordingly does not express an opinion or any other form of assurance on such financial information. Revenue and EBITDA, where presented on an annualized basis, represent revenue and EBITDA for the three months ended June 30, 2021, respectively, multiplied by four.

We include as capital expenditures our acquisition of investment properties, acquisition of property and equipment, acquisition of right of use assets, purchase of shares and payments for land leases. In addition, capital expenditures is not a standardized term, hence, a direct comparison between

companies using such a term may not be possible. See "Management's Discussion and Analysis of Financial Condition and Results of Operations — Capital Expenditures."

We define gross debt as our total borrowings (current and non-current portion of long-term loans, finance leases, lease liabilities — vehicle, notes and lease liabilities — right of use assets) before deducting unamortized borrowing costs. We define gross debt (excluding lease liabilities — right of use assets) as gross debt less lease liabilities — right of use assets. We define gross debt after taking into account our hedging arrangements as our total borrowings (current and non-current portion of long-term loans, finance leases, lease liabilities — vehicle, notes and lease liabilities — right of use assets), as calculated by valuing the hedged portion of our gross debt in U.S. dollars using the hedged rate, before deducting unamortized borrowing costs. We define gross debt after taking into account our hedging arrangements (excluding lease liabilities — right of use assets) as gross debt after taking into account our hedging arrangements less lease liabilities — right of use assets. We define net debt as our gross debt less cash and cash equivalents. We define net debt (excluding lease liabilities — right of use assets) as net debt less lease liabilities — right of use assets. We define net debt after taking into account our hedging arrangements as our gross debt after taking into account our hedging arrangements less cash and cash equivalents. We define net debt after taking into account our hedging arrangements (excluding lease liabilities — right of use assets) as net debt after taking into account our hedging arrangements less lease liabilities — right of use assets. We define total senior debt as our long-term loans — third parties (including indebtedness under the 2017 RLF, the 2018 RCF, the 2019 RLF, the 2021 RLF and the Credit Facilities) as calculated by valuing the hedged portion of our total senior debt in U.S. dollars after taking into account our hedging arrangements, before deducting unamortized borrowing costs. We define total net senior debt as our total senior debt less cash and cash equivalents balance. Gross debt, net debt and total senior debt are not measurements of financial performance under Indonesian FAS and should not be considered as alternatives to total debt outstanding, total liabilities or any other performance measure derived in accordance with Indonesian FAS. In addition, gross debt, gross debt (excluding lease liabilities — right of use assets), net debt, net debt (excluding lease liabilities — right of use assets), and total senior debt are not standardized terms, hence, a direct comparison between companies using such terms may not be possible. Net debt (excluding lease liabilities — right of use assets) has been presented because we believe that net debt (excluding lease liabilities — right of use assets) will represent our ability to repay all debts if our loans were called immediately.

Nevertheless, each of EBITDA, capital expenditures, gross debt, gross debt (excluding lease liabilities — right of use assets), net debt, net debt (excluding lease liabilities — right of use assets) and total senior debt has limitations as an analytical tool, and you should not consider it in isolation from, or as a substitute for, analysis of our financial condition or results of operations, as reported under Indonesian FAS. Some of the limitations with respect to EBITDA are:

- it does not reflect cash outlays for capital expenditures or contractual commitments;
- it does not reflect changes in, or cash requirements for, working capital;
- it does not reflect the interest expense, or the cash requirements necessary to service interest or principal payments on indebtedness;
- it does not reflect income tax expense or the cash necessary to pay income taxes;
- although depreciation and amortization are non-cash charges, the assets being depreciated and amortized will often have to be replaced in the future and EBITDA does not reflect the cash requirements for such replacements; and

- other companies, including companies in our industry, may calculate this measure differently than as presented in this offering circular, limiting the usefulness of this measure for comparative purposes.

ENFORCEMENT OF CIVIL LIABILITIES AND FOREIGN JUDGMENTS

The Issuer is a publicly listed limited liability company incorporated under the laws of the Republic of Indonesia and all of the Issuer's directors reside in Indonesia. Substantially all of the commissioners, directors and executive officers of the Issuer reside outside the United States and all the assets of the Issuer are located outside the United States. As a result, it may be difficult for noteholders to effect service of process within the United States upon these persons or to enforce in courts outside the United States any judgment obtained in the United States against the Issuer or any of these persons, including judgments based upon the civil liability provisions of the laws of the United States, including federal securities laws. In addition, in original actions brought in courts in jurisdictions located outside the United States, it may be difficult for noteholders to enforce liabilities based upon United States federal securities laws.

Our Indonesian legal advisor, Indrawan Darsyah Santoso, has advised that judgments of non-Indonesian courts are not recognized or directly enforceable in Indonesian courts and, as a result, it may not be possible to enforce judgments obtained in non-Indonesian courts against us, although a non-Indonesian court judgment could be admissible into evidence in a proceeding on the underlying claim in an Indonesian court and may be given such evidentiary weight as the Indonesian court may deem appropriate in its sole discretion. A claimant may be required to commence a new action in an Indonesian court on the basis of Indonesian laws. Reexamination of the underlying claim *de novo* would be required before the Indonesian courts. There can be no assurance that the claims or remedies available under Indonesian laws will be the same or as extensive as those available in other jurisdictions.

Enforceability of the notes in Indonesia

Indonesian legal principles relating to the rights of debtors and creditors, or their practical implementation by Indonesian courts, may differ materially from those that would apply in other jurisdictions. Neither the rights of debtors nor the rights of creditors under Indonesian laws are as clearly established or recognized as under legislation or judicial precedent in other jurisdictions. In addition, under Indonesian laws, debtors may have rights and defenses to actions filed by creditors that such debtors would not have in other jurisdictions.

Indonesia's legal system is a civil law system based on written statutes; judicial and administrative decisions do not constitute binding precedent and are not systematically published. Indonesia's commercial and civil laws as well as rules on judicial process were historically based on Dutch law as in effect prior to Indonesia's independence in 1945, and some have not been revised to reflect the complexities of modern financial transactions and instruments. Indonesian courts are often unfamiliar with sophisticated commercial or financial transactions, leading in practice to uncertainty in the interpretation and application of Indonesian legal principles. The application of Indonesian laws in large part depends upon subjective criteria such as the good faith of the parties to the transaction and principles of public policy, the practical effect of which is difficult or impossible to predict. Indonesian judges, who operate in an inquisitorial legal system, have very broad fact-finding powers and a high level of discretion in the manner in which those powers are exercised. As a result, the

administration and enforcement of laws and regulations by Indonesian courts and Indonesian governmental agencies may be subject to considerable discretion and uncertainty. Furthermore, corruption in the court system in Indonesia has been widely reported in publicly available sources.

It may be difficult for the noteholders to pursue a claim against us in Indonesia, which may adversely affect or eliminate entirely the noteholders' ability to obtain and enforce a judgment against us in Indonesia or increase the noteholders' costs of pursuing, and the time required to pursue, claims against us.

For a description of potential limitations on the right of the holders of the notes, see "Risk Factors — Risks Relating to the Notes — Through the purchase of the notes, the noteholders may be exposed to a legal system subject to considerable discretion and uncertainty; it may be difficult or impossible for noteholders to pursue claims under the notes."

INDONESIAN REGULATION OF OFFSHORE BORROWINGS

Under Presidential Decree No. 59/1972 dated October 12, 1972 on Acceptance of Offshore Borrowing ("PD 59/1972"), the Issuer is required to report particulars of its offshore borrowings to the Ministry of Finance of Indonesia and Bank Indonesia, on the acceptance, implementation and repayment of principal and interest. The Minister of Finance Decree No. KEP-261/MK/IV/5/1973 dated May 3, 1973 on Implementing Provisions of Acceptance of Offshore Borrowing, as amended by Minister of Finance Decree No. 417/KMK.013/1989 dated May 1, 1989, as the implementing regulation of PD 59/1972, further set forth the requirement to submit periodic reports to the Ministry of Finance of Indonesia and Bank Indonesia on the effective date of the contract and each subsequent three-month period. On July 20, 2020, the President of the Republic of Indonesia issued the Presidential Regulation No. 82/2020 on Corona Virus Disease of 2019 (COVID-19) Handling and National Economy Restoration Committee, as amended by the Presidential Regulation No. 108/2020 ("PR 82/2020"). This regulation revokes the Presidential Decree No. 39/1991 dated September 4, 1991 on Coordination of the Management of Commercial Offshore Borrowings ("PD No. 39/1991"), under which all offshore commercial borrowers must submit periodic reports to the Team of Offshore Commercial Borrowings (the "PKLN Team") upon the implementation of their offshore commercial borrowing. By virtue of PR 82/2020, PD No. 39/1991 has been revoked and the PKLN Team has been disbanded.

On January 9, 2019, Bank Indonesia Regulation No. 21/2/PBI/2019 on Reporting of Foreign Exchange Traffic Activity ("PBI 21/2") was enacted and took effect from March 1, 2019. This regulation revokes and replaces the provisions of Bank Indonesia Regulation No. 16/22/PBI/2014 dated December 31, 2014 on Reporting of Foreign Exchange Traffic Activity and Reporting of Implementation of Prudential Principles in the Management of Offshore Debt of Non-Bank Corporation ("PBI 16/22") that particularly relate to reporting of foreign exchange traffic activities. Hence the provisions of PBI 16/22, pertaining to reporting of prudential principles implementation with respect to offshore borrowings of non-bank corporations, remain valid.

PBI 21/2 requires all Indonesian residents who engage in foreign exchange traffic activities, whether individual or legal entities, to report to Bank Indonesia. The report shall cover information relating to: (i) any trading of goods, services and other transactions between an Indonesian resident and a non-Indonesian resident; (ii) principal data of offshore borrowings and/or risk participation transaction; (iii) plan to draw and/or repay the offshore borrowings and/or risk participation

transaction; (iv) realization of drawing and/or repayment of offshore borrowings and/or risk participation transaction; (v) position and changes of offshore financial assets, offshore financial liabilities and/or risk participation transaction; and/or (vi) plans to obtain new offshore borrowings and/or changes thereto. The report must be submitted on a monthly basis using an online system at the latest by the 15th day of the following month, while any correction thereto must be notified at least by the 20th day of the respective month. For offshore borrowings plan during the ongoing year, the report shall be submitted at the beginning of each year, no later than March 15 and any amendment thereto, no later than June 15.

As implementing regulation to PBI 21/2, Bank Indonesia issued Regulation of the Members of Board of Governors of Bank Indonesia No. 21/4/PADG/2019 dated February 28, 2019 on Reporting of Foreign Exchange Traffic Activities in the Form of Offshore Debts and Risk Participation Transactions ("PADG 21/4") which took effect from March 1, 2019. PADG 21/4 further specifies that the reporting requirement to Bank Indonesia on foreign exchange traffic activities also applies to Indonesian residents who obtain offshore borrowings through debt securities instrument. Offshore borrowings obtained by an entity must all be reported without any minimum threshold on the amount thereof. The report includes information on principal data of offshore borrowing, recapitulation data of offshore borrowing and plans to obtain new offshore borrowings and/or changes thereto. The report of the principal data and recapitulation data must be submitted monthly to Bank Indonesia at the latest on the 15th day of the following month. The first report of: (i) the principal data must be submitted to Bank Indonesia by no later than the 15th day of the following month from 07:10 Western Indonesia time to 16:15 Western Indonesia time: and (ii) the recapitulation data must be submitted to Bank Indonesia by no later than the 15th day of the following month at 24:00 Western Indonesia time, after the signing of the loan agreement or the issuance of the debt securities and/or the debt acknowledgment over the trade credits and/or other loans.

In addition, for the purposes of implementing prudential principles in relation to offshore borrowings as required by Bank Indonesia Regulation No. 16/21/PBI/2014 dated December 29, 2014 on Implementation of Prudential Principles in the Management of Offshore Debt of Non-Bank Corporation as amended by Bank Indonesia Regulation No. 18/4/PBI/2016 dated April 22, 2016 ("PBI 16/21"), Indonesian companies are required to provide the following documents:

(1) the prudential principle implementation activity report ("KPPK report"), which is to be submitted on a quarterly basis, no later than the end of the third month;

(2) the KPPK report, attested by a public accountant, which is to be submitted no later than the end of June after the ongoing financial year ended;

(3) information on the fulfillment of credit ratings, which is to be submitted at the latest at the end of the month following the execution or issuance of the offshore borrowing; and

(4) the financial statements of the company, consisting of: (i) unaudited financial statements, to be submitted on quarterly basis, by no later than the end of the third month after the end of the relevant quarter; and (ii) annual audited financial statements, which must be submitted by no later than end of June of the following year.

Bank Indonesia examines the accuracy of the foreign exchange traffic report and the prudential principle implementation activity report and may impose administrative sanctions in the form of penalties, written warning and/or may report to other authorities of any violation due to any delay or failure in submission of such reports.

As of January 1, 2016, submissions of and corrections to the prudential principle implementation activity report shall be made online. The requirement to submit credit ratings fulfillment only applies to offshore borrowings executed or issued as of January 1, 2016 subject to certain exemptions as provided in PBI 16/21.

Pursuant to Bank Indonesia Regulation No. 16/10/PBI/2014 dated May 14, 2014 on Receipt of Foreign Exchange from Export Activities and Withdrawal of Foreign Exchange from Offshore Loans as amended by Bank Indonesia Regulation No. 17/23/PBI/2015 dated December 28, 2015 ("PBI 16/10"), any borrowings of offshore loans (in foreign currencies) that originate from (i) non-revolving loan agreements, (ii) a difference between the new loan and the refinanced loan, or (iii) debt securities (i.e., bonds, medium-term notes, floating rate notes, promissory notes, and commercial paper) must be withdrawn by the borrower through foreign exchange banks (which include offshore bank branches in Indonesia) and must be reported to Bank Indonesia. The aggregate amount of the offshore loan withdrawals should be equal to the local commitments provided under such loan. In the event that the aggregate amount of the offshore loan withdrawal through foreign exchange bank is lesser than the amount of local commitments in excess of Rp.50,000,000 (or its equivalent in foreign currencies), the borrower must submit a written explanation and sufficient supporting documents to Bank Indonesia before the expiration of the term of such loan. Withdrawals of the above offshore loans must be reported to Bank Indonesia on a monthly basis by using recapitulation data reports as regulated under PADG 21/4. These reports shall include supporting documents evidencing that the offshore loans were withdrawn through the foreign exchange bank. Administrative sanctions will be imposed on companies that fail to comply with such reporting obligations.

On April 12, 2019, Bank Indonesia issued Regulation of the Members of Board of Governors of Bank Indonesia No. 21/7/PADG/2019 on Reporting of Foreign Exchange Traffic Activities of Non-Bank Entities ("PADG 21/7"), which revoked and replaced Bank Indonesia Circular Letter No. 17/26/DSta of 2015 dated October 15, 2015 on Reporting of Foreign Exchange Traffic Activities Other Than Offshore Loans. Based on PADG 21/7, the following reports are to be submitted to Bank Indonesia: (i) a report on trading transactions of goods, services, and other transactions between Indonesian residents and non-Indonesian residents, (ii) a report on positions held and changes to offshore financial assets, (iii) a report on positions held and changes to equity of non-Indonesian residents and other related obligations, (iv) a report on positions held and changes to offshore derivative positions, (v) a report on positions held and changes to offshore contingencies and commitments, and (vi) a report on positions held in commercial paper owned by custodian customers. The report specified in (v) covers corporate guarantees, and any corporate guarantee given to foreign lenders is to be reported to Bank Indonesia. Such report and/or corrections to such reports (if any) is to be submitted through Bank Indonesia's website in a format that is specified under PADG 21/7. Such report shall be submitted no later than the fifteenth day at 24.00 Western Indonesia time of the following month and the correction of such report (if any) shall be submitted no later than the twentieth day at 24.00 Western Indonesia time of the following month. If the submission period has ended, the reporting party is still required to submit the report offline. Administrative sanctions will be imposed on companies that fail to comply with such reporting obligations or submit inaccurate or incomplete reports.

On December 29, 2014, Bank Indonesia issued PBI 16/21, which is applicable to non-bank corporations that obtain offshore loans in foreign (non-Indonesian Rupiah) currency. PBI 16/21 revokes and replaces PBI 16/20/PBI/2014 dated October 29, 2014 and for the implementation of PBI 16/21, Bank Indonesia also issued: (i) Bank Indonesia Circular Letter No. 16/24/DKEM dated December 30, 2014 on Implementation of Prudential Principles in Managing Offshore Loan of Non-Bank Corporations as lastly amended by Bank Indonesia Circular Letter No. 18/6/DKEM dated

April 22, 2016 ("SEBI 16/24"); and (ii) Bank Indonesia Circular Letter No. 17/3/DSta dated March 6, 2015 on Reporting of the Implementation of Prudential Principles in Managing Offshore Loan of Non-Bank Corporations as amended by Bank Indonesia Circular Letter No. 17/24/DSta dated October 12, 2015.

PBI 16/21 requires non-bank corporations that have offshore loans in foreign (non-Indonesian Rupiah) currency to fulfill three prudential principles, namely: (i) hedging ratio, (ii) liquidity ratio and (iii) credit ratings. The requirement to maintain certain hedging ratio does not apply to non-bank corporations which financial statement is presented in United States dollars and fulfill the following criteria: (i) non-bank corporations with export income to operating revenue ratio of more than 50% in the previous calendar year, and (ii) have obtained approval from the Ministry of Finance to use United States dollars in their financial statement, which approval shall be evidenced by submitting supporting documents to Bank Indonesia.

The minimum hedging ratio will be applied with a two-stage approach to avoid unnecessary difficulties for corporations having existing offshore loan. Until December 31, 2015, the minimum hedging ratio is set at 20% of (i) the negative difference between the foreign exchange assets and the foreign exchange liabilities that will become due within three months from the end of the relevant quarter, and (ii) the negative difference between the foreign exchange assets and the foreign exchange liabilities that will become due in the period of more than three months up to six months after the end of the relevant quarter. After December 31, 2015, the minimum hedging ratio is set at 25% of (i) the negative difference between the foreign exchange assets and the foreign exchange liabilities that will become due within three months from the end of the relevant quarter and (ii) the negative difference between the foreign exchange assets and the foreign exchange liabilities that will become due in the period of more than three months up to six months after the end of the relevant quarter. Foreign currency assets comprises of cash, demand deposits, regular deposits, term deposits, account receivables, inventories, marketable securities and receivables from forwards, swaps and/or options transactions in foreign (non-Indonesian Rupiah) currency calculated based on the position at the end of the relevant quarter. The account receivables which may be calculated as foreign currency assets are (a) account receivables to Indonesian resident and non-Indonesian resident which will be due within three months from the end of the relevant quarter and/or (b) in the period of more than three months up to six months after the end of the relevant quarter, which are true-sale in nature or non-refundable and after deducted with amortization and such underlying agreement was executed before July 1, 2015. Account receivables with underlying agreement executed after July 1, 2015 may be counted as foreign exchange assets if: (a) they are related with strategic infrastructure projects and have obtained Bank Indonesia approval; or (b) the transaction which underlies the foreign currency assets is permitted to be in foreign currency pursuant to Bank Indonesia Regulation No. 17/3/PBI/2015 dated March 31, 2015 regarding Mandatory Use of Rupiah in the Territory of Republic of Indonesia ("PBI 17/3"). Inventory which may be calculated as foreign currency assets is inventory from exporters with export income to operating revenue ratio of more than 50% in the previous calendar year.

SEBI 16/24 describes foreign currency liabilities as foreign currency liabilities to Indonesian resident and non-Indonesian resident, including liability deriving from forward, swap, and/or option which: (a) mature within three months from the end of the last quarter; and/or (b) mature between three and six months from the end of the last quarter. A foreign currency liability, which will be due, may not be calculated as foreign currency liability if: (a) it is in the process of being rolled over, revolved, or refinanced, provided that the transaction which underlies it is in accordance with PBI 17/3; and/or (b) it constitutes foreign currency liability in relation to project financing which will be due within the next six months to the extent secured by offshore loan drawdown in foreign currency where the schedule of such drawdown is adjusted to the payable foreign currency liabilities and the transaction

activities are in accordance with PBI 17/3. These two points must be evidenced by sufficient supporting documents. SEBI 16/24 determines that only corporations that have negative difference more than USD 100,000 are obliged to fulfill the minimum hedging ratio. In addition, PBI 16/21 also regulates that hedging transactions for the fulfillment of hedging ratio shall be conducted with banks in Indonesia and shall become effective in 2017.

On the liquidity ratio requirement, non-bank corporations that have offshore loans in foreign currency are also required to comply with the minimum liquidity ratio of at least 70% liquidity by providing sufficient foreign exchange assets against foreign exchange liabilities that will become due within three months from the end of the relevant quarter. However, the 70% minimum liquidity ratio will commence to apply on January 1, 2016 while the applicable minimum liquidity ratio in 2015 is 50%.

The minimum credit rating is required to be maintained at BB- (BB minus) or its equivalent from a particular rating agency recognized by Bank Indonesia. Such credit rating will be in the form of a rating over the relevant corporation (issuer rating) and/or bonds (issue rating) in accordance with the type and period of the offshore loan in foreign currency. Such rating shall be valid for two years as of the rating issuance. PBI 16/21 sets additional provisions where corporation may use their parent company's credit rating if (i) such corporation enters into an offshore loan with its parent company, or if the offshore loan is guaranteed by the parent company, or (ii) such corporation is a newly established corporation, with the condition that the parent company's credit rating may be used by the new corporation for a maximum three years since the start of its commercial operation. The requirement to fulfill the minimum credit rating requirement is exempted for (i) the refinancing of offshore loans in foreign currency (such exemption is limited to refinancing which does not increase the outstanding amount of the previous loans or if it increases, such increase shall not exceed (a) USD 2,000,000 or (b) 5% of the outstanding of such refinanced loans if such 5% figure is higher than USD 2,000,000); (ii) offshore loans in foreign currency for infrastructure projects from (a) an international bilateral/multilateral lending agencies or (b) syndication loan with more than 50% contribution comes from international bilateral/multilateral institution; (iii) offshore loans in foreign currency for central or regional government infrastructure project; (iv) offshore loans in foreign currency which are secured by bilateral/multilateral international institution; (v) offshore loans in foreign currency in form of trade credits; or (vi) offshore loans in foreign currency in form of other loans; (vii) offshore loans in foreign currency entered into by a finance company (a business entity which conducts financing activities for the procurement of goods and services) to the extent that the finance company has minimum financial soundness of "healthy" as lastly issued by OJK and fulfills the maximum gearing ratio as stipulated by OJK; or (viii) offshore loan in foreign currency by Lembaga Pembiayaan Ekspor Indonesia (Indonesia Eximbank). Non-bank corporations that have offshore loans in foreign currency are obliged to submit report to Bank Indonesia on the implementation of prudential principles and the exemptions, together with the relevant supporting documents. Bank Indonesia will monitor for compliance and may impose administrative sanctions in the form of warning letters for any failure to comply with the said three prudential criteria. PBI 16/21 does not specify any other sanction in the event the non-bank corporations ignore such warning letter, however Bank Indonesia may inform related parties, such as relevant offshore creditors, the Ministry of State-Owned Companies (for state-owned non-bank corporation), the Ministry of Finance c.q. Directorate General of Tax, OJK and the Indonesian Stock Exchange (the "IDX") (for publicly listed non-bank corporation) on the implementation of administrative sanctions. PBI 16/21 has become effective as of January 1, 2015, with exceptions for the implementation of (i) the administrative sanction requirement, which will be effective from the fourth quarter of 2015, and (ii) the minimum credit rating requirement, which will apply to offshore loans that are signed or issued on or after January 1, 2016.

LANGUAGE OF THE TRANSACTION DOCUMENTS

Pursuant to Law No. 24 of 2009 regarding Flag, Language, State Symbol, and National Anthem ("Law No. 24/2009"), Bahasa Indonesia must be used in agreements involving Indonesian parties, although, when a foreign entity is a party, the agreement may also be written in the English language or the national language of the relevant foreign party (in addition to the Bahasa Indonesia version). Law No. 24/2009 also states that further implementing provisions on the use of Bahasa Indonesia will be regulated in a Presidential Regulation. In the period pending issuance of the Presidential Regulation, there has been considerable uncertainties amongst the business community as to how the requirement of using Bahasa Indonesia should be practically applied in private commercial agreements involving parties from multiple jurisdictions, mainly relating to the timing of execution of the Bahasa Indonesia version and whether the contracting parties have liberty to determine the governing language.

On September 30, 2019, the President of the Republic of Indonesia issued Presidential Regulation No. 63 of 2019 on the Use of Indonesian Language ("Regulation No. 63/2019") as implementing regulation of Law No. 24/2009. According to Article 26 (3) of Regulation No. 63/2019, where a foreign entity is a party, the English version or the version in the national language of the foreign party may be used as an equivalent or translation of the Bahasa Indonesia version. This provision implies that Bahasa Indonesia version and the English version must be made available together and at the same time, which lead to the prudent approach of having to execute the Bahasa Indonesia version and the English version concurrently (either in dual-language format or separately). On the subject of governing language, Article 26 (4) of Regulation No. 63/2019 clarifies that, where a foreign entity is a party, the parties may contractually agree on the governing language of the agreement (which may be either Bahasa Indonesia, English language or the national language of the foreign party). However, there exists uncertainty on how Regulation No. 63/2019 and Law No. 24/2009 will be interpreted and applied by Indonesian courts. See "Risk Factors — Risks Relating to Indonesia — An Indonesian Law requiring agreements involving Indonesian parties to be written in the Indonesian language may raise issues as to the enforceability of agreements entered into in connection with the offer and sale of the notes." The Indenture and other documents entered into in connection with the issuance of the notes will also be prepared in Bahasa Indonesia. However, there can be no assurance, in the event of inconsistencies between the Bahasa Indonesia and English language version of those documents, that an Indonesian court would hold that the English versions of such documents prevail. Further, a translation from English to Bahasa Indonesia may not accurately reflect the original intention of the parties.

We will concurrently execute dual English and Bahasa Indonesia versions of certain transaction documents to which we are a party. All of these documents will provide that in the event of a discrepancy or inconsistency, the parties intend the English version to prevail. Some concepts in the English language may not have a corresponding term in the Indonesian language and the exact meaning of the English text may not be fully captured by the Indonesian language version. If this occurs, there can be no assurance that the terms of the notes, including the Indenture, will be as described in this offering circular, or will be interpreted and enforced by the Indonesian courts as intended.

FORWARD-LOOKING STATEMENTS

This offering circular contains "forward-looking" statements that relate to future events, which are, by their nature, subject to significant risks and uncertainties. All statements, other than statements of historical fact contained in this offering circular including, without limitation, those regarding our future financial position and results of operations, strategy, plans, objectives, goals and targets, future developments in the markets where we participate or are seeking to participate and any statements preceded by, followed by or that include the words "believe," "expect," "aim," "intend," "will," "may," "project," "estimate," "anticipate," "predict," "seek," "should" or similar words or expressions, or variations of these expressions, are forward-looking statements.

The future events referred to in these forward-looking statements involve known and unknown risks, uncertainties and other factors, some of which are beyond our control, which may cause the actual results, performance or achievements, or industry results to be materially different from any future results, performance or achievements expressed or implied by the forward-looking statements. These forward-looking statements are based on numerous assumptions regarding our present and future business strategies and the environment in which we will operate in the future and are not a guarantee of future performance. Important factors that could cause the actual results, performance or achievements to differ materially from those in the forward-looking statements include, among others, the following:

- the ability of third parties to perform in accordance with contractual terms and specifications;
- changes in our relationship with our customers;
- the effects of potential consolidation or competition in the telecommunications tower industry in Indonesia;
- the effects of increased tower sharing among telecommunications operators;
- our ability to expand and manage our growth, including through acquisitions and divestures;
- our ability to raise additional financing and to generate sufficient cash to service our debt and to control and finance our capital expenditures and operations;
- our ability to maintain our licenses and permits for our towers and other licenses and permits necessary for the conduct of our business;
- changes in our relationships with regional governments and regulators in Indonesia;
- technological changes in cellular and other telecommunications equipment used by our tenants;
- the ongoing global novel coronavirus ("COVID-19") pandemic and the disruption caused by various countermeasures to contain and reduce its spread;

- the effects of changes in laws, regulations, including tariffs, taxation or accounting standards or practices;

- general political and economic conditions including changes to the global, regional or domestic economy affecting our costs of financing and operations; and

- our success at managing the risks of the above factors and the other financial, business and operating risks referred to elsewhere in this offering circular.

This list of important factors is not exhaustive. Additional factors that could cause the actual results, performance or achievements to differ materially include, but are not limited to, those discussed under "Risk Factors." When relying on forward-looking statements, you should carefully consider the foregoing factors and other uncertainties and events, especially in light of the political, economic, social and legal environment in which we operate. Such forward-looking statements speak only as of the date on which they are made. Accordingly, we do not undertake any obligation to update or revise any of them, whether as a result of new information, future events or otherwise. We do not make any representation, warranty or prediction that the results anticipated by such forward-looking statements will be achieved, and such forward-looking statements represent, in each case, only one of many possible scenarios and should not be viewed as the most likely or standard scenario. Accordingly, you should not place undue reliance on any forward-looking statements.

SUMMARY

The following section summarizes material information that appears later in this offering circular and is qualified in its entirety by, and is subject to, the more detailed information contained or referred to elsewhere in this offering circular. This summary may not contain all of the information that may be important to you. You should read this entire document, including our consolidated financial statements and related notes thereto and the section entitled "Risk Factors," before making an investment decision in our notes. The meanings of terms not defined in this summary can be found elsewhere in this offering circular.

Overview

We are a leading independent tower company in Indonesia. Our principal business is leasing space for antennas and other equipment for wireless signal transmission at tower sites under long-term lease agreements with telecommunications operators. We also provide telecommunications operators with access to our DAS networks in shopping malls and office buildings in major urban areas. As of June 30, 2021, we operated 19,709 telecommunications sites comprising 19,598 tower sites and 111 DAS networks, and we had 37,232 tenancies on sites with five different telecommunications operators and two 4G LTE network providers. For the year ended December 31, 2020 and the six months ended June 30, 2021, 77.5% and 74.2% of our revenue, respectively, was from PT Telekomunikasi Selular ("Telkomsel"), PT Indosat Tbk ("Indosat") and PT XL Axiata Tbk ("XL Axiata"), collectively. We lease space on tower sites under long-term lease agreements of generally 10 years and lease access to our DAS networks under long-term license agreements of generally five to eight years. As of June 30, 2021, the average remaining life of all our tenancy agreements was approximately 5.3 years, and we had total contracted revenue under our leasing agreements of approximately Rp.29,455,732 million (US$2,032.0 million). Our tower leasing revenue (from tower sites), and our DAS network revenue, accounted for 99.2% and 0.7%, respectively, of our total revenue for the year ended December 31, 2020.

We believe that Indonesia's tower leasing industry has strong potential for continued growth in terms of both new tower construction and additional co-locations on existing towers. We construct new sites and acquire existing site portfolios only when they meet our investment criteria which include, among others, return on investment, potential for future co-locations, ease of leasing or purchasing land for sites, ease of community approvals, and credit strength of the potential tenant(s). In particular, we only construct new sites after obtaining a commitment for long-term lease for space from a telecommunications operator. Although we generally construct sites in most provinces of Indonesia, the majority of our sites are located in areas with high population density with 13,364 sites in Java, Bali and Sumatra, and 2,901 sites in other parts of Indonesia, as of December 31, 2020.

We plan to continue to seek additional co-locations for our existing towers, as additional co-locations are accretive to our cash flow because our incremental cost of adding new tenants to existing towers is relatively low. We believe that Indonesian telecommunications operators have sought, and will continue to seek, to satisfy increases in their network coverage and capacity requirements while controlling their capital expenditures for non-core activities such as outsourcing of construction of sites and leasing space from tower companies. As of June 30, 2021, we had a tenancy ratio of 1.89.

Our revenue was Rp.5,327,689 million (US$367.5 million) for the year ended December 31, 2020 and Rp.2,971,379 million (US$205.0 million) for the six months ended June 30, 2021. Our EBITDA

and EBITDA margin were Rp.4,617,126 million (US$318.5 million) and 86.7%, respectively, for the year ended December 31, 2020 and Rp.2,592,881 million (US$178.9 million) and 87.3%, respectively, for the six months ended June 30, 2021. Our annualized revenue and LQA EBITDA for the three months ended June 30, 2021 were Rp.6,196,912 million (US$427.5 million) and Rp.5,415,180 million (US$373.6 million), respectively.

Key Strengths

We believe that we have the following key strengths:

Strong relationships with highly rated Indonesian telecommunications operators

Our largest customers consist of Indonesia's highly rated telecommunications operators. For the year ended December 31, 2020 and the six months ended June 30, 2021, 77.5% and 74.2% of our revenue, respectively, was from Telkomsel, Indosat and XL Axiata (each of which has an investment grade rating from at least one of the rating agencies). Of the remaining 25.8% of our revenue for the six months ended June 30, 2021, 15.3% was contributed by PT Hutchison 3 Indonesia. In 2013, only 62.8% of our revenue was from Telkomsel, Indosat and XL Axiata (27.5%, 23.5% and 11.8%, respectively) and, of the remaining 37.3% of our revenue, 12.1% was contributed by PT Telkom and 10.5% was contributed by PT Hutchison 3 Indonesia. Our long standing relationships with telecommunications operators help us identify opportunities to meet our customers' needs with additional co-locations and build-to-suit towers. We believe that to ensure no disruption in coverage, our customers would prioritize payments to key suppliers such as us.

Contracted revenue under our long-term customer lease agreements provide high visibility on future revenues

Our revenues are derived from long-term lease agreements with tenants on our sites, and provide us with a highly visible recurring revenue stream. The length of our tower site lease agreements is generally 10 years and the length of our DAS network license agreements is generally five to eight years. As of June 30, 2021, our net debt (excluding lease liabilities — right of use assets) after taking into account our hedging arrangements was Rp.25,916 billion (US$1.8 billion), the contracted revenue under our customers' agreements for all types of tenancy agreements was approximately Rp.29,456 billion (US$2.0 billion) and the average remaining life of all tenancy agreements was approximately 5.3 years. Assuming that our existing contracts are to be renewed for 10 years at a 90% renewal rate, the total contracted revenue pursuant to contract renewals is estimated to be Rp.77,874 billion (US$5.4 billion). Our agreements generally have a fixed lease fee and a fixed or escalating maintenance fee (which typically increases annually based on inflation) payable monthly, quarterly or annually. Lease and maintenance fees vary based on tower location and height; height, size and location of our customer's antennas on the tower; and ground space and utilities provided to the customer. Since many of our sites are located in densely populated areas where telecommunications operators are experiencing high subscriber traffic and relocation of equipment takes time and involves operators reconfiguring their networks, we believe that many of our customers are likely to renew their lease agreements at the end of their current term in order to minimize disruption of coverage in such areas, avoid the potential loss of revenue and also avoid the expense they would incur from the relocation of their antenna equipment.

Extensive build-to-suit and operational experience

We believe that our extensive experience in deployment of build-to-suit sites for large Indonesian telecommunications operators, particularly our experience in SITAC and regulatory compliance, allows us to provide competitive speed-to-market on build-to-suit site construction in diverse areas of the Indonesian archipelago. Our regional management unit, supervises and works closely with our subcontractors and agents, and manages an extensive network of relationships with local vendors and government authorities. This allows us to work with our customers to identify locations where they can install their BTS. Once a new location has been selected, tower construction is typically completed within 90 to 120 days of our customer's issuance of a work order.

Ability to acquire and integrate site portfolios

Since commencement of our business in 2004, we have acquired several tower companies and site portfolios. For example, in 2012, we acquired 2,500 towers from Indosat and in 2018, we acquired control of two listed tower companies, GHON and GOLD, which added 1,120 tenancies and 859 telecommunication sites to our portfolio. In April 2021, we acquired 3,000 towers from PT Inti Bangun Sejahtera Tbk ("IBST") for a consideration of Rp.3,975 billion (US$274.2 million) (the "IBST Asset Purchase"). We believe that our previous acquisitions demonstrate our ability to successfully acquire and integrate large tower portfolios from large telecommunications operators. In particular, we believe that we are able to quickly assess and incorporate asset data into our own information systems to ensure that such assets can be appropriately maintained and also space on those towers can be offered to our existing customers, and we have also been able to obtain financing for such acquisitions at competitive rates. We expect that selective acquisitions of large and small site portfolios will continue to be an important part of our growth strategy and we expect to devote substantial resources to ensuring that we are aware of such opportunities and can quickly execute when an acquisition opportunity arises.

High margins and significant operating leverage

Our business enjoys high EBITDA margins that result in strong and stable cash flow from operations. Our EBITDA margins were 86.1%, 85.4%, 86.7% and 87.3% for the years ended December 31, 2018, 2019 and 2020, and the six months ended June 30, 2021, respectively. Increases in our tenancy ratio for our existing towers should increase our operating margins because a majority of our incremental revenue from the increases of our co-location revenue flows to our operating profits. Additional co-locations are also accretive to our cash flow because the capital expenditure required for, and our incremental cost of, adding new tenants to existing sites are relatively low since most of our towers can accommodate additional co-locations without additional strengthening. As of June 30, 2021, 81% of our tower portfolio consisted of ground-based towers with a height of more than 32 meters and rooftop self-supporting towers which are able to accommodate three or more tenants without the need for additional capital expenditure. Our towers that are at or near structural capacity can be strengthened to provide future leasing capacity with relatively minor capital investment.

As an early entrant into the Indonesian tower leasing industry, we have been able to build site portfolios in areas where telecommunications operators experience high subscriber traffic and where there is high demand for tower space to locate BTS. As of December 31, 2020, approximately 82.2% of our sites and 84.4% of our tenancies were concentrated in the densely populated provinces of Java, Bali and Sumatra. We believe that locating our sites in these high demand areas has allowed us to increase the potential for additional co-locations.

Our tenancy ratio was 1.89 as of June 30, 2021. We believe that, with our existing portfolio of sites in high-demand areas, we are well-positioned to meet increased demand among our customers, which should allow us to further increase our tenancy ratio. In addition, although our tenancy ratios may vary from time to time due to future site portfolio acquisitions or build-to-suit construction, we believe there is strong potential for our tenancy ratio to increase in the future as we expect telecommunications operators to continue to increase the outsourcing of construction of sites and leasing space from tower companies for their operations, and telecommunications operators are expected to roll out new technologies (such as 4G and 5G) that require site space.

Experienced management team with the competencies and experience shared by the Company's founding shareholders

We have increased our tenancies from 25,518 as of December 31, 2018 to 37,232 as of June 30, 2021. We believe that our management team has the skills and experience to continue to develop and grow our business within the Indonesian telecommunications market both organically and through future acquisitions. We have benefitted from the business reputation, experience and expertise of our founding shareholders, PT Wahana Anugerah Sejahtera ("Wahana") (as a subsidiary of PT Saratoga Investama Sedaya Tbk.) ("SRTG") and PT Provident Capital Indonesia ("PCI"). Since our establishment in 2004, the Company's management team has leveraged on these shareholders' capabilities, expertise and relationships to strengthen our value proposition to our customers. The founding shareholders have shared their extensive expertise to develop proper risk management governance and controls for the Company, and institute cost-effective financing options and measures to support the Company's long-term growth and vision.

Our Business Strategy

The key elements of our strategy include:

Maximize co-locations on our existing site portfolio

We believe that we can continue to increase our revenue and improve our margins by increasing the tenancy ratio on our existing site portfolio. We expect that our revenues and operating profit from our tower leasing business will continue to grow because many of our existing towers are attractively located for telecommunications operators and have capacity available for additional antenna space that we can offer to customers at low incremental cost to us. The majority of our operating expenses for tower sites from and following the construction stage are of a fixed nature. Increasing the tenancy ratio will significantly increase our operating margin due to the low incremental cost of adding tenancies on existing tower sites. We will continue to focus the activities of our marketing and project management unit to increase the tenancy ratio and revenue, and further improve our margins, on our existing site portfolio. We are also continuing our efforts to improve access to information regarding our tower sites to allow faster and easier site selection by our customers. We believe that by increasing the speed with which we provide our customers with accurate and complete information about our tower sites, we will be able to increase our competitiveness and revenue generation.

Continue to strengthen our relationships with telecommunications operators

We expect that our understanding of the network expansion requirements of Indonesian telecommunications operators, combined with our ability to effectively meet those requirements, will continue to be a key component of our efforts to increase tenancies in our site portfolio. We will

continue to focus on developing our relationships with our customers to identify opportunities to add new tenancies through co-locations and identify desirable new projects, including build-to-suit and acquisition opportunities.

Increase the size of our site portfolio through selective build-to-suit construction and acquisitions

We seek to increase our revenue by increasing the size of our site portfolio through both selective build-to-suit construction and selective acquisition of site portfolios or tower companies. The size of our site portfolio has increased from 15,091 sites as of December 31, 2018, to 15,589 sites as of December 31, 2019, to 16,265 sites as of December 31, 2020 and to 19,709 sites as of June 30, 2021.

We believe that we have achieved a critical scale, which will allow us to continue to seek to construct and acquire additional sites in locations throughout Indonesia, where we can leverage our relationships with existing customers to increase the tenancy ratio and thereby achieve attractive returns on our investment. We will construct new sites and acquire existing site portfolios only when they meet our investment criteria which include, among others, return on investment, potential for future co-locations, ease of leasing or purchasing land for sites, ease of community approvals, and credit strength of the potential tenant(s). Our policy is to generally build new sites only when we have a committed tenancy from our customers. From time to time we may be engaged in a number of discussions or participate in auction processes in relation to acquisitions of site portfolios of tower companies.

Continue to focus on speed-to-market and reliable operational performance

Speed-to-market and reliable operational performance are critical key performance indicators ("KPI") for our customers. We define our speed to market as the period from our receipt of work order to the commissioning of installation of our customers' telecommunications equipment at a site. Our operational performance refers to the quality of our regular maintenance service and our speed of response to fault reporting. We are constantly refining our ability to meet our customers' KPI, and our initiatives include:

- umbrella contracts for SITAC, CME and maintenance service with selected sub-contractors in certain regions;
- standardization of design, process, procedure and control documentation, including timeframe management;
- national web-enabled project management software enabling early recognition of potential delays to completion and execution of countermeasures;
- coordination of local government operational knowledge to enable efficient permit and license processing;
- regular monitoring of supplier inventory of critical components; and
- operation of a 24/7 customer assistance call center.

Capitalize on future technologies that require tower infrastructure

Our customers have introduced and deployed, and we believe that they will continue to introduce and deploy, next generation wireless technologies. We believe that our customers' rollout of new technologies, such as 4G and 5G, and their expansion of their offerings of wireless data services, have increased, and will continue to increase, our total number of tenancies and our tenancy ratio. We expect that next generation technologies, such as 4G and 5G, will result in increased demand for space on our sites.

Optimizing our capital structure to achieve funding flexibility and minimize borrowing costs

We have utilized our credit facilities and debt securities to fund our previous acquisitions and operational requirements. As of June 30, 2021, our gross debt (excluding lease liabilities – right of use assets) was Rp.28,161 billion (US$2.0 billion), and our gross debt after taking into account our hedging arrangements (excluding lease liabilities – right of use assets) was Rp.26,811 billion (US$1.8 billion). See "Management's Discussion and Analysis of Financial Condition and Results of Operations — Indebtedness" and "Description of Material Indebtedness" for details of our total borrowings and see Note 40 to our consolidated financial statements and "Management's Discussion and Analysis of Financial Condition and Results of Operations — Market Risk Disclosures" for further details of our financial risk management.

As of and for the six months ended June 30, 2021, our financial expense (including financial expenses — long term loans and notes and financial expenses — others, excluding interest expense on lease liabilities) was 35.7% of our revenue, our market capitalization was US$4,790.0 million and the ratio of our net debt (excluding lease liabilities — right of use assets) after taking into account our hedging arrangements to our market capitalization plus net debt after taking into account our hedging arrangements was 0.37x. While we believe that we have a strong capital structure with a substantial equity buffer, we intend to continue to optimize our capital structure to achieve funding flexibility and to minimize our borrowing costs by working with our existing lenders as well as by exploring possibilities of accessing financing through the equity and debt capital markets.

Recent Developments

Continuous Bonds V Tower Bersama Infrastructure Phase I Year 2021 ("Continuous Bonds V Phase I")

On August 19, 2021, the Company issued Continuous Bonds V Phase I with a fixed interest rate, which are payable on a quarterly basis, in an aggregate principal amount of Rp.1.2 trillion. For details of these bonds, see "Description of Material Indebtedness — Continuous Bonds — Continuous Bonds V Phase I."

Other Financing Transactions

For details of other financing transactions occurring after June 30, 2021, see Note 42 to the unaudited interim consolidated financial statements as of June 30, 2021 and for the six months ended June 30, 2021 included elsewhere in this offering circular.

COVID-19 Pandemic

The outbreak of the COVID-19 pandemic has delivered economic shocks globally, leading to adverse repercussions across local, regional and global economies, financial markets, industries and businesses. The ultimate impact of the virus on the global economy in the near and longer term remains uncertain.

We implemented a business continuity plan in response to the COVID-19 pandemic. Our management identified areas which we consider critical to our operations and have developed operational continuity plans in our teams to ensure we have sufficient resources to keep our operations running safely within these areas. We prepared and implemented protocols our employees must follow. Our employees are encouraged to work from home to the extent possible, and in connection, granted our employees at our 24/7 customer call center remote access to the Company's server. Where possible, we try to resolve customer issues remotely using virtual tools and available technology to minimize the need for our employees to visit our customers' sites. Where a site visit is required, we require our employees to follow strict protocols to mitigate the risk of transmission. We conduct regular health checks and screenings of our employees and contract workers, implement physical distancing requirements in the office, implement strict access controls, provide personal protective equipment and other supporting gear for all of our employees, whether on the field or at our headquarters, and collaborate with the relevant government and health agencies to ensure that we are in line with their efforts to prevent the spread of COVID-19. As part of our ongoing corporate social responsibility and community investment contributions, we have undertaken several initiatives in response to the COVID-19 pandemic in 2020. Using our existing Monik TBIG (Mobile Health Clinics), our group donated ventilators as well as other protective equipment (hazmat gowns, disposable gloves, thermometer guns and general supplies) to various groups in Indonesia. The Company also developed a health application called "Si Monik", to assist local communities with analyzing and tracking disease history. Starting in May 2021, the Company has purchased COVID-19 vaccines through the Indonesia Chamber of Commerce "Vaksin Gotong Royong" program, for all our employees and their families. The Company has also provided financial support for employees for COVID-19 testing and hospitalization. Our Monik TBIG health professionals have also been deployed to assist in the Government's mass vaccination drive.

The COVID-19 pandemic did not significantly impact our financial results of operations for the year ended December 31, 2020 or the six months period ended June 30, 2021 as our revenues are based on long-term contracts from our telecommunication customers with limited discretionary termination provisions. We have not been required to shut down our operations as part of Government measures to stem the spread of COVID-19 and have implemented our business continuity plans. Some of our employees, subcontractors and agents and local vendors have contracted COVID-19. However, we have not experienced significant disruptions to the operations of our tower sites or DAS networks as a result of the various lockdowns and social distancing requirements implemented by the Government. Nevertheless, we may face delays in our scheduled maintenance works of our tower and other operational sites due to a lack of manpower stemming from lockdowns or mandatory quarantine orders put in place by the Government generally or by us, in line with Government requirements, in response to our employees, subcontractors and agents or local contractors contracting COVID-19. There is no assurance that our business, operations or financial condition will not be significantly impacted as a result of the COVID-19 pandemic in the future and we may not be able accurately predict the near-term or long-term impact of the COVID-19 pandemic on our business. See "Risk Factors — Risks Relating to our Business — The ongoing COVID-19 pandemic and the disruption caused by various

countermeasures to reduce its spread may have unprecedented adverse consequences of uncertain magnitude and duration on our business, industry, Indonesia and the global economy."

Corporate Information

The Issuer is a publicly listed limited liability company incorporated under the laws of the Republic of Indonesia. The principal executive office of the Issuer is located at The Convergence Indonesia 11th Floor, Kawasan Rasuna Epicentrum, Jl. H.R. Rasuna Said, Jakarta Selatan 12940, Indonesia. The information on the Issuer's website does not constitute part of this offering circular.

THE OFFERING

The following summary contains basic information about the notes and is not intended to be complete. It does not contain all the information that is important to you. Some of the terms described below are subject to important limitations and exceptions. For a more complete understanding of the notes, see "Description of the Notes." Capitalized terms used in this section have the meanings given in "Description of the Notes."

Issuer	PT Tower Bersama Infrastructure Tbk
Notes Offered	US$400,000,000 aggregate principal amount of 2.80% Senior Unsecured Notes due 2027 (the "notes").
Issue Price	100% of the principal amount of the notes.
Maturity Date	May 2, 2027
Interest	The notes will bear interest from and including November 2, 2021 at a rate of 2.80% per annum, payable semi-annually in arrears.
Interest Payment Dates	May 2 and November 2 of each year, commencing on May 2, 2022.
Ranking	The notes will be: • general unsecured obligations of the Issuer; • pari passu in right of payment with all existing and future unsecured senior indebtedness of the Issuer; • senior in right of payment to any future subordinated indebtedness of the Issuer; and • effectively subordinated to secured indebtedness of the Issuer to the extent of the value of the assets serving as security therefor and to all liabilities (including trade payables) of each subsidiary of the Issuer.
Optional Redemption	At any time on or after the Par Call Date, the Issuer may redeem the notes, in whole or in part, at 100% of their principal amount plus accrued and unpaid interest, if any, to the redemption date. At any time and from time to time prior to the Par Call Date, the Issuer may at its option redeem the notes, in whole or in part, at a redemption price equal to 100% of their principal amount plus the Applicable Premium as of, and accrued and unpaid interest, if any, to (but not including), the redemption date.

	See "Description of the Notes — Optional Redemption."
Repurchase of Notes upon a Change of Control Triggering Event	Within 10 days following a Change of Control Triggering Event, the Issuer will make an offer to repurchase all outstanding notes at a purchase price equal to 101% of their principal amount plus accrued and unpaid interest, if any, to (but not including) the Change of Control Payment Date.
Withholding Tax; Additional Amounts	Payments with respect to the notes will be made without withholding or deduction for taxes imposed by the jurisdictions in which the Issuer is incorporated or resident for tax purposes, or through which payment is made, except as required by law. Where such withholding or deduction is required by law, the Issuer will make such deduction or withholding and will, subject to certain exceptions, pay such additional amounts as will result in receipt by the Holder of such amounts as would have been received by such Holder had no such withholding or deduction been required. See "Description of the Notes — Additional Amounts."
Redemption for Taxation Reasons . .	Subject to certain exceptions and as more fully described herein, the Issuer may redeem the notes, in whole but not in part, at a redemption price equal to 100% of the principal amount thereof, together with accrued and unpaid interest, if any, to the date fixed by the Issuer for redemption, if, as a result of certain changes in tax law, the Issuer would be required to pay certain Additional Amounts; provided that where the Additional Amounts are payable as a result of changes affecting Indonesian taxes, the notes may be redeemed only in the event that the withholding tax rate exceeds 20%.
Covenants	The Indenture will limit the ability of the Issuer and its Subsidiaries to, among other things: • create Liens securing Relevant Indebtedness (as defined below); and • effect a consolidation or merger or a sale of substantially all of its assets. These covenants are subject to a number of important qualifications and exceptions described in "Description of the Notes — Certain Covenants" and "Description of the Notes — Merger, Consolidation or Sale of Assets."

Selling and Transfer Restrictions . . .	The notes will not be registered under the Securities Act or under any state securities law of the United States and will be subject to customary restrictions on transfer and resale. See "Plan of Distribution."
Form and Denomination and Registration	The notes will be issued only in fully registered form, without coupons, in denominations of US$200,000 and integral multiples of US$1,000 in excess thereof and will be initially represented by Global Notes registered in the name of a nominee of and deposited with a common depositary for Euroclear and Clearstream.
Clearance and Settlement	The notes will be represented by beneficial interests in the global note, which will be registered in the name of a nominee of, and deposited on the Closing Date with, a common depositary for, Euroclear and Clearstream. Beneficial interests in the global certificate will be shown on and transfers thereof will be effected only through records maintained by Euroclear and Clearstream. Except as described herein, certificates for notes will not be issued in exchange for beneficial interests in the global note. For a description of certain factors relating to clearance and settlement, see "Description of the Notes — Book-Entry, Delivery and Form."
Delivery of the Notes	It is expected that delivery of the notes will be made on or about November 2, 2021 (the "Closing Date"), being the fifth business day following the date of pricing of the notes ("T+5"). You should note that initial trading of the notes may be affected by the T+5 settlement. See "Plan of Distribution."
Use of Proceeds	The net proceeds from this offering, after deducting the underwriting fees and commissions and other estimated expenses payable in connection with this offering, are estimated to be approximately US$396.0 million. The Issuer will use the net proceeds of this offering in the manner described in "Use of Proceeds."
Security Codes	ISIN: XS2390472624 Common Code: 239047262
Governing Law	The notes and the Indenture will be governed by, and construed in accordance with, the laws of the State of New York.
Trustee	The Bank of New York Mellon, London Branch

Paying Agent	The Bank of New York Mellon, London Branch
Transfer Agent and Registrar	The Bank of New York Mellon SA/NV, Dublin Branch
Rating	The notes are expected to be rated "BBB-" by Fitch. A rating is not a recommendation to buy, sell or hold securities and may be subject to suspension, reduction or withdrawal at any time by the assigning rating agency.
Listing	Approval in-principle has been received for the listing of the notes on the Official List of the SGX-ST. The notes will be traded on the SGX-ST in a minimum board lot size of US$200,000 for so long as the notes are listed on the SGX-ST.
Risk Factors	For a discussion of certain factors that should be considered in evaluating an investment in the notes, see "Risk Factors."

SUMMARY CONSOLIDATED FINANCIAL INFORMATION AND OTHER DATA

You should read the summary historical consolidated financial information and operating data presented below in conjunction with our consolidated financial statements, related notes to the consolidated financial statements and other financial information, included elsewhere in this offering circular. You should also read the sections of this offering circular entitled "Risk Factors" and "Management's Discussion and Analysis of Our Financial Condition and Results of Operations."

The summary consolidated financial information as of and for the years ended December 31, 2018, 2019 and 2020 has been derived from our audited consolidated financial statements included elsewhere in this offering circular, and the summary consolidated financial information for the six months ended June 30, 2020 and 2021 has been derived from our unaudited interim consolidated financial statements as of June 30, 2021 and for the six months ended June 30, 2020 and 2021 included elsewhere in this offering circular. We have prepared our unaudited interim consolidated financial statements on the same basis as our audited consolidated financial statements for the year ended December 31, 2020. Our historical results for any prior or interim periods are not necessarily indicative of results to be expected for a full financial year or for any future period. Effective January 1, 2020, we applied PSAK 71 "Financial Instruments," PSAK 72 "Revenue from Contracts with Customers" and PSAK 73 "Leases." In accordance with the transitional provision, the cumulative impact of these standards were applied to the beginning balance of the retained earnings at January 1, 2020, hence we did not restate the comparative information. Initial application of these standards produced a cumulative impact of Rp.(806) million, comprising Rp.7,232 million from the recognition of expected credit losses and Rp.(8,038) million from the recognition of the accumulated interest charges on lease and the difference between the accumulated depreciation of the right of use assets and the accumulated rental expenses.

We have prepared and presented our consolidated financial statements in accordance with Indonesian FAS, which differs in certain respects from IFRS. In making an investment decision, you should rely upon your own examination of the terms of the offering of the notes and the financial information contained in this offering circular. You should consult your own professional advisors for an understanding of the differences between Indonesian FAS and IFRS, and how those differences could affect the financial information contained in this offering circular. You should read the section of this offering circular entitled "Summary of Certain Differences between Indonesian FAS and IFRS" for a description of certain differences between Indonesian FAS and IFRS.

We have translated the Rupiah amounts of our consolidated financial information as of and for the year ended December 31, 2020 and as of and for the six months ended June 30, 2021 into U.S. dollars for convenience only based on the average middle exchange rate announced by Bank Indonesia, the Indonesian central bank, as of June 30, 2021, which was Rp.14,496 = US$1.00. Such translations should not be construed as representations that the Rupiah or U.S. dollar amounts referred to could have been, or could be, converted into U.S. dollars or Rupiah, as the case may be, at that or any other rate or at all. See "Exchange Rates and Exchange Controls" for further information regarding rates of exchange between the Rupiah and U.S. dollars.

Consolidated Statements of Profit or Loss and Other Comprehensive Income Data

	For the Year Ended December 31,				For the Six Months Ended June 30,		
	2018	2019	2020	2020[1]	2020	2021	2021[1]
				(unaudited) (US$ in millions)	(unaudited)		(unaudited) (US$ in millions)
	(Rp. in millions)				(Rp. in millions)		
Revenue	4,318,137	4,698,742	5,327,689	367.5	2,577,352	2,971,379	205.0
Cost of revenue	(784,082)	(903,454)	(1,093,065)	(75.4)	(482,961)	(729,089)	(50.3)
Gross profit	3,534,055	3,795,288	4,234,624	292.1	2,094,391	2,242,290	154.7
Operating expenses	(381,463)	(426,434)	(418,623)	(28.9)	(211,520)	(213,484)	(14.7)
Income from operations	**3,152,592**	**3,368,854**	**3,816,001**	**263.2**	**1,882,871**	**2,028,806**	**140.0**
Other income (charges):							
Increase of fair value of investment properties	7,728	79,427	34,778	2.4	—	—	—
Interest income	8,431	10,440	14,869	1.0	6,108	8,231	0.6
Gain on foreign exchange — net	2,221	8,966	37,452	2.6	10,239	26,281	1.8
Decrease of fair value of telecommunication towers	—	(40,405)	(4,584)	(0.3)	—	—	—
Impairment of goodwill	(15,722)	(47,421)	—	—	(25,000)	(8,279)	(0.6)
Final income tax	(17,310)	(81,394)	(155,723)	(10.7)	(44,605)	(136,702)	(9.4)
Financial expenses — long term loans and notes[2]	(2,003,573)	(1,940,149)	(1,943,161)	(134.0)	(960,264)	(989,051)	(68.2)
Financial expenses — others	(68,024)	(76,761)	(191,345)	(13.2)	(120,003)	(96,174)	(6.6)
Expected credit recovery (expense) — financial assets	—	—	(23,810)	(1.6)	(12,803)	492	0.0
Others — net	(49,368)	(58,962)	(75,023)	(5.2)	(43,646)	(12,728)	(0.9)
Other charges — net	**(2,135,617)**	**(2,146,259)**	**(2,306,547)**	**(159.1)**	**(1,189,974)**	**(1,207,930)**	**(83.3)**
Profit before income tax	**1,016,975**	**1,222,595**	**1,509,454**	**104.1**	**692,897**	**820,876**	**56.6**
Income tax (expenses)							
Current	(187,395)	(261,448)	(254,752)	(17.6)	(103,950)	(111,647)	(7.7)
Deferred	(126,948)	(95,026)	(188,126)	(13.0)	(51,027)	(19,393)	(1.3)
Income tax (expenses) — net	**(314,343)**	**(356,474)**	**(442,878)**	**(30.6)**	**(154,977)**	**(131,040)**	**(9.0)**
Net profit for the current period	**702,632**	**866,121**	**1,066,576**	**73.6**	**537,920**	**689,836**	**47.6**
Other Comprehensive Income							
Items that will not be reclassified to profit or loss							
Revaluation surplus (deficit)	83,074	1,600,720	3,405,454	234.9	349,141	(59,289)	(4.1)
Actuarial gain (loss)	8,033	12,236	(4,889)	(0.3)	—	280	0.0
Items that may be reclassified to profit or loss							
Difference translation of foreign currency	349	16	(548)	(0.0)	(408)	(91)	(0.0)
Changes in fair value investment — available-for-sale	14,837	—	—	—	—	—	—
Changes in value of cash flow hedges	963,650	(80,275)	(67,806)	(4.7)	445,851	159,605	11.0
Total comprehensive income for the current period	**1,772,575**	**2,398,818**	**4,398,787**	**303.4**	**1,332,504**	**790,341**	**54.5**

	For the Year Ended December 31,				For the Six Months Ended June 30,		
	2018	2019	2020	2020[1]	2020	2021	2021[1]
	(Rp. in millions)			(unaudited) (US$ in millions)	(unaudited) (Rp. in millions)		(unaudited) (US$ in millions)
Net profit attributable to:							
Equity holder of the parent company	680,581	819,454	1,009,625	69.6	510,483	663,267	45.8
Non-controlling interest	22,051	46,667	56,951	3.9	27,437	26,569	1.8
Total	**702,632**	**866,121**	**1,066,576**	**73.6**	**537,920**	**689,836**	**47.6**
Total comprehensive income attributable to:							
Equity holder of the parent company	1,740,522	2,285,137	4,323,265	298.2	1,268,264	760,491	52.5
Non-controlling interest	32,053	113,681	75,522	5.2	64,240	29,850	2.1
Total	**1,772,575**	**2,398,818**	**4,398,787**	**303.4**	**1,332,504**	**790,341**	**54.5**

Notes:

(1) Converted into U.S. dollars based on the exchange rate of Rp.14,496 = US$1.00 on June 30, 2021 for the convenience of the reader as described under "Presentation of Financial Information."

(2) Financial expenses — long term loans and notes includes financial expenses — interest as disclosed in the consolidated financial statements as of and for the years ended December 31, 2018, 2019 and 2020 and financial expenses — long term loans and notes as disclosed in the unaudited interim consolidated financial statements as of June 30, 2021 and for the six months ended June 30, 2020 and 2021 included elsewhere in this offering circular.

Consolidated Statements of Financial Position Data

	As of December 31,				As of June 30,	
	2018	2019	2020	2020[1]	2021	2021[1]
	(Rp. in millions)			(unaudited) (US$ in millions)	(unaudited) (Rp. in millions)	(unaudited) (US$ in millions)
Assets						
Current Assets:						
Cash and cash equivalents	220,586	525,242	947,341	65.4	894,447	61.7
Trade receivables — third parties	383,303	466,547	710,722	49.0	904,096	62.4
Other receivables	77,660	305,778	262,885	18.1	74,575	5.1
Promissory notes	221,425	—	—	—	—	—
Accrued revenue	546,608	522,332	491,190	33.9	583,131	40.2
Inventories and supplies	22,723	17,708	118,312	8.2	132,241	9.1
Investment	1,508	1,508	—	—	—	—
Advance payments and prepaid expenses	154,803	170,957	534,604	36.9	96,250	6.6
Long-term land lease — current portion	279,643	297,534	—	—	—	—
Prepaid taxes	119,206	69,134	162,340	11.2	866,354	59.8
Advance for shares repurchase	—	—	—	—	—	—
Total current assets	**2,027,465**	**2,376,740**	**3,227,394**	**222.6**	**3,551,094**	**245.0**
Non-current Assets:						
Deferred tax assets — net	344,703	249,591	60,726	4.2	29,965	2.1
Right of use assets — net	—	—	2,614,882	180.4	3,329,709	229.7
Property and equipment — net	21,878,608	24,649,294	28,738,362	1,982.5	32,752,320	2,259.4
Investment properties — fair value	181,608	266,186	388,020	26.8	388,798	26.8
Goodwill	428,610	381,189	381,189	26.3	372,910	25.7
Long-term land lease	1,578,873	1,612,596	—	—	—	—
Refundable deposits	2,067	2,281	1,708	0.1	1,883	0.1
Derivative financial assets	2,605,591	1,312,140	1,084,975	74.8	1,397,984	96.4
Estimated claims for income tax refund	60,368	15,903	15,903	1.1	—	—
Other non-current assets	5,854	5,790	8,144	0.6	11,936	0.8
Total non-current assets	**27,086,282**	**28,494,970**	**33,293,909**	**2,296.8**	**38,285,505**	**2,641.1**
Total assets	**29,113,747**	**30,871,710**	**36,521,303**	**2,519.4**	**41,836,599**	**2,886.1**
Liabilities and Equity						
Current Liabilities						
Trade payables — third parties	231,711	247,591	571,000	39.4	136,233	9.4
Other payables	104,028	40,939	21,057	1.5	29,189	2.0
Taxes payable	60,065	44,071	56,522	3.9	89,927	6.2
Unearned income	668,543	860,882	1,061,994	73.3	2,728,810	188.2
Accrued expenses	1,466,028	1,168,585	1,156,790	79.8	1,103,104	76.1
Notes — current portion[2]	624,283	2,146,911	6,900,451	476.0	3,960,344	273.2
Long-term loans — current portion						
Third parties	3,265,184	—	3,857,445	266.1	3,012,352	207.8
Lease liabilities — current portion[3]	5,095	4,644	152,617	10.5	167,402	11.5
Total current liabilities	**6,424,937**	**4,513,623**	**13,777,876**	**950.5**	**11,227,361**	**774.5**
Non-current Liabilities:						
Deferred tax liabilities — net	12,509	12,000	11,411	0.8	—	—
Provision for post-employment benefits	30,186	14,352	24,850	1.7	26,556	1.8
Notes – net of current portion[2]	7,264,742	5,678,296	6,668,031	460.0	12,145,367	837.8
Long-term loans — net of current portion						
Third parties	11,688,940	15,115,908	6,421,402	443.0	8,743,721	603.2
Lease liabilities — non-current portion[3]	12,868	14,247	313,895	21.7	475,855	32.8
Total non-current liabilities	**19,009,245**	**20,834,803**	**13,439,589**	**927.1**	**21,391,499**	**1,475.7**
Total liabilities	**25,434,182**	**25,348,426**	**27,217,465**	**1,877.6**	**32,618,860**	**2,250.2**

	As of December 31,				As of June 30,	
	2018	2019	2020	2020[1]	2021	2021[1]
	(Rp. in millions)			(unaudited) (US$ in millions)	(unaudited) (Rp. in millions)	(unaudited) (US$ in millions)
Equity						
Share capital[4]	453,140	453,140	453,140	31.3	453,140	31.3
Treasury stock	(985,379)	(1,028,268)	(1,028,268)	(70.9)	(1,028,268)	(70.9)
Additional paid-in capital — net	(499,660)	(519,015)	(520,500)	(35.9)	(578,017)	(39.9)
Other comprehensive income	3,060,932	4,476,604	7,600,888	524.3	7,566,207	522.0
Retained earnings:						
Statutory reserves	61,100	61,600	62,100	4.3	62,600	4.3
Unappropriated	1,280,546	1,549,511	2,142,322	147.8	2,309,547	159.3
Total equity attributable to equity holder of the parent company	**3,370,679**	**4,993,572**	**8,709,682**	**600.8**	**8,785,209**	**606.0**
Non-controlling interest	308,886	529,712	594,156	41.0	432,530	29.8
Total Equity	**3,679,565**	**5,523,284**	**9,303,838**	**641.8**	**9,217,739**	**635.9**
Total liabilities and equity	**29,113,747**	**30,871,710**	**36,521,303**	**2,519.4**	**41,836,599**	**2,886.1**

Notes:

(1) Converted into U.S. dollars based on the exchange rate of Rp.14,496 = US$1.00 on June 30, 2021 for the convenience of the reader as described under "Presentation of Financial Information."

(2) Notes includes short-term notes and long-term notes as presented and disclosed in the consolidated financial statements as of and for the years ended December 31, 2018, 2019 and 2020 and notes (current and non-current portion) as presented and disclosed in the unaudited interim consolidated financial statements as of June 30, 2021 and for the six months ended June 30, 2020 and 2021 included elsewhere in this offering circular.

(3) Lease liabilities includes finance lease as disclosed in the consolidated financial statements as of and for the years ended December 31, 2018, 2019 and 2020 and lease liabilities (current and non-current portion) which resulted from the adoption of PSAK 73 as disclosed in the unaudited interim consolidated financial statements as of June 30, 2021 and for the six months ended June 30, 2020 and 2021 included elsewhere in this offering circular.

(4) Share capital as of December 31, 2018 par value Rp.100 (full amount) per share and for December 31, 2019 and 2020 and June 30, 2021 par value Rp.20 (full amount) per share. Authorized capital of 14,420,120,000 shares as of December 31, 2018, and 72,100,600,000 shares as of December 31, 2019 and 2020, and June 30, 2021. The issued and fully paid-in capital: number of shares outstanding as of December 31, 2018 was 4,531,399,889 shares and as of December 31, 2019 and 2020, and June 30, 2021 was 22,656,999,445 shares.

Consolidated Statements of Cash Flow Data

	For the Year Ended December 31,				For the Six Months Ended June 30,		
	2018	2019	2020	2020[(1)]	2020	2021[(1)]	2021[(1)]
	(Rp. in millions)			(unaudited) (US$ in millions)	(unaudited) (Rp. in millions)		(unaudited) (US$ in millions)
Net cash flows provided by operating activities	3,239,952	3,691,417	3,786,457	261.2	2,334,868	2,982,394	205.7
Net cash flows (used in) investing activities	(2,204,859)	(2,039,485)	(2,051,887)	(141.5)	(1,277,111)	(5,333,511)	(367.9)
Net cash flows provided by (used in) financing activities	(1,229,193)	(1,339,700)	(1,316,568)	(90.8)	(829,230)	2,287,836	157.8
Effect from changes in foreign exchange rates on cash and cash equivalents	7,242	(7,576)	4,097	0.3	8,054	10,387	0.7
Net increase (decrease) of cash and cash equivalents	(186,858)	304,656	422,099	29.1	236,581	(52,894)	(3.6)
Cash and cash equivalents at beginning of period	407,444	220,586	525,242	36.2	525,242	947,341	65.4
Cash and cash equivalents at the end of period	220,586	525,242	947,341	65.4	761,823	894,447	61.7

Note:

(1) Converted into U.S. dollars based on the exchange rate of Rp.14,496 = US$1.00 on June 30, 2021 for the convenience of the reader as described under "Presentation of Financial Information."

Financial Data and Other Non-GAAP Measures

	For the Year Ended December 31,			For the Six Months Ended June 30,	For the Three Months Ended June 30,
	2018	2019	2020	2021	2021[9]
			(unaudited)		
Revenue[1] (US$ in millions)	297.9	324.1	367.5	205.0	106.9
EBITDA[1][2] (US$ in millions)	256.6	276.7	318.5	178.9	93.4
EBITDA margin[3]	86.1%	85.4%	86.7%	87.3%	87.4%
LQA EBITDA[1][2] (US$ in millions)	272.8	290.9	334.6	373.6	373.6
Gross debt (excluding lease liabilities — right of use assets)[4]/LQA EBITDA[2]	5.8x	5.5x	5.0x	—	5.2x
Net debt (excluding lease liabilities — right of use assets)[5][6]/LQA EBITDA[2]	5.8x	5.4x	4.8x	—	5.0x
Total net senior debt[7]/LQA EBITDA[2]	3.3x	3.3x	1.9x	—	1.9x
Gross debt after taking into account our hedging arrangements (excluding lease liabilities — right of use assets)[8]/LQA EBITDA[2]	5.2x	5.2x	4.7x	—	5.0x
Net debt after taking into account our hedging arrangements (excluding lease liabilities — right of use assets)[9]/LQA EBITDA[2]	5.1x	5.0x	4.5x	—	4.8x

Notes:

(1) Converted into U.S. dollars based on the exchange rate of Rp.14,496 = US$1.00 on June 30, 2021 for the convenience of the reader as described under "Presentation of Financial Information."

(2) We define EBITDA as income from operations plus depreciation of property and equipment plus depreciation of right of use assets plus amortization of land leases and amortization of licenses and LQA EBITDA as EBITDA for the three months ended December 31, 2018, 2019 and 2020 and June 30, 2021 multiplied by four, as applicable. EBITDA and LQA EBITDA are not measurements of financial performance or liquidity under Indonesian FAS and should not be considered as alternatives to net profit, income from operations or any other performance measures derived in accordance with Indonesian FAS or as alternatives to cash flow from operating activities as a measure of liquidity. In addition, EBITDA and LQA EBITDA are not standardized terms, hence, a direct comparison between companies using such terms may not be possible. Effective January 1, 2020, we applied PSAK 73, which resulted in the reclassification of the amortization expense as depreciation of right of use assets. The following table reconciles our income from operations under Indonesian FAS to our definition of EBITDA and LQA EBITDA for the periods indicated (and the amounts indicated were converted based on the exchange rate of Rp.14,496 = US$1.00 on June 30, 2021 for the convenience of the reader as described under "Presentation of Financial Information"):

	For the Year Ended December 31,			For the Six Months Ended June 30,	For the Three Months Ended June 30,
	2018	2019	2020	2021	2021
			(unaudited) (US$ in millions)		
Income from Operations	217.5	232.4	263.3	140.0	72.3
Add:					
Depreciation of property and equipment	18.2	22.5	31.2	25.1	13.6
Amortization of licenses	1.7	1.5	2.1	1.3	0.6
Amortization of land leases	19.3	20.3	—	–	–
Depreciation of right of use assets	—	—	21.9	12.5	6.9
EBITDA	**256.6**	**276.7**	**318.5**	**178.9**	**93.4**

	For the Three Months Ended December 31,			For the Three Months Ended June 30, 2021
	2018	2019	2020	
			(unaudited) (US$ in millions)	
Income from Operations	58.0	60.4	64.3	72.3
Add:				
Depreciation of property and equipment	4.4	6.8	13.0	13.6
Amortization of licenses	0.6	0.4	0.7	0.6
Amortization of land leases	5.2	5.2	—	—
Depreciation of right of use assets	—	—	5.7	6.9
EBITDA	**68.2**	**72.7**	**83.7**	**93.4**
LQA EBITDA	**272.8**	**290.9**	**334.6**	**373.6**

(3) EBITDA margin represents EBITDA as a percentage of revenue.

(4) Gross debt refers to our total borrowings (current and non-current portion of long-term loans, finance leases, lease liabilities — vehicle, notes and lease liabilities — right of use assets) before deducting unamortized borrowing costs. The following table reconciles our total borrowings (excluding lease liabilities – right of use assets) to our gross debt for the periods indicated (and the amounts indicated were converted based on the exchange rate of Rp.14,496 = US$1.00 on June 30, 2021 for convenience of the reader as described under "Presentation of Financial Information"):

	As of December 31,			As of June 30,
	2018	2019	2020	2021
		(unaudited)		
		(US$ in millions)		
Long term loans	1,031.6	1,042.8	709.1	811.0
Finance leases	1.2	1.3	—	—
Lease liabilities — vehicle	—	—	1.1	1.0
Notes	544.2	539.8	936.0	1,111.0
Total borrowings (excluding lease liabilities — right of use assets)	1,577.1	1,583.9	1,646.2	1,923.0
Add:				
Unamortized borrowing costs	11.1	12.5	14.8	19.7
Gross debt (excluding lease liabilities — right of use assets)	**1,588.2**	**1,596.4**	**1,661.0**	**1,942.7**
Add:				
Lease liabilities — right of use assets	—	—	31.1	43.4
Gross debt	**1,588.2**	**1,596.4**	**1,692.1**	**1,986.1**

(5) Net debt refers to our gross debt less cash and cash equivalents. The following table reconciles our gross debt to our net debt for the periods indicated (and the amounts indicated were converted based on the exchange rate of Rp.14,496 = US$1.00 on June 30, 2021 for the convenience of the reader as described under "Presentation of Financial Information"):

	As of December 31,			As of June 30,
	2018	2019	2020	2021
		(unaudited)		
		(US$ in millions)		
Gross debt	1,588.2	1,596.4	1,692.1	1,986.1
Less:				
Cash and cash equivalents	15.2	36.2	65.4	61.7
Net debt	**1,572.9**	**1,560.2**	**1,626.7**	**1,924.4**

(6) Net debt (excluding lease liabilities — right of use assets) refers to our net debt less lease liabilities — right of use assets. The following table reconciles our net debt to our net debt (excluding lease liabilities — right of use assets) for the periods indicated (and the amounts indicated were converted based on the exchange rate of Rp.14,496 = US$1.00 on June 30, 2021 for the convenience of the reader as described under "Presentation of Financial Information"):

	As of December 31,			As of June 30,
	2018	2019	2020	2021
		(unaudited)		
		(US$ in millions)		
Net debt	1,572.9	1,560.2	1,626.7	1,924.4
Less:				
Lease liabilities — right of use assets	—	—	31.1	43.4
Net debt (excluding lease liabilities – right of use assets)	**1,572.9**	**1,560.2**	**1,595.6**	**1,881.0**

(7) Total senior debt is defined as our long-term loans – third parties (including indebtedness under the 2017 RLF, the 2018 RCF, the 2019 RLF, the 2021 RLF and the Credit Facilities) as calculated by valuing the hedged portion of our total senior debt in U.S. dollars after taking into account our hedging arrangements, before deducting unamortized borrowing costs. We define total net senior debt as our total senior debt less cash and cash equivalents balance. The following table reconciles our total senior debt to our total net senior debt for the periods indicated (and the amounts indicated were converted based on the exchange rate of Rp.14,496 = US$1.00 on June 30, 2021 for the convenience of the reader as described under "Presentation of Financial Information"):

	As of December 31,			As of June 30,
	2018	2019	2020	2021
	(unaudited) (US$ in millions)			
Total senior debt	915.0	998.5	687.5	789.8
Less:				
Cash and cash equivalents	15.2	36.2	65.4	61.7
Total net senior debt	**899.7**	**962.2**	**622.2**	**728.1**

(8) Gross debt after taking into account our hedging arrangements refers to our total borrowings (current and non-current portion of long-term loans, finance leases, lease liabilities – vehicle, notes and lease liabilities – right of use assets), as calculated by valuing the hedged portion of our gross debt in U.S. dollars using the hedged rate, before deducting unamortized borrowing costs. The following table reconciles our total borrowings after taking into account our hedging arrangements (excluding lease liabilities – right of use assets) to our gross debt after taking into account our hedging arrangements for the periods indicated (and the amounts indicated were converted based on the exchange rate of Rp.14,496 = US$1.00 on June 30, 2021 for convenience of the reader as described under "Presentation of Financial Information"):

	As of December 31,			As of June 30,
	2018	2019	2020	2021
	(unaudited) (US$ in millions)			
Long term loans (hedging rate)	907.0	987.8	679.2	778.8
Finance leases	1.2	1.3	—	—
Notes (hedging rate)	491.6	501.2	886.2	1,050.1
Lease liabilities — vehicle	—	—	1.1	1.0
Total borrowings after taking into account our hedging arrangements (excluding lease liabilities — right of use assets)	**1,399.8**	**1,490.3**	**1,566.5**	**1,829.8**
Add:				
Unamortized borrowing costs	11.1	12.5	14.8	19.7
Gross debt after taking into account our hedging arrangements (excluding lease liabilities — right of use assets)	**1,410.9**	**1,502.9**	**1,581.3**	**1,849.5**
Add:				
Lease liabilities — right of use assets	—	—	31.3	43.4
Gross debt after taking into account our hedging arrangements	**1,410.9**	**1,502.9**	**1,612.4**	**1,892.9**

(9) Net debt after taking into account our hedging arrangements refers to our gross debt after taking into account our hedging arrangements less cash and cash equivalents. The following table reconciles our gross debt after taking into account our hedging arrangements to our net debt after taking into account our hedging arrangements for the periods indicated (and the amounts indicated were converted based on the exchange rate of Rp.14,496 = US$1.00 on June 30, 2021 for the convenience of the reader as described under "Presentation of Financial Information"):

	As of December 31,			As of June 30,
	2018	2019	2020	2021
			(unaudited)	
			(US$ in millions)	
Gross debt after taking into account our hedging arrangements	1,410.9	1,502.9	1,612.4	1,892.9
Less:				
Cash and cash equivalents	15.2	36.2	65.4	61.7
Net debt after taking into account our hedging arrangements	**1,395.7**	**1,466.6**	**1,547.0**	**1,831.2**
Less:				
Lease liabilities — right of use assets	—	—	31.1	43.4
Net debt after taking into account our hedging arrangements (excluding lease liabilities — right of use assets)	**1,395.7**	**1,466.6**	**1,515.9**	**1,787.8**

(10) This information is presented for informational purposes only and is not calculated in the same manner as the method used for calculating the leverage ratios set forth in the Indenture governing the notes.

Operational Data

	As of December 31, 2017	As of December 31, 2018	As of December 31, 2019	As of December 31, 2020	As of June 30, 2021
Total telecommunications sites	13,509	15,091	15,589	16,265	19,709
Total number of tenancies	23,018	25,518	28,740	31,850	37,232
Total number of tower sites	13,461	15,032	15,473	16,155	19,598
Total number of tower tenancies	22,970	25,459	28,624	31,740	37,121
Total DAS network sites	48	59	116	110	111
Tenancy ratio	1.71	1.69	1.85	1.96	1.89

An investment in the notes is subject to significant risks. You should carefully consider all of the information in this offering circular and, in particular, the risks described below before deciding to invest in the notes. The following describes some of the significant risks that could affect us and the value of the notes as well as our ability to pay interest on, and repay the principal of, the notes. Additionally, some risks may be unknown to us and other risks, currently believed to be immaterial, could turn out to be material. All of these could materially and adversely affect our business, financial condition, results of operations and prospects. The market price of the notes could decline due to any of these risks and you may lose all or part of your investment. This offering circular also contains forward-looking statements that involve risks and uncertainties including those described under "Forward-Looking Statements" elsewhere in this offering circular. Our actual results could differ materially from those anticipated in these forward-looking statements as a result of certain factors, including the risks faced by us described below and elsewhere in this offering circular.

The risks described below are not the only ones that may affect us or our notes. In general, investing in securities of companies in emerging market countries such as Indonesia involves risks not typically associated with investing in the securities of companies in more developed economies. To the extent the description in this section relates to Government or Indonesian macroeconomic data, such information has been extracted from official Government publications or other third-party sources and has not been independently verified by us.

Risks Relating to Our Business

The ongoing global COVID-19 pandemic and the disruption caused by various measures to reduce its spread may have unprecedented adverse consequences of uncertain magnitude and duration on our business, industry, Indonesia and the global economy.

The World Health Organization declared COVID-19 a pandemic on March 11, 2020. The outbreak of the COVID-19 pandemic has delivered economic shocks globally, leading to adverse repercussions across local, regional and global economies, financial markets, industries and businesses which necessarily adversely affects Indonesia and in turn, our business. The governments of many countries, including Indonesia, have reacted by instituting lockdowns, business shutdowns, quarantines and restrictions on travel. On March 31, 2020, by virtue of Presidential Decree No. 11 of 2020, the President of Indonesia declared COVID-19 a "Public Health Emergency" (*Darurat Kesehatan Masyarakat*) and on April 13, 2020 through Presidential Decree No. 12 of 2020, a "National Disaster" (*Bencana Nasional*). The Government implemented various protective measures, including imposing temporary travel restrictions on inbound travelers, closing of certain schools and workplaces, restrictions on religious activities and activities in public places. Businesses have also implemented countermeasures and safety measures to reduce the risk of transmission. Businesses, including ours, have faced disruptions in light of the restrictions that have been put in place which has reduced levels of commercial activities and industrial production in affected countries.

Such actions have not only disrupted businesses but have had a material and adverse effect on industries and local, regional and global economies, including the Indonesian economy. A number of governments revised gross domestic product ("GDP") growth forecasts downward for 2020 as well as 2021, in response to the economic slowdown caused by the spread of COVID-19. Indonesia's gross domestic product in 2020 contracted by 2.1% due to the fallout of the COVID-19 pandemic, which caused a negative impact on domestic demands. In July 2021, the Government revised its forecast of Indonesia's GDP in 2021 to 3.7% from 4.5%, due to the new COVID-19 restrictions imposed to curb record infections.

The economic impact of COVID-19 on Indonesia has already been substantial and may increase. Unemployment has increased and is expected to further increase, valuations and trading prices of financial and other assets have declined and the Rupiah has depreciated significantly against the U.S. dollar. If the pandemic continues to spread and more restrictive measures are implemented by our Government, our business, financial condition, results of operations and prospects may be materially and adversely impacted.

The COVID-19 pandemic may affect our industry and business in a number of ways, including:

- limiting our ability to generate cash flow, and as a result, affecting our financial condition;
- causing us to delay, postpone or cancel certain of our operating and development plans, and the associated capital expenditures;
- the economic slowdown may adversely impact our customers' abilities to raise capital, which may result in our customers being unable to meet their payment obligations under our tenant leases, reducing their capital spending, which may adversely affect the demand for our telecommunications sites;
- adversely impacting our ability to enter into new strategic transactions or to finalize strategic transactions on previously agreed terms and timetables; and
- requiring us to make operational changes and implement measures to ensure the health and safety of our employees and counterparties, which may involve increased costs or operational inefficiencies.

The COVID-19 pandemic did not significantly impact our financial results of operations for the year ended December 31, 2020 or the six months ended June 30, 2021, as our revenues are based on long-term contracts from our telecommunication customers with limited discretionary termination provisions. We have not been required to shut down any of our operations as part of Government measures to stem the spread of COVID-19 and have implemented our business continuity plans. Certain of our employees, subcontractors and agents and local vendors have contracted COVID-19. However, we have not experienced significant disruptions to the operations of our tower sites or DAS networks as a result of the various lockdowns and social distancing requirements implemented by the Government. Nevertheless, we may face delays in our scheduled maintenance works of our tower and other operational sites due to a lack of manpower stemming from lockdowns or mandatory quarantine orders put in place by the Government generally or by us, in line with Government requirements, in response to our employees, subcontractors and agents or local contractors contracting COVID-19.

The ultimate impact of the virus on our business in the near and longer term remains uncertain and will depend on a range of factors which we are not able to accurately predict, including the duration, severity, potential recurrence and scope of the pandemic and the nature and severity of measures adopted by governments. It is possible that the COVID-19 pandemic will cause a prolonged global economic crisis or recession. To the extent the COVID-19 pandemic adversely affects our business and financial results, it may also have the effect of heightening many of the other risks described in this "*Risk Factors*" section.

Due to the long-term expectations of revenue from tenant leases, we are exposed to the creditworthiness and financial strength of our tenants.

Due to the long-term nature of our tenant leases (usually 10 years), we, like others in the tower industry, are dependent on the continued financial strength of our tenants. Although the Indonesian

telecommunications industry is highly competitive, with seven operators currently in the market, we believe that only a small number of these operators are profitable. Many telecommunications operators have substantial leverage and rely on capital raising activities to fund their operations and capital expenditures. A downturn in the economy and/or disruption in the financial and credit markets could make it more difficult and expensive to raise capital. If our customers or potential customers are unable to raise adequate capital to fund their business plans, they may reduce their capital spending, which could materially and adversely affect demand for our telecommunications sites. If, as a result of a prolonged economic downturn or otherwise, one or more of our significant customers experience financial difficulties, it could result in uncollectible accounts receivable from our customers, which in turn could have a material adverse effect on our business, financial condition, results of operations and liquidity.

A substantial portion of our revenue is derived from a small number of customers, and the termination, non-renewal or material modification of our tower lease agreements with them could have a material and adverse effect on us.

A substantial portion of our revenue is derived from a small number of customers. For the year ended December 31, 2020 and the six months ended June 30, 2021, 77.5% and 74.2% of our revenue, respectively, was from Telkomsel, Indosat and XL Axiata, collectively. If any of these customers is unwilling or unable to perform its obligations under our tower lease agreements with them, our revenues, results of operations, financial condition and liquidity could be materially and adversely affected. It is possible that disputes with our customers could lead to a termination of our agreements with customers or a material modification of the terms of those agreements, either of which could have a material adverse effect on our business, results of operations, financial condition and liquidity. If we are forced to resolve any of these disputes through litigation, our relationship with the applicable customer could be terminated or damaged, which could lead to decreased revenues or increased costs, resulting in a corresponding adverse effect on our business, financial condition, results of operations and liquidity. In addition, no assurance can be given that our customers will renew their tower lease agreements at the expiration of those agreements. No assurance can be given that we will be successful in negotiating favorable terms with the customers that renew their lease agreements. Any failure to obtain renewals of existing tower lease agreements or the failure to successfully negotiate favorable terms for such renewals could result in a reduction in our revenues and, accordingly, our ability to make payment on the notes.

Merger or consolidation among our customers could have a material and adverse effect on our revenue and cash flow.

We believe that there will be continued price competition among the largest Indonesian telecommunications operators which will increase their number of subscribers, subscribers' minutes of use and network capacity requirements. We also believe that the current pricing levels, combined with significant capital expenditure requirements for telecommunications operators, will be sustainable only for the operators with large scale operations in terms of both network capacity and total number of subscribers. We believe that, given the high number of telecommunications operators in Indonesia, as well as benefits of scale enjoyed by the larger operators, consolidation is likely to occur among the smaller telecommunications operators (some of whom are our customers) in order to achieve the scale necessary for long term profitable growth in this market.

Significant consolidation among our customers could result in a reduction in their BTS and/or co-location requirements for the consolidated companies, since certain BTS may become redundant or additional tower spaces may be gained in the consolidation. In addition, consolidation may result in a

reduction in future capital expenditures in the aggregate, if the expansion plans of the consolidated companies are similar. As a result, our customers could determine not to renew leases with us as a result of such consolidation. If a significant number of such terminations occur as a result of industry consolidation, it could materially and adversely affect our revenue and cash flow, which in turn could have a material adverse effect on our business, financial condition, results of operations and liquidity.

Competition in the tower leasing industry may create pricing pressures that materially and adversely affect us.

Competition in the tower leasing industry is substantial, and our customers have numerous alternatives for leasing tower space including:

- telecommunications operators such as Telkomsel, XL Axiata and Indosat that own site portfolios and lease antenna space to third parties;
- tower companies that operate large site portfolios, primarily PT Dayamitra Telekomunikasi ("Mitratel"), PT Sarana Menara Nusantara Tbk. ("Protelindo") and PT Solusi Tunas Pratama Tbk;
- a significant number of tower companies that operate smaller site portfolios; and
- in certain circumstances, owners of alternative site structures such as building rooftops, outdoor and indoor DAS networks, billboards and electric transmission towers.

We believe competition in the Indonesian tower leasing industry is based principally on tower location, relationships with telecommunications operators, tower quality and height and, to a lesser extent, on size of site portfolio, pricing, operational management and additional services to tenants. Some of our competitors, such as the national telecommunications operators that allow co-location on their towers, are larger and may have greater financial resources than we do. In addition, some of our competitors may have lower return on investment criteria than we do.

For the year ended December 31, 2020 and the six months ended June 30, 2021, 77.5% and 74.2% of our revenue, respectively, was from Telkomsel, Indosat and XL Axiata, collectively. We believe, however, that large telecommunications operators tend not to lease extensively from their direct competitors. A change in this policy or any other event, including regulatory action, that increases co-location among major Indonesian telecommunications operators, could result in increased competition for co-locations.

Competitive pressures could materially and adversely affect our lease rates and services income, and could result in our existing customers not renewing their leases, or new customers leasing towers from our competitors and not from us. We also face, and expect to continue to face, competition in identifying and successfully acquiring tower assets, particularly for high quality tower assets and large site portfolios, which could also make our tower acquisitions more costly. Any of the foregoing factors could materially and adversely affect our business, financial condition, results of operations and liquidity.

We may not successfully execute our growth strategy. Our organic and acquisition growth strategies depend on various factors, some of which are outside our control.

Our strategy for the growth of our business involves three components: organic growth through expansion of our tenancy ratio, construction of additional sites on a build-to-suit basis for Indonesian

telecommunications operators, and growth by acquisition of site portfolios from tower leasing companies and telecommunications operators. In April 2021, we acquired 3,000 towers from IBST for a consideration of Rp.3,975 billion (US$274.2 million). Our ability to execute the organic growth component of our strategy will depend on a number of factors, including our ability to continue to obtain orders and deploy build-to-suit sites and co-locations in a timely and cost-effective manner, our ability to maintain our relationships with the regulatory authorities and to obtain any required governmental approvals. There can be no assurance that we will be able to continue expanding our site portfolio organically on a commercially viable basis or in a timely manner, or at all, and our failure to do so could have a material adverse effect on our business, financial condition, results of operations and liquidity.

Our ability to execute the acquisition growth component of our strategy will also depend on a number of factors. We must identify suitable and available acquisition candidates at an acceptable cost, reach an agreement with each acquisition candidate and its shareholders on commercially reasonable terms and also secure financing to complete larger acquisitions or investments. In addition, the completion of acquisitions are typically subject to the fulfillment of certain conditions, some of which are beyond our control. We are continuously examining the merits, risks and feasibility of potential transactions and searching for acquisition opportunities. Such search and examination efforts, and any related discussions with third parties, may or may not lead to future acquisitions.

Our ability to grow through further acquisitions will also depend on a number of factors, including the willingness of large Indonesian telecommunications operators (some of whom are our major customers) to engage with us in sale and leaseback transactions for their site portfolios on terms that meet our return on investment criteria. The benefits of any acquisition may take considerable time to develop, and there can be no assurance that any particular acquisition will produce the intended results or benefits. In addition, an acquisition or investment transaction may expose us to unknown liabilities or risks without sufficient indemnities or other legal protections. There can be no assurance that we will be able to continue to expand our site portfolio on a commercially viable basis or in a timely manner, or at all.

Our acquisition strategy will also place significant demands on the time and attention of our management. In addition to integrating, training and managing our expanding workforce, we will need to continue to develop and improve our financial and management controls, information systems and reporting procedures, including those of any acquired businesses. Additional risks associated with acquisitions include, but are not limited to, the following:

- it may be difficult to integrate the operations of an acquired business into our organization;
- management, information, and accounting systems of an acquired business may be different from, and incompatible with, our current systems and may need to be successfully integrated;
- our management must devote its attention to integrating acquired businesses, which diverts its attention from our existing business;
- our failure to manage regulatory non-compliance following the acquisition of a business may result in the requirement that we dismantle towers in the site portfolio of the acquired business; and
- we could lose some of our key employees or key employees of an acquired business.

The resolution of any of the foregoing could be time consuming and costly.

We may also incur earn-out and contingent consideration payments in connection with future acquisitions, which could result in a higher than expected impact on our future earnings. For example, under the provisions of an asset purchase agreement (the "Indosat Asset Purchase Agreement"), which we entered into with Indosat in February 2012 in relation to the acquisition of 2,500 towers from Indosat (the "Indosat Acquisition"), if our co-location revenues exceed a stated target in any year ending on or prior to December 31, 2022, we are required to pay an earn-out amount to Indosat. The maximum aggregate earn-out amount payable is US$112.5 million. As of the date of this offering circular, we have paid a total of US$18.8 million to Indosat under the earn-out. Such payment was made on October 11, 2019.

In addition, our acquisition strategy will also require us to expend a significant portion of our cash reserves, incur substantial indebtedness and/or issue a substantial amount of new equity, which could adversely affect our financial condition and liquidity and result in significant dilution of our existing shareholders' interests. The impact of dilution may also restrict our ability to consummate further acquisitions. We may also incur losses related to the impairment of goodwill and other intangible assets upon or following the acquisition of another business. There can be no assurance that we will be able to efficiently or effectively manage the integration of acquisitions or the growth of our operations post-acquisition, and our failure to do so could materially and adversely affect our business, financial condition, results of operations and ability to implement our business strategy.

We have a substantial amount of indebtedness. In the event we do not repay or refinance such indebtedness, we could face substantial liquidity issues and might be required to issue equity securities or securities convertible into equity securities, or sell some of our assets to meet our debt payment obligations.

We have a substantial amount of indebtedness. As of June 30, 2021, our gross debt (excluding lease liabilities — right of use assets) was Rp.28,161 billion (US$2.0 billion). Our ability to execute our business plans and in particular our acquisition strategy may depend on external fund raising activities, including debt and equity financing. Our ability to raise additional equity financing is subject to prevailing market risks. Our access to debt financing for acquisitions and to refinance maturing debt is subject to many factors, some of which are beyond our control. For example, political instability, economic downturns, liquidity of the U.S. dollar and Rupiah bank and debt capital markets, social unrest or changes in the regulatory environment could increase our cost of borrowing or restrict our ability to obtain debt financing. We cannot guarantee that we will be able to arrange financing on acceptable terms, if at all. Our inability to obtain debt financing from banks and other financial institutions and/or capital markets could adversely affect our ability to execute our growth strategies or refinance maturing debt.

If we are unable to refinance or renegotiate our debt, we cannot guarantee that we will be able to generate enough cash flows from operations or that we will be able to obtain enough capital to service our debt or fund our planned capital expenditures. In such an event, we could face substantial liquidity issues and might be required to issue equity securities or securities convertible into equity securities, or sell some of our assets to meet our debt payment obligations. Failure to refinance indebtedness when required could result in a default under such indebtedness and materially restrict our ability to pay amounts due on the notes. Assuming we meet certain financial ratios, we have the ability under our debt instruments to incur additional indebtedness, and any additional indebtedness we incur could exacerbate the risks described above.

Additionally, as a result of our substantial indebtedness:

- we may be more vulnerable to general adverse economic and industry conditions;

- we may find it more difficult to obtain additional financing to fund discretionary investments and other general corporate requirements or to refinance our existing indebtedness;

- we may have more difficulty satisfying our obligations with respect to the notes;

- we are or will be required to dedicate a substantial portion of our cash flow from operations to the payment of principal and interest on our debt, thereby reducing the available cash flows to fund other projects, including certain discretionary investments;

- we may have limited flexibility in planning for, or reacting to, changes in our business and in the industry;

- we may have a competitive disadvantage relative to other companies in our industry with less debt;

- we may be required to issue equity securities or securities convertible into equity or sell some of our assets, possibly on unfavorable terms, in order to meet payment obligations; and

- we may be limited in our ability to take advantage of strategic business opportunities, including wireless infrastructure development and mergers and acquisitions.

Currently we have debt instruments in place that limit in certain circumstances our ability to incur indebtedness, pay dividends, create liens, sell assets and engage in certain mergers and acquisitions. Our subsidiaries, under their debt instruments, are also required to maintain specific financial ratios. Our ability to comply with the financial ratio covenants under these instruments and to satisfy our debt obligations will depend on our future operating performance. If we fail to comply with the debt restrictions, we will be in default under those instruments, which in some cases would cause the maturity of a substantial portion of our long-term indebtedness, including the notes, to be accelerated. If our operating subsidiaries were to default on their debt, the collateral agent under our revolving and term loan facilities, to the extent they are secured, could seek to foreclose on the collateral securing such debt, in which case we could lose control over collateralized assets and the revenues associated with such assets.

We may incur additional indebtedness, which could exacerbate the risks associated with our existing indebtedness.

We may incur additional indebtedness, which could increase the risks associated with our existing indebtedness. If we incur debt that is secured, the relevant creditors will effectively rank senior to the notes with respect to the assets securing such debt. If we incur debt at our subsidiaries, the relevant creditors will effectively rank senior to the notes with respect to the assets of such subsidiary. If we incur any additional indebtedness that ranks equally with the notes, the relevant creditors will be entitled to share ratably with the holders of the notes in any proceeds distributed in connection with any insolvency, liquidation, reorganization, dissolution or other winding-up of us. This may have the effect of reducing the amount of proceeds paid to the holders of the notes. Covenants in agreements governing debt that we may incur in the future may also materially restrict our operations, including our ability to incur debt, pay dividends, make certain investments and payments, and encumber or dispose of assets. In addition, we could be in default of financial covenants contained in agreements relating to our future debt in the event that our results of operations do not meet any of the terms in the

covenants, including the financial thresholds or ratios. A default under one debt instrument may also trigger cross-defaults under other debt instruments. An event of default under any debt instrument, if not cured or waived, could have a material adverse effect on us.

Higher interest expense could erode our margins.

The majority of our indebtedness is subject to floating interest rates, which has caused, and will continue to cause, our interest expense to fluctuate with changes in interest rates. In addition, our indebtedness subject to both fixed and floating rates has a shorter tenor than our tenant lease agreements and we are subject to a risk of refinancing at higher interest rates. Financial expense (including financial expenses – long term loans and notes and financial expenses — others (excluding interest expense on lease liabilities)) amounted to 48.0%, 42.9%, 38.3% and 35.7% of our revenue in the years ended December 31, 2018, 2019 and 2020, and the six months ended June 30, 2021, respectively. We cannot assure you that the floating interest rates on our outstanding indebtedness will not increase in the future and thereby increase our interest expense, which could decrease our margins and have a material adverse effect on our business, financial condition, results of operations and liquidity.

Any increase in our operating expenses could erode our operating margins.

Our EBITDA margins were 86.1%, 85.4%, 86.7% and 87.3% for the years ended December 31, 2018, 2019 and 2020, and the six months ended June 30, 2021, respectively. We cannot assure you that our operating expenses will not increase in the future or that we will be able to successfully pass any such increases in operating expenses to our customers. Increases in our operating expenses would reduce our operating margins and have a material adverse effect on our business, financial condition, results of operations and liquidity.

We do not have the required approvals and licenses for some of our tower sites.

The construction of a telecommunications tower requires the prior approval of each household in the surrounding community that is fully or partially located within a radius from the tower equal to the height of the tower. Once all requisite household approvals have been obtained, an application is made to the local authorities for separate licenses and approvals for the towers. Although we generally seek and obtain the requisite household consents and local community approval prior to the commencement of tower construction, consistent with what we believe is the common practice in Indonesia and given the long lead time generally required for processing applications for approvals and licenses from the local authorities — including the building construction permit (*Izin Mendirikan Bangunan* or IMB) or the tower construction permit (*Izin Mendirikan Bangunan Menara* or IMBM) as the case may be, and other permits — we sometimes proceed with, and often complete, tower construction and BTS installation for our tenants before all required approvals and licenses have been formally obtained from local authorities.

As of June 30, 2021, 2,046 of our 19,598 tower sites, had not been issued an IMB or IMBM. Of these 2,046 tower sites, we believe that 264 tower sites do not require an IMB or IMBM due to the tower type being roof top poles with a height of six meters or less. Of the remaining tower sites, (i) we have submitted applications to obtain licenses which are required prior to our submission of IMB or IMBM applications for 1,734 tower sites, representing approximately 8.8% of our tower sites; and (ii) we have yet to receive written confirmation from our third party subcontractor related to permit process for 48 tower sites, representing approximately 0.2% of our tower sites.

There can be no assurance that the relevant authorities will issue the required licenses or approvals or that they will be issued in a timely manner or as expected. If such approvals and licenses are not obtained, the local authorities may issue notices for our towers to be dismantled and removed, and we may be placed on a blacklist and prohibited from constructing towers in the region for up to one year. In 2009, we were required by the local authorities in Badung, Bali to dismantle five towers that were constructed and tenanted prior to the issuance of the IMB or IMBM. We had challenged the Badung's local authorities' requirement at the Bali State Administrative Court which had upheld the decision of Badung's local authorities. Following this decision, we then successfully appealed at the Surabaya Administrative High Court, which had annulled the decision of the Bali State Administrative Court. However, the decision of the Surabaya Administrative High Court was annulled by the decision of Supreme Court and we were ordered to dismantle five of our towers. A regulation issued by the Minister of Home Affairs allows us to submit new IMB applications for our tower sites which have not been issued an IMB or IMBM. We cannot assure you that local authorities will not require us to dismantle our towers and impose other penalties on us, such as reprimands, warnings and fines, for non-compliance with the relevant licensing and approval requirement.

In addition to the IMB or IMBM, certain municipalities and regencies require telecommunication towers to obtain tower operational licenses (*Izin Operasional Menara* or "IOM"). These local regulations prescribe various penalties for failure to obtain such IOMs which are largely administrative in nature, although some of the local regulations introduced by certain municipalities and regencies may require tower dismantling and/or impose criminal sanctions in the event of non-compliance. As local regulations are not regularly and accurately published at the national level to the public in a timely manner, it is often difficult to monitor the enactment of such local regulations. While the number of municipalities and regencies that have enacted these regulations are limited, there is no assurance that in the future, other local governments will not impose similar requirements for tower businesses operating within their jurisdiction. To the best of our knowledge, these local regulations requiring the IOMs have not been enforced by the relevant municipalities and regencies, no towers have been dismantled, no penalties have been imposed on any tower operator operating under such local regulations, and no municipality or regency has required tower operators to obtain such IOMs. As of June 30, 2021, 6.3% of our tower sites are subject to the local regulations requiring IOMs. While we have IOMs for some of our towers and are in the process of applying for IOMs for our other towers, we cannot assure you that the relevant municipalities or regencies will not strictly enforce such local regulations in respect of our tower sites for which IOMs are required, require us to dismantle our towers and/or impose the other prescribed penalties in the future for towers that do not have IOMs, or enact or implement further regulations with more stringent requirements or more adverse consequences for breach.

A failure to obtain and/or maintain all such approvals and licenses would constitute a breach of our obligations under certain of our tenant lease agreements giving rise to a right to terminate by the tenant of the relevant site if such breach is not remedied within the cure period. If we are required to relocate a material number our towers and cannot locate replacement sites which are acceptable to our customers or if a material number of our tenant lease agreements are terminated, this could materially and adversely affect our revenue and cash flow, which in turn could have a material adverse effect on our business, financial condition, results of operations and liquidity.

We may experience local community opposition to some of our tower sites.

We have experienced, and may in the future experience, local community opposition to our existing sites or the construction of new sites for various reasons, including concerns about alleged health risks. As a result of such local community opposition, we could be required by the local

authorities to dismantle and relocate certain towers. If we are required to relocate a material number of our towers and cannot locate replacement sites that are acceptable to our customers, it could materially and adversely affect our revenue and cash flow, which in turn could have a material adverse effect on our business, financial condition, results of operations and liquidity.

If we are unable to extend our ground leases, or renew on commercially viable terms, or protect our rights to the land under our towers, it could adversely affect our business and operating results.

Our site portfolio consists primarily of ground-based towers constructed on land that we have leased under long term ground lease agreements. Approximately 96.4% of the tower sites in our portfolio as of June 30, 2021 are operated under ground leases on land that we do not own. For tower sites on leased land, approximately 54.9% of the ground leases for these sites have a final expiration date of 2026 or beyond and, as of June 30, 2021, the average remaining life of our ground leases was 6.3 years.

For various reasons, landowners may not want to renew their ground leases with us, they may lose their rights to the land or they may transfer their land interests to third parties, which could affect our ability to renew ground leases on commercially viable terms. In addition, we may not have the required available capital to extend these ground leases for our towers at the end of the applicable period. In the event that we cannot extend these ground leases, we will be required to dismantle or relocate these towers and may lose the cash flows derived from such towers, which may have a material adverse effect on our business, financial condition and results of operation.

Our real property interests relating to our towers consist primarily of leasehold interests. For various reasons, we may not always have the ability to access, analyze and verify all information regarding titles and other issues prior to entering into a ground lease for a tower site, which could affect our rights to access and operate the site. From time to time we may also experience disputes with lessors regarding the terms of our ground leases for tower sites, which can affect our ability to access and operate a tower site. The termination of a ground lease for a particular site may interfere with our ability to operate and generate revenues from the tower. If this were to happen at a material number of our sites, it would have a material adverse effect on our business, financial condition and results of operation.

Our revaluation of property and equipment could fluctuate and adversely affect our net profit.

Increase in fair value on property and equipment (telecommunications sites) is comprised of the difference between the historical cost and fair market value of our property and equipment at the end of the relevant accounting period. Revaluation of our property and equipment is affected by factors including our number of towers, number of tenancies, tenancy ratio and average remaining life. Although revaluation of property and equipment does not adversely affect our cash flow from operations, a decrease in our number of towers, number of tenancies and tenancy ratio could potentially decrease the value of our property and equipment and adversely affect our net profit, and have a material adverse effect on our business, financial condition, and results of operations.

New technologies could make our tower leasing business less desirable to potential tenants and result in decreasing revenues.

The development and implementation of new technologies designed to enhance the efficiency of wireless networks could reduce the use and need for tower-based wireless services transmission and reception and have the effect of decreasing demand for tower space. Examples of such technologies

might include spectrally efficient technologies which could potentially relieve some network capacity problems, thereby reducing the demand for tower-based antenna space, or complementary VoIP access technologies that could be used to offload a portion of subscriber traffic away from the traditional tower-based networks, which would reduce the need for telecommunications operators to add more tower-based antenna equipment at certain tower sites. Moreover, the emergence of alternative technologies could reduce the need for tower-based wireless services transmission and reception. For example, the growth in delivery of wireless communication, radio and video services by direct broadcast satellites could materially and adversely affect demand for our antenna space. Finally, certain alternative technologies could cause radio interference with older generation tower-based wireless services transmission and reception. As a result, the development and implementation of alternative technologies to any significant degree could have a material adverse effect on our business, financial condition and results of operation.

Our business is subject to government regulations and any changes in current or future laws or regulations could restrict our ability to operate our business as we currently do.

Our business, and that of our customers, is subject to national provincial and local regulation governing telecommunications as well as the construction and operation of towers. These regulations and opposition from local zoning authorities and community organizations against construction in their communities can delay, prevent or increase the cost of new tower construction, modifications, additions of new antennas to a site, or site upgrades, thereby limiting our ability to respond to customer demands and requirements. In addition, certain licenses for the operation of our towers may be subjected to additional terms and conditions with which we cannot comply. As public concern over tower proliferation has grown in recent years, some communities now try to restrict tower construction or delay granting permits. Existing regulatory policies and changes in such policies may materially and adversely affect the associated timing or cost of such projects and additional regulations may be adopted which increase delays, or result in additional costs to us, or that prevent completion of our projects in certain locations. Any failure to complete new tower construction, modifications, additions of new antennas to a site, or site upgrades could harm our ability to add additional site space and maintain existing lessees, which could have an adverse effect on our revenues and, accordingly, on our ability to make payments on the notes. See "Regulation of the Tower Leasing Industry in Indonesia."

We may not be able to detect and prevent bribery or other misconduct committed by our employees, representatives, agents, customers or other third parties.

We are subject to risks relating to bribery and other misconduct committed by our employees, representatives, agents or other third parties. Such misconduct, which may be difficult to detect and deter, could include, but is not limited to, engaging in misrepresentation or fraudulent, deceptive or otherwise improper activities, such as accepting or offering bribes, or otherwise not complying with applicable laws or our internal policies and procedures.

Although we have established policies and procedures designed to prevent, detect and respond to such behavior and ensure overall compliance with applicable laws, these measures may not always be completely effective in detecting or preventing all incidents of non-compliance or suspicious transactions. For example, in April 2019, one of our ex-employees as well as contractors used by us were found guilty by an Indonesian court for bribes in relation to the issuance of land use and building permits. In response, we reviewed and strengthened our internal policies and procedures, including by updating our payment procedures, requiring all of our employees and contractors to sign pacts of integrity and we also worked with the Indonesian regulatory authorities and other members of the tower association on best practices to prevent unlawful behavior.

Any violations of anti-corruption laws could result in investigation or litigation which could require us to expend significant time, incur substantial costs and divert management's attention from day-to-day operations, as well as subject us to penalties, financial or otherwise, that could have a material adverse effect on our business, financial condition and reputation.

The terms of our existing debt securities contain covenants limiting our financial and operating flexibility.

Covenants in our existing debt securities restrict the ability of us and our subsidiaries to, among other things:

- incur or guarantee additional indebtedness and issue certain redeemable or preferred stock;
- create or incur certain liens;
- make certain payments, including dividends or other distributions, with respect to our notes or those of our restricted subsidiaries;
- prepay or redeem subordinated debt or equity;
- make certain investments and capital expenditures;
- create encumbrances or restrictions on the payment of dividends, or other distributions, loans or advances;
- sell, lease or transfer certain assets, including stock of restricted subsidiaries;
- enter into sale and leaseback transactions;
- engage in certain transactions with affiliates;
- enter into unrelated businesses or engage in prohibited activities; and
- consolidate or merge with other entities.

All of these covenants are subject to the limitations, exceptions and qualifications. These covenants could limit our ability to pursue our growth plan, restrict our flexibility in planning for, or reacting to, changes in our business and industry, and increase our vulnerability to general adverse economic and industry conditions. We may also enter into additional financing arrangements in the future which could further restrict our flexibility.

Any defaults of covenants contained in our existing debt securities may lead to an event of default under the notes and the Indenture and may lead to cross-defaults under our other indebtedness. No assurance can be given that we will be able to pay any amounts due to holders of the notes in the event of such default, and any default may significantly impair our ability to pay, when due, the interest of and principal on the notes.

We could have liability under environmental laws.

Our operations, like those of other companies engaged in similar businesses, are subject to the requirements of various environmental and occupational safety and health laws and regulations, including those relating to the management, use, storage, disposal, emission and remediation of, and exposure to, hazardous and non-hazardous substances, materials and wastes as regulated in Law No. 32 of 2009 on Environmental Protection and Management as amended by Law No. 11 of 2020 regarding Job Creation (the "Omnibus Law") and its implementing regulations. As the owner, lessee or operator of many thousands of real estate sites underlying our towers, we may be liable for substantial costs of remediating soil and groundwater contaminated by hazardous materials, without regard to whether we, as the owner, lessee or operator, knew of or were responsible for the contamination. Many of these laws and regulations contain information reporting and record keeping requirements. We cannot assure you that we are at all times in complete compliance with all environmental requirements. We may be subject to potentially significant fines or penalties if we fail to comply with any of these requirements. The requirements of these laws and regulations are complex, change frequently, and could become more stringent in the future. It is possible that these requirements will change or that liabilities will arise in the future in a manner that could have a material adverse effect on our business, results of operations or financial condition.

Our towers may be affected by natural disasters and other unforeseen damage for which our insurance may not provide adequate coverage.

Our towers are located across the main islands of the Indonesian archipelago and are subject to risks associated with natural disasters, such as windstorms, floods, hurricanes and earthquakes, as well as other unforeseen damage. Any damage or destruction to our towers as a result of these or other risks would impact our ability to provide services to our customers. While we maintain insurance coverage for natural disasters, our insurance may not be adequate. While we carry business interruption insurance, such insurance may not adequately cover all of our lost revenues, including potential revenues from new tenants that could have been added to our towers but for the damage. If we are unable to provide services to our customers as a result of damage to our towers, it could lead to customer loss, resulting in a corresponding material adverse effect on our business, financial condition and results of operation.

We rely on key management personnel, and our business may be adversely affected by any inability to recruit, train, retain and motivate key employees.

We believe that our current management team contributes significant experience and expertise to the management and growth of our business. The continued success of our business and our ability to execute our business strategies in the future will depend in large part on the efforts of our key personnel. There is also a shortage of skilled personnel in the telecommunications tower industry in Indonesia, which we believe is likely to continue. As a result, we may face increased competition for skilled employees in many job categories from tower companies, telecommunications operators and new entrants into the tower industry and this competition is expected to intensify. Although we believe our employee salary and benefit packages are generally competitive with those of our competitors, if the number of our competitors in the Indonesian tower industry increases, we and our competitors may face difficulties in retaining skilled employees. In addition, as we expand our business through acquisitions, we will need to retain and integrate skilled employees from acquired companies. Our inability to successfully integrate, recruit, train, retain and motivate key skilled employees could have a material adverse effect on our business, financial condition and results of operation.

Our costs could increase and the growth of our revenues could decrease due to perceived health risks from radio emissions, especially if these perceived risks are substantiated.

Public perception of possible health risks associated with cellular and other wireless communications technology could slow the growth of wireless companies, which could in turn slow our revenue growth. In particular, negative public perception of, and regulations regarding, these perceived health risks could slow the market acceptance of wireless communications services and increase opposition to the development and expansion of tower sites. The potential connection between radio frequency emissions and certain negative health effects has been the subject of substantial study by the scientific community in recent years, and numerous health-related lawsuits have been filed around the world against wireless carriers and wireless device manufacturers. If a scientific study or court decision resulted in a finding that radio frequency emissions posed health risks to consumers, it could negatively impact the market for wireless services, as well as our wireless carrier customers, which could materially and adversely affect our business, financial condition and results of operation. We do not maintain any significant insurance with respect to these matters.

Risks Relating to Indonesia

All of our operations and substantially all of our assets are located in Indonesia. As a result, future political, economic, legal and social conditions in Indonesia, as well as certain actions and policies the Government may take or adopt, or omit from taking or adopting, could have a material adverse effect on our business, financial condition, results of operations and prospects and our ability to make payments under the notes.

Domestic, regional or global economic changes may adversely affect our businesses.

The economic crisis which affected Southeast Asia, including Indonesia, from mid-1997 was characterized in Indonesia by, among other things, currency depreciation, significant decline in real gross domestic product, high interest rates, social unrest and extraordinary political events. These conditions had a material adverse effect on our customers, who depend on the health of the overall Indonesian economy to stimulate demand for telecommunications services. In addition, the economic crisis resulted in the failure of many Indonesian companies to meet their debt obligations. Many Indonesian companies have not fully recovered from the economic crisis, and many such companies are still in the process of restructuring their debt obligations or are engaged in disputes arising from defaults under their debt obligations. The global financial crisis that began in 2007, which was triggered in part by the subprime mortgage crisis in the United States, caused failures of large U.S. financial institutions and rapidly evolved into a global credit crisis. U.S. bank failures were followed by failures in a number of European banks and declines in various stock indexes, as well as large reductions in the market value of equities and commodities worldwide, including in Indonesia. The world economic downturn has adversely affected the economic performance of Indonesia, resulting in declining economic growth, slowing household consumption and weakening investment due to loss of external demand and increased uncertainty in the world economy. Global financial markets have also experienced volatility due to political uncertainty following political elections in the United States and Western Europe and the 2016 United Kingdom national referendum in which a majority of voters elected to withdraw from the European Union. Uncertainty over the outcome of the Eurozone's government's financial support programs and the stability of the European Union and worries about sovereign finances generally are ongoing. The COVID-19 pandemic has also led to uncertainty in the global and domestic economy and significant volatility in global financial markets, and may cause prolonged global or domestic economic disruption. The ultimate impact of the virus on the global economy in the near and longer term remains uncertain. These conditions have had a negative impact

on Indonesian businesses and consumers, which may result in reduced demand for telecommunication services.

Volatility in oil prices and potential food shortages may also cause an economic slowdown in many countries, including Indonesia. An economic downturn in Indonesia could also lead to additional defaults by Indonesian borrowers and could have a material adverse effect on our business, financial condition and results of operations and prospects. The Government continues to have a relatively high fiscal deficit and a relatively high level of sovereign debt. Its foreign currency reserves are modest and, in the past, the banking sector has suffered from relatively high levels of non-performing loans. A higher inflation rate in Indonesia could also result in less disposable income available to consumers to spend or cause consumer purchasing power to decrease, which may reduce consumer demand for telecommunication services, including our services.

Indonesia and other ASEAN (The Association of Southeast Asian Nations) countries have been negatively affected, along with developing market countries globally, by the weak financial and economic conditions in developed markets. U.S. President Donald Trump's administration advocated greater restrictions on trade generally and increases on tariffs on goods imported into the United States, particularly from China. These or similar actions, or adverse spillover effects of foreign trade policies, treaties or tariffs, could have a material adverse impact on the Indonesian market. Although the Government has in the past taken steps to maintain economic stability and public confidence in the Indonesian economy in response to such conditions internationally, any continuation of weak financial and economic conditions in developed markets may negatively impact economic growth, the Government's fiscal position, the Rupiah's exchange rate and other facets of the Indonesian economy. According to the IMF (The International Monetary Fund), the world economic downturn adversely affected the economic performance of Indonesia, slowing real GDP growth to 5.0%, 4.9% and 5.0% in 2014, 2015 and 2016, before strengthening to 5.1% in 2017 and 5.2% in 2018, and slowing to 5.0% in 2019 and further worsening to a contraction of -2.1% in 2020 due to the COVID-19 pandemic. There remains significant uncertainty and volatility with respect to Indonesia's real GDP growth in 2021 due to the fallout of the COVID-19 pandemic, which continues to impact Indonesia's economy substantially.

A loss of investor confidence in the financial systems of emerging and other markets, or other factors, including the deterioration of the global economic situation, may cause increased volatility in the Indonesian financial markets and a slowdown in economic growth or negative economic growth in Indonesia. Any such increased volatility or slowdown or negative growth could have a material adverse effect on our business, financial condition and results of operations and prospects and the Issuer's ability to pay interest on, and repay the principal of, the notes.

Political and social instability in Indonesia may adversely affect the economy, which in turn could have a material adverse effect on our business, financial condition, results of operations and prospects.

Since 1998, Indonesia has experienced a process of democratic change, resulting in political and social events that have highlighted the unpredictable nature of Indonesia's changing political landscape. These events have resulted in political instability as well as general social and civil unrest on certain occasions in the past few years. As a relatively new democratic country, Indonesia continues to face various socio-political issues and has, from time to time, experienced political instability and social and civil unrest.

Indonesia has experienced frequent social unrest arising from economic issues which has, on occasion, escalated into riots and violence. Since 2000, thousands of Indonesians have participated in demonstrations in Jakarta and other Indonesian cities both for and against former President Abdurrahman Wahid, former President Megawati Sukarnoputri, former President Susilo Bambang Yudhoyono, and current President Joko Widodo as well as in response to specific issues, including fuel subsidy reductions, electricity subsidy reductions, privatization of state assets, anti-corruption measures, decentralization and provincial autonomy and the American-led military campaigns in Afghanistan and Iraq. In and shortly after October 2016, thousands of Indonesians marched in a series of demonstrations in Jakarta and other cities either in support of or in opposition to the then Governor of Jakarta, Basuki Tjahja Purnama in connection with blasphemy allegations against him, in the period preceding a Jakarta Gubernatorial election in early 2017. Mr. Purnama was convicted of the blasphemy charges in May 2017. Anies Baswedan (of the same party as the losing candidate of the 2014 Presidential election) had been elected as Governor of Jakarta in April 2017. Although demonstrations in Indonesia since 2000 have been generally peaceful, some have turned violent, including one on November 4, 2016, in which thousands of Indonesians marched in Jakarta demanding legal action against Governor Basuki in connection with the blasphemy allegations against him. Clashes with police injured hundreds and left one dead. On April 17, 2019, for the first time in history, Indonesia held a general election, where the President and Vice President, members of People's Consultative Assembly (*Majelis Permusyawaratan Rakyat*) and the Regional House of Representatives (*Dewan Perwakilan Rakyat Daerah*) were elected on the same day. On May 21, 2019, the General Elections Commission ("Komisi Pemilihan Umum" or "KPU") has officially announced that the incumbent President Joko Widodo had won the 2019 Presidential election. Following the official announcement of the election results, protests and riots erupted in various area in Jakarta over two days from May 21 to 22, 2019. On May 24, 2019, the losing candidate, Prabowo Subianto, through his legal team, filed a lawsuit contesting the official results of the 2019 Presidential election with the Indonesian Constitutional Court. On June 27, 2019, the Indonesia Constitutional Court rejected the entirety of the lawsuit filed by Prabowo Subianto and declared "the court rejects all of the plaintiffs' claims," and upheld the results of the 2019 Presidential election that handed Joko Widodo a second term as the President of the Republic of Indonesia. The Indonesian Constitutional Court's decision is final and binding. In 2020, protests and riots have broken out in various parts of Indonesia over the proposed bill and following the enactment of the Omnibus Law, due to concerns that the law would harm labor rights and indigenous land rights, and reduce environmental protection. The bill was passed on October 5, 2020 by Indonesia's People's Representative Council and the Omnibus Law was enacted on November 2, 2020.

There can be no assurance that increases in subsidized fuel prices, or cuts in fuel subsidies in the future, will not result in political and social instability. Our business may be affected by additional political and related social developments in Indonesia could result in civil disturbances and Government actions including, but not limited to, changes in crude oil or natural gas policy, responses to war and terrorist acts, renegotiation or nullification of existing concessions and contracts, changes in tax laws, treaties or policies, the imposition of foreign exchange restrictions and responses to international developments. In May 2019, Joko Widodo was re-elected as Indonesia's seventh President. There is no assurance that new policies or regulations will not be introduced that will affect our business under the new presidency.

Regional political instability and clashes between religious and ethnic groups also remain problematic. Separatist movements and clashes between religious and ethnic groups have resulted in social and civil unrest in parts of Indonesia. In the provinces of Aceh and Papua (formerly Irian Jaya), there have been clashes between supporters of those separatist movements and the Indonesian military, although there has been little conflict in Aceh since a memorandum of understanding was signed in August 2005. In August 2019, a series of mass riots and protests involving thousands of participants

began across Papua, in areas such as Jayapura, Manokwari, Sorong and Wamena, as a response to a demand for independence in Papua and alleged racist and ethnic discriminatory behavior towards fellow Papuans, resulting in over 30 people killed, other injuries and the destruction of public facilities, such as the post office, the gas station, stores and government buildings.

Political and related social developments in Indonesia have been unpredictable in the past, and we cannot assure you that social and civil disturbances will not occur in the future and on a wider scale, or that any such disturbances will not, directly or indirectly, have a material adverse effect on our business, financial condition, results of operations and prospects.

Our business may be adversely affected by the imposition of national and regional restrictions, taxes and levies.

Our business and operations are located throughout Indonesia and may be adversely affected by conflicting or additional restrictions, taxes and levies that may be imposed by applicable national and regional authorities.

For example, on September 6, 2017, the Indonesian tax authority issued Government Regulation (GR) No. 34 ("GR 34") regarding income tax rates on income derived from leasing out land and/or building rental, which includes those leased out by tower companies. According to GR 34, rental income for leases of telecommunication towers with lease terms commencing from and including January 2, 2018 will be subject to the final income tax rate of 10%, while rental income for leases of telecommunication towers with lease terms that commenced prior to January 2, 2018 remains subject to the prior non-final income corporate tax rate of 22%. We cannot assure you that the income tax treatment of telecommunications services providers will not change in the future, which in turn could increase our income tax payable and adversely affect our net profit.

In addition, during the administration of the former President Suharto, the central Government controlled and exercised decision-making authorities on almost all aspects of national and regional administration, including the allocation of revenues generated from extraction of national resources in the various regions. This control led to a demand for greater regional autonomy, in particular with respect to the management of local economic and financial resources. In response to such demand, the Indonesian Parliament in 1999 passed Law No. 22 of 1999 regarding Regional Autonomy ("Law No. 22/1999") and Law No. 25 of 1999 regarding the Fiscal Balance between the Central and the Regional Governments ("Law No. 25/1999"). Law No. 22/1999 has been revoked and replaced by Law No. 32 of 2004 regarding Regional Autonomy as severally amended by Law No. 8 of 2005 and Law No. 12 of 2008 ("Law No. 32/2004"). Law No. 32/2004 has been further revoked and replaced by Law No. 23 of 2014 regarding Regional Autonomy as severally amended by Law No. 2 of 2015, Law No. 9 of 2015 and the Omnibus Law ("Regional Autonomy Law"). Law No. 25/1999 has been revoked and replaced by Law No. 33 of 2004 regarding the Fiscal Balance between the Central and the Regional Governments as amended by Law No. 2 of 2020 regarding the Enactment of Regulation in lieu of Law (Perppu) No. 1 of 2020 on State Fiscal Policy and Financial System Stability for Handling of 2019 Corona Virus Disease (COVID-19) Pandemic and/or in Anticipation of Threat to National Economy and/or Financial System Stability into Law. Under these regional autonomy laws, regional autonomy was expected to give the regional governments greater powers and responsibilities over the use of "national assets" and to create a balanced and equitable financial relationship between central and regional governments. However, under the pretext of regional autonomy, certain regional governments have put in place various restrictions, taxes and levies which may differ from restrictions, taxes and levies put in by other regional governments and/or are in addition to restrictions, taxes and levies stipulated by the central government.

Indonesia is located in an earthquake zone and is subject to significant geological risk that could lead to social unrest and economic loss.

Many parts of Indonesia are vulnerable to natural disasters such as earthquakes, tsunamis, floods, volcanic eruptions as well as droughts, power outages or other events beyond our control. In the past, several natural disasters have occurred in Indonesia (in addition to the Asian tsunami in 2004). In September 2018, a 7.5 magnitude earthquake struck off the central island of Sulawesi and triggered a tsunami that hit the coastal city of Palu and 11 of our towers were affected. The region is also prone to heavy rains and flooding. The region is also prone to volcanic eruptions, such as recent eruptions of Mount Agung, Mount Merapi and Mount Sinabung. These types of natural disasters have the potential to, among other things, displace local residents and disrupt air travel and local tourism. On December 22, 2018, a tsunami followed an eruption and partial collapse of the Anak Krakatau volcano in the Sunda Strait, striking coastal regions of Banten province, Java, and Lampung province, in Sumatra. Roads connecting Serang and Pandeglang was cut off as a result.

In addition to these geological events, seasonal downpours have resulted in frequent landslides and flash floods in Indonesia, including Jakarta, Sumatra and Sulawesi, displacing a large number of people and significantly injuring others.

As a result of these natural disasters, the Government has had to spend significant amounts on emergency aid and resettlement efforts. Most of these costs have been underwritten by foreign governments and international aid agencies. We cannot assure you that such aid will continue to be forthcoming, or that it will be delivered to recipients on a timely basis. If the Government is unable to timely deliver foreign aid to affected communities, political and social unrest could result. Additionally, recovery and relief efforts are likely to continue to impose a strain on the Government's finances, and may affect its ability to meet its obligations on its sovereign debt. Any such failure on the part of the Government, or declaration by it of a moratorium on its sovereign debt, could trigger an event of default under numerous private-sector borrowings including those of our group, thereby materially and adversely affecting our business.

Our towers are located across the main islands of the Indonesian archipelago. See "— Our towers may be affected by natural disasters and other unforeseen damage for which our insurance may not provide adequate coverage." We cannot assure you that our insurance coverage will be sufficient to protect us from potential losses resulting from such natural disasters and other events beyond our control. In addition, we cannot assure you that the premium payable for these insurance policies upon renewal will not increase substantially, which may materially and adversely affect our financial condition and results of operations. We also cannot assure you that future geological or meteorological occurrences will not have more of an impact on the Indonesian economy. A significant earthquake, other geological disturbance or weather-related natural disaster in any of Indonesia's more populated cities and financial centers could severely disrupt the Indonesian economy and undermine investor confidence, thereby materially and adversely affecting our business, financial condition, results of operations and prospects.

Terrorist activities in Indonesia could destabilize the country, thereby adversely affecting our businesses.

The conflicts in the Middle East and past terrorist attacks in North America and Europe have resulted in substantial and continuing economic volatility and social unrest globally and in Southeast Asia. Further developments stemming from these events or other similar events could cause further volatility. Any additional significant military or other response by affected countries or any further

terrorist activities could also materially and adversely affect international financial markets and the Indonesian economy.

In Indonesia during the past several years, there have been various bombing incidents directed toward the Government, foreign governments, and public and commercial buildings frequented by foreigners, including international hotels and the Jakarta Stock Exchange Building. For example, in January 2016, multiple explosions and gunfire were reported near the Sarinah shopping mall in central Jakarta, Indonesia. In May 2017, two explosions occurred at a bus terminal in Kampung Melayu, East Jakarta. In May 2018, a suicide bombing took place in three churches, an apartment and, on the following day, at the police headquarters (*Mapolrestabes Surabaya*) in Surabaya. In November 2019, a suicide bombing was conducted in Medan, North Sumatra, targeting the city's metropolitan police headquarters (*Polrestabes*). Most recently in March 2021, a suicide bombing took place at the entrance of Cathedral Church in Makassar, South Sulawesi. All of these incidents have resulted in several people being killed and injured, and public property being destroyed. Indonesian and foreign government officials have indicated that these attacks might be linked to international terrorist organizations.

There can be no assurance that further terrorist acts will not occur in the future. A number of governments have issued warnings to their citizens in relation to a perceived increase in the possibility of terrorist activities in Indonesia, targeting foreign, particularly the United States, interests. Such terrorist acts could destabilize Indonesia and increase internal divisions within the Government as it considers responses to such instability and unrest, thereby adversely affecting investors' confidence in Indonesia and the Indonesian economy. Violent acts arising from and leading to instability and unrest have in the past had, and could continue to have, a material adverse effect on investment and confidence in, and the performance of, the Indonesian economy, and in turn our business. Any of the events described above, including damage to our assets, could cause interruption to parts of our business and materially and adversely affect our financial condition, results of operations and prospects, and our ability to make payments under the notes.

An actual or perceived outbreak of an infectious disease, such as COVID-19, or any other serious public health concerns in Asia (including Indonesia) and elsewhere may have an adverse effect on the economies of Asian countries and may adversely affect us.

The outbreak of an infectious disease in Asia (including Indonesia) and elsewhere, together with any resulting restrictions on travel or quarantines imposed, could have a negative impact on the economy and business activity in Indonesia and thereby adversely impact our revenue. Examples are the outbreak in 2003 of Severe Acute Respiratory Syndrome in Asia (SARS), the outbreaks in 2004 and 2005 of Avian influenza, or bird flu, in Asia, the outbreak in 2009 of Influenza A (H1N1), the outbreak in early 2017 of Diphtheria, the Zika virus and the recent COVID-19 pandemic. The impact of the COVID-19 pandemic and measures to prevent its spread has already, and may continue to, materially and adversely impact the Indonesian economy and negatively affect the operations and financial conditions of our suppliers and customers, which could have a material adverse effect on our business, financial condition, results of operations and prospects.

There can be no assurance that any precautionary measures taken against infectious diseases such as COVID-19 would be effective. Any intensification or recurrence of past outbreaks or the emergence of other contagious disease or any other serious public health concern in Indonesia may adversely affect our business, financial condition, results of operations and prospects.

Labor activism could adversely affect us, our customers and Indonesian companies in general, which in turn could affect our business, financial condition, results of operations and prospects.

In March 2003, the Government enacted Law No. 13 of 2003 regarding Manpower (the "Labor Law") and has further issued implementing regulations allowing employees to form unions without interference from employers. The Omnibus Law amended certain provisions of the Labor Law, among other things, the amount of severance and compensation payments payable to employees upon termination of employment. It also eliminates the statutory housing and medication/medical care portion of the compensation pay for qualifying individuals. The Omnibus Law maintains that an employee's entitlements upon termination shall consist of a severance pay and/or service pay, and compensation pay for rights that were not used during the period of employment. It also preserves the general formulas, defined in terms of monthly wages for years of service, used to calculate the severance and service payments. One of the notable changes applied under the Omnibus Law and its implementing regulation relates to the severance payment formula, whereby employees will receive a lower amount of severance payment depending on the grounds of termination. Government Regulation No. 35 of 2021 on Fixed-Term Employment Agreement, Outsourcing, Working and Break Hours and Employment Termination further specifies the amount of severance, service and compensation payments payable to employees under different grounds of termination, where the severance pay ranges from 50%, 75% to 100%.

Based on the Labor Law, companies that have 50 employees or more are required to have a bilateral forum consisting of both employers and employees, and a labor union with more than half of a company's employees participating as members may represent the employees to negotiate the collective labor agreements with the employers. The Labor Law also established more permissive procedures for staging strikes. Under the Labor Law, employees have the right to terminate their employment if there is a merger, consolidation, acquisition or spin-off of their employer and receive severance pay, service pay and other compensation which are calculated based on their basic salary and fixed allowances, as well as their length of employment with such employer.

Following its enactment, several labor unions urged the Constitutional Court of the Republic of Indonesia (Mahkamah Konstitusi Republik Indonesia) (the "Indonesian Constitutional Court") to declare certain provisions of the Labor Law unconstitutional and order the Government of Indonesia to revoke those provisions. The Indonesian Constitutional Court declared the Labor Law valid except for certain provisions, including those relating to the right of an employer to terminate the employment of an employee who committed a serious violation and to criminal sanctions against an employee who instigates or participates in an illegal labor strike. For the most part, provisions of the Labor Law declared unconstitutional by the Indonesian Constitutional Court have been further deleted under the Omnibus Law. The liberalization of regulations permitting the formation of labor unions combined with weak economic conditions has resulted, and will likely continue to result in, labor unrest and activism in Indonesia.

Labor unrest and activism in Indonesia could disrupt our operations, our suppliers or contractors and could affect the financial condition of Indonesian companies in general, depressing the prices of Indonesian securities on the Indonesian or other stock exchanges and the value of the Rupiah relative to other currencies. Such events could materially and adversely affect our business, financial condition, results of operations and prospects, and our ability to make payments under the notes. In addition, general inflationary pressures or changes in applicable laws and regulations could increase labor costs, which could have a material adverse effect on our business, operational results, financial condition and prospects.

The Labor Law provides that the employer is not allowed to pay an employee wage below the minimum wage stipulated annually by the provincial government. The minimum wage is set in accordance with a calculation formula to be stipulated by the Government and taking into consideration the economic growth or inflation variables. Pursuant to local regulations promulgated in Jakarta, the minimum wage increased from Rp.3,355,750 per month in 2017 to Rp.3,648,036 per month in 2018, Rp.3,940,973 per month in 2019, Rp.4,276,350 per month in 2020 and Rp.4,416,186 in 2021. Further minimum wage increases in Indonesia could have a material adverse effect on our business, cash flows, financial condition and prospects.

Current OJK rules may restrict our ability to issue the notes and any additional debt securities.

On April 21, 2020, OJK issued OJK Rule No. 17/POJK.04/2020 on Material Transactions and Change of Business Activities and most provisions under this rule became effective on October 21, 2020. This OJK rule replaces the previous regulation issued in 2011 (the "Material Transactions Rule"). This Material Transactions Rule is applicable to publicly listed companies in Indonesia, even if the material transaction is directly conducted by their unlisted consolidated subsidiaries. Pursuant to the Material Transactions Rule, each borrowing and lending in one transaction or a series of related transactions for a particular purpose or activity having a transaction value of 20.0% to 50.0% of a publicly listed company's equity, as determined by the latest of its audited annual financial statements, quarterly financial statements (accompanied with accountant's report on the review or audit results) or other audited interim financial statements, must be announced to the public and it must also appoint an independent appraiser registered with OJK to prepare an appraisal report. The announcement relating to the material transaction must be made on its website and the website of IDX within two business days after the date of such transaction (i.e. the execution date of the agreement(s) related to the material transaction). The announcement is required to include a summary of the transaction, an explanation of the considerations and reasons for such material transaction and the effect of the transaction on the company's financial condition, a summary of the appraisal report (including its purpose, the object, the parties involved, the assumptions, qualifications and methodology used in the appraisal report, the conclusion on the value of the transaction, and the fairness opinion on the transaction), which must not be dated more than six months prior to the date of the material transaction, the amount borrowed or lent, and a summary of the terms and conditions of the borrowing or lending. The publicly listed company must submit evidence of the announcement as referred to above, including the independent appraisal report to OJK within two business days after the date of execution of the agreement(s) related to the material transaction.

The aggregate transaction value of the offering of the notes and the lending of the proceeds of the notes from the Issuer to its designated subsidiaries will exceed the 50.0% threshold. Accordingly, in connection with the offering, we are required to obtain and submit to OJK an appraisal report from an independent appraiser (registered with OJK), a summary of which is required to be announced on our website and the website of IDX within two business days after the issue date of the notes. We have appointed an independent appraiser, Martokoesoemo, Pakpahan & Rekan to prepare this appraisal report, which we expect to be completed on or within two business days after the issue date of the notes.

Subject to certain exceptions under the Material Transactions Rule, a material transaction (in this case, borrowing and lending) with a value in excess of 50.0% of a publicly listed company's equity must be approved by shareholders holding more than half of all shares with valid voting rights who are present or represented, and more than half of such shareholders present or represented approve the transaction and the implementation result of such transaction must also be disclosed in its annual report, in addition to fulfilling the appraisal disclosure requirements. On September 30, 2021, the

Company obtained the approval of its shareholders to conduct one or multiple notes issuances for total issuance size of up to USD 900 million (including this offering) outside Indonesia in the period within 12 months from September 30, 2021.

If we decide to issue additional debt securities beyond such approval through a non-public offering, and the amount issued exceeds the 50.0% threshold, we would be required to obtain shareholders' approval, as well as a new appraisal report. There is no assurance that we would be able to obtain the approval of our shareholders or a favorable appraisal report in order to issue such additional debt securities. This requirement could limit our ability to finance our future operations and capital needs, or pursue business opportunities or activities that may be in our interest. Any limitation on our ability to raise funds to finance our operations could materially and adversely affect our business, financial condition, results of operations and prospects.

The appraisal report may not be accurate or complete, and you will not have access to it.

The independent appraiser is relying upon the accuracy and completeness of the information, including certain projections, that we provide to the independent appraiser. The appraisal report that is submitted to OJK pursuant to Indonesian regulations will be based on certain assumptions, including certain assumptions with respect to the terms of the notes and projections, which, by their nature, are subjective and uncertain and may differ from actual results. The independent appraiser has not independently verified such information, and assumes no responsibility for and expresses no view as to any, such information, projections or the assumptions on which they were based. The initial purchasers and our independent auditors have not examined, reviewed or compiled the projections and accordingly, do not express an opinion or any other form of assurance with respect thereto. Unanticipated results of, or changes in, our business or tower leasing industry, or changes in global or local economic conditions or other relevant factors, could affect such projections and the conclusions in the appraisal report. After the issuance of the notes, neither we nor the independent appraiser or obligated or will provide an update to the report of the differences between the projections or the assumptions made in the appraisal report.

Accordingly, the appraisal report is not a prediction or an indication of our actual ability to perform our obligations under the notes. Investors should not rely on the appraisal report when making an investment decision.

The full appraisal report, including the detailed projections underlying the analysis and the assumption on which the appraiser's conclusions are based, is confidentially submitted to OJK and not available to shareholders or to you for review. The summary of the appraisal report will only be announced on our website and the website of IDX within two business days after the issue date of the notes, and will not include a full statement of all of the relevant facts, information and assumptions on which the appraiser bases its conclusions.

Depreciation or volatility in the value of the Rupiah may adversely affect our business, financial condition, results of operations and prospects.

One of the most important immediate causes of the economic crisis which began in Indonesia in mid-1997 was the depreciation and volatility of the value of the Rupiah, as measured against other currencies, such as the U.S. dollar. The Rupiah has experienced significant volatility in the recent past, particularly during prolonged economic downturns following the global financial crisis in 2007 to 2008, and it may experience increased volatility as a result of COVID-19 and its impact on economies worldwide. There is no assurance that the Rupiah will not experience significant volatility again in the

future. During the period between January 1, 2016 through June 30, 2021, the Rupiah/U.S. dollar exchange rate ranged from a low of Rp.12,926 per U.S. dollar to a high of Rp.16,741 per U.S. dollar. As a result, we recorded a gain of Rp.2,221 million in 2018, a gain of Rp.8,966 million in 2019, a gain of Rp.37,452 million in 2020 and a gain of Rp.26,281 million for the six months ended June 30, 2021. As of June 30, 2021, the Rupiah/U.S. dollar exchange rate stood at Rp.14,496 per U.S. dollar. We cannot assure you that further depreciation of the Rupiah against other currencies, including the U.S. dollar, will not occur, especially in light of the rapidly changing impact of the COVID-19 pandemic. A substantial portion of our outstanding indebtedness is denominated in U.S. Dollars, while most of our revenues are denominated in Rupiah, hence to the extent the Rupiah depreciates further from the exchange rates at June 30, 2021, our obligations under our accounts payable and our foreign currency-denominated loans payable would increase in Rupiah terms and such depreciation of the Rupiah would result in additional losses on foreign exchange translation and could significantly impact our other income and net income.

In addition, while the Rupiah has generally been freely convertible and transferable (except that Indonesian banks may not transfer Rupiah to persons outside of Indonesia who lack a bona fide trade or investment purpose), from time to time, Bank Indonesia has intervened in the currency exchange markets in furtherance of its policies, either by selling Rupiah or by using its foreign currency reserves to purchase Rupiah. We cannot assure you that the current floating exchange rate policy of Bank Indonesia will not be modified or that the Government will take additional action to stabilize, maintain or increase the value of the Rupiah, or that any of these actions, if taken, will be successful.

Modification of the current floating exchange rate policy could result in significantly higher domestic interest rates, liquidity shortages, capital or exchange controls or the withholding of additional financial assistance by multinational lenders. This could result in a reduction of economic activity, an economic recession, loan defaults or declining usage of our subscribers, and as a result, we may also face difficulties in funding our capital expenditures and in implementing our business strategy. Any of the foregoing consequences could have a material adverse effect on our business, financial condition, results of operations and prospects.

Downgrades of credit ratings of Indonesia and Indonesian companies could adversely affect us and the market price of the notes.

In 1997, certain recognized statistical rating organizations, including Moody's Investors Services, Inc. ("Moody's") and S&P, downgraded Indonesia's sovereign rating and the credit ratings of various credit instruments of the Government and a large number of Indonesian banks and other companies. Currently, Indonesia's sovereign foreign currency long-term rating is "Baa2" by Moody's, "BBB" by S&P and "BBB" by Fitch with a stable outlook from Moody's, a negative outlook from S&P and a stable outlook from Fitch, and its short-term foreign currency rating is "A2" by S&P and "F2" by Fitch. These ratings reflect an assessment of the Government's overall financial capacity to pay its obligations and its ability or willingness to meet its financial commitments as they become due. Even though the recent trend in Indonesian sovereign ratings has been positive, no assurance can be given that Moody's, S&P or any other statistical rating organization will not downgrade the credit ratings of Indonesia or Indonesian companies in general. In particular, the credit ratings for Indonesia or Indonesian companies have been and may be further downgraded due to the effects of the current COVID-19 pandemic. Any such downgrade could have an adverse impact on liquidity in the Indonesian financial markets, the ability of the Government and Indonesian companies, including us, to raise additional financing and the interest rates and other commercial terms at which such additional financing is available to us, which could materially and adversely affect our business, financial condition, results of operations and prospects.

Indonesian corporate and other disclosure and accounting standards differ from those in other countries.

Our financial statements are prepared in accordance with Indonesian FAS, which differ from IFRS. As a result, our financial statements and reported earnings could be different from those which would be reported under IFRS. This offering circular does not contain a reconciliation of our financial statements to IFRS, and there can be no assurance that such reconciliation, if performed, would reveal material differences. See "Summary of Certain Differences Between Indonesian FAS and IFRS."

An Indonesian law requiring agreements involving Indonesian parties to be written in the Indonesian language may raise issues as to the enforceability of agreements entered into in connection with the offer and sale of the notes.

On September 30, 2019, the President of the Republic of Indonesia issued Regulation No. 63/2019 as the implementing regulation of Law No. 24/2009 requiring that agreements involving Indonesian parties be written in the Indonesian language. Where an agreement also involves foreign parties, it may also be executed in both the Indonesian language and a foreign language. Regulation No. 63/2019 also provides that the parties may contractually agree on the governing language of the agreement (which may be either the Indonesian language or the foreign language).

On June 20, 2013, the District Court of West Jakarta released Decision No. 451/Pdt.G/2012/PN.Jkt.Bar, which annulled a loan agreement between an Indonesian borrower, PT Bangun Karya Pratama Lestari, and a non-Indonesian lender, Nine AM. The loan agreement was governed by Indonesian laws and was drafted only in English. The court ruled that the agreement had contravened Article 31(1) of Law No. 24/2009 and declared it to be invalid. In arriving at this conclusion, the court relied on Articles 1320, 1335 and 1337 of the Indonesian Civil Code, when taken together will render an agreement void if, among other things, it is tainted by illegality. The court held that the agreement had not been drafted in the Bahasa Indonesia as required by Article 31(1) and therefore failed to satisfy the "lawful cause" requirement and was void from the outset, meaning that a valid and binding agreement had never existed. The defendant appealed to the Jakarta High Court. Upon appeal to the Jakarta High Court, the Jakarta High Court affirmed the decision of the District Court of West Jakarta in Decision No. 48/PDT/2014/PT.DKI on May 7, 2014. The defendant further filed a cassation petition to the Supreme Court. On August 31, 2015, the Supreme Court denied the cassation petition in Decision No. 601 K/PDT/2015.

The Indenture and related transaction documents will concurrently be prepared and executed in both English and Indonesian versions as required under Law No. 24/2009 and Regulation No. 63/2019 and all of these documents will provide that in the event of a discrepancy or inconsistency, the parties intend the English version to prevail. However, we cannot assure you that, in the event of inconsistencies between the Indonesian language and English language versions of these agreements, an Indonesian court would hold that the English version prevails. Some concepts in the English language may not have a corresponding term in the Indonesian language and the exact meaning of the English text or may not be fully captured by such Indonesian version. If this occurs, we cannot assure you that the terms of the notes, including the Indenture, will be as described in this offering circular, or will be interpreted and enforced by the Indonesian courts as intended.

Law No. 24/2009 and Regulation No. 63/2019 do not specify any sanction for non-compliance. We cannot predict as to how the implementation of these regulations will impact the validity and enforceability of the notes under Indonesian laws. This creates uncertainty as to the ability of holders of notes to enforce the notes in Indonesia.

Risks Relating to the Notes

We are a holding company. The notes will be the unsecured obligations of the Company and holders of the notes will be structurally subordinated to all our subsidiaries' indebtedness and obligations.

We conduct all of our operations through our subsidiaries. Accordingly, our only source of cash to pay interest and principal on our outstanding indebtedness is distributions relating to our ownership interests in our subsidiaries from the net earnings and cash flow generated by such subsidiaries or from proceeds of debt or equity offerings. Earnings and cash flow generated by our subsidiaries will generally first be applied by such subsidiaries in conducting their operations, including the service of their respective debt obligations, after which any excess cash flow may be paid to us. Our subsidiaries are legally distinct from us and, unless they guarantee our debt, have no obligation to pay amounts due on our debt or to make funds available to us for such payment.

The claims of all existing and future third-party creditors of the Company's subsidiaries as to the cash flows and assets of such companies will have priority over the claims of the shareholders of such subsidiaries, including the Issuer, and the creditors of such shareholders (such as holders of the notes). The notes will be structurally subordinated to all existing and future indebtedness and other obligations of our subsidiaries. Additionally, the notes will be unsecured obligations of the Company and be effectively subordinated to any of our secured obligations to the extent of the assets serving as security therefor.

As of June 30, 2021, our subsidiaries had gross debt of Rp.12,557.9 billion (US$866.3 million), including lease liabilities and indebtedness under our Credit Facilities, 2017 RLF, 2018 RCF, 2019 RLF and 2021 RLF, all of which would be structurally senior to the notes. Further, the Company and our subsidiaries have entered into subordination deeds in connection with the Credit Facilities, 2017 RLF, 2019 RLF and 2021 RLF pursuant to which intercompany liabilities between our subsidiaries or owing by our subsidiaries to the Company are subordinated to the liabilities of such subsidiaries owing under the Credit Facilities Agreement, 2017 RLF Agreement, 2019 RLF Agreement and 2021 RLF Agreement, as applicable. Under the subordination deeds, the prior written consent of the agent for the finance parties specified under the Credit Facilities, 2017 RLF Agreement, 2019 RLF Agreement and 2021 RLF Agreement, as applicable, may be required for, among other things, any payment of such intercompany liabilities between such subsidiaries or taking, accepting or receiving any payment or distribution of assets of such subsidiaries if an event of default is continuing. See "Description of Material Indebtedness" for more details on the subordination deeds. As a result of the subordination deeds and other covenants under our Credit Facilities and our 2017 RLF, 2019 RLF and 2021 RLF, the ability of certain of our subsidiaries to pay dividends or make distributions to us and to one another is materially restricted. The Indenture does not contain any restrictions on our ability or our subsidiaries' ability to incur additional indebtedness. There can be no assurance that our subsidiaries will generate sufficient cash flow to meet their respective obligations under the applicable debt instruments, nor can we assure that excess cash flow, if any, of our subsidiaries will be available for payment to us or sufficient to satisfy our debt obligations, including interest and principal payments on the notes.

We or our major shareholders may engage in transactions that could significantly change our ownership and control structure. In addition, our major shareholders may sell a substantial portion or all of the shares they own in the Company.

As of June 30, 2021, PCI and Wahana held 22.2% and 34.2%, respectively, of the Company's equity shares, and 23.28% and 35.85%, respectively, of the Company's voting rights. Should a suitable opportunity arise, these shareholders may divest some or all of their shares to other parties, which may

trigger change of control provisions under the Notes, the 2025 Existing USD Notes and the 2026 Existing USD Notes, as well as change of control and similar provisions under our other debt or financing arrangements (including under the Credit Facilities, Facility B, the 2017 RLF, the 2019 RLF and the 2021 RLF) and a shareholders agreement in GOLD to which the Company is a party. If such a sale occurs which triggers a "Change of Control" (as defined under the 2025 Existing USD Notes) under the 2025 Existing USD Notes and/or a "Change of Control Triggering Event" (as defined under the 2026 Existing USD Notes and the Indenture) under the 2026 Existing USD Notes or the Notes, or triggers the change of control provisions under our other debt facilities and/or the particular shareholders agreement, the Company will be required to make an offer to repurchase all outstanding 2025 Existing USD Notes and/or the 2026 Existing USD Notes and/or all outstanding Notes, as applicable, to repay our debt facilities of Facility B, the 2017 RLF and partial repayment of the 2019 RLF, and/or to purchase all shares of GOLD owned by the other parties under the particular shareholders agreement. There can be no assurance that the Company will have sufficient funds at such time to satisfy its obligations under these change of control provisions; or that any such event will not result in an adverse impact to our business, financial condition and results of operations (see also below "— We may not have the ability to raise the funds necessary to finance an offer to repurchase the notes upon the occurrence of certain events constituting a change of control triggering event as required by the Indenture"). Any such transaction could also result in significant changes in our shareholders, board of commissioners, board of directors and control structure. There can also be no assurance that new controlling shareholders will act in the best interest of our other shareholders or the holders of the notes. Further, any such corporate or shareholder transaction or sale may or may not necessarily give rise to a "Change of Control Triggering Event" (as defined in "Description of the Notes"), which also requires a decline in the rating of the notes, or trigger a "Change of Control" (as defined in "Description of the Notes"), and therefore the Company may not be required to make a Change of Control Offer to repurchase the Notes even if other change of control provisions are triggered.

We may not have the ability to raise the funds necessary to finance an offer to repurchase the notes upon the occurrence of certain events constituting a change of control triggering event as required by the Indenture.

Upon a Change of Control Triggering Event (as defined in the Indenture), we must make an offer to repurchase all outstanding notes. Pursuant to such offer, we must repurchase the outstanding notes at 101% of their principal amount plus accrued and unpaid interest, if any, up to the date of repurchase. See "Description of the Notes — Repurchase at the Option of Holders — Upon a Change of Control Triggering Event." However, we may not have enough available funds at the time of any Change of Control Triggering Event to pay the purchase price of the tendered outstanding notes, as a result of our existing or future obligations under our credit facilities and our other debt agreements, which may require us to first repay our indebtedness under those facilities. Our failure to make the offer to repurchase or repurchase tendered notes would constitute an Event of Default (as defined in the Indenture). This Event of Default may, in turn, constitute an event of default under other indebtedness, any of which could cause the related debt to be accelerated after any applicable notice or grace periods. If such other debt were accelerated, we may not have sufficient funds to repurchase the notes and repay the debt. In addition, the definition of Change of Control Triggering Event for purposes of the Indenture does not necessarily afford protection for the holders of the notes in the event of certain important corporate events or highly-leveraged transactions, including certain acquisitions, mergers, refinancings, restructurings, reorganizations, other recapitalizations, or similar transactions involving the Company that may adversely affect holders of the notes, because such corporate events or highly-leveraged transactions may not involve a change in ownership or control or a downgrade in the ratings of the notes in accordance with the terms of the Indenture, and even if they do, may not constitute a

"Change of Control Triggering Event" as defined in the Indenture. The definition of Change of Control Triggering Event for purposes of the Indenture also includes a phrase relating to the sale of "all or substantially all" of our properties or assets and our subsidiaries taken as a whole. Although there is a limited body of case law interpreting the phrase "substantially all," there is no precise established definition under applicable law. Accordingly, our obligation to make an offer to repurchase the notes, and the ability of a holder of notes to require us to repurchase the notes pursuant to the offer, as a result of a highly leveraged transaction or a sale of less than all of our assets, may be uncertain.

Through the purchase of the notes, the noteholders may be exposed to a legal system subject to considerable discretion and uncertainty; it may be difficult or impossible for noteholders to pursue claims under the notes.

Indonesian legal principles relating to the rights of debtors and creditors, or their practical implementation by Indonesian courts, may differ materially from those that would apply in other jurisdictions. Neither the rights of debtors nor the rights of creditors under Indonesian laws are as clearly established or recognized as under legislation or judicial precedent in other jurisdictions. In addition, under Indonesian laws, debtors may have rights and defenses to actions filed by creditors that such debtors would not have in other jurisdictions.

Indonesia's legal system is a civil law system based on written statutes; judicial and administrative decisions do not constitute binding precedent and are not systematically published. Indonesia's commercial and civil laws as well as rules on judicial process were historically based on Dutch law as in effect prior to Indonesia's independence in 1945, and some have not been revised to reflect the complexities of modern financial transactions and instruments. Indonesian courts are often unfamiliar with sophisticated commercial or financial transactions, leading in practice to uncertainty in the interpretation and application of Indonesian legal principles. The application of Indonesian laws in large part depends upon subjective criteria such as the good faith of the parties to the transaction and principles of public policy, the practical effect of which is difficult or impossible to predict. Indonesian judges, who operate in an inquisitorial legal system, have very broad fact-finding powers and a high level of discretion in the manner in which those powers are exercised. As a result, the administration and enforcement of laws and regulations by Indonesian courts and Indonesian governmental agencies may be subject to considerable discretion and uncertainty. Furthermore, corruption in the court system in Indonesia has been widely reported in publicly available sources.

Furthermore, on September 2, 2013 the trustee of the holders of notes issued by BLD Investments Pte. Ltd. and guaranteed by PT Bakrieland Development Tbk ("Bakrieland"), under a trust deed governed under English law, filed a postponement of debt payment petition against Bakrieland with the Jakarta Commercial Court on grounds including that Bakrieland had failed to comply with its obligation to repay the principal amount of the notes when noteholders exercised their put option under the terms of the notes. In its decision dated September 20, 2013, the Jakarta Commercial Court rejected the postponement of debt payment petition on the basis that, among other things, the trust deed relating to the notes is governed by English law, all disputes arising out of or in connection with the trust deed must be settled by English courts and, accordingly, the Jakarta Commercial Court did not have authority to examine and adjudicate this case.

In early 2016, an Indonesian company, PT Trikomsel Oke Tbk. ("Trikomsel"), entered into a court suspension of payment of debt (*penundaan kewajiban pembayaran utang* or "PKPU") process. The PKPU administrators were reported to reject claims that arose from their two Singapore dollar bonds and have taken the stance that the trustees do not have any standing to make claims on behalf of the bondholders. Further, they asserted that only individual noteholders that had filed claims on their

own would be able to participate in the PKPU proceedings and to vote on the restructuring plan. However, such proceedings were settled on September 28, 2016, through the ratification of a composition plan (*rencana perdamaian*) by the Jakarta Commercial Court. Under the approved composition plan, Trikomsel's indebtedness under two Singapore dollar bonds is included as recognized claims and will be fully converted into equity in accordance with all applicable laws. Notwithstanding such settlement, the fact remains that during the PKPU process, the PKPU administrators rejected the trustees' claims, stating that the trustees do not have any legal standing to make claims on behalf of the bondholders and therefore do not have any voting rights in the creditors meeting.

As a result, it may be difficult for the noteholders to pursue a claim against us in Indonesia, which may adversely affect or eliminate entirely the noteholders' ability to obtain and enforce a judgment against us in Indonesia or increase the noteholders' costs of pursuing, and the time required to pursue, claims against us.

We may not be able to generate sufficient cash flows to meet our debt service obligations.

Our ability to make scheduled payments on, or to refinance our obligations with respect to, our indebtedness will depend on our financial and operating performance, which in turn will be affected by general economic conditions and by financial, competitive, regulatory and other factors beyond our control. We may not generate sufficient cash flow from operations and future sources of capital may not be available to us in an amount sufficient to enable us to service our indebtedness, including the notes, or to fund our other liquidity needs. If we are unable to generate sufficient cash flow and capital resources to satisfy our debt obligations or other liquidity needs, we may have to undertake alternative financing plans, such as refinancing or restructuring our debt, selling assets, reducing or delaying capital investments or seeking to raise additional capital. There is no assurance that any refinancing would be possible, that any assets could be sold or, if sold, of the timing of the sales and the amount of proceeds that may be realized from those sales, or that additional financing could be obtained on acceptable terms, if at all. In the absence of such operating results and resources, we could face substantial liquidity problems and might be required to dispose of material assets or operations to meet our debt service and other obligations. Other credit facilities and other debt may restrict our ability to dispose of assets and use the proceeds from the disposition. We may not be able to consummate those dispositions or to obtain the proceeds which we could realize from them and these proceeds may not be adequate to meet any debt service obligations then due. Our inability to generate sufficient cash flows to satisfy our debt obligations, or to refinance our indebtedness on commercially reasonable terms and in a timely manner, would materially and adversely affect our financial condition and results of operations and our ability to satisfy our obligations under the notes. See "Management's Discussion and Analysis of Financial Condition and Results of Operations — Liquidity and Capital Resources" and "Description of the Notes."

Enforcing the rights of noteholders under the notes across multiple jurisdictions may prove difficult.

We are incorporated under the laws of the Republic of Indonesia. The notes and the Indenture will be governed by the laws of the State of New York. In the event of a bankruptcy, insolvency or similar event, proceedings could be initiated in Indonesia and the United States. Such multi-jurisdictional proceedings are likely to be complex and costly for creditors and otherwise may result in greater uncertainty and delay regarding the enforcement of your rights. The rights of noteholders under the notes will be subject to the insolvency and administrative laws of several jurisdictions and there can be no assurance that you will be able to effectively enforce your rights in such complex multiple bankruptcy, insolvency or similar proceedings. In addition, the bankruptcy, insolvency, administrative

and other laws of Indonesia and the United States may be materially different from, or be in conflict with, each other and those with which may be familiar, including in the areas of rights of creditors, priority of governmental and other creditors, ability to obtain post-petition interest and duration of the proceeding. The application of these laws, or any conflict among them, could call into question whether any particular jurisdiction's laws should apply, adversely affect your ability to enforce your rights under the notes in the relevant jurisdictions or limit any amounts that you may receive.

The interest of our principal shareholders may conflict with the interest of noteholders, and they may take actions that are not in, or may conflict with, the interest of the noteholders.

As of June 30, 2021, PCI and Wahana held 22.2% and 34.2%, respectively, of the Company's equity shares, and 23.28% and 35.85%, respectively, of the Company's voting rights. See "Principal Shareholders and Related Party Transactions." PCI and Wahana have the ability to exercise a controlling influence over our business and may cause us to take actions that are not in, or may conflict with, the noteholders' best interests, including matters relating to our management and policies. Nominees of PCI and Wahana hold positions on our Board of Commissioners and Board of Directors, and we cannot assure you that our controlling shareholders will elect or be able to influence our business in a way that benefits the noteholders.

You may not be able to enforce a judgment of a foreign court against us and it may be difficult or impossible for you to pursue claims relating to the notes in Indonesia.

The Issuer is a limited liability company incorporated in Indonesia operating within the framework of Indonesian laws relating to investment and all of its significant assets are located in Indonesia. All of our commissioners, directors and executive officers reside in Indonesia. A substantial portion of our assets and the assets of such persons are located in Indonesia. As a result, it may not be possible for investors to effect service of process within the United States upon us or such persons or to enforce against us or such persons judgments obtained in U.S. courts, including judgments predicated upon the civil liability provisions of the securities laws of the United States or any state or territory within the United States.

We have been advised by our Indonesian legal advisor, Indrawan Darsyah Santoso, that judgments of non-Indonesian courts are not recognized or directly enforceable in Indonesian courts, although such judgments could be admissible as non-conclusive evidence in a proceeding on the underlying claim in an Indonesian court. Our Indonesian legal advisers have also advised us that there is doubt as to whether Indonesian courts will recognize judgments in original actions brought in Indonesian courts based only upon the civil liability provisions of the securities laws of other countries. In addition, an Indonesian court may refuse to hear an original action based on securities laws of other countries. As a result, holders of the notes would be required to pursue claims against us or our respective commissioners, directors and executive officers in Indonesian courts and on the basis of Indonesian laws.

The claims and remedies available under Indonesian laws may not be as extensive as those available in other jurisdictions. We cannot assure you that the Indonesian courts will protect the interests of investors in the same manner or to the same extent as would U.S. courts.

Indonesia's legal system is a civil law system based on written statutes, and decided legal cases do not constitute binding precedent. The administration of laws and regulations by courts and government agencies may be subject to considerable discretion. In addition, because relatively few disputes relating to commercial matters and modern financial transactions and instruments are brought

before Indonesia's courts, such courts do not necessarily have the experience of courts in other countries. There is uncertainty as to how long it will take for proceedings in Indonesian courts to be concluded and the outcome of proceedings in Indonesian courts may be more uncertain than that of similar proceedings in other jurisdictions. Accordingly, it may not be possible for investors to obtain swift and equitable enforcement of their legal rights.

In addition, holders of the notes may have more difficulty in protecting their interests against actions by our commissioners, directors or principal shareholders than they might have as investors in debt securities issued by a corporation established under the laws of other jurisdictions.

The ratings assigned to the notes may be lowered or withdrawn entirely in the future

The notes are expected to be rated "BBB-" by Fitch. This rating may be lowered or withdrawn entirely in the future. The ratings do not reflect the Issuer's ability to make timely payments of principal and interest on senior unsecured debts. Additionally, one or more independent credit rating agencies may assign credit ratings to an issue of notes and if so, there can be no assurance that such a rating would be above or below the expected ratings for the notes. A rating is not a recommendation to buy, sell or hold securities and may be subject to revision, suspension or withdrawal at any time. No assurances can be given that a rating will remain for any given period of time or that a rating will not be lowered or withdrawn entirely by the relevant rating agency if in its judgment circumstances in the future so warrant. A downgrade in ratings may affect the trading price of the notes.

An active trading market for the notes may not develop and the trading price of the notes could be materially and adversely affected.

Although the initial purchasers have advised us that they intend to make a market in the notes, they are not obligated to do so and may discontinue such market making activity at any time without notice. We cannot predict whether an active trading market for the notes will develop or be sustained. If an active trading market were to develop, the notes could trade at prices that may be lower than their initial offering price. The liquidity of any market for the notes depends on many factors, including:

- the number of holders of notes;
- the interest of securities dealers in making a market in the notes;
- prevailing interest rates and the markets for similar securities;
- general economic conditions; and
- our financial condition, historical financial performance and future prospects.

If an active market for the notes fails to develop or be sustained, the trading price of the notes could be materially and adversely affected. Approval in-principle has been received for the listing of the notes on the SGX-ST. However, no assurance can be given that we will be able to obtain or maintain such approval in-principle or listing or that, if listed, a trading market will develop. We do not intend to apply for listing of the notes on any securities exchange other than the SGX-ST. Lack of a liquid, active trading market for the notes may adversely affect the price of the notes or may otherwise impede a holder's ability to dispose of the notes.

The transfer of the notes is restricted which may adversely affect their liquidity and the price at which they may be sold.

The notes have not been registered under, and we are not obligated to register the notes under, the Securities Act or the securities laws of any other jurisdiction and, unless so registered, may not be offered or sold except pursuant to an exemption from, or a transaction not subject to, the registration requirements of the Securities Act and any other applicable laws. See "Transfer Restrictions." We have not agreed to or otherwise undertaken to register the notes (including by way of an exchange offer), and we have no intention to do so.

Investment in the notes may subject noteholders to foreign exchange risks.

The notes are denominated and payable in U.S. dollars. If you measure your investment returns by reference to a currency other than U.S. dollars, an investment in the notes entails foreign exchange-related risks, including possible significant changes in the value of the U.S. dollars relative to the currency by reference to which you measure your returns, due to, among other things, economic, political and other factors over which we have no control. Depreciation of the U.S. dollar against the currency by reference to which you measure your investment returns could cause a decrease in the effective yield of the notes below their stated coupon rates and could result in a loss to you when the return on the notes is translated into the currency by reference to which you measure your investment returns. In addition, there may be tax consequences for you as a result of any foreign exchange gains resulting from any investment in the notes.

USE OF PROCEEDS

We estimate that our net proceeds from this offering, after deducting the underwriting fees and commissions and other estimated fees and expenses payable in relation to this offering, will be approximately US$396.0 million. We intend to use the net proceeds from this offering to repay outstanding indebtedness under our existing revolving credit facilities and other outstanding indebtedness and/or for general corporate purposes. Amounts refinanced under our existing revolving credit facilities will be available and can be reborrowed.

We plan to place the net proceeds from this offering in temporary cash deposits pending their use to fund the foregoing.

CAPITALIZATION AND INDEBTEDNESS

The following table shows our total cash and capitalization as of June 30, 2021 (i) on an actual basis and (ii) as adjusted to give effect to the issuance of notes in this offering and the application of our net proceeds from this offering in the manner described in "Use of Proceeds."

This table should be read in conjunction with our consolidated financial statements, including the notes thereto, included elsewhere herein and the sections of this offering circular entitled "Use of Proceeds," "Selected Consolidated Financial Information and Other Data" and "Management's Discussion and Analysis of Our Financial Condition and Results of Operations."

	As of June 30, 2021			
	Actual	Actual[4]	As Adjusted	As Adjusted[4]
		(unaudited)		
	(Rp. in millions)	(US$ in millions)	(Rp. in millions)	(US$ in millions)
Cash and cash equivalents	894,447	61.7	894,447	61.7
Borrowings:				
Notes offered hereby	—	—	5,798,400	400.0
US$375.0 million Revolving Loan Facility[1]	4,841,664	334.0	1,951,162	134.6
Facility B under the Credit Facilities (revolving loan facility)[1]	1,377,120	95.0	144,960	10.0
US$275.0 million Revolving Loan Facility[1]	3,986,400	275.0	3,986,400	275.0
US$200.0 million Revolving Loan Facility[1]	1,617,754	111.6	—	—
Rp.150,000 million Revolving Loan Facility[1]	46,700	3.2	46,700	3.2
Rp.50,000 million Term Loan Facility[1]	45,000	3.1	45,000	3.1
US$350.0 million 4.25% Senior Unsecured Notes due 2025 issued by the Company	5,073,600	350.0	5,073,600	350.0
US$300.0 million 2.75% Senior Unsecured Notes due 2026 issued by the Company	4,348,800	300.0	4,348,800	300.0
Continuous Bonds III Phase I	608,000	41.9	608,000	41.9
Continuous Bonds III Phase IV	867,000	59.8	867,000	59.8
Continuous Bonds IV Phase I	700,000	48.3	700,000	48.3
Continuous Bonds IV Phase II	750,000	51.7	750,000	51.7
Continuous Bonds IV Phase III	2,915,000	201.1	2,915,000	201.1
Continuous Bonds IV Phase IV	970,000	66.9	970,000	66.9
Unamortized borrowing cost	(285,254)	(19.7)	(269,505)	(18.6)
Total third party debt	**27,861,784**	**1,922.0**	**27,935,516**	**1,927.1**
Lease liabilities — vehicles	14,151	1.0	14,151	1.0
Total borrowings (excluding lease liabilities — right of use assets)	**27,875,935**	**1,923.0**	**27,949,667**	**1,928.1**
Lease liabilities — right of use assets	629,106	43.4	629,106	43.4
Total borrowings[2][3]	**28,505,041**	**1,966.4**	**28,578,773**	**1,971.5**
Equity	**9,217,739**	**635.9**	**9,144,006**	**630.8**
Total capitalization	**37,722,780**	**2,602.3**	**37,722,780**	**2,602.3**

Notes:

(1) As of June 30, 2021 and after giving effect to the issuance and sale of the notes and the application of the net proceeds therefrom, the Issuer's Subsidiaries would have had gross debt of Rp.6,817,479 million (US$470.3 million) including lease liabilities — vehicles, lease liabilities — right of use assets and indebtedness under the 2017 RLF, the 2018 RCF, the 2019 RLF, the 2020 TLF, the 2021 RLF and the Credit Facilities.

(2) We define our total borrowings to include the current and non-current portion of long-term loans, finance leases, lease liabilities — vehicle, notes and lease liabilities — right of use assets. See "Management's Discussion and Analysis of Financial Condition and Results of Operations — Indebtedness" and "Description of Material Indebtedness" for details of our total borrowings.

(3) As of June 30, 2021, our committed and undrawn facilities under the 2017 RLF, the 2018 RCF, the 2019 RLF, the 2020 TLF, the 2020 RCF, the 2021 RLF and the Credit Facilities amounted to US$155.7 million, and as adjusted to take into account the issuance of notes in this offering and the application of our net proceeds from this offering in the manner described in "Use of Proceeds," our committed and undrawn facilities under the 2017 RLF, the 2018 RCF, the 2019 RLF, the 2020 TLF, the 2020 RCF, the 2021 RLF and the Credit Facilities would amount to US$551.7 million.

(4) Converted into U.S. dollars based on the exchange rate of Rp.14,496 = US$1.00 on June 30, 2021 for the convenience of the reader as described under "Presentation of Financial Information."

Except as otherwise disclosed in this offering circular, there have not been any material changes to our capitalization since June 30, 2021. See "Description of Material Indebtedness" and Note 42 to the unaudited interim consolidated financial statements as of June 30, 2021 and for the six months ended June 30, 2021 included elsewhere in this offering circular.

Exchange Rates

Bank Indonesia is the sole issuer of the Rupiah and is responsible for maintaining its stability. Since 1970, Indonesia has implemented three exchange rate systems: a fixed rate between 1970 and 1978, a managed floating exchange rate system between 1978 and 1997 and a free-floating exchange rate system since August 14, 1997. Under the managed floating rate system, Bank Indonesia maintained the stability of the Rupiah through a trading band policy, pursuant to which Bank Indonesia would enter the foreign currency market and buy or sell Rupiah, as required, when trading in the Rupiah exceeded bid and offer prices announced by Bank Indonesia on a daily basis. On August 14, 1997, Bank Indonesia terminated the trading band policy and instituted the current free-floating exchange rate system, allowing the Rupiah to float without an announced level at which it would intervene, which resulted in a substantial decrease in the value of the Rupiah relative to the U.S. dollar. Under the current system, the exchange rate of the Rupiah is determined by the market, reflecting the interaction of supply and demand in the market. Bank Indonesia may take measures, however, to maintain a stable exchange rate.

Exchange Controls

Indonesia has limited foreign exchange controls. The Rupiah has been, and in general is, freely convertible within or from Indonesia. However, to maintain the stability of the Rupiah and to prevent the utilization of the Rupiah for speculative purposes by non-residents, Bank Indonesia has introduced regulations to restrict the movement of Rupiah from banks within Indonesia to offshore banks, an offshore branch of an Indonesian bank, or any investment denominated in Rupiah by foreign parties and/or Indonesian parties domiciled or permanently residing outside Indonesia, thereby limiting offshore trading to existing sources of liquidity. In addition, Bank Indonesia has the authority to request information and data concerning the foreign exchange activities of individuals, legal entities and other entities that are domiciled, or who plan to be domiciled, in Indonesia for at least one year, including Indonesian representatives and diplomats outside Indonesia "Residents."

Pursuant to PBI 21/2, all Indonesian residents who engage in foreign exchange traffic activities, whether individual or legal entities, are required to report to Bank Indonesia with respect to: (i) any trading of goods, services and other transaction between an Indonesian resident and a non-Indonesian resident, (ii) principal data of offshore borrowings and/or risk participation transaction; (iii) plan to draw and/or repay the offshore borrowings and/or risk participation transaction; (iv) realization of drawing and/or repayment of offshore borrowings and/or risk participation transaction; (v) position and changes of offshore financial assets, offshore financial liabilities and/or risk participation transaction; and/or (vi) plans to obtain new offshore borrowing and/or changes thereto. The report must be submitted on a monthly basis using an online system at the latest by the 15th day of the following month, while any correction thereto must be notified at least by the 20th day of the respective month. For offshore borrowings plan during the ongoing year, the report shall be submitted by no later than March 15 and any amendment thereto, no later than June 15.

In addition, for the purposes of implementing prudential principles in relation to offshore borrowings as required by PBI 16/21, Indonesian companies are required to provide the following documents:

(1) the prudential principle implementation activity report ("KPPK report"), which is to be submitted on a quarterly basis, no later than the end of the third month;

(2) the KPPK report, attested by a public accountant, which is to be submitted no later than the end of June after the ongoing financial year ended;

(3) information on the fulfillment of credit ratings, which is to be submitted at the latest at the end of the month following the execution or issuance of the offshore borrowing; and

(4) the financial statements of the company, consisting of: (i) unaudited financial statements, to be submitted on quarterly basis, by no later than the end of the third month after the end of the relevant quarter; and (ii) annual audited financial statements, which must be submitted by no later than end of June of the following year.

Bank Indonesia examines the accuracy of the foreign exchange traffic report and the prudential principle implementation activity report and may impose administrative sanctions in the form of penalties, written warning and/or may report to other authorities of any violation due to any delay or failure in submission of such reports.

As of January 1, 2016, submissions of and corrections to the prudential principle implementation activity report shall be made online. The requirement to submit credit ratings fulfillment only applies to offshore borrowings executed or issued as of January 1, 2016.

Purchasing of Foreign Currencies Against Rupiah Through Banks

On September 7, 2016, Bank Indonesia issued Regulation No. 18/18/PBI/2016 on Foreign Exchange to Rupiah Transaction between Banks and Domestic Parties ("PBI 18/18"), as implemented by the Regulation of the Members of Board of Governors of Bank Indonesia No. 20/16/PADG/2018 dated August 15, 2018. Under PBI 18/18, any foreign exchange transaction against Rupiah between commercial banks in Indonesia and Indonesian citizens or non-commercial bank legal entities domiciled in Indonesia ("Domestic Customer") must be based on a contract. A foreign exchange transaction refers to a sale/purchase transaction of foreign currencies against Rupiah in the form of (i) spot transactions, or (ii) foreign exchange derivative transactions against Rupiah which consist of (a) standard (plain vanilla) foreign exchange derivative transactions against Rupiah in the form of forwards, swaps, options, and cross currency swaps and (b) foreign exchange structured product transactions against Rupiah in the form of call spread option. There must be an underlying transaction if: (i) the purchase of foreign currency in the form of a spot transaction amounts to more than US$25,000 (or its equivalent) per month per Domestic Customer; (ii) the purchase of foreign currency in the form of derivative transaction amounts to more than US$100,000 (or its equivalent) per month per Domestic Customer; (iii) the sale of foreign currency against Rupiah for forward transactions exceeds US$5,000,000 per transaction per Domestic Customer; (iv) the sale of foreign currency against Rupiah for option transactions exceeds US$1,000,000 (or its equivalent) per transaction per Domestic Customer; or (v) the transaction of structured product is in the form of call spread option.

The following transactions may be deemed underlying transactions under PBI 18/18: (a) domestic and international trade of goods and services; (b) investment in the forms of direct investment, portfolio investments, loans, capital and other investments inside and outside Indonesia; and/or (c) the granting of facility or financing from a bank in foreign currency and/or Rupiah for trade and investment activities. Underlying transactions do not include (a) placement of funds in banks in the form of, among others, saving accounts, demand deposit accounts, time deposits, and negotiable certificate deposits, (b) money transfer activities by remittance companies, (c) undisbursed loan facility (among others in the form of standby loan and undisbursed loan), and (d) the use of negotiable instrument of Bank Indonesia in foreign currency.

Indonesian companies who: (i) purchases foreign currencies from banks through spot transactions in excess of US$25,000 or standard derivative (plain vanilla) transactions in excess of US$100,000 and (ii) conducts foreign exchange structured product transaction against Rupiah in the form of call spread option, will be required to submit certain supporting documents to the selling bank, including among others, a duly stamped statement confirming that the underlying agreement is valid and the amount of foreign currency purchased does not exceed the amount stated in the underlying agreement. For purchases of foreign currencies not exceeding specific thresholds (US$25,000 for spot transaction or US$100,000 for standard derivative transaction), such company must declare in a duly stamped letter that its aggregate foreign currency purchases do not exceed the relevant threshold in the Indonesian banking system.

On September 7, 2016, Bank Indonesia issued Regulation No. 18/19/PBI/2016 on Foreign Exchange to Rupiah Transaction between Banks and Foreign Parties ("PBI 18/19"), as implemented by the Regulation of the Members of Board of Governors of Bank Indonesia No. 20/17/PADG/2018 dated August 15, 2018 on Foreign Exchange to Rupiah Transaction between Banks and Foreign Parties. Similar to PBI 18/18, PBI 18/19 governs foreign exchange transactions against Rupiah in Indonesia. However, PBI 18/19 specifically governs foreign exchange transactions between banks and foreign parties.

Similar to PBI 18/18, PBI 18/19 also requires an underlying transaction for a foreign exchange transaction against Rupiah if it exceeds specified thresholds. These thresholds are: (i) a purchase of foreign exchange against Rupiah of more than US$25,000 (or its equivalent) per month per foreign party for spot transactions; (ii) the sale and purchase of foreign exchange against Rupiah of more than US$1,000,000 (or its equivalent) per month per foreign party or per outstanding amount of each derivative transaction per bank; and (iii) the sale of foreign exchange against Rupiah of more than US$5,000,000 (or its equivalent) per transaction per foreign party for forward transactions.

The following transactions constitute as underlying transactions under PBI 18/19: (a) domestic and international trade of goods and services; and/or (b) investments in the forms of direct investment, portfolio investments, loans, capital and other investments inside and outside Indonesia. Further, underlying transactions do not include: (a) Bank Indonesia certificates for derivative transactions, (b) a placement of funds in banks (vostro account) in the form of saving account, demand deposit account, time deposit, or negotiable certificate of deposit; (c) the granting of facility which has not been withdrawn, such as standby loan and disbursed loan; and (d) the use of Bank Indonesia securities in foreign currencies.

PBI 18/19 also sets out foreign parties that (i) enter into foreign currency structured product against Rupiah in form of a call spread option in any amount and (ii) purchase foreign currencies from banks by way of spot transactions in excess of US$25,000 or standard derivative (plain vanilla) transactions in excess of US$1,000,000 respectively, must submit certain supporting documents to the selling bank, including, among other items, a duly stamped written statement by the foreign party confirming that the underlying transaction document is valid and correct, and the amount of foreign currency purchased does not exceed the amount stated in the underlying transaction document. For purchase of foreign currencies not exceeding specific thresholds (US$25,000 for spot transaction or US$1,000,000 for standard derivative transaction), the foreign party must declare in a duly stamped written statement that its aggregate foreign currency purchases do not exceed the relevant threshold in the Indonesian banking system.

On May 14, 2014, Bank Indonesia issued PBI 16/10 which provides that any borrowings of offshore loans (in foreign currencies) that originate from (i) non-revolving loan agreements, (ii) a difference between the new loan and the refinanced loan, or (iii) debt securities (i.e., bonds, medium-term notes, floating rate notes, promissory notes, and commercial paper) must be withdrawn by the borrower through foreign

exchange banks (which include offshore bank branches in Indonesia) and must be reported to Bank Indonesia. The aggregate amount of the offshore loan withdrawals should be equal to the local commitments provided under such loan. In the event that the aggregate amount of the offshore loan withdrawal through foreign exchange bank is lesser than the amount of local commitments in excess of Rp.50,000,000 (or its equivalent in foreign currencies), the borrower must submit a written explanation and sufficient supporting documents to Bank Indonesia before the expiration of the term of such loan. Withdrawals of the above offshore loans must be reported to Bank Indonesia on a monthly basis by using recapitulation data reports as regulated under PADG 21/4. These reports shall include supporting documents evidencing that the offshore loans were withdrawn through the foreign exchange bank. Administrative sanctions will be imposed on companies that fail to comply with such reporting obligations.

Indonesian Laws on Currency and Mandatory Use of Rupiah in Territory of Indonesia

Pursuant to Article 21 (1) of Law No. 7 of 2011 regarding Currency, the use of Rupiah currency is mandatory for transactions conducted within the territory of Indonesia, including for (i) each transaction with the purpose of payment, (ii) settlement of other obligations which must be satisfied with money and/or (iii) other financial transactions. The mandatory use of Rupiah is regulated in further details under Bank Indonesia Regulation No. 17/3/PBI/2015 dated March 31, 2015 on Mandatory Use of Rupiah in the Territory of the Unitary State of the Republic of Indonesia ("PBI 17/3") and Bank Indonesia Circular Letter No. 17/11/DKSP dated June 1, 2015 on Mandatory Use of Rupiah in the Territory of the Unitary State of the Republic of Indonesia.

The obligation to use Rupiah applies to both cash and non-cash transactions, however certain transactions including the following are exempted: (i) certain transactions relating to the implementation of state revenue and expenditure, (ii) the receipt or provision of grants either from or to an overseas source, (iii) international trade transactions, including export or import of goods to or from outside Indonesia and activities relating to cross border trade in services, (iv) bank deposits denominated in foreign currencies, (v) international financing transactions and (vi) transactions in foreign currencies conducted in accordance with applicable laws, including, among others a bank's business activities in foreign currencies conducted based on applicable laws regarding conventional and sharia banks, securities in foreign currencies issued by the Government in a primary or secondary market based on applicable laws and other transactions in foreign currencies conducted based on applicable laws.

Any party is prohibited from rejecting Rupiah as means of payment, to settle obligations expressed in Rupiah and/or with respect to other financial transactions conducted within Indonesian territory, except if: (i) there is uncertainty regarding the authenticity of the Rupiah that is received in respect to cash transactions or (ii) the parties to a transaction have agreed in writing to the payment or settlement of obligations in a foreign currency. PBI 17/3 further sets out that the exemption based on such a written agreement between the parties is only applicable to an agreement made with respect to one of the exempted transactions described above or transactions related to a strategic infrastructure project with approval from by Bank Indonesia. PBI 17/3 became effective on March 31, 2015 and the obligation to use Rupiah for non-cash transactions has been effective since July 1, 2015.

A failure to comply with the mandatory use of Rupiah in cash transactions may result in imposition of criminal sanctions against the offender, in the form of fines and imprisonment. While a failure to comply with the obligation to use Rupiah in non-cash transactions will be subjected to administrative sanctions in the form of (i) written warnings, (ii) fines, and/or (iii) prohibition from undertaking payment activities. Bank Indonesia may also recommend to the relevant authority to revoke the business license or stop the business activities of the party that fails to comply with the mandatory use of Rupiah in non-cash transactions.

SELECTED CONSOLIDATED FINANCIAL INFORMATION AND OTHER DATA

You should read the following discussion together with our audited consolidated financial statements and notes thereto as of and for the three years ended December 31, 2018, 2019 and 2020 and our unaudited interim consolidated financial statements and notes thereto as of June 30, 2021 and for the six months ended June 30, 2020 and 2021. Our consolidated financial statements are prepared in accordance with Indonesian FAS which differs in certain respects from generally accepted accounting principles in other countries, including those in the United States.

The selected consolidated financial information as of and for the years ended December 31, 2018, 2019 and 2020 has been derived from our audited consolidated financial statements included elsewhere in this offering circular, and the selected consolidated financial information for the six months ended June 30, 2020 and 2021 has been derived from our unaudited interim consolidated financial statements as of June 30, 2021 and for the six months ended June 30, 2020 and 2021 included elsewhere in this offering circular. We have prepared our unaudited interim consolidated financial statements on the same basis as our audited consolidated financial statements for the year ended December 31, 2020. Our historical results for any prior or interim periods are not necessarily indicative of results to be expected for a full financial year or for any future period. Effective January 1, 2020, we applied PSAK 71 "Financial Instruments," PSAK 72 "Revenue from Contracts with Customers" and PSAK 73 "Leases." In accordance with the transitional provision, the cumulative impact of these standards were applied to the beginning balance of the retained earnings at January 1, 2020, hence we did not restate the comparative information. Initial application of these standards produced a cumulative impact of Rp.(806) million, comprising Rp.7,232 million from the recognition of expected credit losses and Rp.(8,038) million from the recognition of the accumulated interest charges on lease and the difference between the accumulated depreciation of the right of use assets and the accumulated rental expenses.

We have prepared and presented our consolidated financial statements in accordance with Indonesian FAS, which differs in certain respects from IFRS. In making an investment decision, you should rely upon your own examination of the terms of the offering of the notes and the financial information contained in this offering circular. You should consult your own professional advisors for an understanding of the differences between Indonesian FAS and IFRS, and how those differences could affect the financial information contained in this offering circular. You should read the section of this offering circular entitled "Summary of Certain Differences between Indonesian FAS and IFRS" for a description of certain differences between Indonesian FAS and IFRS.

We have translated the Rupiah amounts of our consolidated financial information as of and for the year ended December 31, 2020 and as of and for the six months ended June 30, 2021 into U.S. dollars for convenience only based on the average middle exchange rate announced by Bank Indonesia, the Indonesian central bank, as of June 30, 2021, which was Rp.14,496 = US$1.00. Such translations should not be construed as representations that the Rupiah or U.S. dollar amounts referred to could have been, or could be, converted into U.S. dollars or Rupiah, as the case may be, at that or any other rate or at all. See "Exchange Rates and Exchange Controls" for further information regarding rates of exchange between the Rupiah and U.S. dollars.

Consolidated Statements of Profit or Loss and Other Comprehensive Income Data

	For the Year Ended December 31,				For the Six Months Ended June 30,		
	2018	2019	2020	2020[1]	2020	2021	2021[1]
				(unaudited) (US$ in millions)	(unaudited)		(unaudited) (US$ in millions)
	(Rp. in millions)				(Rp. in millions)		
Revenue	4,318,137	4,698,742	5,327,689	367.5	2,577,352	2,971,379	205.0
Cost of revenue	(784,082)	(903,454)	(1,093,065)	(75.4)	(482,961)	(729,089)	(50.3)
Gross profit	3,534,055	3,795,288	4,234,624	292.1	2,094,391	2,242,290	154.7
Operating expenses	(381,463)	(426,434)	(418,623)	(28.9)	(211,520)	(213,484)	(14.7)
Income from operations	**3,152,592**	**3,368,854**	**3,816,001**	**263.2**	**1,882,871**	**2,028,806**	**140.0**
Other income (charges):							
Increase of fair value of investment properties	7,728	79,427	34,778	2.4	—	—	—
Interest income	8,431	10,440	14,869	1.0	6,108	8,231	0.6
Gain on foreign exchange — net	2,221	8,966	37,452	2.6	10,239	26,281	1.8
Decrease of fair value of telecommunication towers	—	(40,405)	(4,584)	(0.3)	—	—	—
Impairment of goodwill	(15,722)	(47,421)	—	—	(25,000)	(8,279)	(0.6)
Final income tax	(17,310)	(81,394)	(155,723)	(10.7)	(44,605)	(136,702)	(9.4)
Financial expenses — long term loans and notes[2]	(2,003,573)	(1,940,149)	(1,943,161)	(134.0)	(960,264)	(989,051)	(68.2)
Financial expenses — others	(68,024)	(76,761)	(191,345)	(13.2)	(120,003)	(96,174)	(6.6)
Expected credit recovery (expense) — financial assets	—	—	(23,810)	(1.6)	(12,803)	492	0.0
Others — net	(49,368)	(58,962)	(75,023)	(5.2)	(43,646)	(12,728)	(0.9)
Other charges — net	**(2,135,617)**	**(2,146,259)**	**(2,306,547)**	**(159.1)**	**(1,189,974)**	**(1,207,930)**	**(83.3)**
Profit before income tax	**1,016,975**	**1,222,595**	**1,509,454**	**104.1**	**692,897**	**820,876**	**56.6**
Income tax (expenses)							
Current	(187,395)	(261,448)	(254,752)	(17.6)	(103,950)	(111,647)	(7.7)
Deferred	(126,948)	(95,026)	(188,126)	(13.0)	(51,027)	(19,393)	(1.3)
Income tax (expenses) — net	**(314,343)**	**(356,474)**	**(442,878)**	**(30.6)**	**(154,977)**	**(131,040)**	**(9.0)**
Net profit for the current period	**702,632**	**866,121**	**1,066,576**	**73.6**	**537,920**	**689,836**	**47.6**
Other Comprehensive Income							
Items that will not be reclassified to profit or loss							
Revaluation surplus (deficit)	83,074	1,600,720	3,405,454	234.9	349,141	(59,289)	(4.1)
Actuarial gain (loss)	8,033	12,236	(4,889)	(0.3)	—	280	0.0
Items that may be reclassified to profit or loss							
Difference translation of foreign currency	349	16	(548)	(0.0)	(408)	(91)	(0.0)
Changes in fair value investment — available-for-sale	14,837	—	—	—	—	—	—
Changes in value of cash flow hedges	963,650	(80,275)	(67,806)	(4.7)	445,851	159,605	11.0
Total comprehensive income for the current period	**1,772,575**	**2,398,818**	**4,398,787**	**303.4**	**1,332,504**	**790,341**	**54.5**

	For the Year Ended December 31,				For the Six Months Ended June 30,		
	2018	2019	2020	2020[1]	2020	2021	2021[1]
	(Rp. in millions)			(unaudited) (US$ in millions)	(unaudited) (Rp. in millions)		(unaudited) (US$ in millions)
Net profit attributable to:							
Equity holder of the parent company	680,581	819,454	1,009,625	69.6	510,483	663,267	45.8
Non-controlling interest	22,051	46,667	56,951	3.9	27,437	26,569	1.8
Total	**702,632**	**866,121**	**1,066,576**	**73.6**	**537,920**	**689,836**	**47.6**
Total comprehensive income attributable to:							
Equity holder of the parent company	1,740,522	2,285,137	4,323,265	298.2	1,268,264	760,491	52.5
Non-controlling interest	32,053	113,681	75,522	5.2	64,240	29,850	2.1
Total	**1,772,575**	**2,398,818**	**4,398,787**	**303.4**	**1,332,504**	**790,341**	**54.5**

Notes:

(1) Converted into U.S. dollars based on the exchange rate of Rp.14,496 = US$1.00 on June 30, 2021 for the convenience of the reader as described under "Presentation of Financial Information."

(2) Financial expenses — long term loans and notes includes financial expenses — interest as disclosed in the consolidated financial statements as of and for the years ended December 31, 2018, 2019 and 2020 and financial expenses — long term loans and notes as disclosed in the unaudited interim consolidated financial statements as of June 30, 2021 and for the six months ended June 30, 2020 and 2021 included elsewhere in this offering circular.

Consolidated Statements of Financial Position Data

	As of December 31,				As of June 30,	
	2018	2019	2020	2020[1]	2021	2021[1]
	(Rp. in millions)			(unaudited) (US$ in millions)	(unaudited) (Rp. in millions)	(unaudited) (US$ in millions)
Assets						
Current Assets:						
Cash and cash equivalents	220,586	525,242	947,341	65.4	894,447	61.7
Trade receivables — third parties	383,303	466,547	710,722	49.0	904,096	62.4
Other receivables	77,660	305,778	262,885	18.1	74,575	5.1
Promissory notes	221,425	—	—	—	—	—
Accrued revenue	546,608	522,332	491,190	33.9	583,131	40.2
Inventories and supplies	22,723	17,708	118,312	8.2	132,241	9.1
Investment	1,508	1,508	—	—	—	—
Advance payments and prepaid expenses	154,803	170,957	534,604	36.9	96,250	6.6
Long-term land lease — current portion	279,643	297,534	—	—	—	—
Prepaid taxes	119,206	69,134	162,340	11.2	866,354	59.8
Advance for shares repurchase	—	—	—	—	—	—
Total current assets	**2,027,465**	**2,376,740**	**3,227,394**	**222.6**	**3,551,094**	**245.0**
Non-current Assets:						
Deferred tax assets — net	344,703	249,591	60,726	4.2	29,965	2.1
Right of use assets — net	—	—	2,614,882	180.4	3,329,709	229.7
Property and equipment — net	21,878,608	24,649,294	28,738,362	1,982.5	32,752,320	2,259.4
Investment properties — fair value	181,608	266,186	388,020	26.8	388,798	26.8
Goodwill	428,610	381,189	381,189	26.3	372,910	25.7
Long-term land lease	1,578,873	1,612,596	—	—	—	—
Refundable deposits	2,067	2,281	1,708	0.1	1,883	0.1
Derivative financial assets	2,605,591	1,312,140	1,084,975	74.8	1,397,984	96.4
Estimated claims for income tax refund	60,368	15,903	15,903	1.1	—	—
Other non-current assets	5,854	5,790	8,144	0.6	11,936	0.8
Total non-current assets	**27,086,282**	**28,494,970**	**33,293,909**	**2,296.8**	**38,285,505**	**2,641.1**
Total assets	**29,113,747**	**30,871,710**	**36,521,303**	**2,519.4**	**41,836,599**	**2,886.1**
Liabilities and Equity						
Current Liabilities						
Trade payables — third parties	231,711	247,591	571,000	39.4	136,233	9.4
Other payables	104,028	40,939	21,057	1.5	29,189	2.0
Taxes payable	60,065	44,071	56,522	3.9	89,927	6.2
Unearned income	668,543	860,882	1,061,994	73.3	2,728,810	188.2
Accrued expenses	1,466,028	1,168,585	1,156,790	79.8	1,103,104	76.1
Notes – current portion[2]	624,283	2,146,911	6,900,451	476.0	3,960,344	273.2
Long-term loans — current portion						
Third parties	3,265,184	—	3,857,445	266.1	3,012,352	207.8
Lease liabilities — current portion[3]	5,095	4,644	152,617	10.5	167,402	11.5
Total current liabilities	**6,424,937**	**4,513,623**	**13,777,876**	**950.5**	**11,227,361**	**774.5**
Non-current Liabilities:						
Deferred tax liabilities — net	12,509	12,000	11,411	0.8	—	—
Provision for post-employment benefits	30,186	14,352	24,850	1.7	26,556	1.8
Notes – net of current portion[2]	7,264,742	5,678,296	6,668,031	460.0	12,145,367	837.8
Long-term loans — net of current portion						
Third parties	11,688,940	15,115,908	6,421,402	443.0	8,743,721	603.2
Lease liabilities — non-current portion[3]	12,868	14,247	313,895	21.7	475,855	32.8
Total non-current liabilities	**19,009,245**	**20,834,803**	**13,439,589**	**927.1**	**21,391,499**	**1,475.7**
Total liabilities	**25,434,182**	**25,348,426**	**27,217,465**	**1,877.6**	**32,618,860**	**2,250.2**

	As of December 31,				As of June 30,	
	2018	2019	2020	2020[1]	2021	2021[1]
	(Rp. in millions)			(unaudited) (US$ in millions)	(unaudited) (Rp. in millions)	(unaudited) (US$ in millions)
Equity						
Share capital[4]	453,140	453,140	453,140	31.3	453,140	31.3
Treasury stock	(985,379)	(1,028,268)	(1,028,268)	(70.9)	(1,028,268)	(70.9)
Additional paid-in capital — net	(499,660)	(519,015)	(520,500)	(35.9)	(578,017)	(39.9)
Other comprehensive income	3,060,932	4,476,604	7,600,888	524.3	7,566,207	522.0
Retained earnings:						
Statutory reserves	61,100	61,600	62,100	4.3	62,600	4.3
Unappropriated	1,280,546	1,549,511	2,142,322	147.8	2,309,547	159.3
Total equity attributable to equity holder of the parent company	**3,370,679**	**4,993,572**	**8,709,682**	**600.8**	**8,785,209**	**606.0**
Non-controlling interest	308,886	529,712	594,156	41.0	432,530	29.8
Total Equity	**3,679,565**	**5,523,284**	**9,303,838**	**641.8**	**9,217,739**	**635.9**
Total liabilities and equity	**29,113,747**	**30,871,710**	**36,521,303**	**2,519.4**	**41,836,599**	**2,886.1**

Notes:

(1) Converted into U.S. dollars based on the exchange rate of Rp.14,496 = US$1.00 on June 30, 2021 for the convenience of the reader as described under "Presentation of Financial Information."

(2) Notes includes short-term notes and long-term notes as presented and disclosed in the consolidated financial statements as of and for the years ended December 31, 2018, 2019 and 2020 and notes (current and non-current portion) as presented and disclosed in the unaudited interim consolidated financial statements as of June 30, 2021 and for the six months ended June 30, 2020 and 2021 included elsewhere in this offering circular.

(3) Lease liabilities includes finance lease as disclosed in the consolidated financial statements as of and for the years ended December 31, 2018, 2019 and 2020 and lease liabilities (current and non-current portion) which resulted from the adoption of PSAK 73 as disclosed in the unaudited interim consolidated financial statements as of June 30, 2021 and for the six months ended June 30, 2020 and 2021 included elsewhere in this offering circular.

(4) Share capital as of December 31, 2018 par value Rp.100 (full amount) per share and for December 31, 2019 and 2020 and June 30, 2021 par value Rp.20 (full amount) per share. Authorized capital of 14,420,120,000 shares as of December 31, 2018, and 72,100,600,000 shares as of December 31, 2019 and 2020, and June 30, 2021. The issued and fully paid-in capital: number of shares outstanding as of December 31, 2018 was 4,531,399,889 shares and as of December 31, 2019 and 2020, and June 30, 2021 was 22,656,999,445 shares.

Consolidated Statements of Cash Flow Data

	For the Year Ended December 31,				For the Six Months Ended June 30,		
	2018	2019	2020	2020[1]	2020	2021[1]	2021[1]
				(unaudited) (US$ in millions)	(unaudited)	(unaudited)	(unaudited) (US$ in millions)
	(Rp. in millions)				(Rp. in millions)		
Net cash flows provided by operating activities	3,239,952	3,691,417	3,786,457	261.2	2,334,868	2,982,394	205.7
Net cash flows (used in) investing activities	(2,204,859)	(2,039,485)	(2,051,887)	(141.5)	(1,277,111)	(5,333,511)	(367.9)
Net cash flows provided by (used in) financing activities	(1,229,193)	(1,339,700)	(1,316,568)	(90.8)	(829,230)	2,287,836	157.8
Effect from changes in foreign exchange rates on cash and cash equivalents	7,242	(7,576)	4,097	0.3	8,054	10,387	0.7
Net increase (decrease) of cash and cash equivalents	(186,858)	304,656	422,099	29.1	236,581	(52,894)	(3.6)
Cash and cash equivalents at beginning of period	407,444	220,586	525,242	36.2	525,242	947,341	65.4
Cash and cash equivalents at the end of period	220,586	525,242	947,341	65.4	761,823	894,447	61.7

Note:

(1) Converted into U.S. dollars based on the exchange rate of Rp.14,496 = US$1.00 on June 30, 2021 for the convenience of the reader as described under "Presentation of Financial Information."

Financial Data and Other Non-GAAP Measures

	For the Year Ended December 31,			For the Six Months Ended June 30,	For the Three Months Ended June 30,
	2018	2019	2020	2021	2021[9]
			(unaudited)		
Revenue[1] (US$ in millions)	297.9	324.1	367.5	205.0	106.9
EBITDA[1][2] (US$ in millions)	256.6	276.7	318.5	178.9	93.4
EBITDA margin[3]	86.1%	85.4%	86.7%	87.3%	87.4%
LQA EBITDA[1][2] (US$ in millions)	272.8	290.9	334.6	373.6	373.6
Gross debt (excluding lease liabilities — right of use assets)[4]/LQA EBITDA[2]	5.8x	5.5x	5.0x	—	5.2x
Net debt (excluding lease liabilities — right of use assets)[5][6]/LQA EBITDA[2]	5.8x	5.4x	4.8x	—	5.0x
Total net senior debt[7]/LQA EBITDA[2]	3.3x	3.3x	1.9x	—	1.9x
Gross debt after taking into account our hedging arrangements (excluding lease liabilities — right of use assets)[8]/LQA EBITDA[2]	5.2x	5.2x	4.7x	—	5.0x
Net debt after taking into account our hedging arrangements (excluding lease liabilities — right of use assets)[9]/LQA EBITDA[2]	5.1x	5.0x	4.5x	—	4.8x

Notes:

(1) Converted into U.S. dollars based on the exchange rate of Rp.14,496 = US$1.00 on June 30, 2021 for the convenience of the reader as described under "Presentation of Financial Information."

(2) We define EBITDA as income from operations plus depreciation of property and equipment plus depreciation of right of use assets plus amortization of land leases and amortization of licenses and LQA EBITDA as EBITDA for the three months ended December 31, 2018, 2019 and 2020 and June 30, 2021 multiplied by four, as applicable. EBITDA and LQA EBITDA are not measurements of financial performance or liquidity under Indonesian FAS and should not be considered as alternatives to net profit, income from operations or any other performance measures derived in accordance with Indonesian FAS or as alternatives to cash flow from operating activities as a measure of liquidity. In addition, EBITDA and LQA EBITDA are not standardized terms, hence, a direct comparison between companies using such terms may not be possible. Effective January 1, 2020, we applied PSAK 73, which resulted in the reclassification of the amortization expense as depreciation of right of use assets. The following table reconciles our income from operations under Indonesian FAS to our definition of EBITDA and LQA EBITDA for the periods indicated (and the amounts indicated were converted based on the exchange rate of Rp.14,496 = US$1.00 on June 30, 2021 for the convenience of the reader as described under "Presentation of Financial Information"):

	For the Year Ended December 31,			For the Six Months Ended June 30,	For the Three Months Ended June 30,
	2018	2019	2020	2021	2021
			(unaudited) (US$ in millions)		
Income from Operations	217.5	232.4	263.3	140.0	72.3
Add:					
Depreciation of property and equipment	18.2	22.5	31.2	25.1	13.6
Amortization of licenses	1.7	1.5	2.1	1.3	0.6
Amortization of land leases	19.3	20.3	—	—	—
Depreciation of right of use assets	—	—	21.9	12.5	6.9
EBITDA	**256.6**	**276.7**	**318.5**	**178.9**	**93.4**

	For the Three Months Ended December 31,			For the Three Months Ended June 30
	2018	2019	2020	2021
			(unaudited) (US$ in millions)	
Income from Operations	58.0	60.4	64.3	72.3
Add:				
Depreciation of property and equipment	4.4	6.8	13.0	13.6
Amortization of licenses	0.6	0.4	0.7	0.6
Amortization of land leases	5.2	5.2	—	—
Depreciation of right of use assets	—	—	5.7	6.9
EBITDA	**68.2**	**72.7**	**83.7**	**93.4**
LQA EBITDA	**272.8**	**290.9**	**334.6**	**373.6**

(3) EBITDA margin represents EBITDA as a percentage of revenue.

(4) Gross debt refers to our total borrowings (current and non-current portion of long-term loans, finance leases, lease liabilities — vehicle, notes and lease liabilities — right of use assets) before deducting unamortized borrowing costs. The following table reconciles our total borrowings (excluding lease liabilities — right of use assets) to our gross debt for the periods indicated (and the amounts indicated were converted based on the exchange rate of Rp.14,496 = US$1.00 on June 30, 2021 for convenience of the reader as described under "Presentation of Financial Information"):

	As of December 31,			As of June 30,
	2018	2019	2020	2021
		(unaudited)		
		(US$ in millions)		
Long term loans	1,031.6	1,042.8	709.1	811.0
Finance leases	1.2	1.3	—	—
Lease liabilities — vehicle	—	—	1.1	1.0
Notes	544.2	539.8	936.0	1,111.0
Total borrowings (excluding lease liabilities — right of use assets)	1,577.1	1,583.9	1,646.2	1,923.0
Add:				
Unamortized borrowing costs	11.1	12.5	14.8	19.7
Gross debt (excluding lease liabilities — right of use assets)	1,588.2	1,596.4	1,661.0	1,942.7
Add:				
Lease liabilities — right of use assets	—	—	31.1	43.4
Gross debt	1,588.2	1,596.4	1,692.1	1,986.1

(5) Net debt refers to our gross debt less cash and cash equivalents. The following table reconciles our gross debt to our net debt for the periods indicated (and the amounts indicated were converted based on the exchange rate of Rp.14,496 = US$1.00 on June 30, 2021 for the convenience of the reader as described under "Presentation of Financial Information"):

	As of December 31,			As of June 30,
	2018	2019	2020	2021
		(unaudited)		
		(US$ in millions)		
Gross debt	1,588.2	1,596.4	1,692.1	1,986.1
Less:				
Cash and cash equivalents	15.2	36.2	65.4	61.7
Net debt	1,572.9	1,560.2	1,626.7	1,924.4

(6) Net debt (excluding lease liabilities — right of use assets) refers to our net debt less lease liabilities — right of use assets. The following table reconciles our net debt to our net debt (excluding lease liabilities — right of use assets) for the periods indicated (and the amounts indicated were converted based on the exchange rate of Rp.14,496 = US$1.00 on June 30, 2021 for the convenience of the reader as described under "Presentation of Financial Information"):

	As of December 31,			As of June 30,
	2018	2019	2020	2021
		(unaudited)		
		(US$ in millions)		
Net debt	1,572.9	1,560.2	1,626.7	1,924.4
Less:				
Lease liabilities — right of use assets	—	—	31.1	43.4
Net debt (excluding lease liabilities — right of use assets)	1,572.9	1,560.2	1,595.6	1,881.0

(7) Total senior debt is defined as our long-term loans — third parties (including indebtedness under the 2017 RLF, the 2018 RCF, the 2019 RLF, the 2021 RLF and the Credit Facilities) as calculated by valuing the hedged portion of our total senior debt in U.S. dollars after taking into account our hedging arrangements, before deducting unamortized borrowing costs. We define total net senior debt as our total senior debt less cash and cash equivalents balance. The following table reconciles our total senior debt to our total net senior debt for the periods indicated (and the amounts indicated were converted based on the exchange rate of Rp.14,496 = US$1.00 on June 30, 2021 for the convenience of the reader as described under "Presentation of Financial Information"):

	As of December 31,			As of June 30,
	2018	2019	2020	2021
		(unaudited)		
		(US$ in millions)		
Total senior debt	915.0	998.5	687.5	789.8
Less:				
Cash and cash equivalents	15.2	36.2	65.4	61.7
Total net senior debt	**899.7**	**962.2**	**622.2**	**728.1**

(8) Gross debt after taking into account our hedging arrangements refers to our total borrowings (current and non-current portion of long-term loans, finance leases, lease liabilities — vehicle, notes and lease liabilities — right of use assets), as calculated by valuing the hedged portion of our gross debt in U.S. dollars using the hedged rate, before deducting unamortized borrowing costs. The following table reconciles our total borrowings after taking into account our hedging arrangements (excluding lease liabilities — right of use assets) to our gross debt after taking into account our hedging arrangements for the periods indicated (and the amounts indicated were converted based on the exchange rate of Rp.14,496 = US$1.00 on June 30, 2021 for convenience of the reader as described under "Presentation of Financial Information"):

	As of December 31,			As of June 30,
	2018	2019	2020	2021
		(unaudited)		
		(US$ in millions)		
Long term loans (hedging rate)	907.0	987.8	679.2	778.8
Finance leases	1.2	1.3	—	—
Notes (hedging rate)	491.6	501.2	886.2	1,050.1
Lease liabilities — vehicle	—	—	1.1	1.0
Total borrowings after taking into account our hedging arrangements (excluding lease liabilities — right of use assets)	**1,399.8**	**1,490.3**	**1,566.5**	**1,829.8**
Add:				
Unamortized borrowing costs	11.1	12.5	14.8	19.7
Gross debt after taking into account our hedging arrangements (excluding lease liabilities — right of use assets)	**1,410.9**	**1,502.9**	**1,581.3**	**1,849.5**
Add:				
Lease liabilities — right of use assets	—	—	31.3	43.4
Gross debt after taking into account our hedging arrangements	**1,410.9**	**1,502.9**	**1,612.4**	**1,892.9**

(9) Net debt after taking into account our hedging arrangements refers to our gross debt after taking into account our hedging arrangements less cash and cash equivalents. The following table reconciles our gross debt after taking into account our hedging arrangements to our net debt after taking into account our hedging arrangements for the periods indicated (and the amounts indicated were converted based on the exchange rate of Rp.14,496 = US$1.00 on June 30, 2021 for the convenience of the reader as described under "Presentation of Financial Information"):

	As of December 31,			As of June 30,
	2018	2019	2020	2021
	(unaudited) (US$ in millions)			
Gross debt after taking into account our hedging arrangements	**1,410.9**	**1,502.9**	**1,612.4**	**1,892.9**
Less:				
Cash and cash equivalents	15.2	36.2	65.4	61.7
Net debt after taking into account our hedging arrangements	**1,395.7**	**1,466.6**	**1,547.0**	**1,831.2**
Less:				
Lease liabilities — right of use assets	—	—	31.1	43.4
Net debt after taking into account our hedging arrangements (excluding lease liabilities — right of use assets)	**1,395.7**	**1,466.6**	**1,515.9**	**1,787.8**

(10) This information is presented for informational purposes only and is not calculated in the same manner as the method used for calculating the leverage ratios set forth in the Indenture governing the notes.

Operational Data

	As of December 31, 2017	As of December 31, 2018	As of December 31, 2019	As of December 31, 2020	As of June 30, 2021
Total telecommunications sites	13,509	15,091	15,589	16,265	19,709
Total number of tenancies	23,018	25,518	28,740	31,850	37,232
Total number of tower sites	13,461	15,032	15,473	16,155	19,598
Total number of tower tenancies	22,970	25,459	28,624	31,740	37,121
Total DAS network sites	48	59	116	110	111
Tenancy ratio	1.71	1.69	1.85	1.96	1.89

MANAGEMENT'S DISCUSSION AND ANALYSIS OF FINANCIAL CONDITION AND RESULTS OF OPERATIONS

You should read the following Management's Discussion and Analysis of our Financial Condition and Results of Operations in conjunction with our consolidated financial statements, related notes to the consolidated financial statements, and other financial information, included elsewhere in this offering circular. This offering circular also contains forward-looking statements that involve risks and uncertainties including those described under "Forward-Looking Statements" elsewhere in this offering circular. Our actual results could differ materially from those anticipated in these forward-looking statements as a result of certain factors, including the risks faced by us described below and elsewhere in this offering circular. Effective January 1, 2020, we applied PSAK 71 "Financial Instruments," PSAK 72 "Revenue from Contracts with Customers" and PSAK 73 "Leases." In accordance with the transitional provision, the cumulative impact of these standards were applied to the beginning balance of the retained earnings at January 1, 2020, hence we did not restate the comparative information. Initial application of these standards produced a cumulative impact of Rp.(806) million, comprising Rp.7,232 million from the recognition of expected credit losses and Rp.(8,038) million from the recognition of the accumulated interest charges on lease and the difference between the accumulated depreciation of the right of use assets and the accumulated rental expenses.

Overview

We are a leading independent tower company in Indonesia. As of June 30, 2021, we owned 19,709 telecommunications sites comprising 19,598 tower sites and 111 DAS networks. For the year ended December 31, 2020 and the six months ended June 30, 2021, 77.5% and 74.2% of our revenue, respectively, was from Telkomsel, Indosat and XL Axiata, collectively. Our principal business is leasing space for antennas and other equipment for wireless signal transmission at tower sites under long-term lease agreements. We also provide telecommunications operators with access to our DAS networks in shopping malls and office buildings in major urban areas.

As of June 30, 2021, we had 37,232 tenancies on 19,709 sites with five different telecommunications operators and two 4G LTE network providers. We lease space on tower sites under long-term lease agreements of generally 10 years and lease access to our DAS networks under long-term license agreements of generally five to eight years. As of June 30, 2021, the average remaining life of all our tenancy agreements was 5.3 years. Our tower leasing revenue (from tower sites), and our DAS network revenue accounted for 99.2% and 0.7%, respectively, of our total revenue for the year ended December 31, 2020.

Our revenue was Rp.5,327,689 million (US367.5 million) for the year ended December 31, 2020 and Rp.2,971,379 million (US$205.0 million) for the six months ended June 30, 2021. Our EBITDA and EBITDA margin were Rp.4,617,126 million (US$318.5 million) and 86.7%, respectively, for the year ended December 31, 2020 and Rp.2,592,881 million (US$178.9 million) and 87.3%, respectively, for the six months ended June 30, 2021. Our annualized revenue and LQA EBITDA for the three months ended June 30, 2021 were Rp.6,196,912 million (US$427.5 million) and Rp.5,415,180 million (US$373.6 million), respectively.

Factors Affecting Our Financial Condition and Results of Operations

Our financial condition and results of operations have been, and will continue to be, affected by a number of important factors, including the following:

Creditworthiness of our customers

Our revenues are contracted significantly in advance as our tenant leases are generally long-term in nature (usually 10 years for tower sites). As of June 30, 2021, our contracted revenue under our customers' agreements for all types of tenancies was approximately Rp.29,456 billion (US$2.0 billion) and the average remaining life of all tenancy agreements was approximately 5.3 years. As such, we are dependent on the creditworthiness and financial strength of our tenants. Our major customers consist of Indonesia's telecommunications operators, with 77.5% of our revenue for the year ended December 31, 2020 and 74.2% of our revenue for the six months ended June 30, 2021 attributable to Telkomsel, Indosat and XL Axiata (each of which has an investment grade rating from at least one rating agency). Should our customers experience financial difficulties, this could result in uncollectible, or a delay in collecting, trade receivables from our customers, for which we will be required to make write offs or record an impairment to our trade receivables. See also "Risk Factors — Risks Relating to Our Business — Due to the long-term expectations of revenue from tenant leases, we are exposed to the creditworthiness and financial strength of our customers."

Changes in the number of tenancies and tenancy ratio

Build-to-suit construction. We do not engage in speculative building and normally only construct new tower sites after obtaining a commitment for long-term leases (each typically for a period of 10 years) for space on such sites from our customers. In 2020, we organically increased the number of our build-to-suit tower sites by 835 sites and in the six months ended June 30, 2021, we organically increased the number of our built-to-suit tower sites by 465 sites.

Tenancy ratio. We continually seek to increase co-locations for our existing towers, as additional co-locations are accretive to our cash flow and improve operating margins because the incremental cost of adding new tenants to existing towers is relatively low. Our towers that are at or near structural capacity can also be strengthened to meet future leasing capacity with relatively minor capital investment. While we have increased our tenancies from 25,518 as of December 31, 2018 to 37,232 as of June 30, 2021, our tenancy ratios may vary from time to time due to site portfolio acquisitions or build-to-suit construction. Our tower tenancy ratio increased from 1.69 as of December 31, 2018 to 1.85 as of December 31, 2019, increased to 1.96 as of December 31, 2020, and decreased to 1.89 as of June 30, 2021.

Accordingly, upon addition of tenancies through construction of our build-to-suit sites and the addition of co-locations, we typically experience increases to our revenue.

Acquisition of site portfolios. From time to time, we also seek to increase the size of our site portfolio through the acquisition of site portfolios. As the site portfolios that we acquire typically have existing tenants, we experience increases to our revenue when we complete such acquisitions. However, the extent to which we would experience an increase in revenue and our ability to increase our tenancy ratio for these acquired sites may differ from our build-to-suit sites because the lease fees payable for, and the existing tenancy ratio of, each acquired site varies. We acquire existing site portfolios only when they meet our investment criteria, which include, among others, return on investment, potential for future co-locations, ease of leasing or purchasing land for sites, ease of

community approvals, and credit strength of the potential tenant(s). We acquired a controlling stake in two listed tower companies, GHON and GOLD, in 2018, which added 1,120 tenancies and 859 telecommunication sites to our portfolio. In April 2021, we acquired 3,000 towers from IBST for a consideration of Rp.3,975 billion (US$274.2 million).

Interest costs

Indebtedness has been a significant source of our funding for build-to-suit construction and acquisition of other tower leasing companies or site portfolios. Our interest expense has therefore been a significant component of our other charges in each of the years ended December 31, 2018, 2019 and 2020, and for the six months ended June 30, 2021, respectively. A significant portion of our indebtedness has been subject to floating interest rates, which has caused, and is expected to continue to cause, our interest expense to fluctuate with changes in interest rates. We may, from time to time, seek to partially or fully, hedge our floating interest rate exposure by entering into interest rate swap contracts.

Capital expenditures

Our business is capital intensive. The cost of construction of a tower principally comprises the costs of steel for the tower, land lease fees, tower construction activities including transportation and labor and, to a lesser extent, licenses, community approvals and shelter construction. We also include as capital expenditures our acquisition of investment properties, acquisition of property and equipment, acquisition of right of use assets, purchase of shares and payments for land leases. See "— Capital Expenditures." Our capital expenditures for the years ended December 31, 2018, 2019 and 2020 and for the six months ended June 30, 2020 and 2021, were Rp.2,225,323 million, Rp.2,039,485 million, Rp.2,051,887 million (US$141.5 million), Rp.1,277,111 million (US$88.1 million) and Rp.5,333,511 million (US$367.9 million), respectively.

Taxes

The current corporate tax rate in Indonesia is 22%. The difference between our effective corporate tax rate and the corporate tax rate is primarily due to permanent differences in calculating our taxable income. For tax purposes, for leases signed prior to January 2, 2018, we depreciated property and equipment and investment properties based on the useful life of the related assets. For financial reporting purposes, we only depreciated property and equipment, while at the same time measured our property and equipment as well as investment properties by their fair value. Changes to investment property value are recognized in our consolidated statements of profit and loss and other comprehensive income. See "— Critical Accounting Policies — Property and equipment, and depreciation" and "— Critical Accounting Policies — Investment properties." Under current Indonesian regulations, tax losses can be carried forward for up to five years after the tax loss was incurred. We also recognize deferred income tax assets and liabilities relating to temporary differences between the accounting and tax treatment of certain expenses. These temporary differences relate principally to tax losses, post-employment benefits and depreciation. See Note 21 to our consolidated financial statements as of and for the years ended December 31, 2018, 2019 and 2020 and Note 19 to our unaudited interim consolidated financial statements as of June 30, 2021 and for the six months ended June 30, 2020 and 2021 included elsewhere in this offering circular for a further description of these differences.

On September 6, 2017, the Indonesian tax authority issued GR 34 regarding income tax rates on income derived from leasing out land and/or building rental, which includes those leased out by tower

companies. According to GR 34, rental income for leases of telecommunication towers with lease terms commencing from and including January 2, 2018 will be subject to the final income tax rate of 10%, while rental income for leases of telecommunication towers with lease terms that commenced prior to January 2, 2018 remains subject to the prior non-final income corporate tax rate of 22%.

Our effective tax rate as a percentage of revenue was 11.2% in 2020 and 9.0% in the six months ended June 30, 2021. Our income tax (expenses) including final income tax were Rp.331,653 million (US$22.9 million) in 2018, Rp.437,868 million (US$30.2 million) in 2019, Rp.598,601 million (US$41.3 million) in 2020 and Rp.267,742 million (US$18.5 million) in the six months ended June 30, 2021.

We are required to charge a 10.0% value-added tax to our customers. However, we are allowed to offset value-added taxes paid to our suppliers for payment of goods and services against the value-added taxes we charge our customers. Value-added tax is not included in our revenue in the profit and loss statement and is remitted to the Government net of such offset.

Government regulation

We are subject to Government regulations on the construction and operation of tower sites. A significant proportion of our SITAC activities for tower construction involve obtaining community approvals, IMB or IMBM, and compliance with various Government regulations. Although we typically obtain community approvals prior to commencing construction of a tower site, consistent with what we believe is the common practice in Indonesia and given the long lead time generally required for processing applications for approvals and licenses (including IMB or IMBM), we sometimes proceed with, and often complete, tower construction and BTS installation for our tenants before all required approvals and licenses have been formally obtained from local authorities. If such approvals and licenses are not eventually obtained, the local authorities may issue notices for our towers to be dismantled and removed. Increased Government regulation of the tower leasing business could increase the time and cost of our build-to-suit construction, as well as the overall cost of regulatory compliance for our site portfolio. See "Regulation of the Indonesian Tower Leasing Industry" and "Risk Factors — Risks Relating to Our Business — We do not have the required approvals and licenses for some of our tower sites."

Changes in the Indonesian economy and new technology

We conduct substantially all our operations in Indonesia and our customers' demand for additional tenancies on our telecommunications sites is necessarily dependent on the overall health of the Indonesian economy. Indonesia's gross domestic product, or GDP, grew at an annual rate of 5.2% in 2018 and 5.0% in 2019, and contracted at an annual rate of 2.1% in 2020, according to Badan Pusat Statistik estimates, with an annual inflation rate of 3.1% in 2018, 2.7% in 2019 and 1.7% in 2020 according to Badan Pusat Statistik estimates. See "Risk Factors — Risks Relating to Indonesia" for a description of certain risks we face from potential changes in the political, economic and social conditions in Indonesia. New technologies, such as 4G and 5G, are expected to contribute to increased requirements for tower space among telecommunications operators and wireless data service providers, and may result in an increase in demand from our customers for us to build new towers or allow us to increase the co-locations on our existing towers.

Acquisition of tower sites from PT Indosat Tbk

In February 2012, we entered into the Indosat Asset Purchase Agreement in relation to the Indosat Acquisition. The Indosat Acquisition pursuant to the Indosat Asset Purchase Agreement was

completed on August 2, 2012. Concurrent with our entry into the Indosat Asset Purchase Agreement, we also entered into a master lease agreement with Indosat under which Indosat leased the 2,500 acquired towers from us as an anchor tenant for a minimum period of 10 years, under separate site lease agreements governed by the terms of the master lease agreement (together with the master lease agreement, the "Indosat Lease Agreements"). The Indosat Lease Agreements have similar key terms to the master tower lease agreements that we have executed with all our Indonesian mobile telecommunications operators. See "— Tower Space Leasing."

The purchase consideration for the Indosat Acquisition was US$406.0 million in both cash and newly issued shares in the Company. The share consideration was based on trailing market prices over a period prior to closing and represented, at the time of closing, approximately 5% of the Company's enlarged share capital. In addition, under the provisions of the Indosat Asset Purchase Agreement, if our co-location revenues exceed a stated target in any year ending on or prior to December 31, 2022, we are required to pay an earn-out amount to Indosat. The maximum aggregate earn-out amount payable is US$112.5 million. As of the date of this offering circular, we have paid a total of US$18.8 million to Indosat under the earn-out. The earn-out arrangement may result in a higher than expected impact on our future earnings. See "Risk Factors — Risks Relating to our Business — We may not successfully execute our growth strategy. Our organic and acquisition growth strategies depend on various factors, some of which are outside our control."

Impact of the COVID-19 Pandemic

The COVID-19 pandemic did not significantly impact our financial results of operations for the year ended December 31, 2020 or the six months ended June 30, 2021 as our revenues are based on long-term contracts from our telecommunication customers with limited discretionary termination provisions. The COVID-19 pandemic has also not resulted in a significant increase in our credit risk, as our customers have been able to fulfill their payment obligations to us under the relevant tenant leases, and we have been able to fulfill our obligations to our creditors. However, the COVID-19 situation is still evolving and its eventual impact on our future operations remains uncertain. See "Risk Factors — Risks Relating to our Business — The ongoing COVID-19 pandemic and the disruption caused by various countermeasures to reduce its spread may have unprecedented adverse consequences of uncertain magnitude and duration on our business, industry, Indonesia and the global economy."

Critical Accounting Policies

Our consolidated financial statements included elsewhere in this offering circular were prepared in accordance with Indonesian FAS. The preparation of these consolidated financial statements requires us to make judgments, estimates and assumptions that affect the reported amounts of revenue, expenses, assets and liabilities as well as the disclosure of contingent assets and liabilities at the reporting periods. We base our estimates and assumptions on historical experience and other factors that we believe to be reasonable under the circumstances. We continually evaluate such estimates and judgments, although existing circumstances and assumptions about future developments may change due to market changes or conditions which are beyond our control. Actual results may differ from these estimates under different assumptions or actual conditions. In order to provide an understanding of how our management forms their judgment about future events, including the variables and assumptions underlying our estimates, and the sensitivity of judgments to different circumstances, we have identified the critical accounting policies discussed below. For more details, see Notes 2 and 3 to our consolidated financial statements included in this offering circular.

Fair value measurement

Regarding the implementation of PSAK 16 (Revised 2014) "Property and Equipment," we have chosen the revaluation model for the measurement after initial recognition of telecommunication towers. The fair value hierarchy of property and equipment at the end of reporting year is categorized as a level 3 recurring fair value measurement. To determine the fair value, the independent appraiser utilizes a combination of two approaches as the appraisal method: the income approach, which discounts future cash flows, and the cost approach, which is based on current replacement cost. For more details, see Notes 3 and 13 to our consolidated financial statements included in this offering circular.

Classification of financial assets and financial liabilities

We determine the classifications of certain assets and liabilities as financial assets and financial liabilities by judging if they meet the definitions set forth in PSAK 71. Accordingly, the financial assets and financial liabilities are accounted for in accordance with our accounting policies disclosed in Note 2(f) to our consolidated financial statements.

Expected credit losses

We evaluate specific accounts where we have information that certain customers are unable to meet their financial obligations. In these cases, we use our judgment, based on the best available facts and circumstances, including but not limited to, the length of our relationship with the customer and its credit status based on third party credit reports and known market factors, to record specific provisions for customers against amounts due to reduce the receivable amounts that we expect to collect. These specific provisions are re-evaluated and adjusted as additional information we receive affects the amounts of allowance for the impairment of trade receivables.

Depreciation of property and equipment

We state our property and equipment, except for telecommunication towers, at cost net of accumulated depreciation and accumulated of asset impairment value, if any. Telecommunication towers are accounted for using the revaluation model, which is the fair value at the date of revaluation less any accumulated depreciation and accumulated impairment losses after the date of revaluation, if any.

A revaluation at fair value is made every year. If the carrying amount of the asset increases as a result of the revaluation, the increase is recognized in other comprehensive income and accumulates in equity in the revaluation surplus section. The increase is recognized in profit and loss up to the same amount of impairment loss due to revaluation previously recognized in profit or loss. Revaluation increases are recognized in other comprehensive income and accumulated in equity, unless they reverse a previous revaluation decrease. Revaluation decreases are recognized in profit or loss unless they reverse a previous revaluation increase. The revaluation surplus of property and equipment may be transferred to the retained earnings when there is a termination or disposal of the asset. Some revaluation surpluses may also be transferred in line with asset use. In that case, the revaluation surplus transferred to retained earnings is the difference between the amount of depreciation based on the revaluation amount and the amount of depreciation based on the initial cost. The transfer is not made through profit or loss.

We compute depreciation on a straight-line method, based on the estimated useful lives of the related assets. Our management estimates the useful lives of these property and equipment to be within 4 to 30 years. These are common life expectancies applied in the industries where our group conducts its businesses. Changes in the expected level of usage and technological development could impact the economic useful lives and the residual values of these assets, and therefore future depreciation charges could be revised.

Impairment of goodwill

We are required to test, on an annual basis, whether goodwill has suffered any impairment. The recoverable amount is determined based on the "value in use" calculations. The use of this method requires the estimation of future cash flows and the determination of a discount rate in order to calculate the present value of the cash flows. More information on the carrying values is included in Note 38 to our consolidated financial statements as of and for the years ended December 31, 2018, 2019 and 2020, and Note 35 to our unaudited interim consolidated financial statements as of June 30, 2021 and for the six months ended June 30, 2020 and 2021 included in this offering circular.

Post-employment benefits

We determine our obligations and cost for pension and employee benefits liabilities based on certain assumptions used by the independent actuaries in calculating such amounts. Those major assumptions include annual discount rates, future annual wage and salary increase, resignation rate, morbidity rate and mortality rate. More details of the key assumptions are set out in Note 35 to our consolidated financial statements for the years ended December 31, 2018, 2019 and 2020 and Note 32 to our unaudited interim consolidated financial statements as of June 30, 2021 and for the six months ended June 30, 2020 and 2021 included in this offering circular. Changes in the assumptions used may have a significant effect on the consolidated statements of profit or loss and other comprehensive income and the consolidated statements of financial position.

Income taxes

Significant judgment is involved in determining the provision for corporate income tax. There are certain transactions and computation for which the ultimate tax determination is uncertain during the ordinary course of business. We recognize liabilities for expected corporate income tax issues based on estimates of whether additional corporate income tax will be due.

Legal proceedings

We review outstanding legal cases following developments in the legal proceedings and at each reporting date in order to assess the need for provisions and disclosures in our financial statements. The factors considered in making decisions on the need for provisions include the nature of litigation, claim or assessment, the legal process and potential level of damages in the jurisdiction in which the litigation, claim or assessment has been brought, the progress of the case (including the progress after the date of the financial statements but before those statements are issued), the opinions or views of legal advisers, experience on similar cases and any decision of the management of the Company and the relevant subsidiary as to how it will respond to the litigation, claim or assessment.

Certain Income Statement Items

Our Revenue

Our revenue principally comprises lease and maintenance fees paid by our customers for tenancies on our telecommunications sites. The following table shows the breakdown of total revenue among our customers and revenue from each customer as a percentage of total revenue for the periods indicated:

	Year Ended December 31,						Six Months Ended June 30,			
	2018		2019		2020		2020		2021	
							(unaudited)		(unaudited)	
	(Rp. in millions, except percentages)									
PT Telekomunikasi Selular	1,936,976	44.9%	2,010,213	42.8%	2,082,756	39.1%	1,024,702	39.8%	1,085,382	36.5%
PT Indosat Tbk	960,851	22.3%	1,013,971	21.6%	1,145,724	21.5%	550,878	21.4%	641,453	21.6%
PT XL Axiata Tbk	679,808	15.7%	844,416	18.0%	898,641	16.9%	442,298	17.2%	479,195	16.1%
PT Hutchison 3 Indonesia	387,916	9.0%	526,683	11.2%	785,540	14.7%	370,156	14.4%	453,662	15.3%
PT Smartfren Telecom Tbk	238,928	5.5%	264,802	5.6%	377,148	7.1%	172,361	6.7%	288,614	9.7%
PT Internux	99,311	2.3%	—	—	—	—	—	—	—	—
Others	14,347	0.3%	38,657	0.8%	37,880	0.7%	16,957	0.7%	23,073	0.8%
Total	**4,318,137**	**100.0%**	**4,698,742**	**100.0%**	**5,327,689**	**100.0%**	**2,577,352**	**100.0%**	**2,971,379**	**100.0%**

The following table shows the geographical distribution of our revenue for the periods indicated:

	Year Ended December 31,					
	2018		2019		2020	
	(Rp. in millions, except percentages)					
Java and Bali	2,515,040	58.2%	2,671,840	56.9%	3,053,819	57.3%
Sumatra	1,143,303	26.5%	1,274,710	27.1%	1,426,335	26.8%
Kalimantan	297,950	6.9%	338,178	7.2%	392,311	7.4%
Sulawesi and others	361,844	8.4%	414,014	8.8%	455,224	8.5%
Total Revenue	**4,318,137**	**100.0%**	**4,698,742**	**100.0%**	**5,327,689**	**100.0%**

See Note 45 to our audited consolidated financial statements as of and for the years ended December 31, 2018, 2019 and 2020 included elsewhere in this offering circular for further details of the geographical distribution of our revenue.

Cost of Revenue

Our cost of revenue was 18.2%, 19.2%, 20.5%, 18.7% and 24.5% of our revenue for the years ended December 31, 2018, 2019 and 2020 and for the six months ended June 30, 2020 and 2021, respectively. The follow table shows the breakdown of our cost of revenue and each item as a percentage of our cost of revenue for the periods indicated:

	Year Ended December 31,						Six months ended June 30,			
	2018		2019		2020		2020		2021	
							(unaudited)		(unaudited)	
	(Rp. in millions, except percentages)									
Amortization of land lease	279,933	35.7%	294,071	32.5%	—	—	—	—	—	—
Amortization of licenses	24,175	3.1%	21,206	2.3%	31,104	2.8%	13,428	2.8%	18,345	2.5%
Depreciation of right of use assets	—	—	—	—	310,171	28.4%	148,560	30.8%	177,946	24.4%
Depreciation of towers	214,588	27.4%	277,413	30.7%	406,836	37.2%	152,880	31.7%	342,645	47.0%
Repairs and maintenance	154,240	19.7%	176,484	19.5%	210,928	19.3%	101,982	21.1%	122,001	16.7%
Security	41,292	5.3%	43,931	4.9%	45,430	4.2%	22,543	4.7%	24,522	3.4%
Electricity	14,785	1.9%	26,296	2.9%	28,008	2.6%	13,647	2.8%	13,799	1.9%
Insurance	25,073	3.2%	25,662	2.8%	25,884	2.4%	12,788	2.6%	14,258	2.0%
Depreciation of transportable towers	15,971	2.0%	16,857	1.9%	16,289	1.5%	8,507	1.8%	6,553	0.9%
Others	14,025	1.8%	21,534	2.4%	18,415	1.7%	8,626	1.8%	9,020	1.2%
Total	**784,082**	**100.0%**	**903,454**	**100.0%**	**1,093,065**	**100.0%**	**482,961**	**100.0%**	**729,089**	**100.0%**

Amortization of land lease. Amortization of land lease comprises amortization of ground lease fees paid in advance for tower sites that we do not own. Land lease fees are amortized over a period that corresponds to the term of the relevant land lease agreement. For our acquisitions of tower companies and tower portfolios, we generally allocate the purchase price to property and equipment, after deducting, where possible, the portion allocated to land lease fees paid in advance.

Amortization of licenses. Amortization of licenses comprises fees paid to building owners under site license agreements for our DAS networks and license cost paid in advance. License cost are amortized over the useful life of those licenses.

Depreciation of right of use assets. The implementation of PSAK 73, effective January 1, 2020, resulted in the reclassification of the amortization expense as depreciation of right of use assets, which represents depreciation costs of land leases for telecommunication towers and office leases.

Depreciation of towers. Depreciation of towers represents depreciation costs of the telecommunication towers (which are recorded under property and equipment).

Repairs and maintenance. Repair and maintenance expense comprises primarily payments to third party contractors for repairs and maintenance of our telecommunications sites.

Security. Security expense comprises payments to third party contractors for security services at tower sites.

Electricity. Electricity expense comprises electricity costs at most of our telecommunications sites, and fuel for generators used at certain of our tower sites. Electricity costs incurred for the operation of customer's equipment at our telecommunication sites are paid by our customers, except for some of our DAS network customers. For those customers, we charge electricity costs as a component of the maintenance fees and pay the actual electricity cost incurred for operation of antenna equipment at our telecommunication sites.

Insurance. Insurance expense comprises premiums paid for the insurance coverage for our telecommunications sites.

Depreciation of transportable towers. Depreciation of transportable towers represents depreciation costs of the transportable towers (which are recorded under property and equipment).

Others. Other expense mainly comprises expenses for business trips and site visits for operational staff, corporate social responsibility events and expenses related to maintaining our relationship with local communities near our sites and tax on land and buildings.

Gross Profit

Our gross profit comprises total revenue less cost of revenue. The following table shows our gross profit, including as a percentage of total revenue, for the periods indicated:

	Year Ended December 31,						Six months ended June 30,			
	2018		2019		2020		2020		2021	
							(unaudited)		(unaudited)	
	(Rp. in millions, except percentages)									
Gross Profit	3,534,055	81.8%	3,795,288	80.8%	4,234,624	79.5%	2,094,391	81.3%	2,242,290	75.5%

Operating Expenses

Our operating expenses were 8.8%, 9.1%, 7.9%, 8.2% and 7.2% of our total revenue for the years ended December 31, 2018, 2019 and 2020 and the six months ended June 30, 2020 and 2021, respectively. The following table shows the breakdown of our operating expenses and each item as a percentage of our operating expenses for the periods indicated:

	Year Ended December 31,						Six months ended June 30,			
	2018		2019		2020		2020		2021	
							(unaudited)		(unaudited)	
	(Rp. in millions, except percentages)									
Salaries, wages and allowances	220,922	57.9%	261,345	61.3%	265,685	63.5%	134,573	63.6%	140,141	65.6%
Depreciation	32,641	8.6%	32,155	7.5%	29,638	7.1%	14,721	7.0%	15,067	7.1%
Donation and social responsibility	6,815	1.8%	5,829	1.4%	16,271	3.9%	12,070	5.7%	3,663	1.7%
Sponsorship and representation	21,557	5.7%	17,266	4.0%	8,271	2.0%	5,312	2.5%	6,936	3.2%
Office expenses	20,312	5.3%	21,227	5.0%	20,508	4.9%	10,766	5.1%	10,136	4.7%
Professional fees	19,201	5.0%	25,840	6.1%	16,812	4.0%	7,147	3.4%	8,797	4.1%
Employee benefits expenses	15,157	4.0%	14,262	3.3%	23,293	5.6%	7,936	3.8%	10,829	5.1%
Office rent	10,627	2.8%	13,123	3.1%	11,033	2.6%	5,384	2.5%	5,780	2.7%
Travel duty	10,046	2.6%	9,695	2.3%	3,555	0.8%	1,761	0.8%	1,039	0.5%
Transportation	6,759	1.8%	7,651	1.8%	6,712	1.6%	3,798	1.8%	2,967	1.4%
Depreciation of right of use assets	—	—	—	—	7,087	1.7%	3,301	1.6%	3,519	1.6%
Telecommunication	927	0.2%	698	0.2%	577	0.1%	346	0.2%	252	0.1%
Others	16,499	4.3%	17,343	4.1%	9,181	2.2%	4,405	2.1%	4,358	2.0%
Total	**381,463**	**100.0%**	**426,434**	**100.0%**	**418,623**	**100.0%**	**211,520**	**100.0%**	**213,484**	**100.0%**

Salaries, wages and allowances. Salaries, wages and allowances expense comprises salaries, bonuses and allowances for our employees.

Depreciation. Depreciation expense is related to the depreciation of property and equipment using the straight-line method over their estimated useful lives.

Donation and social responsibility. Donation and social responsibility mainly comprises of our donations to disaster relief, corporate social responsibility events expenses which are not directly related to where our sites are located.

Sponsorship and representation. Sponsorship and representation mainly comprises of expenses for public relations events and sponsorship for our customers.

Office expenses. Office expenses comprise miscellaneous office expenses including printing and stationary, postage and courier, subscription expenses and electricity in head and regional offices.

Professional fees. Professional fees comprise fees for lawyers, accountants and other advisors.

Employee benefits expenses. Employee benefits expense is the provision for post-employment benefits for employees (in accordance with the Manpower Law).

Office rent. Office rent expense comprises lease payment for the rental of office space at our head office in Jakarta and regional offices.

Travel duty. Travel duty expense comprises expenses for business trips and site visits by non-operational staff.

Transportation. Transportation expense comprises payments for rental vehicles used by personnel at our regional offices.

Depreciation of right of use assets. We started recording depreciation of right of use assets due to the implementation of PSAK 73. Depreciation of right of use assets expense is related to the depreciation of right of use assets using the straight-line method over their estimated useful lives.

Telecommunication. Telecommunication expense comprises expenses for mobile and fixed line phone expenses, including voice and data communications, at our head office and regional offices.

Others. Other expenses consist principally of minor items of miscellaneous expenditures including staff training, advertising and company functions.

Income from Operations

Our income from operations comprises revenue less cost of revenue and operating expenses. The following table shows our income from operations, including as a percentage of total revenue, for the periods indicated:

	Year Ended December 31,						Six months ended June 30,			
	2018		2019		2020		2020		2021	
							(unaudited)		(unaudited)	
	(Rp. in millions, except percentages)									
Income from operations	3,152,592	73.0%	3,368,854	71.7%	3,816,001	71.6%	1,882,871	73.1%	2,028,806	68.3%

Other Income (Charges)

The following table shows the breakdown of our other income (charges), including as a percentage of total revenue, for the periods indicated:

	Year Ended December 31,						Six months ended June 30,			
	2018		2019		2020		2020		2021	
							(unaudited)		(unaudited)	
	(Rp. in millions, except percentages)									
Increase of fair value on investment properties	7,728	0.2%	79,427	1.7%	34,778	0.7%	—	—	—	—
Interest income	8,431	0.2%	10,440	0.2%	14,869	0.3%	6,108	0.2%	8,231	0.3%
Gain on foreign exchange — net	2,221	0.1%	8,966	0.2%	37,452	0.7%	10,239	0.4%	26,281	0.9%
Decrease of fair value of telecommunication towers	—	—	(40,405)	(0.9%)	(4,584)	(0.1%)	—	—	—	—
Impairment of goodwill	(15,722)	(0.4%)	(47,421)	(1.0%)	—	—	(25,000)	(1.0%)	(8,279)	(0.3%)
Final income tax	(17,310)	(0.4%)	(81,394)	(1.7%)	(155,723)	(2.9%)	(44,605)	(1.7%)	(136,702)	(4.6%)
Financial expenses — long term loans and notes	(2,003,573)	(46.4%)	(1,940,149)	(41.3%)	(1,943,161)	(36.5%)	(960,264)	(37.3%)	(989,051)	(33.2%)
Financial expenses — Others	(68,024)	(1.6%)	(76,761)	(1.6%)	(191,345)	(3.6%)	(120,003)	(4.7%)	(96,174)	(3.2%)
Interest expense on lease liabilities	—	—	—	—	(93,604)	(1.8)%	(69,568)	(2.7%)	(25,170)	(0.8%)
Amortization of cost of long term loan — third parties	(53,396)	(1.3%)	(46,196)	(1.0%)	(61,787)	(1.2)%	(34,166)	(1.3%)	(35,050)	(1.2%)
Amortization of cost of notes	(14,628)	(0.3%)	(30,565)	(0.6%)	(35,954)	(0.7)%	(16,269)	(0.6%)	(35,954)	(1.2%)
Expected credit recovery (expense) — financial assets	—	—	—	—	(23,810)	(0.4)%	(12,803)	(0.5%)	492	0.0%
Others — Net	(49,368)	(1.1%)	(58,962)	(1.3%)	(75,023)	(1.4%)	(43,646)	(1.7%)	(12,728)	(0.4%)

Increase of fair value of investment properties. Increase of fair value of investment properties comprises the difference between the carrying cost and fair market value of our investment properties at the end of the relevant accounting period.

Interest income. Interest income comprises interest earned on our cash and cash equivalents deposited in our operating accounts.

Gain on foreign exchange — Net. Gain on foreign exchange — Net primarily comprises translation gains and losses on our monetary assets and liabilities denominated in U.S. dollars including certain unsecured U.S. dollar-denominated loans from third parties.

Decrease of fair value of telecommunication towers. Decrease of fair value of telecommunication towers comprises the difference between the carrying cost and fair market value of our property and equipment at the end of the relevant accounting period.

Impairment of goodwill. Effective from January 1, 2011, we conduct an impairment test in respect of goodwill from prior business combinations. See Notes 3 and 38 to our consolidated financial statements for the years ended December 31, 2018, 2019 and 2020, and Note 35 to our unaudited interim consolidated financial statements as of June 30, 2021 and for the six months ended June 30, 2020 and 2021 included in this offering circular for a further discussion of this accounting policy.

Final income tax. Final income tax represents the amount of final income tax due from the Company relating to rental income for leases of telecommunication towers that is subject to a tax rate of 10%.

Financial expenses — Long term loans and notes. Financial expenses — Long term loans and notes comprises interest paid and accrued interest on our debt outstanding under our U.S. dollar and Rupiah-denominated long-term loans and our U.S. dollar and Rupiah-denominated bonds issued, as well as certain unsecured loans from third parties.

Financial expenses — Others. Financial expenses — Others comprise interest expense on lease liabilities, and amortization of cost of long term loan — third parties and amortization of cost of notes under our U.S. dollar and Rupiah denominated long-term loans and bonds.

Expected credit recovery (expense) — financial assets. Where we have information that certain customers are unable to meet their financial obligations, we evaluate these accounts and use judgment based on factors such as the length of our relationship with the customer and the customer's current credit status based on third party credit reports and known market factors. Expected credit expense – financial assets represents specific provisions for customers that we record against amounts due to reduce the receivable amounts we expect to collect.

Others — Net. Others — Net charges consist principally of minor items of miscellaneous non-operating expenditure.

Other Comprehensive Income

Revaluation surplus (deficit). A revaluation of our property and equipment at fair value is made at each reporting year. If the carrying amount of the asset increases as a result of the revaluation, the increase is recognized in other comprehensive income and accumulates in equity in the revaluation surplus section. However, the increase is recognized in profit and loss up to the same amount of impairment loss due to revaluation previously recognized in profit or loss. If the carrying amount of the asset decreases as a result of the revaluation, the decrease is recognized in profit or loss. The impairment is recognized in other comprehensive income, in order to reduce the accumulated amount of the revaluation surplus, as long as it does not exceed the revaluation surplus balance of the asset.

The revaluation surplus of property and equipment may be transferred to the retained earnings when there is a termination or disposal of the asset. Some revaluation surpluses may also be transferred in line with asset use. In that case, the revaluation surplus transferred to retained earnings is the difference between the amount of depreciation based on the revaluation amount and the amount of depreciation based on the initial cost. The transfer is not made through profit or loss.

Changes in value of cash flow hedges. We enter into hedging contracts in order to mitigate the fluctuations in interest rates and exchange rates from debt denominated in foreign currency.

Non-controlling interest

Non-controlling interest represents the minority shareholders' rights and interest in the equity and net profit of our subsidiaries that are not wholly-owned based on the percentage ownership of the minority shareholders in such subsidiaries.

Results of Operations

Six months ended June 30, 2021 compared to six months ended June 30, 2020

Revenue. Revenue increased by 15.3% to Rp.2,971,379 million (US$205.0 million) in the six months ended June 30, 2021 from Rp.2,577,352 million in the six months ended June 30, 2020, primarily due to the acquisition of 3,000 towers from PT Inti Bangun Sejahtera Tbk as well as the addition of 2,382 tenancies to our portfolio in the first six months of 2021. The total number of our telecommunications sites increased to 19,709 as of June 30, 2021 from 15,893 as of June 30, 2020, and the total number of our tenancies increased to 37,232 as of June 30, 2021 from 31,039 as of June 30, 2020. In addition, our tenancy ratio decreased to 1.89 as of June 30, 2021 from 1.96 as of June 30, 2020, due to the inclusion of the towers from the IBST Asset Purchase, which had a lower tenancy ratio than our portfolio.

Cost of revenue. Cost of revenue increased by 51.0% to Rp.729,089 million (US$50.3 million) in the six months ended June 30, 2021 from Rp.482,961 million in the six months ended June 30, 2020, primarily due to the increase in depreciation of towers as a result of the increase in the number of tower sites and tenancies, increase in the depreciation of right of use assets and increases in licenses expense, repair and maintenance expenses and insurance expenses.

Amortization of licenses. Amortization of licenses increased by 36.6% to Rp.18,345 million (US$1.3 million) in the six months ended June 30, 2021 from Rp.13,428 million in the six months ended June 30, 2020, primarily due to an increase in the number of tower sites built and an increase in the licensing costs.

Depreciation of right of use assets. Depreciation of right of use assets increased by 19.8% to Rp.177,946 million (US$12.3 million) in the six months ended June 30, 2021 from Rp.148,560 million in the six months ended June 30, 2020, due to the increase in the number of tower sites.

Depreciation of towers. Depreciation of towers increased by 124.1% to Rp.342,645 million (US$23.6 million) in the six months ended June 30, 2021 from Rp.152,880 million in the six months ended June 30, 2020, primarily due to an increase in the number of tower sites and tenancies and the views of the independent appraiser.

Repairs and maintenance. Repairs and maintenance expense increased by 19.6% to Rp.122,001 million (US$8.4 million) in the six months ended June 30, 2021 from Rp.101,982 million in the six months ended June 30, 2020, primarily due to an increase in the number of tenancies.

Security. Security expense increased by 8.8% to Rp.24,522 million (US$1.7 million) in the six months ended June 30, 2021 from Rp.22,543 million in the six months ended June 30, 2020, primarily due to an increase in the number of tower sites.

Electricity. Electricity expense increased by 1.1% to Rp.13,799 million (US$1.0 million) in the six months ended June 30, 2021 from Rp.13,647 million in the six months ended June 30, 2020, primarily due to an increase in the number of sites requiring electricity connection.

Insurance. Insurance expense increased by 11.5% to Rp.14,258 million (US$1.0 million) in the six months ended June 30, 2021 from Rp.12,788 million in the six months ended June 30, 2020, primarily due to an increase in the number of tower sites.

Depreciation of transportable towers. Depreciation of transportable towers decreased by 23.0% to Rp.6,553 million (US$0.5 million) in the six months ended June 30, 2021 from Rp.8,507 million in the six months ended June 30, 2020 due to depletion of the economic life of some of the transportable towers.

Others. Other expenses increased by 4.6% to Rp.9,020 million (US$0.6 million) in the six months ended June 30, 2021 from Rp.8,626 million in the six months ended June 30, 2020, primarily due to increase in entertainment expense.

Gross profit. As a result of the foregoing, our gross profit increased by 7.1% to Rp.2,242,290 million (US$154.7 million) in the six months ended June 30, 2021 from Rp.2,094,391 million in the six months ended June 30, 2020.

Operating expenses. Operating expenses increased by 0.9% to Rp.213,484 million (US$14.7 million) from Rp.211,520 million in the six months ended June 30, 2020, primarily due to an increase in salaries, wages and allowance expenses, employee benefits expense, professional fees, sponsorship and representation fees and depreciation of right of use assets, which was partially offset by a decrease in depreciation, donation and social responsibility, and transportation and travel duty expenses. Salaries, wages and allowance expenses increased by 4.1% to Rp.140,141 million (US$9.7 million) in the six months ended June 30, 2021 from Rp.134,573 million in the six months ended June 30, 2020, primarily due to additional personnel that we hired. Employee benefits expense increased by 36.5% to Rp.10,829 million (US$0.7 million) in the six months ended June 30, 2021 from Rp.7,936 million in the six months ended June 30, 2020, primarily due to the increase in the number of employees. Professional fees increased by 23.1% to Rp.8,797 million (US$0.6 million) in the six months ended June 30, 2021 from Rp.7,147 million in the six months ended June 30, 2020, primarily due to additional professional work that was undertaken in the six months ended June 30, 2021. Sponsorship and representation fees increased by 30.6% to Rp.6,936 million (US$0.5 million) the six months ended June 30, 2021 from Rp.5,312 million the six months ended June 30, 2020, primarily due to an increase in the number of sponsored events. These were offset by a decrease in depreciation expense, donation and social responsibility expense, transportation and travel duty expenses. Donation and social responsibility expense decreased by 69.7% to Rp.3,663 million (US$0.3 million) in the six months ended June 30, 2021 from Rp.12,070 million in the six months ended June 30, 2020, primarily due to a higher than normal donation in the first half of 2020 from the donation of ventilators for the COVID-19 pandemic. Transportation expense decreased by 21.9% to Rp.2,967 million (US$0.2 million) in the six months ended June 30, 2021 from Rp.3,798 million in the six months ended June 30, 2020, primarily due to a decrease in travel due to the COVID-19 pandemic. Travel duty expense decreased by 41.0% to Rp.1,039 million (US$0.1 million) in the six months ended June 30, 2021 from Rp.1,761 million in the six months ended June 30, 2020, primarily due to a decrease in travel due to the COVID-19 pandemic. We incurred depreciation of right of use assets expenses of Rp.3,519 million (US$0.2 million) in the six months ended June 30, 2021, while our depreciation of right of use assets in the six months ended June 30, 2020 was Rp.3,301 million, primarily due to the increase in non-tower leases.

Income from operations. As a result of the foregoing, our income from operations increased by 7.8% to Rp.2,028,806 million (US$140.0 million) in the six months ended June 30, 2021 from Rp.1,882,871 million in the six months ended June 30, 2020.

Other charges — Net. Our other charges — Net increased by 1.5% to Rp.1,207,930 million (US$83.3 million) in the six months ended June 30, 2021 from Rp.1,189,974 million in the six months ended June 30, 2020, primarily due to the reasons described below.

Gain on foreign exchange — Net. We had a gain on foreign exchange — net of Rp.26,281 million (US$1.8 million) in the six months ended June 30, 2021 compared to a gain on foreign exchange — net of Rp.10,239 million in the six months ended June 30, 2020. This was primarily due to the impact of an increased weakening of the Rupiah from Rp.14,105 per U.S. dollar on December 30, 2020 to Rp.14,496 per U.S. dollar on June 30, 2021 compared to the weakening of the Indonesian Rupiah from Rp.13,901 per U.S. dollar on December 31, 2019 to Rp.14,302 per U.S. dollar on June 30, 2020. As the Company generally fully hedges its debts denominated in USD, the amount of gain on foreign exchange is mainly caused by daily bank transactions.

Interest income. Interest income increased by 34.8% to Rp.8,231 million (US$0.6 million) in the six months ended June 30, 2021 from Rp.6,108 million in the six months ended June 30, 2020, primarily due to a higher average cash balance in the six months ended June 30, 2021.

Expected credit losses recovery (expense) — financial assets. The expected credit losses – financial assets increased to a recovery of Rp.492 million (US$0.03 million) from an expense of Rp.12,803 million in the six months ended June 30, 2020 due to recovery of expected credit losses due to receipt of payment of other receivables from PT Hamparan Cipta Sejati.

Impairment of goodwill. The impairment of goodwill decreased by 66.9% to Rp.8,279 million (US$0.6 million) in the six months ended June 30, 2021 from Rp.25,000 million in the six months ended June 30, 2020 based on management calculations.

Financial expenses — Long term loans and notes. Financial expenses — Long term loans and notes increased by 3.0% to Rp.989,051 million (US$68.2 million) in the six months ended June 30, 2021 from Rp.960,264 million in the six months ended June 30, 2020.

Financial expenses — Others. Financial expenses — Others decreased by 19.9% to Rp.96,174 million (US$6.6 million) in the six months ended June 30, 2021 from Rp.120,003 million in the six months ended June 30, 2020, primarily due to decrease in interest expenses of right of use assets lease liabilities, partially offset by an increase in amortization of the cost of the 2025 Existing USD Notes and amortization of cost of long term loan to third parties.

Final income tax. Final income tax increased by 206.5% to Rp.136,702 million (US$9.4 million) in the six months ended June 30, 2021 from Rp.44,605 million in the six months ended June 30, 2020, primarily due to an increase in tower rental revenue from lease contracts beginning on or after January 2, 2018, on which final income tax at a rate of 10% is payable pursuant to GR 34, which was implemented in January 2018.

Others — Net. Others — Net decreased by 70.8% to Rp.12,728 million (US$0.9 million) in the six months ended June 30, 2021 from Rp.43,646 million in the six months ended June 30, 2020 primarily due to an adjustment in the estimated amount of income tax due from the notice of tax assessment and tax penalties.

Profit before income tax. As a result of the foregoing, our profit before income tax increased by 18.5% to Rp.820,876 million (US$56.6 million) in the six months ended June 30, 2021 from Rp.692,897 million in the six months ended June 30, 2020.

Income tax benefits (expenses) — net. Our income tax expenses — net was Rp.131,040 million (US$9.0 million) in the six months ended June 30, 2021 as compared to income tax expenses – net of Rp.154,977 million in the six months ended June 30, 2020 primarily as a result of a decrease in the deferred tax expense, which was partially offset by an increase in current tax expense, in 2021.

Current tax expense. Our current tax expense increased by 7.4% to Rp.111,647 million (US$7.7 million) in the six months ended June 30, 2021 from Rp.103,950 million in the six months ended June 30, 2020, primarily due to an increase in fiscal gain in the Company's subsidiaries.

Deferred tax. Our deferred tax expense decreased by 62.0% to Rp.19,393 million (US$1.3 million) in the six months ended June 30, 2021 from Rp.51,027 million in the six months ended June 30, 2020, due to the reversal of deferred tax related to interest expense on the US$350.0 million 5.25% Senior Unsecured Notes due 2022 issued by TBG Global Pte. Ltd. on February 10, 2015 and guaranteed by the Company, which was prepaid in 2021.

Revaluation surplus (deficit). Our revaluation surplus (deficit) decreased by 117.0% to a deficit of Rp.59,289 million (US$4.1 million) in the six months ended June 30, 2021 from a surplus of Rp.349,141 million in the six months ended June 30, 2020, based on management calculation.

Changes in value of cash flow hedges. Our changes in value of cash flow hedges decreased by 64.2% to Rp.159,605 million (US$11.0 million) in the six months ended June 30, 2021 from Rp.445,851 million in the six months ended June 30, 2020, primarily due to the value our hedging counterparties attribute to our cash flow hedges.

Net profit attributable to equity holder of the parent company. As a result of the foregoing, our net profit attributable to equity holder of the parent company increased by 29.9% to Rp.663,267 million (US$45.8 million) in the six months ended June 30, 2021 from Rp.510,483 million in the six months ended June 30, 2020.

Net profit attributable to non-controlling interest. We recorded lower net profit attributable to non-controlling interest of Rp.26,569 million (US$1.8 million) in the six months ended June 30, 2021, as compared to Rp.27,437 million in the six months ended June 30, 2020, primarily due to increase in the Company's ownership in PT Tower Bersama.

Net profit for the period. As a result of the foregoing, our net profit for the period increased by 28.2% to Rp.689,836 million (US$47.6 million) in the six months ended June 30, 2021 from Rp.537,920 million in the six months ended June 30, 2020.

Year ended December 31, 2020 compared to year ended December 31, 2019

Revenue. Revenue increased by 13.4% to Rp.5,327,689 million in the year ended December 31, 2020 from Rp.4,698,742 million in the year ended December 31, 2019, primarily due to an increase of tenancies, which increased to 31,850 as of December 31, 2020 from 28,740 as of December 31, 2019. Our tenancy ratio increased to 1.96 as of December 31, 2020 from 1.85 as of December 31, 2019, as we improved the utilization of existing towers by adding more co-locations. Our total number of tower sites increased by 4.4% to 16,155 as of December 31, 2020 from 15,473 as of December 31, 2019.

Cost of revenue. Cost of revenue increased by 21.0% to Rp.1,093,065 million in the year ended December 31, 2020 from Rp.903,454 million in the year ended December 31, 2019. The components of our cost of revenue generally increased in line with the increase in our revenue across the same period other than the amortization of land lease and other expenses, for the reasons described below.

Amortization of land lease. Amortization of land lease decreased to nil in the year ended December 31, 2020 from Rp.294,071 million in the year ended December 31, 2019, primarily due to the implementation of PSAK 73, which resulted in the recognition of depreciation of right of use assets instead of amortization of land lease as previously presented.

Amortization of licenses. Amortization of licenses increased by 46.7% to Rp.31,104 million in the year ended December 31, 2020 from Rp.21,206 million in the year ended December 31, 2019, primarily due to an increase in the number of tower sites built and an increase in the licensing costs.

Depreciation of right of use assets. Depreciation of right of use assets increased to Rp.310,171 million in the year ended December 31, 2020 from nil in the year ended December 31, 2019 due to the implementation of PSAK 73.

Depreciation of towers. Depreciation of towers increased by 46.7% to Rp.406,836 million in the year ended December 31, 2020 from Rp.277,413 million in the year ended December 31, 2019, primarily due to an increase in the number of towers sites and tenancies and the views of the independent appraiser.

Repairs and maintenance. Repairs and maintenance expense increased by 19.5% to Rp.210,928 million in the year ended December 31, 2020 from Rp.176,484 million in the year ended December 31, 2019, primarily due to an increase in the number of our tenancies.

Security. Security expense increased by 3.4% to Rp.45,430 million in the year ended December 31, 2020 from Rp.43,931 million in the year ended December 31, 2019, primarily due to an increase in the number of tower sites.

Electricity. Electricity expense increased by 6.5% to Rp.28,008 million in the year ended December 31, 2020 from Rp.26,296 million in the year ended December 31, 2019, primarily due to an increase in number of sites requiring electricity connection.

Insurance. Insurance expense increased by 0.9% to Rp.25,884 million in the year ended December 31, 2020 from Rp.25,662 million in the year ended December 31, 2019, primarily due to an increase in the number of tenancy additions insured by the Company.

Depreciation of transportable towers. Depreciation of transportable towers decreased by 3.4% to Rp.16,289 million in the year ended December 31, 2020 from Rp.16,857 million in the year ended December 31, 2019, primarily due to depletion of the economic life of some of the transportable towers.

Others. Other expenses decreased by 14.5% to Rp.18,415 million in the year ended December 31, 2020 from Rp.21,534 million in the year ended December 31, 2019, primarily due to a decrease in site visit related expenses due to the COVID-19 pandemic.

Gross profit. As a result of the foregoing, our gross profit increased by 11.6% to Rp.4,234,624 million in the year ended December 31, 2020 from Rp.3,795,288 million in the year ended December 31, 2019.

Operating expenses. Operating expenses decreased by 1.8% to Rp.418,623 million in the year ended December 31, 2020 from Rp.426,434 million in the year ended December 31, 2019, primarily due to decrease in professional fees, travel duty, and others. Professional fees decreased by 34.9% to Rp.16,812 million in the year ended December 31, 2020 from Rp.25,840 million in the year ended December 31, 2019, primarily due to less professional work taken in 2020, travel duty decreased by 63.3% to Rp.3,555 million in the year ended December 31, 2020 from Rp.9,695 million in the year ended December 2019 due to a decrease in travel due to the COVID-19 pandemic, while other expenses decreased by 47.1% to Rp.9,181 million in the year ended December 31, 2020 from Rp.17,343 million in the year ended December 31, 2019 due to a decrease in face-to-face training and office events.

Income from operations. As a result of the foregoing, our income from operations increased by 13.3% to Rp.3,816,001 million in the year ended December 31, 2020 from Rp.3,368,854 million in the year ended December 31, 2019.

Other charges — Net. Our other charges — Net increased by 7.5% to Rp.2,306,547 million in the year ended December 31, 2020 compared to Rp.2,146,259 million in the year ended December 31, 2019.

Gain on foreign exchange — Net. Gain on foreign exchange — Net was Rp.37,452 million in the year ended December 31, 2020 compared to gain on foreign exchange — Net of Rp.8,966 million in the year ended December 31, 2019, primarily due to the weakening of the Rupiah in 2019 from Rp.13,901 per U.S. dollar at the end of 2019 to Rp.14,105 per U.S. dollar at the end of 2020.

Increase of fair value of investment properties. Increase of fair value of investment properties was Rp.34,778 million in the year ended December 31, 2020 compared to Rp.79,427 million in the year ended December 31, 2019 as a result of a decrease in fair value at the revaluation date calculated by the independent appraiser.

Interest income. Interest income increased by 42.4% to Rp.14,869 million in the year ended December 31, 2020 from Rp.10,440 million in the year ended December 31, 2019 as a result of having a higher average cash balance in 2020.

Decrease of fair value of telecommunication towers. The decrease of fair value of telecommunication towers amounted to Rp.4,584 million in the year ended December 31, 2020 as a result of independent appraisal calculations.

Impairment of goodwill. Impairment of goodwill decreased to nil in the year ended December 31, 2020 from Rp.47,421 million in the year ended December 31, 2019, as assessed by the independent appraiser.

Financial expenses — Long term loans and notes. Financial expenses — Long term loans and notes increased by 0.2% to Rp.1,943,161 million in the year ended December 31, 2020 from Rp.1,940,149 million in the year ended December 31, 2019, primarily due to higher average loan balance during 2020.

Financial expenses — Others. Financial expenses — Others increased by 149.3% to Rp.191,345 million in the year ended December 31, 2020 from Rp.76,761 million in the year ended December 31, 2018, primarily due to the costs related to interest expenses of right of use assets lease liabilities, because of the implementation of PSAK 73.

Final income tax. Final income tax increased by 91.3% to Rp.155,723 million in the year ended December 31, 2020 from Rp.81,394 million in the year ended December 31, 2019, primarily due to an increase in tower rental revenue from lease contracts beginning on or after January 2, 2018, on which final income tax at a rate of 10% is payable pursuant to GR 34.

Others — Net. Others — Net increased by 27.2% to Rp.75,023 million in the year ended December 31, 2020 from Rp.58,962 million in the year ended December 31, 2019 primarily due to an adjustment in the estimated amount of income tax due from previous years.

Profit before income tax. As a result of the foregoing, our profit before income tax increased by 23.5% to Rp.1,509,454 million in the year ended December 31, 2020 from Rp.1,222,595 million in the year ended December 31, 2019.

Income tax benefits (expenses) — net. Our income tax expenses — net was Rp.442,878 million in the year ended December 31, 2020 as compared to income tax expenses of Rp.356,474 million in the year ended December 31, 2019, primarily as a result of an increase in deferred tax expenses in 2020.

Current tax. Our current tax decreased to Rp.254,752 million in the year ended December 31, 2020 from Rp.261,448 million in the year ended December 31, 2019, primarily due to an increase in our revenue subject to final income tax in accordance with GR 34 and a lowering of the income tax rate in accordance with PP No. 30/2020.

Deferred tax. Our deferred tax expense increased to Rp.188,126 million in the year ended December 31, 2020 from a deferred tax expense of Rp.95,026 million in the year ended December 31, 2019, primarily due to the use of deferred tax assets originating from the previous period's fiscal tax losses.

Revaluation surplus (deficit). Our revaluation surplus (deficit) increased to a surplus of Rp.3,405,454 million in the year ended December 31, 2020 from to Rp.1,600,720 million in the year ended December 31, 2019, based on a 3rd party appraiser assessment.

Changes in value of cash flow hedges. Our changes in value of cash flow hedges increased to a loss of Rp.67,806 million in the year ended December 31, 2020 from a loss of Rp.80,275 million in the year ended December 31, 2019, based on the value our hedging counterparties attribute to our cash flow hedges.

Net profit attributable to equity holder of the parent company. As a result of the foregoing, our profit attributable to equity holder of the parent company increased by 23.2% to Rp.1,009,625 million in the year ended December 31, 2020 from Rp.819,454 million in the year ended December 31, 2019.

Net profit attributable to non-controlling interest. As a result of the foregoing, our profit attributable to non-controlling interest increased to Rp.56,951 million in the year ended December 31, 2020 from Rp.46,667 million in the year ended December 31, 2019.

Net profit for the period. As a result of the foregoing, our net profit for the period increased by 23.1% to Rp.1,066,576 million in the year ended December 31, 2020 from Rp.866,121 million in the year ended December 31, 2019.

Year ended December 31, 2019 compared to year ended December 31, 2018

Revenue. Revenue increased by 8.8% to Rp.4,698,742 million in the year ended December 31, 2019 from Rp.4,318,137 million in the year ended December 31, 2018, primarily due to an increase of tenancies, which increased to 28,740 as of December 31, 2019 from 25,518 as of December 31, 2018 and was off-set by a one-off discontinuation of tenancies from PT Internux at the end of December 2018. Our tenancy ratio increased to 1.85 as of December 31, 2019 from 1.69 as of December 31, 2018, as we improved the utilization of existing towers by adding more co-locations. In addition, the financial results of GHON and GOLD, which we acquired control over in the fourth quarter of 2018, are reflected in our consolidated financial information as of and for the year ended December 31, 2019.

Cost of revenue. Cost of revenue increased by 15.2% to Rp.903,454 million in the year ended December 31, 2019 from Rp.784,082 million in the year ended December 31, 2018 primarily due to the increase in the depreciation of towers, the increase in the amortization of land lease and the increase in electricity expense, repair and maintenance expense and other expenses, for the reasons described below.

Amortization of land lease. Amortization of land lease increased by 5.1% to Rp.294,071 million in the year ended December 31, 2019 from Rp.279,933 million in the year ended December 31, 2018, primarily due to an increase in the number of tower sites as well as from land lease renewals in 2019.

Amortization of licenses. Amortization of licenses decreased by 12.3% to Rp.21,206 million in the year ended December 31, 2019 from Rp.24,175 million in the year ended December 31, 2018, primarily due to an increase in the number of towers.

Depreciation of towers. Depreciation of towers increased by 29.3% to Rp.277,413 million in the year ended December 31, 2019 from Rp.214,588 million in the year ended December 31, 2018, primarily due to an increase in the number of towers sites and tenancies and the views of the independent appraiser.

Repairs and maintenance. Repairs and maintenance expense increased by 14.4% to Rp.176,484 million in the year ended December 31, 2019 from Rp.154,240 million in the year ended December 31, 2018, primarily due to an increase in the number of our tenancies.

Security. Security expense increased by 6.4% to Rp.43,931 million in the year ended December 31, 2019 from Rp.41,292 million in the year ended December 31, 2018, primarily due to an increase in the number of tower sites.

Electricity. Electricity expense increased by 77.9% to Rp.26,296 million in the year ended December 31, 2019 from Rp.14,785 million in the year ended December 31, 2018, primarily due to an increase in number of sites requiring electricity connection.

Insurance. Insurance expense increased by 2.3% to Rp.25,662 million in the year ended December 31, 2019 from Rp.25,073 million in the year ended December 31, 2018, primarily due to an increase in the number of tenancy additions insured by the Company.

Depreciation of transportable towers. Depreciation of transportable towers increased by 5.5% to Rp.16,857 million in the year ended December 31, 2019 from Rp.15,971 million in the year ended December 31, 2018, primarily due to an increase in the number of transportable towers.

Others. Other expenses increased by 53.5% to Rp.21,534 million in the year ended December 31, 2019 from Rp.14,025 million in the year ended December 31, 2018, primarily due to an increase in land and building tax expense payments in 2019.

Gross profit. As a result of the foregoing, our gross profit increased by 7.4% to Rp.3,795,288 million in the year ended December 31, 2019 from Rp.3,534,055 million in the year ended December 31, 2018.

Operating expenses. Operating expenses increased by 11.8% to Rp.426,434 million in the year ended December 31, 2019 from Rp.381,463 million in the year ended December 31, 2018, primarily due to increase in salaries, wages and allowances. Salaries, wages and allowances increased by 18.3%

to Rp.261,345 million in the year ended December 31, 2019 from Rp.220,922 million in the year ended December 31, 2018, primarily due to additional personnel that we hired and existing personnel from acquired companies.

Income from operations. As a result of the foregoing, our income from operations increased by 6.9% to Rp.3,368,854 million in the year ended December 31, 2019 from Rp.3,152,592 million in the year ended December 31, 2018.

Other charges — Net. Our other charges — Net increased by 0.5% to Rp.2,146,259 million in the year ended December 31, 2019 compared to Rp.2,135,617 million in the year ended December 31, 2018.

Gain on foreign exchange — Net. Gain on foreign exchange — Net was Rp.8,966 million in the year ended December 31, 2019 compared to gain on foreign exchange — net of Rp.2,221 million in the year ended December 31, 2018, primarily due to the strengthening of the Rupiah in 2019 from Rp.14,481 per U.S. dollar at the end of 2018 to Rp.13,901 per U.S. dollar at the end of 2019.

Increase of fair value of investment properties. Increase of fair value of investment properties was Rp.79,427 million in the year ended December 31, 2019 compared to Rp.7,728 million in the year ended December 31, 2018 as a result of an increase in fair value at the revaluation date calculated by the independent appraiser.

Interest income. Interest income increased by 23.8% to Rp.10,440 million in the year ended December 31, 2019 from Rp.8,431 million in the year ended December 31, 2018 as a result of having a higher average cash balance in 2019.

Decrease of fair value of telecommunication towers. The decrease of fair value of telecommunication towers amounted to Rp.40,405 million in the year ended December 31, 2019 as a result of independent appraisal calculations.

Impairment of goodwill. Impairment of goodwill increased by 201.6% to Rp.47,421 million in the year ended December 31, 2019 from Rp.15,722 million in the year ended December 31, 2018, as assessed by the independent appraiser.

Financial expenses — Long term loans and notes. Financial expenses — Long term loans and notes decreased by 3.2% to Rp.1,940,149 million in the year ended December 31, 2019 from Rp.2,003,573 million in the year ended December 31, 2018, primarily due to lower average loan balance during 2019.

Financial expenses — Others. Financial expenses — Others increased by 12.8% to Rp.76,761 million in the year ended December 31, 2019 from Rp.68,024 million in the year ended December 31, 2018, primarily due to the costs related to the refinancing of all outstanding indebtedness under Facility A and replacement of an existing financing with a US$375.0 million revolving loan facility.

Final income tax. Final income tax increased by 370.2% to Rp.81,394 million in the year ended December 31, 2019 from Rp.17,310 million in the year ended December 31, 2018, primarily due to an increase in tower rental revenue from lease contracts beginning on or after January 2, 2018, on which final income tax at a rate of 10% is payable pursuant to GR 34.

Others — Net. Others — Net increased by 19.4% to Rp.58,962 million in the year ended December 31, 2019 from Rp.49,368 million in the year ended December 31, 2018 due to the recognition of gain on the GOLD shares we acquired in 2018.

Profit before income tax. As a result of the foregoing, our profit before income tax increased by 20.2% to Rp.1,222,595 million in the year ended December 31, 2019 from Rp.1,016,975 million in the year ended December 31, 2018.

Income tax benefits (expenses) — net. Our income tax expenses — net was Rp.356,474 million in the year ended December 31, 2019 as compared to income tax expenses of Rp.314,343 million in the year ended December 31, 2018, as a result of higher taxable income in 2019.

Current tax. Our current tax increased to Rp.261,448 million in the year ended December 31, 2019 from Rp.187,395 million in the year ended December 31, 2018, primarily due to higher taxable income in 2019.

Deferred tax. Our deferred tax expense decreased to Rp.95,026 million in the year ended December 31, 2019 from a deferred tax expense of Rp.126,948 million in the year ended December 31, 2018, primarily due to the introduction of GR 34.

Revaluation surplus (deficit). Our revaluation surplus (deficit) increased to a surplus of Rp.1,600,720 million in the year ended December 31, 2019 from to Rp.83,074 million in the year ended December 31, 2018, primarily due to an increase in tenancies.

Changes in value of cash flow hedges. Our changes in value of cash flow hedges decreased to a loss of Rp.80,275 million in the year ended December 31, 2019 from a gain of Rp.963,650 million in the year ended December 31, 2018, primarily due to decreased volatility in the relevant exchange rates in 2019 compared to 2018.

Net profit attributable to equity holder of the parent company. As a result of the foregoing, our profit attributable to equity holder of the parent company increased by 20.4% to Rp.819,454 million in the year ended December 31, 2019 from Rp.680,581 million in the year ended December 31, 2018.

Net profit attributable to non-controlling interest. As a result of the foregoing, our profit attributable to non-controlling interest increased to Rp.46,667 million in the year ended December 31, 2019 from Rp.22,051 million in the year ended December 31, 2018.

Net profit for the period. As a result of the foregoing, our net profit for the period increased by 23.3% to Rp.866,121 million in the year ended December 31, 2019 from Rp.702,632 million in the year ended December 31, 2018.

Recent Accounting Pronouncements

The Indonesian FAS includes the Statements of Finance Accounting Standards ("PSAK") and the Interpretations of Financial Accounting Standards ("ISAK") issued by the Financial Accounting Standards Board, Institute of Accountants in Indonesia. The new standards, amendments, improvements and interpretations issued and effective for the financial year beginning on January 1,

2021, but do not have a substantial impact on our accounting policies and the material effects on the financial statements, are as follows:

- Amendment to PSAK 55, Amendment to PSAK 60, Amendment to PSAK 62, Amendment to PSAK 71 and Amendment to PSAK 73: Interest Rate Reference Reform Phase 2

  The reform of the interest rate reference refers to the global reform which is intended to replace IBOR with an alternative interest rate reference. The accounting issues arising from the replacement of IBOR are divided into two stages, namely:

  - Stage 1 (pre-replacement issues)

  This is an issue of uncertainty that arises before the transition period that affects financial reporting in the period prior to the change of the interest rate reference.

  - Stage 2 (replacement issues)

  This discusses the issues that may affect financial reporting during the interest rate benchmark reform, including the impact of changes in contractual cash flows or hedging relationships arising from replacing the interest rate benchmark with a new alternative benchmark. This amendment changes the requirements in PSAK 71 "Financial Instruments", PSAK 55 "Financial Instruments: Recognition and Measurement", PSAK 60 "Financial Instruments: Disclosures", PSAK 62 "Insurance Contracts" and PSAK 73 "Leases relating to changes in the basis for determining contractual cash flows from financial assets, financial liabilities and lease liabilities, hedge accounting, and disclosures."

- Amendments to PSAK 22 "Business Combinations"

  This amendment clarifies the definition of business for the purpose of assisting the entity in determining whether a transaction should be accounted for as a business combination or an asset acquisition. In general, the amendments to PSAK 22:

  a. amend the definition of "business";

  b. add an optional concentration test that allows a simplified assessment of whether the acquired set of activities and assets is not a business;

  c. clarify the business element that to be considered as a business, an integrated set of activities and assets acquired includes, as a minimum, substantive inputs and processes that together contribute significantly to the ability to produce outputs; and

  d. provide illustrative guidance and examples to help the entity assess whether substantive processes have been acquired.

There are a number of standards and interpretations that have been issued by the Financial Accounting Standards Board — IAI that are effective in future accounting periods and that we have decided not to adopt early on.

The new standards, interpretations and amendments that are not yet effective include:

- Amendment of PSAK 1 "Presentation of financial statement"

  The amendment clarifies that liabilities can be classified as current liabilities or non-current liabilities, depending on the rights of the liabilities that exist at the end of the relevant reporting period. Such classification is unaffected by the expectations of the entity or events after the relevant reporting date, such as the receipt of a waver or a breach of covenant. The amendments also clarify what PSAK 1 means when it refers to the 'settlement' of a liability.

  The amendments could affect the classification of liabilities, particularly for entities that previously considered management's intentions to determine classification and for some liabilities that can be converted into equity. These clarifications must be applied retrospectively in accordance with the requirements in PSAK 25 "Accounting Policies, Changes in Accounting Estimates and Errors." The amendment of PSAK 1 will take effect on January 1, 2023 and earlier application is permitted.

- Amendments to PSAK 57 "Provisions, Contingent Liabilities, and Contingent Assets on Losing Contracts — Cost of Fulfilling Contracts"

  This amendment clarifies the cost of fulfilling a contract in relation to determining whether a contract is a burdensome contract. This amendment stipulates that the costs to fulfill the contract consist of costs directly related to the contract. The costs directly related to the contract consist of the incremental costs to fulfill the contract, and the allocation of other costs directly related to fulfilling the contract.

- PSAK 74 "Insurance contract"

  The PSAK 74 "Insurance Contract" has included the relaxation of several provisions as stipulated in the Amendments to IFRS 17 Insurance Contract, which, among others, provides additional scope exceptions, adjustments to the presentation of financial statements, implementation of risk mitigation options and some modifications to transitional provisions.

  The application of PSAK 74 "Insurance Contracts" will make the financial statements of insurance companies comparable with other industries such as banking and other financial service companies, because the current PSAK 62 "Insurance Contracts" (adoption of IFRS 4) still allows for varied reporting in each jurisdiction or country. In addition, PSAK 74 also requires a clear separation between income generated from the insurance business and income from investment activities so that all stakeholders from financial statements, including policy holders and investors, obtain transparent information on the financial statements of companies that have contracts. insurance for insurance protection products with investment features.

- Adjustment of PSAK 69 "Agriculture"

  PSAK 69 (Adjustment 2020) clarifies the recognition and measurement in paragraph 22, which previously was stated as "entities do not take into account cash flows for financing assets, taxation or regrowth of biological assets after harvest", to "entities do not take into account cash flows for financing assets or regrowth biological assets. after harvest."

- Adjustment of PSAK 71 "Financial Instruments"

  PSAK 71 (2020 Adjustment) clarifies that the fee or compensation recognized by the borrower in relation to derecognition of a financial liability (Section 3.3) in Paragraph B3.3.6. In determining the fee or reward paid after deducting the fee or reward received, the borrower only includes the fee or reward paid or received between the borrower and the lender, including the fees or reward paid or received by either the borrower or lender on behalf of the lender or other parties.

- Adjustment of PSAK 73 "Lease"

  PSAK 73 (Adjustment 2020) clarifies the measurement by lessee and recording of changes in the lease term related to "repair of leased property."

Liquidity and Capital Resources

We have principally used our cash for the expansion of our site portfolio by construction of new sites and acquisition of tower companies and/or their site portfolios, and the addition of co-locations. Our main source of liquidity has been cash received from our customers, and bank and bond borrowings. We currently rely on cash generated from operations and debt financing to fund our operations, construction of new sites and acquisitions of tower companies and/or their site portfolios.

We believe that after taking into account the use of proceeds from this offering, the expected cash to be generated from operations and the financial resources currently available to us, we have sufficient liquidity for our present and anticipated working capital needs, our debt service obligations, and for other cash requirements, for the 12 months following the date of this offering circular.

Consolidated Statements of Cash Flows Data

	Year Ended December 31,				Six Months Ended June 30,		
	2018	2019	2020	2020	2020	2021	2021[1]
				(unaudited) (US$ in millions)	(unaudited)	(unaudited)	(unaudited) (US$ in millions)
	(Rp. in millions)				(Rp. in millions)		
Cash flows from operating activities:							
Cash received from customers	4,319,731	4,822,066	5,329,911	367.7	2,959,502	4,332,878	298.2
Interest received from current accounts and deposits	8,431	12,324	14,869	1.0	6,108	8,231	0.6
Payments of income tax	(190,563)	(272,610)	(497,775)	(34.3)	(180,818)	(623,754)	(43.0)
Cash paid to employees	(228,894)	(247,353)	(200,305)	(13.8)	(146,660)	(169,176)	(11.7)
Cash paid to suppliers	(668,753)	(623,010)	(860,243)	(59.3)	(303,264)	(555,785)	(38.3)
Net cash flows provided by operating activities	**3,239,952**	**3,691,417**	**3,786,457**	**261.2**	**2,334,868**	**2,982,394**	**205.7**
Cash flows from investing activities:							
Sale proceeds of property and equipment	18,647	—	—	—	—	—	—
Sale of investment in shares	1,817	—	—	—	—	—	—
Purchase of shares	(371,511)	—	—	—	—	(170,000)	(11.7)
Payments for land lease	(390,377)	(345,684)	—	—	—	—	—
Acquisition of investment properties	(5,190)	(5,151)	(87,056)	(6.0)	(38,085)	(3,991)	(0.3)

	Year Ended December 31,				Six Months Ended June 30,		
	2018	2019	2020	2020	2020	2021	2021[1]
				(unaudited) (US$ in millions)	(unaudited)	(unaudited)	(unaudited) (US$ in millions)
	(Rp. in millions)				(Rp. in millions)		
Acquisition of right of use assets	—	—	(610,007)	(42.1)	(222,580)	(734,335)	(50.7)
Acquisition of property and equipment	(1,458,245)	(1,688,650)	(1,354,824)	(93.5)	(1,016,446)	(4,425,185)	(305.3)
Net cash flows used in investing activities	**(2,204,859)**	**(2,039,485)**	**(2,051,887)**	**(141.5)**	**(1,277,111)**	**(5,333,511)**	**(367.9)**
Cash flows from financing activities:							
Receipt from long-term loans	3,887,051	10,512,614	5,911,224	407.8	3,804,406	16,158,498	1,114.7
Receipt from settlement of derivatives	1,014,857	452,727	439,625	30.3	439,625	343,283	23.7
Issuance of notes	1,236,000	750,000	7,728,900	533.2	6,278,900	8,109,000	559.4
Share repurchase	(4,995)	—	—	—	—	—	—
Payments of finance lease	(4,839)	(6,272)	—	—	—	—	—
Payments of lease liabilities — vehicles	—	—	(8,445)	(0.6)	(3,783)	(2,938)	(0.2)
Payment of lease liabilities — right of use assets	—	—	(22,199)	(1.5)	(6,915)	(22,967)	(1.6)
Treasury stock	(517,761)	(42,889)	—	—	—	—	—
Dividend payment	(760,910)	(600,000)	(605,670)	(41.8)	(605,670)	(692,194)	(47.8)
Payments of interest and cost of borrowing for long-term loans and notes	(1,983,036)	(2,105,771)	(1,775,421)	(122.5)	(946,167)	(1,182,358)	(81.6)
Payments of long-term loans and notes	(4,095,560)	(10,322,752)	(12,973,527)	(895.0)	(9,784,024)	(20,629,668)	(1,423.1)
Proceeds from the issuance of new shares — subsidiaries	—	32,580	—	—	—	—	—
Payments of fees related to the issuance of new shares — subsidiaries	—	(1,940)	—	—	—	—	—
Dividend payment — subsidiaries	—	(9,197)	(11,055)	(0.8)	(5,602)	(14,245)	(1.0)
Receipt from related party	—	1,200	—	—	—	—	—
Receipt from third party	—	—	—	—	—	221,425	15.3
Net cash flows provided by (used in) financing activities	**(1,229,193)**	**(1,339,700)**	**(1,316,568)**	**(90.8)**	**(829,230)**	**2,287,836**	**157.8**
Effects from changes in foreign exchange rates on cash and cash equivalents	**7,242**	**(7,576)**	**4,097**	**0.3**	**8,054**	**10,387**	**0.7**
Net increase (decrease) on cash and cash equivalent	**(186,858)**	**304,656**	**422,099**	**29.1**	**236,581**	**(52,894)**	**(3.6)**
Cash and cash equivalents at the beginning of period	**407,444**	**220,586**	**525,242**	**36.2**	**525,242**	**947,341**	**65.4**
Cash and cash equivalents at end of period	**220,586**	**525,242**	**947,341**	**65.4**	**761,823**	**894,447**	**61.7**

Note:

(1) Converted into U.S. dollars based on the exchange rate of Rp.14,496 = US$1.00 on June 30, 2021 for the convenience of the reader as described under "Presentation of Financial Information."

Net Cash Provided by Operating Activities

Net cash provided by operating activities consists of cash received from our customers, cash paid to suppliers, cash paid to employees and cash inflows and outflows reflecting receipts, payments of interest received from current accounts and deposits and income tax and payments of tax arising from assets revaluation.

In the six months ended June 30, 2021, cash received from customers totaled Rp.4,322,878 million, cash paid to suppliers totaled Rp.555,785 million, cash paid to employees totaled Rp.169,176 million and payments of income tax totaled Rp.623,754 million. After taking into account net cash from interest received from current accounts and deposits, our net cash provided by operating activities amounted to Rp.2,982,394 million in the six months ended June 30, 2021.

In 2020, cash received from customers totaled Rp.5,329,911 million, cash paid to suppliers totaled Rp.860,243 million, cash paid to employees totaled Rp.200,305 million and payments of income tax totaled Rp.497,775 million. After taking into account net cash from interest received from current accounts and deposits, our net cash flows provided by operating activities amounted to Rp.3,786,457 million in 2020.

In 2019, cash received from customers totaled Rp.4,822,066 million, cash paid to suppliers totaled Rp.623,010 million, cash paid to employees totaled Rp 247,353 million and payments of income tax totaled Rp.272,610 million. After taking into account net cash from interest received from current accounts and deposits, our net cash flows provided by operating activities amounted to Rp.3,691,417 million in 2019.

In 2018, cash received from customers totaled Rp.4,319,731 million, cash paid to suppliers totaled Rp.668,753 million, cash paid to employees totaled Rp.228,894 million and payments of income tax totaled Rp.190,563 million. After taking into account net cash from interest received from current accounts and deposits, our net cash flows provided by operating activities amounted to Rp.3,239,952 million in 2018.

Net Cash Used in Investing Activities

Net cash used in investing activities consists primarily of cash received from the sale of property and equipment and the sale of investment in shares, and cash paid in purchase shares, the payments for land lease, our acquisition of investment properties, acquisition of right of use assets and acquisition of property and equipment.

Our net cash flows used in investing activities was Rp.5,333,511 million in the six months ended June 30, 2021, primarily consisting of our acquisition of property and equipment of Rp.4,425,185 million, our acquisition of right of use assets of Rp.734,335 million and our purchase of shares of Rp.170,000 million.

In 2020, our net cash flows used in investing activities was Rp.2,051,887 million, primarily consisting of cash paid in our acquisition of investment properties of Rp.87,056 million, the payments for land lease of Rp.610,007 million and our acquisition of property and equipment of Rp.1,354,824 million.

In 2019, our net cash flows used in investing activities was Rp.2,039,485 million, primarily consisting of cash paid in our acquisition of investment properties of Rp.5,151 million, the payments for land lease of Rp.345,684 million and our acquisition of property and equipment of Rp.1,688,650 million.

In 2018, our net cash flows used in investing activities was Rp.2,204,859 million, primarily consisting of cash received from the sale proceeds of property and equipment of Rp.18,647 million and the sale of investment in shares of Rp.1,817 million, offset by cash paid in purchase of shares of Rp.371,511 million relating to our acquisition of controlling stakes in two listed tower companies, GHON and GOLD, the payments for land lease of Rp.390,377 million, our acquisition of investment properties of Rp.5,190 million and our acquisition of property and equipment of Rp.1,458,245 million.

Net Cash from Financing Activities

Net cash from financing activities consists primarily of cash flows from receipts from long-term loans, receipt from settlement of derivatives, issuance of notes, and cash paid for share repurchase, payments of finance lease, payments of lease liabilities — vehicles, payments of lease liabilities — right of use assets, purchase of treasury stock, dividend payments, payments of interest and cost of borrowing for long-term loans and notes, and payments of long-term loans and notes.

Our net cash flows provided by financing activities was Rp.2,287,836 million in the six months ended June 30, 2021, primarily consisting of receipt from long term loans of Rp.16,158,498 million, issuance of notes of Rp.8,109,000 million, receipt from settlement of derivatives of Rp.343,283 million, and receipt from third party of Rp.221,425 million, which are partially offset by dividend payment by subsidiaries of Rp.14,245 million, the payment of lease liabilities — vehicles of Rp.2,938 million, the payments of lease liabilities — right of use assets of Rp.22,967 million, the payments of dividend of Rp.692,194 million, the payments of interest and cost of borrowing for long-term loans and notes of Rp.1,182,358 million, and the payments of long-term loans and notes of Rp.20,629,668 million.

In 2020, our net cash flows used in financing activities was Rp.1,316,568 million, primarily consisting of payments of dividends of Rp.605,670 million, the payments of interest and cost of borrowing for long-term loans and notes of Rp.1,775,421 million, the payments of long-term loans and notes of Rp.12,973,527 million, payment of lease liabilities — right of use assets of Rp.22,199 million, payments of lease liabilities — vehicles of Rp.8,445 million and the dividend payment — subsidiaries of Rp.11,055 million, partially offset by receipt from long-term loans of Rp.5,911,224 million and receipt from settlement of derivatives of Rp.439,625 million, issuance of notes of Rp.7,728,900 million.

In 2019, our net cash flows used in financing activities was Rp.1,339,700 million, primarily consisting of payments of finance lease of Rp.6,272 million, the purchases of treasury stock of Rp.42,889 million, the payments of dividends of Rp.600,000 million, the payments of interest and cost of borrowing for long-term loans and notes of Rp.2,105,771 million, the payments of long-term loans and notes of Rp.10,322,752 million, and the payment of fees related to the issuance of new shares — subsidiaries of Rp.1,940 million, partially offset by receipt from long-term loans of Rp.10,512,614 million, receipt from settlement of derivatives of Rp.452,727 million, issuance of notes of Rp.750,000 million, proceeds from the issuance of new shares — subsidiaries of Rp.32,580 million, and the receipt from related party of Rp.1,200 million,.

In 2018, our net cash flows used in financing activities was Rp.1,229,193 million, primarily consisting of share repurchase of Rp.4,995 million, the payments of finance lease of Rp.4,839 million, the purchases of treasury stock of Rp.517,761 million, the payments of dividends of Rp.760,910 million, the payments of interest and cost of borrowing for long-term loans and notes of Rp.1,983,036 million, and the payments of long-term loans and notes of Rp.4,095,560 million, partially offset by receipt from long-term loans of Rp.3,887,051 million, receipt from settlement of derivatives of Rp.1,014,857 million, and issuance of notes of Rp.1,236,000 million.

Capital Expenditures

Historically, we have funded our capital expenditures through a combination of cash from operations and long-term and short-term debt financing. We include as capital expenditures our acquisition of investment properties, acquisition of property and equipment, acquisition of right of use assets, purchase of shares and payments of land leases. We include the cost of these items on our balance sheet upon completion of construction or acquisition. The following table summarizes our historical capital expenditures relating to our acquisition of property and equipment, investment properties, right of use assets, purchase of shares and payments for land leases, for the periods indicated:

	Year Ended December 31,				Six months ended June 30,		
	2018	2019	2020	2020	2020	2021	2021[1]
					(unaudited)	(unaudited)	(unaudited)
		(Rp. in millions)		(US$ in millions)	(Rp. in millions)		(US$ in millions)
Acquisition of investment properties	(5,190)	(5,151)	(87,056)	(6.0)	(38,085)	(3,991)	(0.3)
Acquisition of property and equipment	(1,458,245)	(1,688,650)	(1,354,824)	(93.5)	(1,016,446)	(4,425,185)	(305.3)
Purchase of shares	(371,511)	—	—	—	—	(170,000)	(11.7)
Acquisition of right of use assets	—	—	(610,007)	(42.1)	(222,580)	(734,335)	(50.7)
Payments for land lease	(390,377)	(345,684)	—	—	—	—	—
Total	**(2,225,323)**	**(2,039,485)**	**(2,051,887)**	**(141.5)**	**(1,277,111)**	**(5,333,511)**	**(367.9)**

Note:

(1) Converted into U.S. dollars based on the exchange rate of Rp.14,496 = US$1.00 on June 30, 2021 for the convenience of the reader as described under "Presentation of Financial Information."

Off-Balance Sheet Arrangements

We do not have any off-balance sheet arrangements.

Indebtedness

Our gross debt was Rp.28,790 billion (US$1,986 million) as of June 30, 2021. It consisted of aggregate principal indebtedness of Rp.11,822,938 million (US$815.6 million) in U.S. dollar-denominated long-term loans, Rp.9,422,400 million (US$650.0 million) in U.S. dollar-denominated bonds, Rp.91,700 million (US$6.3 million) in Rupiah-denominated long-term loans, Rp.6,810,000 million (US$469.8 million) in Rupiah-denominated bonds, Rp.14,151 million (US$1.0 million) in lease liabilities — vehicles and Rp.629,106 million (US$43.4 million) in lease liabilities — right of use assets. Our gross debt (excluding lease liabilities — right of use assets) was Rp.28,161 billion (US$2.0 billion) as of June 30, 2021. See Notes 22 and 23 to our unaudited interim consolidated financial statements as of June 30, 2021 and for the six months ended June 30, 2020 and 2021 and "Description of Material Indebtedness," for further details of our outstanding and historical debt.

Our gross debt after taking into account our hedging arrangements was Rp.27,440 billion (US$1.9 billion) as of June 30, 2021. It consisted of Rp.11,356,573 million (US$783.4 million) in syndication loans, Rp.91,700 million (US$6.3 million) in non-syndication loans, Rp.15,348,263 million (US$1,058.8 million) in notes, and Rp.14,151 million (US$1.0 million) in lease liabilities — vehicles

and Rp.629,106 million (US$43.4 million) in lease liabilities – right of use assets. Our gross debt after taking into account our hedging arrangements (excluding lease liabilities – right of use assets) was Rp.26,811 billion (US$1.8 billion) as of June 30, 2021. See Note 40 to our unaudited interim consolidated financial statements as of June 30, 2021 and for the six months ended June 30, 2020 and 2021 and "— Market Risk Disclosures" for further details of our financial risk management.

Our total cash and cash equivalents in banks as of June 30, 2021 was Rp.894,447 million (US$61.7 million).

The following table sets out certain details relating to our long-term borrowings (other than finance leases) as of June 30, 2021:

Facility/Bonds	Borrowings (before deducting unamortized borrowing costs) Outstanding as of June 30, 2021	Committed / Uncommitted and Undrawn Amount as of June 30, 2021	Interest Rate Per Annum	Maturity
	(Rp. and US$ in millions, unless otherwise stated)			
US$375.0 million Revolving Loan Facility[1]	US$334.0 (Rp.4,841,664)	US$41.0 (Rp.594,336)	LIBOR plus 1.75% (for offshore lenders) or 1.85% (for onshore lenders)	January 2025
Facility B under the Credit Facilities (revolving loan facility)[1]	US$95.0 (Rp.1,377,120)	US$5.0 (Rp.72,480)	LIBOR plus 1.75% (for offshore lenders) or 1.85% (for onshore lenders)	June 2022
US$275.0 million Revolving Loan Facility[1]	US$275.0 (Rp.3,986,400)	—	LIBOR plus 1.75% (for offshore lenders) or 1.85% (for onshore lenders)	June 2026
US$200.0 million Revolving Loan Facility[1]	US$111.6 (Rp.1,617,754)	US$88.4 (Rp.1,281,446)	LIBOR plus 1.75% (for offshore lenders) or 2.00% (for onshore lenders)	June 2022
US$350.0 million 4.25% Senior Unsecured Notes due 2025 issued by the Company[1]	US$350.0 (Rp.5,073,600)	—	4.25%	January 2025
US$300.0 million 2.75% Senior Unsecured Notes due 2026 issued by the Company[1]	US$300.0 (Rp.4,348,800)	—	2.75%	January 2026
Rp.150,000 million[2] revolving credit facility with PT Bank UOB Indonesia, consisting of: (i) Rp.100,000 million uncommitted revolving credit facility ("RCF 1"); and (ii) Rp.50,000 million committed revolving credit facility ("RCF 2")	RCF 1: Rp.9,000 RCF 2: Rp.37,700	RCF 1: Rp.91,000 (uncommitted) RCF 2: 12,300	For RCF 1: JIBOR plus 1.75% (if total debt to EBITDA ratio is less than 3 times) and JIBOR plus 2.25% (if total debt to EBITDA ratio is 3 times or more) For RCF 2: JIBOR plus 2.50% (if total debt to EBITDA ratio is less than 3 times) and JIBOR plus 3.00% (if total debt to EBITDA ratio is 3 times or more)	For RCF 1: October 2021 For RCF 2: January 2023

Facility/Bonds	Borrowings (before deducting unamortized borrowing costs) Outstanding as of June 30, 2021	Committed / Uncommitted and Undrawn Amount as of June 30, 2021	Interest Rate Per Annum	Maturity
	(Rp. and US$ in millions, unless otherwise stated)			
Rp.50,000 million[3] term loan facility with PT Bank QNB Indonesia Tbk	Rp.45,000	Rp.5,000	JIBOR plus 2.75%	December 2025
Continuous Bonds III Phase I[4]	Rp.608,000	—	8.50%	July 2021
Series B of the Continuous Bonds III Phase IV[5], in an aggregate amount of Rp.867,000 million	Rp.867,000	—	7.75%	March 2023
Continuous Bonds IV Phase I[6], consisting of: (i) Series A bonds in an aggregate amount of Rp.231,000 million; and (ii) Series B bonds in an aggregate amount of Rp.469,000 million	Rp.700,000	—	For Series A: 6.30% For Series B: 8.00%	September 2021 September 2023
Continuous Bonds IV Phase II[7], consisting of: (i) Series A bonds in an aggregate amount of Rp.295,000 million; and (ii) Series B bonds in an aggregate amount of Rp.455,000 million	Rp.750,000	—	For Series A: 5.75% For Series B: 7.25%	December 2021 December 2023
Continuous Bonds IV Phase III[8], consisting of: (i) Series A bonds in an aggregate amount of Rp.1,898,000 million; and (ii) Series B bonds in an aggregate amount of Rp.1,017,000 million	Rp.2,915,000	—	For Series A: 5.50% For Series B: 6.75%	February 2022 February 2024
Continuous Bonds IV Phase IV[9]	Rp.970,000	—	5.50%	April 2022

Notes:

(1) Converted into Rupiah based on the exchange rate of Rp.14,496 = US$1.00 on June 30, 2021 for the convenience of the reader as described under "Presentation of Financial Information."

(2) Equivalent to US$3.2 million based on an exchange rate of Rp.14,496 = US$1.00 on June 30, 2021.

(3) Equivalent to US$3.1 million based on an exchange rate of Rp.14,496 = US$1.00 on June 30, 2021.

(4) Equivalent to US$41.9 million based on an exchange rate of Rp.14,496 = US$1.00 on June 30, 2021. The Continuous Bonds III Phase I matured on July 5, 2021 and were fully repaid by the Company.

(5) Equivalent to US$59.8 million based on an exchange rate of Rp.14,496 = US$1.00 on June 30, 2021. Series A of the Continuous Bonds III Phase IV matured on April 4, 2021 and were fully repaid by the Company.

(6) Equivalent to US$48.3 million based on an exchange rate of Rp.14,496 = US$1.00 on June 30, 2021.

(7) Equivalent to US$51.7 million based on an exchange rate of Rp.14,496 = US$1.00 on June 30, 2021.

(8) Equivalent to US$201.1 million based on an exchange rate of Rp.14,496 = US$1.00 on June 30, 2021.

(9) Equivalent to US$66.9 million based on an exchange rate of Rp.14,496 = US$1.00 on June 30, 2021.

Contractual Obligations

The following table sets forth our contractual obligations to make future principal payments (excluding interest charges but before deducting unamortized costs) of the Company's financial liabilities as of December 31, 2020:

	Expected cash payments due by period				
	Total	Less than 1 year	1-3 years	3-5 years	More than 5 years
			(Rp. in millions)		
Contractual Obligations					
2017 RLF, 2018 RCF, 2019 RLF, 2020 TLF, 2021 RLF and Credit Facilities[1]	10,400,265	3,910,975	2,369,220	4,120,070	—
Existing USD Notes and IDR Bonds[1]	13,661,500	6,933,750	1,791,000	4,936,750	—
Finance leases	21,101	6,954	11,188	2,959	—
Total	**24,082,866**	**10,851,679**	**4,171,408**	**9,059,779**	**—**
Less:					
Future financing charges of finance lease	5,019	2,313	2,448	258	—
Total Contractual obligations excluding future financing charges of finance lease	**24,077,847**	**10,849,366**	**4,168,960**	**9,059,521**	**—**

Note:

(1) Does not include interest payable.

Under the provisions of the Indosat Asset Purchase Agreement dated February 7, 2012, entered into by and among the Company, PT Solusi Menara Indonesia (SMI) and Indosat, relating to our acquisition of 2,500 towers from Indosat, if our co-location revenues exceed a stated target in any year ending on or prior to December 31, 2022, we are required to pay an earn-out amount to Indosat. The maximum aggregate earn-out amount payable is US$112.5 million. As of the date of this offering circular, we have paid a total of US$18.8 million to Indosat under the earn-out. The above table does not reflect such future contingent payments.

Market Risk Disclosures

Our major market risk exposures include, among other things, changes in interest rates and currency exchange rates. See Note 43 to our consolidated financial statements as of and for the year ended December 31, 2018, 2019 and 2020 and Note 40 to our unaudited interim consolidated financial statements as of June 30, 2021 and for the six months ended June 30, 2020 and 2021 included elsewhere in this offering circular for further details.

Interest Rate Risk

We are exposed to interest rate risk through the impact rate changes on our interest-bearing liabilities. The interest rates for our borrowings can fluctuate over our borrowing period. The treasury

policy sets the guideline that the interest rate exposure shall be identified and minimized or neutralized promptly (as relevant). To measure market risk of interest rate fluctuation, we primarily use interest margin and spread analysis, and enter into interest rate swap contracts to hedge the foreign currency interest loans from interest rate uncertainty from time to time.

Foreign Currency Risk

Our foreign currency denominated liabilities as of June 30, 2021 comprised mainly borrowings denominated in U.S. dollars under our long-term loans and the bonds we had issued. Our revenue is principally denominated in Rupiah, and we are exposed to fluctuations in foreign exchange rates resulting mainly from our debt denominated in U.S. dollars. We hedge a portion of our foreign currency exposure principally because the receipts of our annual U.S. dollar operating revenue were less than the sum of payments of our U.S. dollar capital expenditures. We enter into forward foreign currency contracts with international financial institutions, where we typically pay a fixed rate of premium. To the extent the Rupiah declines in value relative to the U.S. dollar, the value of our monetary assets and liabilities denominated in U.S. dollars will increase in Rupiah terms. See Note 41 to our consolidated financial statements for a description of our historical monetary assets and liabilities denominated in foreign currencies. As of June 30, 2021, if the Rupiah had strengthened by 1.0% against the foreign currencies that we are exposed to, with all other variables held constant, profit for the year would have been lower by Rp.2,612 million (US$0.2 million) mainly as a result of foreign exchange gains on the translation of monetary assets and liabilities denominated in foreign currency.

Effects of Inflation

Indonesia had an annual inflation rate of 3.1% in 2018, 2.7% in 2019, 1.7% in 2020 and 1.3% in the first six months of 2021 according to Badan Pusat Statistik estimates. We do not consider inflation in Indonesia, where all of our operations are currently located, to have had a material impact on the results of our operations. Inflation in Indonesia could adversely affect our net income and cash flow to the extent we are unable to increase our revenue to cover any increases in our operating expenses resulting from inflation. Although the maintenance fees for many of our tenancies are adjusted annually based on inflation, our lease fees are fixed and we may, upon renewal of our lease agreements, be constrained in our ability to increase our lease fees in response to inflation because of competitive pressures.

Introduction

Macroeconomic Overview

Indonesia is the largest economy in Southeast Asia and the 7th largest economy in the world in terms of purchasing power parity. A diverse archipelago nation of more than 300 ethnic groups, Indonesia is the world's fourth most populous nation with a population size of approximately 274 million in 2020.

Before the COVID-19 pandemic, Indonesia enjoyed steady economic growth over the past decade, averaging between five percent on the back of a young demographic profile, a growing middle class, and benign macroeconomic conditions such as moderate inflation and relatively low unemployment. The country saw a steady increase in foreign direct investment ("FDI") as well as increasing domestic investment in facilities and infrastructure including such projects as Palapa Ring integrated fibre network linking cities and regions through the country.

Figure 1: Demographic and economic facts

	2015	2016	2017	2018	2019
Economic Facts					
GDP (current US$ in billion)	861	932	1,016	1,042	1,119
Real GDP Growth	4.9%	5.0%	5.1%	5.2%	5.0%
Inflation	6.4%	3.5%	3.8%	3.2%	3.0%
FDI, net inflows (BoP, current US$ in billion)	19.8	4.5	20.5	18.9	24.9
Unemployment (modeled ILO estimate)	4.5%	4.3%	3.9%	4.4%	3.6%
Demographic Facts					
Population (in million)	258	262	265	268	271
Population Growth	1.3%	1.2%	1.2%	1.1%	1.1%

Source: World Bank

As with many countries across the world, the COVID-19 pandemic had an impact on the Indonesian economy as the government implemented social distancing and travel restrictions to curb the spread of COVID-19, resulting in a GDP contraction in 2020 and growing unemployment. These measures have however helped to further transform consumer behavior, including a resulting increase in adoption of digital and online services among Indonesians.

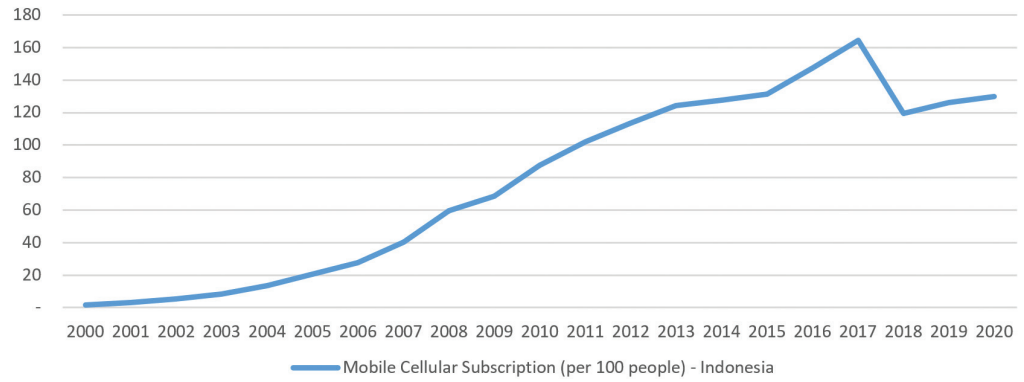
All three rating agencies have maintained Indonesia's investment grade credit ratings: Baa2/Stable by Moody's, BBB/Negative by S&P and BBB/Stable by Fitch; reflecting the country's economic resilience, its long-term growth prospects and attractiveness for investment.

Mobile Phone Penetration

The Indonesian mobile market has experienced rapid growth over the past decade, from 20.7% mobile penetration rate in 2005 to almost 130% in 2020. The overall number of reported mobile subscribers has been affected by the subscriber registration process imposed by the Government in

2018, resulting in the deactivation of inactive subscribers. Young Indonesians, especially those in the rapidly growing urban middle-class, are early adopters of mobile and internet technologies. With approximately 40% of the population under 25 years of age, the demand for those technologies is expected to be robust, which in turn indicates strong growth potential for the telecom and tower industry.

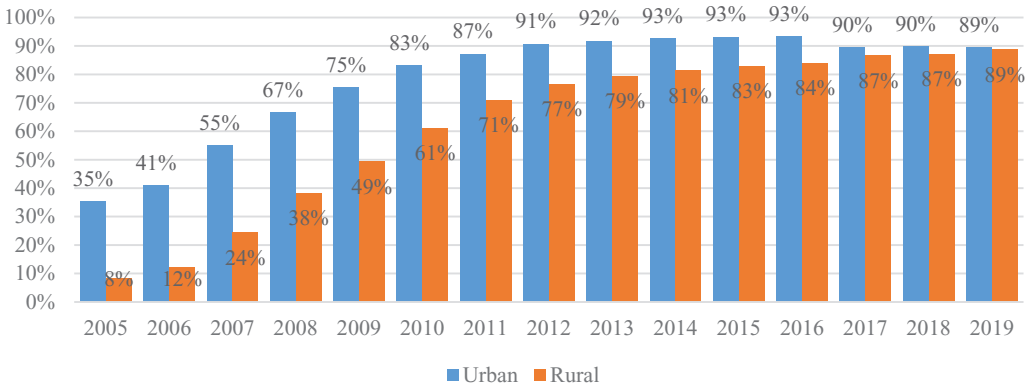
Figure 2: Indonesia mobile cellular subscription (per 100 people)



Source: World Bank

The initial mobile penetration growth since 2005 has been driven by the urban population. However, the urban-rural gap in terms of mobile phone ownership has narrowed over the past decade, further driving the overall mobile phone penetration in the Indonesian market.

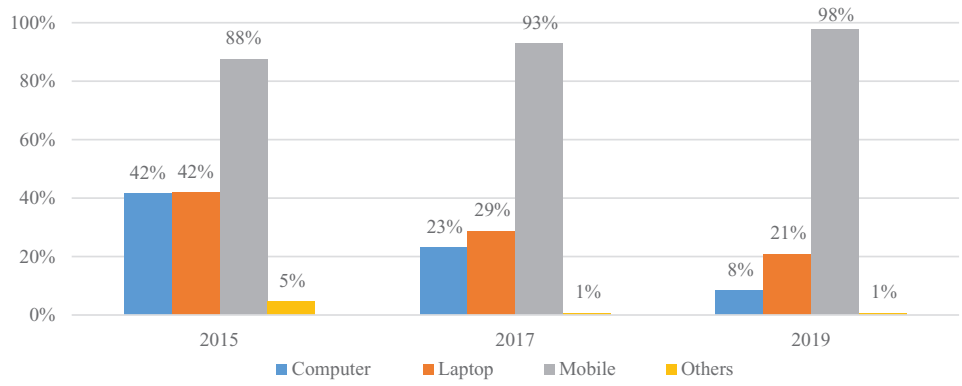
Figure 3: Percentage of household that owns cellular phone by urban rural classification



Source: Statistics Indonesia

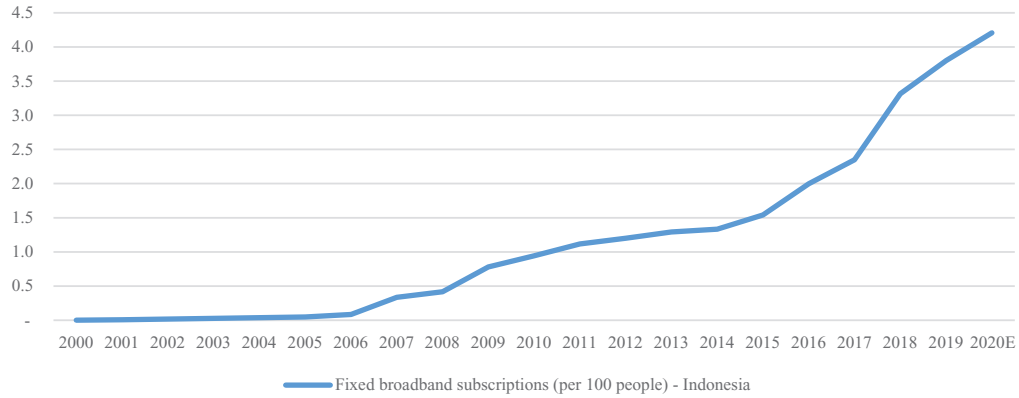
Due to a rapid growth in mobile phone ownership and low fixed broadband penetration and coverage overall, Indonesians increasingly prefer to use mobile phones to access the internet. This is especially so in the rural and remote areas due to Indonesia's complex geography hampering development of fixed broadband infrastructure. Despite developments accelerating in recent years the fixed broadband penetration remains low at approximately 4.2% in 2020. From 2015 to 2019, household's access to internet shifted from using computers and laptops, which are usually connected through fixed broadband, to using mobile phones.

Figure 4: Percentage of household accessing internet by media of access



Source: Statistics Indonesia

Figure 5. Indonesia fixed broadband subscriptions (per 100 people)



Source: World Bank

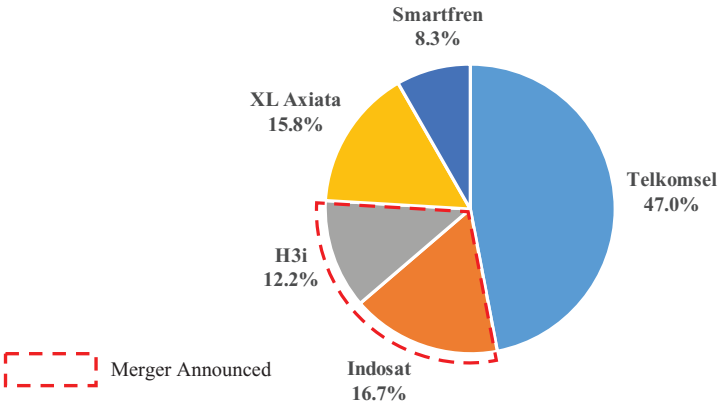
Mobile Network Operator ("MNO") Overview

The mobile network market is serviced by a number of operators. The three largest MNOs, namely Telkomsel, Indosat and XL Axiata, have approximately 81% of the Indonesia's mobile subscriber market share as of 2020. These operators are established players with shareholders including global telecommunications firms and the Indonesian government. Shareholder background coupled with their financial strength amongst other factors, has resulted in them being rated investment grade by at least one of the three major credit rating agencies. Other MNOs in the market include PT Hutchison 3 Indonesia ("H3i"), Smartfren and Sampoerna.

On September 16, 2021, CK Hutchison and Ooredoo Group agreed to merge Indosat and H3i with the merged entity to be renamed PT Indosat Ooredoo Hutchison Tbk. The merger is subject to regulatory approval and expected to be completed by the end of 2021.

We believe the combination of Indosat and H3i will create a larger and financially stronger operator which would be positive for long term growth of the MNOs as well as tower operators in Indonesia.

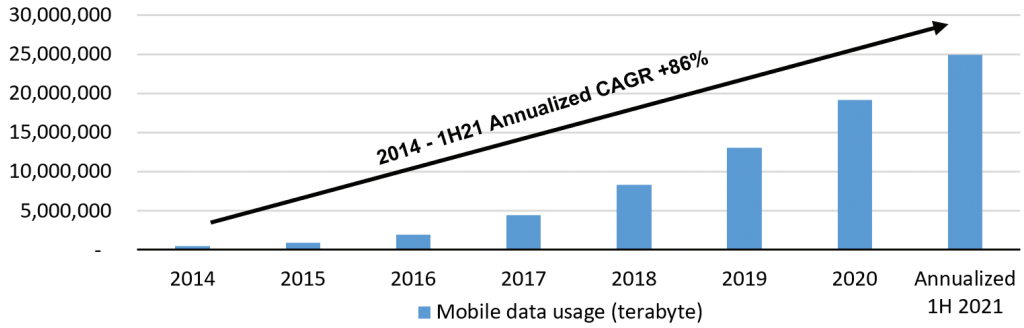
Figure 6: Market share by subscribers count of the 5 largest MNOs as of June 2021



Source: Telkomsel, Indosat, XL Axiata, H3i and Smartfren reports

Following the shift of demand from 2G to 3G / 4G networks, the Indonesian telecommunications industry has been achieving better data monetization in recent years. All MNOs have experienced an increase in smartphone penetration amongst their subscribers and a corresponding surge in data usage. The growing availability and breadth of smartphones and mobile applications, including for social networks, gaming or video streaming, translate into increasing data transfer requirements. These trends, in a market environment with low fixed broadband penetration, are expected to drive mobile operators' revenue growth going forward.

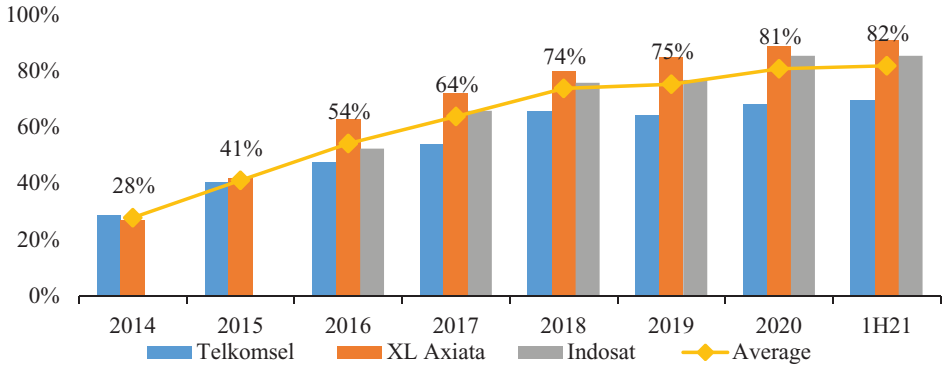
Figure 7: Data usage compiled from Telkomsel, XL Axiata and Indosat



Source: Telkomsel, XL Axiata and Indosat Reports

With the initial 5G spectrum in the 2.3 GHz frequency band being allocated to Telkomsel and Smartfren, following a re-auction process in March 2021, MNOs have started rolling out commercial 5G services selectively in major cities. While the regulators are preparing additional spectrum options to encourage the adoption of 5G services and overall digital transformation in Indonesia, MNOs continue to focus on expanding and monetizing their 4G networks.

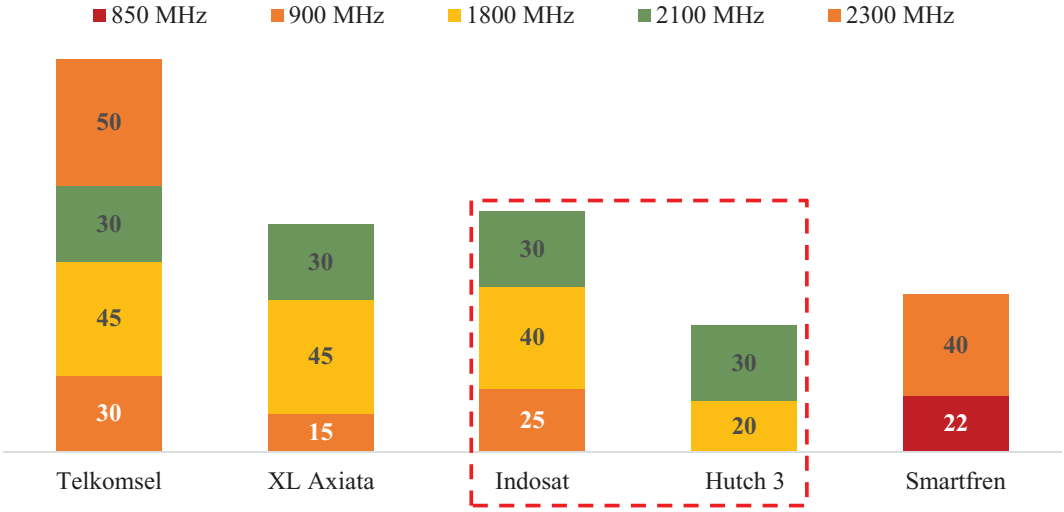
Figure 8: Percentage of smartphone subscribers



Source: Telkomsel, XL Axiata and Indosat Reports

The enactment of the Omnibus Law, including implementation of provisions relating to foreign ownership of telecommunication operators and sharing of radio frequency spectrum, is expected to expedite consolidation of telecommunication operators. MNOs involved in mergers can retain and combine their spectrum holdings for shared use in the merged entity, thereby reducing disruptions to their services and improving their competitiveness and profitability.

Figure 9: Spectrum Ownership of Indonesia Operators as of Jun 2021



Source: Telkomsel, XL Axiata and Indosat Reports, Ministry of Communication and Informatics Announcement

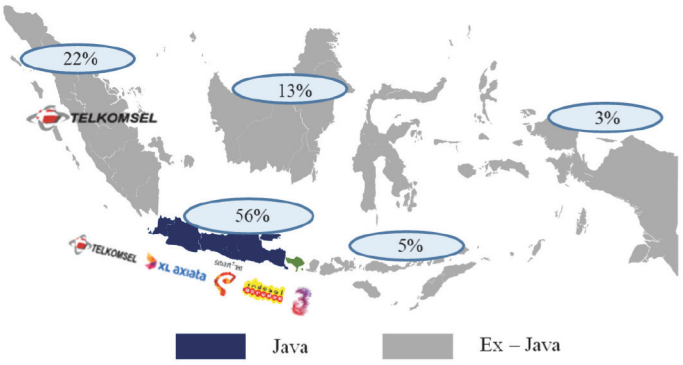
Telecom Tower Industry in Indonesia – Overview

The rapid growth in the usage of wireless data services is driven by the proliferation of mobile devices and data heavy applications including social media and online video. Coupled with increasing user demand for high quality telecommunication services, this necessitates investments by telecom operators in high capacity network infrastructure, network densification and coverage expansion. These investments facilitate a strong increase in the required number of base stations and towers and in turn, drive sustainable growth for tower infrastructure operators.

The growth of wireless network infrastructure in Indonesia is further supported by continued 4G capacity investments, especially as MNOs have focused recent network expansion efforts in ex-Java territories. The APJII estimates that approximately 44% of Indonesia's internet users are outside of Java. In addition, the relatively low penetration of alternative fixed broadband services, low tower

density per capita, limited availability of wireless frequency spectrum overall, the high towers requirement for higher frequency spectrum bands used in 3G and 4G networks, as well as still relatively low overall data usage per user will continue to drive growth for tower infrastructure operators.

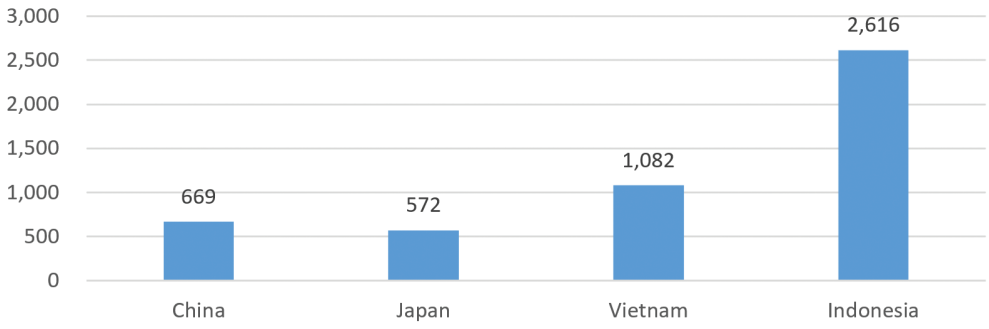
Figure 10: Contribution of Indonesia's Internet Users per Province



Source: Asosiasi Penyelenggara Jasa Internet (APJII)

From 2015 to 2Q 2021, the number of towers in Indonesia has grown from approximately 69,500 to approximately 105,000, with an overall 6-year CAGR of 6.6%. According to TowerXchange, organic growth has picked up over the last couple of years, and Indonesian tower operators build approximately 3,000-5,000 towers, rooftops and infill sites per year. In addition, the tenancy ratio growth compares favorably to many other global tower markets. A comparison of Indonesia's population per telecom tower with levels seen in other tower markets such as Japan or China suggests the need for increased infrastructure investment by telecommunication operators to increase tower density or number of towers per capita. Overall, the Indonesian tower industry is structurally well positioned for further growth in the medium to long-term as the operator led network roll-outs create substantial demand. A large portion of this demand is fueled by leading operators as they expand the coverage reach and increase capacity of their 4G networks.

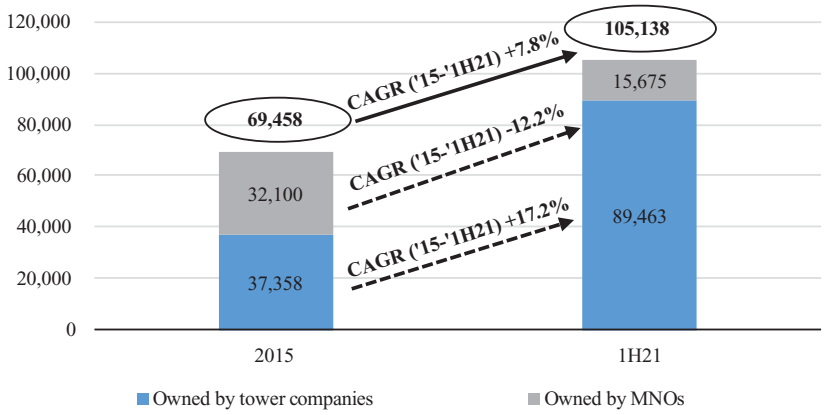
Figure 11: Estimated population per telecom tower



Source: TowerXchange, World Bank

Higher density requirements of 5G technology, similarly to the ongoing transition from 2G to 3G / 4G networks, will require far larger tower additions, and should translate into significant investments and further increase in demand in the long-term for sites and towers including small cells and DAS networks. Despite selective commercial launch of 5G services, the technology is not expected to have imminent impact on the tower space in Indonesia.

Figure 12: Estimated tower number in Indonesia owned by MNOs and tower companies in 2015 and 1H21

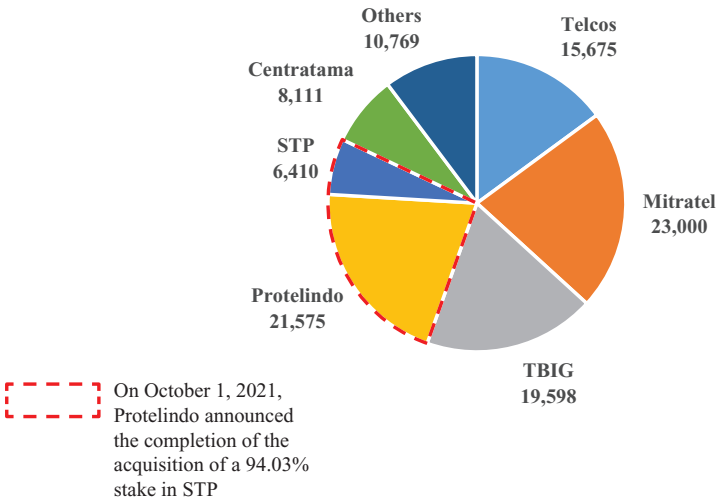


Source: TowerXchange, Telkomsel, XL Axiata, IBST, Tower Bersama, Protelindo and STP Reports

Note: Telecommunication operators include: Telkomsel, Indosat, XL Axiata; Tower companies include: Tower Bersama, Mitratel, Protelindo, Centratama, STP, and other tower companies

Historically, the majority of the towers were built and owned by the telecommunications operators. Over time, tower companies have significantly increased their share and currently account for 85% of approximately 105,000 towers in Indonesia. This has been driven by the disposals of tower portfolios by MNOs, who seek to raise investment capital to invest in and expand their core 4G networks to cope with the rapid growth in data consumption. As such, substantially all new tower growth is expected to go to tower companies as MNOs continue to increase the outsourcing of construction of sites and leasing space from tower companies. The outsourcing model provides the most efficient way in terms of cost and time for MNOs to expand and densify their networks to provide quality communication services, while tower operators have proven their ability to deliver build-to-suit towers and colocation space on existing tower sites.

Figure 13. Estimated tower count in Indonesia by towers companies and by MNOs in 2Q 2021



Source: TowerXchange, Telkom, XL Axiata, Tower Bersama, Protelindo and STP Reports
Note: Other tower companies include IBST, Balitowers, and others

Amongst the MNOs, only Telkomsel continues to hold a significant tower portfolio, as Indosat and XL Axiata have significantly divested their tower assets. It is expected that Telkomsel, having announced the sale of more than 10,000 towers in two separate transactions in October 2020 and September 2021, will continue to gradually divest its tower portfolio over time to focus on its core business to provide digital services to its subscribers. The removal of foreign ownership restrictions from the tower industry as well as drive to achieve substantial scale to better serve operators, has resulted in a shift towards consolidation among tower operators over the past year.

The three largest tower companies — Mitratel, Protelindo and Tower Bersama dominate the tower market and combined accounted for approximately 67% of the estimated total tower count as at June 30, 2021. Large tower operators have the advantage of well-established relationships with telecommunications companies, track record and experience, portfolio benefits and economies of scale, ability to access competitive financing, capability to build on a large scale within desired timelines and in required locations in diverse areas of the Indonesian archipelago, as well as professional management. We expect that the largest tower companies will continue to benefit from growth and densification of telecommunication networks in Indonesia.

We believe the tower operator business model is defensive in nature. Customer retention is high due to high switching costs, such as revenue loss from network disruptions in the event of relocation of mission critical equipment in addition to the penalties for early termination of contracts. The tower industry in Indonesia has gone through multiple contract renewal stages, indicating a similar dynamic to the high historical renewal rates observed in other mature tower markets such as the United States. The long term contracts signed typically with high creditworthiness customers, provide substantial visibility and stability to future financial performance of tower operators.

In terms of asset quality, we believe organic build-to-suit towers are higher quality assets than acquired towers for a number of reasons. Organic towers are built based on MNO customers' network plan requirement. As these towers are typically built in unique locations, there is greater future co-location potential and higher probability of securing tenants new to a given coverage area. In addition, organic sites provide a better opportunity to assure high construction quality, optimize long term maintenance, and negotiate competitive land lease rates as compared to acquired towers. Build-to-suit towers are typically built when a long-term lease contract (each typically for a period of 10 years) is secured, whereas acquired towers often have contract terms below 10 years on average. In addition, the capital expenditure to build an organic site is typically less than the acquisition cost of a tower. We therefore believe that a portfolio with higher proportion of organic build-to-suit towers is of higher quality.

Overview

We are a leading independent tower company in Indonesia. Our principal business is leasing space for antennas and other equipment for wireless signal transmission at tower sites under long-term lease agreements with telecommunications operators. We also provide telecommunications operators with access to our DAS networks in shopping malls and office buildings in major urban areas. As of June 30, 2021, we operated 19,709 telecommunications sites comprising 19,598 tower sites and 111 DAS networks, and we had 37,232 tenancies on sites with five different telecommunications operators and two 4G LTE network providers. For the year ended December 31, 2020 and the six months ended June 30, 2021, 77.5% and 74.2% of our revenue, respectively, was from Telkomsel, Indosat and XL Axiata, collectively. We lease space on tower sites under long-term lease agreements of generally 10 years and lease access to our DAS networks under long-term license agreements of generally five to eight years. As of June 30, 2021, the average remaining life of all our tenancy agreements was approximately 5.3 years, and we had total contracted revenue under our leasing agreements of approximately Rp.29,455,732 million (US$2,032 million). Our tower leasing revenue (from tower sites), and our DAS network revenue, accounted for 99.2% and 0.7%, respectively, of our total revenue for the year ended December 31, 2020.

We believe that Indonesia's tower leasing industry has strong potential for continued growth in terms of both new tower construction and additional co-locations on existing towers. We construct new sites and acquire existing site portfolios only when they meet our investment criteria which include, among others, return on investment, potential for future co-locations, ease of leasing or purchasing land for sites, ease of community approvals, and credit strength of the potential tenant(s). In particular, we only construct new sites after obtaining a commitment for long-term lease for space from a telecommunications operator. Although we generally construct sites in most provinces of Indonesia, the majority of our sites are located in areas with high population density with 13,364 sites in Java, Bali and Sumatra, and 2,901 sites in other parts of Indonesia, as of December 31, 2020.

We plan to continue to seek additional co-locations for our existing towers, as additional co-locations are accretive to our cash flow because our incremental cost of adding new tenants to existing towers is relatively low. We believe that Indonesian telecommunications operators have sought, and will continue to seek, to satisfy increases in their network coverage and capacity requirements while controlling their capital expenditures for non-core activities such as outsourcing of construction of sites and leasing space from tower companies. As of June 30, 2021, we had a tenancy ratio of 1.89.

Our revenue was Rp.5,327,689 million (US$367.5 million) for the year ended December 31, 2020 and Rp.2,971,379 million (US$205.0 million) for the six months ended June 30, 2021. Our EBITDA and EBITDA margin were Rp.4,617,126 million (US$318.5 million) and 86.7%, respectively, for the year ended December 31, 2020 and Rp.2,592,881 million (US$178.9 million) and 87.3%, respectively, for the six months ended June 30, 2021. Our annualized revenue and LQA EBITDA for the three months ended June 30, 2021 were Rp.6,196,912 million (US$427.5 million) and Rp.5,415,180 million (US$373.6 million), respectively.

Recent Developments

Other Financing Transactions

For details of other financing transactions occurring after June 30, 2021, see Note 42 to the unaudited interim consolidated financial statements as of June 30, 2021 and for the six months ended June 30, 2021 included elsewhere in this offering circular.

Continuous Bond V Phase I

On August 19, 2021, the Company issued Continuous Bonds V Phase I with a fixed interest rate, which are payable on a quarterly basis, in an aggregate principal amount of Rp.1.2 trillion. For details of these bonds, see "Description of Material Indebtedness — Continuous Bonds — Continuous Bonds V Phase I."

COVID-19 Pandemic

The outbreak of the COVID-19 pandemic has delivered economic shocks globally, leading to adverse repercussions across local, regional and global economies, financial markets, industries and businesses. The ultimate impact of the virus on the global economy in the near and longer term remains uncertain.

We implemented a business continuity plan in response to the COVID-19 pandemic. Our management identified areas which we consider critical to our operations and have developed operational continuity plans in our teams to ensure we have sufficient resources to keep our operations running safely within these areas. We prepared and implemented protocols our employees must follow. Our employees are encouraged to work from home to the extent possible, and in connection, granted our employees at our 24/7 customer call center remote access to the Company's server. Where possible, we try to resolve customer issues remotely using virtual tools and available technology to minimize the need for our employees to visit our customers' sites. Where a site visit is required, we require our employees to follow strict protocols to mitigate the risk of transmission. We conduct regular health checks and screenings of our employees and contract workers, implement physical distancing requirements in the office, implement strict access controls, provide personal protective equipment and other supporting gear for all of our employees, whether on the field or at our headquarters, and collaborate with the relevant government and health agencies to ensure that we are in line with their efforts to prevent the spread of COVID-19. As part of our ongoing corporate social responsibility and community investment contributions, we have undertaken several initiatives in response to the COVID-19 pandemic in 2020. Using our existing Monik TBIG (Mobile Health Clinics), our group donated ventilators as well as other protective equipment (hazmat gowns, disposable gloves, thermometer guns and general supplies) to various groups in Indonesia. The Company also developed a health application called "Si Monik", to assist local communities with analyzing and tracking disease history. Starting in May 2021, the Company has purchased COVID-19 vaccines through the Indonesia Chamber of Commerce "Vaksin Gotong Royong" program, for all our employees and their families. The Company has also provided financial support for employees for COVID-19 testing and hospitalization. Our Monik TBIG health professionals have also been deployed to assist in the Government's mass vaccination drive.

The COVID-19 pandemic did not significantly impact our financial results of operations for the year ended December 31, 2020 or the six months period ended June 30, 2021 as our revenues are based on long-term contracts from our telecommunication customers with limited discretionary termination

provisions. We have not been required to shut down our operations as part of Government measures to stem the spread of COVID-19 and have implemented our business continuity plans. Some of our employees, subcontractors and agents and local vendors have contracted COVID-19. However, we have not experienced significant disruptions to the operations of our tower sites or DAS networks as a result of the various lockdowns and social distancing requirements implemented by the Government. Nevertheless, we may face delays in our scheduled maintenance works of our tower and other operational sites due to a lack of manpower stemming from lockdowns or mandatory quarantine orders put in place by the Government generally or by us, in line with Government requirements, in response to our employees, subcontractors and agents or local contractors contracting COVID-19. There is no assurance that our business, operations or financial condition will not be significantly impacted as a result of the COVID-19 pandemic in the future and we may not be able accurately predict the near-term or long-term impact of the COVID-19 pandemic on our business. See "Risk Factors — Risks Relating to our Business — The ongoing COVID-19 pandemic and the disruption caused by various countermeasures to reduce its spread may have unprecedented adverse consequences of uncertain magnitude and duration on our business, industry, Indonesia and the global economy."

Key Strengths

We believe that we have the following key strengths:

Strong relationships with highly rated Indonesian telecommunications operators

Our largest customers consist of Indonesia's highly rated telecommunications operators. For the year ended December 31, 2020 and the six months ended June 30, 2021, 77.5% and 74.2% of our revenue, respectively, was from Telkomsel, Indosat and XL Axiata (each of which has an investment grade rating from at least one of the rating agencies). Of the remaining 25.8% of our revenue for the six months ended June 30, 2021, 15.3% was contributed by PT Hutchison 3 Indonesia. In 2013, only 62.8% of our revenue was from Telkomsel, Indosat and XL Axiata (27.5%, 23.5% and 11.8%, respectively) and, of the remaining 37.3% of our revenue, 12.1% was contributed by PT Telkom and 10.5% was contributed by PT Hutchison 3 Indonesia. Our long standing relationships with telecommunications operators help us identify opportunities to meet our customers' needs with additional co-locations and build-to-suit towers. We believe that to ensure no disruption in coverage, our customers would prioritize payments to key suppliers such as us.

Contracted revenue under our long-term customer lease agreements provide high visibility on future revenues

Our revenues are derived from long-term lease agreements with tenants on our sites, and provide us with a highly visible recurring revenue stream. The length of our tower site lease agreements is generally 10 years and the length of our DAS network license agreements is generally five to eight years. As of June 30, 2021, our net debt (excluding lease liabilities – right of use assets) after taking into account our hedging arrangements was Rp.25,916 billion (US$1.8 billion), the contracted revenue under our customers' agreements for all types of tenancy agreements was approximately Rp.29,456 billion (US$2.0 billion) and the average remaining life of all tenancy agreements was approximately 5.3 years. Assuming that our existing contracts are to be renewed for 10 years at a 90% renewal rate, the total contracted revenue pursuant to contract renewals is estimated to be Rp.77,874 billion (US$5.4 billion). Our agreements generally have a fixed lease fee and a fixed or escalating maintenance fee (which typically increases annually based on inflation) payable monthly, quarterly or annually. Lease and maintenance fees vary based on tower location and height; height, size and location of our customer's antennas on the tower; and ground space and utilities provided to the

customer. Since many of our sites are located in densely populated areas where telecommunications operators are experiencing high subscriber traffic and relocation of equipment takes time and involves operators reconfiguring their networks, we believe that many of our customers are likely to renew their lease agreements at the end of their current term in order to minimize disruption of coverage in such areas, avoid the potential loss of revenue and also avoid the expense they would incur from the relocation of their antenna equipment.

Extensive build-to-suit and operational experience

We believe that our extensive experience in deployment of build-to-suit sites for large Indonesian telecommunications operators, particularly our experience in SITAC and regulatory compliance, allows us to provide competitive speed-to-market on build-to-suit site construction in diverse areas of the Indonesian archipelago. Our regional management unit, supervises and works closely with our subcontractors and agents, and manages an extensive network of relationships with local vendors and government authorities. This allows us to work with our customers to identify locations where they can install their BTS. Once a new location has been selected, tower construction is typically completed within 90 to 120 days of our customer's issuance of a work order.

Ability to acquire and integrate site portfolios

Since commencement of our business in 2004, we have acquired several tower companies and site portfolios. For example, in 2012, we acquired 2,500 towers from Indosat and in 2018, we acquired control of two listed tower companies, GHON and GOLD, which added 1,120 tenancies and 859 telecommunication sites to our portfolio. In April 2021, we acquired 3,000 towers from IBST for a consideration of Rp.3,975 billion (US$274.2 million). We believe that our previous acquisitions demonstrate our ability to successfully acquire and integrate large tower portfolios from large telecommunications operators. In particular, we believe that we are able to quickly assess and incorporate asset data into our own information systems to ensure that such assets can be appropriately maintained and also space on those towers can be offered to our existing customers, and we have also been able to obtain financing for such acquisitions at competitive rates. We expect that selective acquisitions of large and small site portfolios will continue to be an important part of our growth strategy and we expect to devote substantial resources to ensuring that we are aware of such opportunities and can quickly execute when an acquisition opportunity arises.

High margins and significant operating leverage

Our business enjoys high EBITDA margins that result in strong and stable cash flow from operations. Our EBITDA margins were 86.1%, 85.4%, 86.7% and 87.3% for the years ended December 31, 2018, 2019 and 2020, and the six months ended June 30, 2021, respectively. Increases in our tenancy ratio for our existing towers should increase our operating margins because a majority of our incremental revenue from the increases of our co-location revenue flows to our operating profits. Additional co-locations are also accretive to our cash flow because the capital expenditure required for, and our incremental cost of, adding new tenants to existing sites are relatively low since most of our towers can accommodate additional co-locations without additional strengthening. As of June 30, 2021, 81% of our tower portfolio consisted of ground-based towers with a height of more than 32 meters and rooftop self-supporting towers which are able to accommodate three or more tenants without the need for additional capital expenditure. Our towers that are at or near structural capacity can be strengthened to provide future leasing capacity with relatively minor capital investment.

As an early entrant into the Indonesian tower leasing industry, we have been able to build site portfolios in areas where telecommunications operators experience high subscriber traffic and where there is high demand for tower space to locate BTS. As of December 31, 2020, approximately 82.2% of our sites and 84.4% of our tenancies were concentrated in the densely populated provinces of Java, Bali and Sumatra. We believe that locating our sites in these high demand areas has allowed us to increase the potential for additional co-locations.

Our tenancy ratio was 1.89 as of June 30, 2021. We believe that, with our existing portfolio of sites in high-demand areas, we are well-positioned to meet increased demand among our customers, which should allow us to further increase our tenancy ratio. In addition, although our tenancy ratios may vary from time to time due to future site portfolio acquisitions or build-to-suit construction, we believe there is strong potential for our tenancy ratio to increase in the future as we expect telecommunications operators to continue to increase the outsourcing of construction of sites and leasing space from tower companies for their operations, and telecommunications operators are expected to roll out new technologies (such as 4G and 5G) that require site space.

Experienced management team with the competencies and experience shared by the Company's founding shareholders

We have increased our tenancies from 25,518 as of December 31, 2018 to 37,232 as of June 30, 2021. We believe that our management team has the skills and experience to continue to develop and grow our business within the Indonesian telecommunications market both organically and through future acquisitions. We have benefitted from the business reputation, experience and expertise of our founding shareholders, Wahana (as a subsidiary of SRTG) and PCI. Since our establishment in 2004, the Company's management team has leveraged on these shareholders' capabilities, expertise and relationships to strengthen our value proposition to our customers. The founding shareholders have shared their extensive expertise to develop proper risk management governance and controls for the Company, and institute cost-effective financing options and measures to support the Company's long-term growth and vision.

Our Business Strategy

The key elements of our strategy include:

Maximize co-locations on our existing site portfolio

We believe that we can continue to increase our revenue and improve our margins by increasing the tenancy ratio on our existing site portfolio. We expect that our revenues and operating profit from our tower leasing business will continue to grow because many of our existing towers are attractively located for telecommunications operators and have capacity available for additional antenna space that we can offer to customers at low incremental cost to us. The majority of our operating expenses for tower sites from and following the construction stage are of a fixed nature. Increasing the tenancy ratio will significantly increase our operating margin due to the low incremental cost of adding tenancies on existing tower sites. We will continue to focus the activities of our marketing and project management unit to increase the tenancy ratio and revenue, and further improve our margins, on our existing site portfolio. We are also continuing our efforts to improve access to information regarding our tower sites to allow faster and easier site selection by our customers. We believe that by increasing the speed with which we provide our customers with accurate and complete information about our tower sites, we will be able to increase our competitiveness and revenue generation.

Continue to strengthen our relationships with telecommunications operators

We expect that our understanding of the network expansion requirements of Indonesian telecommunications operators, combined with our ability to effectively meet those requirements, will continue to be a key component of our efforts to increase tenancies in our site portfolio. We will continue to focus on developing our relationships with our customers to identify opportunities to add new tenancies through co-locations and identify desirable new projects, including build-to-suit and acquisition opportunities.

Increase the size of our site portfolio through selective build-to-suit construction and acquisitions

We seek to increase our revenue by increasing the size of our site portfolio through both selective build-to-suit construction and selective acquisition of site portfolios or tower companies. The size of our site portfolio has increased from 15,091 sites as of December 31, 2018, to 15,589 sites as of December 31, 2019, to 16,265 sites as of December 31, 2020 and to 19,709 sites as of June 30, 2021.

We believe that we have achieved a critical scale, which will allow us to continue to seek to construct and acquire additional sites in locations throughout Indonesia, where we can leverage our relationships with existing customers to increase the tenancy ratio and thereby achieve attractive returns on our investment. We will construct new sites and acquire existing site portfolios only when they meet our investment criteria which include, among others, return on investment, potential for future co-locations, ease of leasing or purchasing land for sites, ease of community approvals, and credit strength of the potential tenant(s). Our policy is to generally build new sites only when we have a committed tenancy from our customers. From time to time we may be engaged in a number of discussions or participate in auction processes in relation to acquisitions of site portfolios of tower companies.

Continue to focus on speed-to-market and reliable operational performance

Speed-to-market and reliable operational performance are critical KPI for our customers. We define our speed to market as the period from our receipt of work order to the commissioning of installation of our customers' telecommunications equipment at a site. Our operational performance refers to the quality of our regular maintenance service and our speed of response to fault reporting. We are constantly refining our ability to meet our customers' KPI, and our initiatives include:

- umbrella contracts for SITAC, CME and maintenance service with selected sub-contractors in certain regions;
- standardization of design, process, procedure and control documentation, including timeframe management;
- national web-enabled project management software enabling early recognition of potential delays to completion and execution of countermeasures;
- coordination of local government operational knowledge to enable efficient permit and license processing;
- regular monitoring of supplier inventory of critical components; and
- operation of a 24/7 customer assistance call center.

Capitalize on future technologies that require tower infrastructure

Our customers have introduced and deployed, and we believe that they will continue to introduce and deploy, next generation wireless technologies. We believe that our customers' rollout of new technologies, such as 4G and 5G, and their expansion of their offerings of wireless data services, have increased, and will continue to increase, our total number of tenancies and our tenancy ratio. We expect that next generation technologies, such as 4G and 5G, will result in increased demand for space on our sites.

Optimizing our capital structure to achieve funding flexibility and minimize borrowing costs

We have utilized our credit facilities and debt securities to fund our previous acquisitions and operational requirements. As of June 30, 2021, our gross debt (excluding lease liabilities — right of use assets) was Rp.28,161 billion (US$1.943 million), and our gross debt after taking into account our hedging arrangements (excluding lease liabilities — right of use assets) was Rp.26,811 billion (US$1.8 billion). See "Management's Discussion and Analysis of Financial Condition and Results of Operations — Indebtedness" and "Description of Material Indebtedness" for details of our total borrowings and see Note 40 to our consolidated financial statements and "Management's Discussion and Analysis of Financial Condition and Results of Operations — Market Risk Disclosures" for further details of our financial risk management.

As of and for the six months ended June 30, 2021, our financial expense (including financial expenses — long term loans and notes and financial expenses — others, excluding interest expense on lease liabilities) was 35.7% of our revenue, our market capitalization was US$4,790.0 million and the ratio of our net debt (excluding lease liabilities — right of use assets) after taking into account our hedging arrangements to our market capitalization plus net debt after taking into account our hedging arrangements was 0.37x. While we believe that we have a strong capital structure with a substantial equity buffer, we intend to continue to optimize our capital structure to achieve funding flexibility and to minimize our borrowing costs by working with our existing lenders as well as by exploring possibilities of accessing financing through the equity and debt capital markets.

Corporate History and Group Structure

PT Tower Bersama Infrastructure Tbk is the holding company of the Tower Bersama Group, which conducts its business operations through its directly and indirectly owned subsidiaries. The sites in our portfolio are owned by the subsidiaries of the Tower Bersama Group, and revenue from each site in our portfolio is earned under a lease agreement between the relevant subsidiary that owns the site and the tenants on such site.

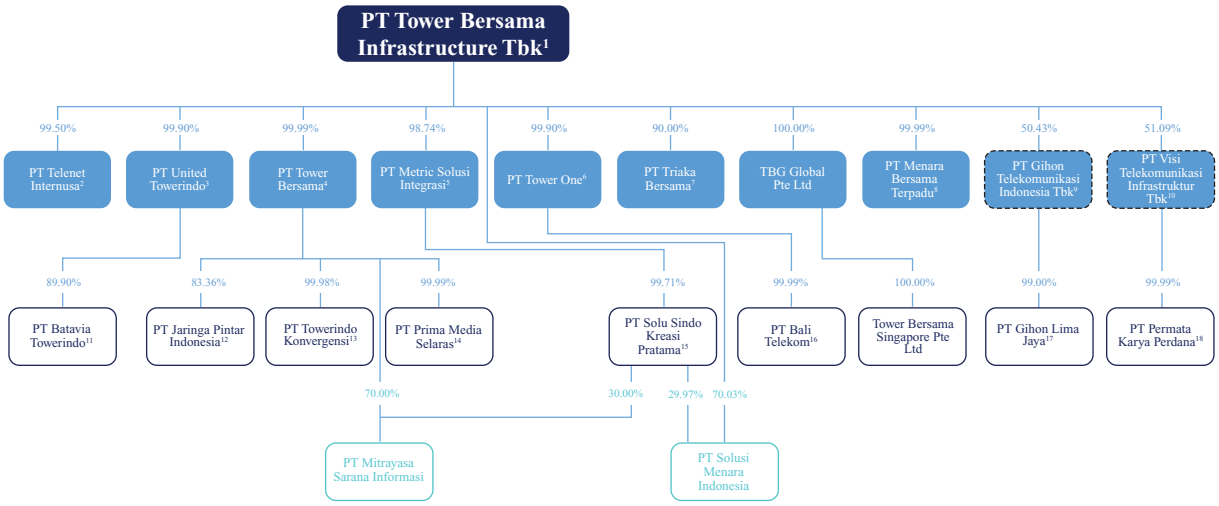
The Company was established in 2004 to own, operate, develop and lease sites. Since our inception, we have grown our portfolio through the development and construction of new sites, the acquisition of other tower companies with existing portfolios and the acquisition of towers from other telecommunication operators, increasing the size of our portfolio to 19,709 sites and 37,232 tenancies as of June 30, 2021.

The following timeline sets forth the key milestones in the history of our business and the growth of our group's sites and tenancies.

2004	• Established Tower Bersama Group
	• Acquired Telenet Internusa
	• Our group had 7 sites and 7 tenancies
2005	• Our group had 57 sites and 58 tenancies
2006	• Acquired Mobile-8's core tower asset network
	• Our group had 347 sites and 350 tenancies
2007	• Acquired Balikom
	• Our group had 556 sites and 729 tenancies
2008	• First tranche of PT Prima Media Selaras acquisitions
	• Our group had 1,006 sites and 1,415 tenancies
2009	• Signing of US$130 million banking facility agreement
	• PT Prima Media Selaras consolidated into the Tower Bersama Group
	• Our group had 1,234 sites and 1,896 tenancies
2010	• Merger with PT Solu Sindo Kreasi Pratama resulted in our becoming one of Indonesia's largest independent tower companies
	• Received BB/Ba2 Ratings from Fitch and Moody's respectively
	• Listed on IDX at a market cap of US$1 billion
	• Entered into the US$2 billion debt program
	• Our group had 3,104 sites and 4,729 tenancies
2011	• Acquired Mitrayasa Sarana Informasi or Infratel
	• Our group had 4,868 sites and 7,002 tenancies
2012	• Acquired 2,500 towers from Indosat
	• Our group had 8,439 sites and 13,708 tenancies
2013	• Issued US$300 million in USD Notes and Rp.740 billion in IDR Bonds
	• Our group had 10,134 sites and 16,577 tenancies
2014	• Received BB / Stable outlook rating from S&P
	• Refinanced all amounts outstanding under the US$2 billion debt program with a US$300 million revolving credit facility and the Credit Facilities

2015	• Issued US$350 million in USD Notes
	• Entered into US$275 million bank loan
2016	• Issued Rp.230 billion in IDR Bonds
2017	• Entered into US$500 million bank loan
	• Issued Rp.1.4 trillion in IDR Bonds
2018	• Issued Rp.608 billion and Rp.628 billion in IDR Bonds
	• Acquired 50.12% shareholding in PT Gihon Telekomunikasi Indonesia Tbk
	• Acquired 51.0% shareholding in PT Visi Telekomunikasi Infrastruktur Tbk
2019	• Issued Rp.750 billion in IDR Bonds
	• Entered into a US$375 million revolving credit facility to refinance by prepaying the US$400 million term loan facility, or Facility A, under the Credit Facilities
	• Increased shareholding in PT Gihon Telekomunikasi Indonesia Tbk to 50.43%
	• Increased shareholding in PT Visi Telekomunikasi Infrastruktur Tbk to 51.09%
	• Acquired remaining 49.88% shareholding in PT Gihon Telekomunikasi Indonesia Tbk
	• Acquired remaining 49.0% shareholding in PT Visi Telekomunikasi Infrastruktur Tbk
	• Undertook a five-for-one stock split
2020	• Issued Rp.2,950 billion in IDR Bonds
	• Issued US$350 million in USD Notes
	• Disposed of 90.0% interests in PT Infrastruktur Digital Indonesia
	• Entered into the IBST Asset Purchase Agreement
2021	• Issued US$300 million in USD Notes
	• Entered into a US$275 million revolving credit facility, or the 2021 RLF, to refinance the US$275 million term loan facility, or Facility D, under the Credit Facilities
	• Completed the IBST Asset Purchase
	• Issued Rp.5,085 billion in IDR Bonds

The chart below sets forth our corporate structure including our direct and indirect subsidiaries as of the date of this offering circular.



Notes:

(1) PT Tower Bersama Infrastructure Tbk (previously known as PT Banyan Mas)

(2) Remaining 0.5% of PT Telenet Internusa owned by PT Wahana Anugerah Sejahtera

(3) Remaining 0.1% of PT United Towerindo owned by PT Tower Bersama

(4) Remaining 1 share (0.01%) of PT Tower Bersama is owned by PT Tower One

(5) Remaining 1.26% of PT Metric Solusi Integrasi owned by PT Tower Bersama

(6) Remaining 0.1% of PT Tower One owned by PT Provident Capital Indonesia

(7) Remaining 10.0% of PT Triaka Bersama owned by PT Tower Bersama

(8) Remaining 0.01% of PT Menara Bersama Terpadu owned by PT Tower Bersama

(9) Remaining 49.57% of PT Gihon Telekomunikasi Indonesia Tbk owned by Rudolf Parningotan Nainggolan, PT Gihon Nusantara Tujuh and members of the public

(10) Remaining 48.91% of PT Visi Telekomunikasi Infrastruktur Tbk owned by PT Amanda Cipta Persada, PT Mulia Sukses Mandiri, PT Trimegah Sekuritas Indonesia Tbk and members of the public

(11) Remaining 10.1% of PT Batavia Towerindo owned by PT Tower Bersama

(12) Remaining 16.64% of PT Jaringan Pintar Indonesia owned by Kristiono, Bagas Dwi Bawono, PT Tower Bersama Infrastructure Tbk

(13) Remaining 0.02% of PT Towerindo Kovergensi owned by PT Tower Bersama Infrastructure Tbk

(14) Remaining 0.01% of PT Prima Media Selaras owned by PT Tower Bersama Infrastructure Tbk

(15) Remaining 0.29% of PT Solu Sindo Kreasi Pratama owned by Sakti Wahyu Trenggono and Abdul Satar

(16) Remaining 0.01% of PT Bali Telekom owned by PT Tower Bersama Infrastructure Tbk

(17) Remaining 1.0% of PT Gihon Lima Jaya owned by PT Gihon Nusantara Tujuh

(18) Remaining 0.01% of PT Permata Karya Perdana owned by PT Sukses Prima Sakti

Some of the Tower Bersama Group subsidiaries were acquired through our acquisitions of site portfolios and most subsidiaries continue to construct build-to-suit sites. See "— Our Site Portfolio — Acquisition of site portfolios."

Our Site Portfolio

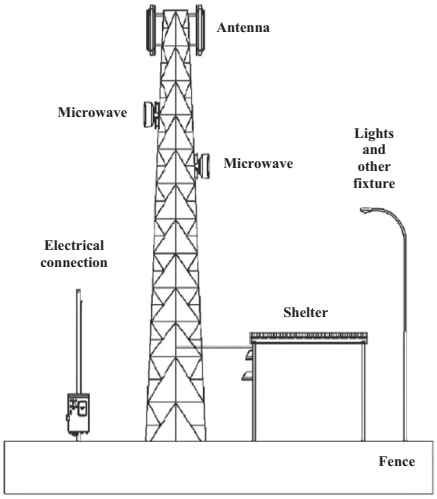
We have increased our number of sites and number of tenancies through a combination of build-to-suit construction, acquisition of tower companies and site portfolios of telecommunication operators, and increase in our co-locations. As of June 30, 2021, we had developed a portfolio of 19,709 sites, comprising 19,598 tower sites and 111DAS network sites, and reached 37,232 tenancies. The following table shows the breakdown of sites and tenancies for the dates indicated.

	As of December 31,			As of June 30,
	2018	2019	2020	2021
Sites	15,091	15,589	16,265	19,709
Tower sites	15,032	15,473	16,155	19,598
DAS network sites	59	116	110	111
Tenancies	25,518	28,740	31,850	37,232

As of December 31, 2020, we owned and/or operated sites in 34 provinces of Indonesia, with 82.2% of our sites and 84.4% of our tenancies located in the densely populated provinces of Java, Bali and Sumatra. As of December 31, 2020, we also maintained 19 offices around Indonesia. In addition, our listed subsidiaries GHON and GOLD have an additional three offices combined. The following table sets forth general geographic distribution, and each geographic region as a percentage of our total sites and total tenancies as of December 31, 2020:

Area	Sites	%	Tenancies	%
Java, Bali and Sumatra	13,364	82.2	26,869	84.4
Others	2,901	17.8	4,982	15.6
Total	16,265	100.0	31,850	100.0

Our tower site portfolio consists principally of four-legged ground-based towers typically ranging in height from 30 to 72 meters, as well as rooftop placements and monopoles. The following diagram illustrates the standard facilities located on our tower sites:



The antenna and the microwaves in the diagram above, and equipment in the shelter, are owned and maintained by our customers, while we own and maintain the passive infrastructure, including the telecommunications tower and the shelter.

The following table sets forth the number and percentage distribution of our tower sites by tower type as of June 30, 2021:

Tower Type	Height	Number	Percentage (%)
Ground-based	> 65m	4,914	25%
Ground-based	51-65m	4,469	23%
Ground-based	32-50m	6,120	31%
Ground-based	< 32m	2,354	12%
Rooftop self-supporting towers	32-50m	21	0%
Rooftop self-supporting towers	<32m	326	2%
Rooftop Pole/Monopole	<32m	1,394	7%
Total		19,598	100.0%

Ground-based towers with a height of more than 32 meters and rooftop self-supporting towers can accommodate more than three tenants. However, primarily due to the limited weight bearing capacity and low height (and thus limited space), it is difficult to add co-locations to rooftop poles. For ground-based towers with a height of less than 32 meters, the available space at attractive heights is also limited and it is also more difficult to obtain co-locations for these towers.

Build-to-suit sites

We believe that our timely deployment of build-to-suit towers, including our expertise with SITAC, CME and regulatory compliance has been a critical component in obtaining and completing these build-to-suit orders. We generally seek to construct build-to-suit towers with optimal additional co-location capacity consistent with community and regulatory approvals for the tower. For all the towers that we construct on a build-to-suit basis, we retain ownership as well as the exclusive right to co-locate additional tenants on the tower.

The entire process from receipt of work order to completion of build-to-suit construction typically takes 90 to 120 days. The actual time taken and the detailed steps followed can vary depending on the customer, the location of the specific site and the issues identified during the SITAC process.

The following table shows our gross new sites built during the years and period indicated.

	2014	2015	2016	2017	2018	2019	2020	Six months ended June 30, 2021
Gross new sites built	1,976	685	1,314	925	1,146	593	835	465

A typical process involves the following steps:

- Our customer informs our marketing unit that it requires a new site in a certain location (usually a location within a certain radius of a precise coordinate, generally within a 100 meter radius).

- Our regional management unit analyzes availability of sites and gauges ease of community acceptance and applicable licenses in that area. An Engineering Survey Report ("ESR") is

produced for the customer by the SITAC officer in the regional unit, usually for three potential site candidates. The ESR includes site candidate coordinates, availability of mains electricity, review of site access roads and topography, and panoramic photographs. The ESR is provided to the customer and the preferred site candidate is selected.

- Once a site is selected and a work order issued by the customer, the SITAC officer, under supervision of the regional management unit, conducts the negotiation of the ground lease with the property owner and obtains consent for tower construction from each household in the surrounding community that is fully or partially located within a radius from the tower equal to the height of the tower. At the same time, we also seek informal or formal approval from the local government to commence construction.

- Upon securing community approval, and informal or formal local government approval, we complete the SITAC process and the CME process commences. In parallel, an application is made to the local government for either (i) the building construction permit (*Izin Mendirikan Bangunan* or IMB); or (ii) the tower construction permit (*Izin Mendirikan Bangunan Menara* or IMBM), depending on the applicable licenses required in that particular *kabupaten* (sub-province).

- Upon completion of the construction, a notification (typically called a "Ready for Installation" notice or RFI) is sent to the customer. Upon the customer's acceptance of the tower construction completion (*Berita Acara Uji Kelayakan* or "BAUK"), a separate agreement is signed for the commissioning of the individual site; this agreement incorporates the provisions of the master tower lease agreement. The accrual of lease and maintenance fees generally starts at BAUK execution. Subsequent invoicing depends on the particular tenancy agreement but generally commences within one to 30 days of BAUK execution.

Acquisition of site portfolios

The principal criteria that we use to evaluate acquisition prospects are price, duration of tenant lease agreements, credit quality of tenants, status of tower regulatory compliance, potential for additional co-locations and physical quality of the assets. Since commencement of our business in 2004, we have acquired several tower companies and site portfolios, including an acquisition of 2,500 towers from Indosat in August 2012. In the fourth quarter of 2018, we acquired control of two listed tower companies, GHON and GOLD, which added 1,120 tenancies and 859 telecommunication sites to our portfolio. In April 2021, we acquired 3,000 towers from IBST for a consideration of Rp.3,975 billion (US$274.2 million). We believe that our previous acquisitions demonstrate our ability to successfully acquire and integrate large tower portfolios from large telecommunications operators.

Some acquisitions require us to integrate, train and manage additional personnel and also integrate the information systems and reporting procedures of the acquired business.

Co-locations

Our marketing unit is in regular discussions with our customers to identify whether our existing towers can fulfill the need for new BTS installations. The entire process from receipt of work order to completion of adding a co-location typically takes 30 to 60 days. Co-locations are processed in accordance with the terms of our existing lease agreements with our customers.

The following table shows our gross number of organic co-locations during the years and period indicated.

	2014	2015	2016	2017	2018	2019	2020	Six months ended June 30, 2021
Gross co-locations	849	803	889	2,084	1,466	2,953	2,773	752

A typical process involves the following steps:

- Upon determination to lease a tower space for co-location, the customer delivers a work order requesting reservation of a tower space. Once the work order has been processed and the tower space is ready for installation, we issue a notification.

- Upon the customer's acceptance of the tower construction completion (Berita Acara Uji Kelayakan or "BAUK"), a separate agreement is signed for the commissioning of the co-location; this agreement incorporates the provisions of the master tower lease agreement. The accrual of lease and maintenance fees generally starts at BAUK execution.

- Subsequent invoicing depends on the particular tenancy agreement, but usually commences within one to 30 days of BAUK execution.

The following table shows our tenancy ratio at the dates indicated.

	December 31, 2013	December 31, 2014	December 31, 2015	December 31, 2016	December 31, 2017	December 31, 2018	December 31, 2019	December 31, 2020	June 30, 2021
Tenancy ratio	1.73	1.67	1.65	1.63	1.71	1.69	1.85	1.96	1.89

Our tenancy ratio decreased from 1.67 as of December 31, 2013 to 1.63 as of December 31, 2016 due to our focus on organically building our towers based on customer orders. Our tenancy ratio increased to 1.71 as of December 31, 2017 as we began adding more co-location tenants to newly-built towers. Our tenancy ratio decreased to 1.69 as of December 31, 2018 as we absorbed the impact of the GOLD and GHON acquisitions, which had a blended tenancy ratio of 1.30. Our tenancy ratio increased to 1.85 as of December 31, 2019, and to 1.96 as of December 31, 2020 as we added more co-location tenants to newly-built towers, and then decreased to 1.89 as we absorbed the impact of the IBST Asset Purchase.

Tower Space Leasing

Our core business is leasing antenna space on our towers. We lease antenna space to Indonesian telecommunications operators for signal transmission related to wireless voice and data transmission.

Tower Lease Agreements. As of June 30, 2021, we had executed master tower lease agreements with all our Indonesian mobile telecommunications operators, which provide certain terms (including price terms) that govern our lease of tower space to our tenants.

Lease Fees. Lease fees are paid in advance by tenants on a monthly, quarterly or annual basis. The average lease fee that we receive from a new tenant is generally fixed for the initial term of the tower space lease based on the following factors:

- tower site location (including ground lease cost);
- size of the tenant's antenna equipment located on the tower;
- shelter specification, ground space necessary for the tenant's electronic and other equipment related to the antenna;
- payment terms;
- type of tower and tower height; and
- location of tenant's antenna on the tower.

Under certain of our lease agreements, anchor tenants on build-to-suit towers receive discounts to their lease fees as additional co-locations occur on the tower.

Maintenance Fees. We also receive maintenance payments, which are either fixed or adjusted annually based on inflation published by Badan Pusat Statistik (although some agreements incorporate a cap on inflation escalation), for security, repairs and maintenance relating to the tower site, as well as shared back-up power infrastructure. Our maintenance fees are paid in advance by our tenants on a monthly, quarterly or annual basis.

Ground Leases. Most of our tower sites are located on real property which has been leased to us under ground lease agreements or building lease agreements with the property owners. We generally seek to enter into these lease agreements for a term of 10 to 12 years and tower lease agreements with our tenants are generally for a period of 10 years. In this manner, we seek to avoid the need to renew the ground lease during the term of our tenant leases for tower space on the relevant property. Ground lease fees are generally paid in advance for the full lease term. Ground lease fees are then amortized over the term of the land lease agreement. Since advance payments for ground lease fees typically represent a substantial percentage of the property value, we believe that ground leases will not be difficult to obtain and should not be difficult to renew.

Operating Expenses. Our operating expenses consist principally of repairs and maintenance, employee compensation and related employee benefit costs and utilities, such as electricity costs incurred for the operation of antenna equipment at our tower sites, which are paid by most of our customers.

Our operating expenses tend to increase at the rate of inflation and as tenancies increase. As a result of the relatively fixed nature of these expenses, the incremental cost of each additional co-location is low. Our site portfolio generally requires minimal sustaining capital expenditures except for items such as tower strengthening for adding co-locations if the specific tower is currently at structural capacity.

Except for certain events of default such as breach and insolvency (including in certain cases, our inability to obtain an IMB or IMBM), our tower lease agreements may not be terminated. As a result,

our revenue earned in lease fees and maintenance fees for our tower leases provide us with a highly visible recurring revenue stream. As of June 30, 2021, the average remaining life of agreements for all tenancy agreements was 5.3 years. We believe that our tenant leases will generally enjoy a high renewal rate because (i) the locations of many of our towers are critical to the efficient and cost-effective operation of our tenants' telecommunications networks, (ii) the cost and time associated with re-configuring antenna equipment across multiple towers when relocating a BTS, (iii) there is considerable lost revenue associated with relocating a BTS to another tower and (iv) SITAC, regulatory compliance issues and other barriers associated with the construction of new towers and relocation of antenna equipment.

DAS Network Leasing

Our DAS networks are generally located in malls and office buildings. Except for certain customary events of default such as breach and insolvency, our license agreements for DAS networks may not be terminated.

We have obtained the right to install and operate the in-building DAS networks under agreements with property owners (for a period generally ranging from five to eight years), and we grant rights to telecommunications operators to attach their equipment to our DAS networks for a fee under licenses that generally have terms of between five and eight years.

Our Customers

Our major customers consist of Indonesia's highly rated telecommunications operators. For the year ended December 31, 2020 and the six months ended June 30, 2021, 77.5% and 74.2% of our revenue, respectively, was from Telkomsel, Indosat and XL Axiata (each of which has an investment grade rating from at least one rating agency). The following table sets forth revenue from each of our customers who are telecommunications operators, and such revenue as percentage of total revenue, for the periods indicated:

	Year Ended December 31,						Six Months Ended June 30,			
	2018		2019		2020		2020		2021	
							(unaudited)		(unaudited)	
	(Rp. in millions, except percentages)									
PT Telekomunikasi Selular	1,936,976	44.9%	2,010,213	42.8%	2,082,756	39.1%	1,024,702	39.8%	1,085,382	36.5%
PT Indosat Tbk	960,851	22.3%	1,013,971	21.6%	1,145,724	21.5%	550,878	21.4%	641,453	21.6%
PT XL Axiata Tbk	679,808	15.7%	844,416	18.0%	898,641	16.9%	442,298	17.2%	479,195	16.1%
PT Hutchison 3 Indonesia	387,916	9.0%	526,683	11.2%	785,540	14.7%	370,156	14.4%	453,662	15.3%
PT Smartfren Telecom Tbk	238,928	5.5%	264,802	5.6%	377,148	7.1%	172,361	6.7%	288,614	9.7%
PT Internux	99,311	2.3%	—	—	—	—	—	—	—	—
Others	14,347	0.3%	38,657	0.8%	37,880	0.7%	16,957	0.7%	23,073	0.8%
Total	**4,318,137**	**100.0%**	**4,698,742**	**100.0%**	**5,327,689**	**100.0%**	**2,577,352**	**100.0%**	**2,971,379**	**100.0%**

Competition

We believe competition in the Indonesian tower leasing industry is based principally on tower location, relationships with telecommunications operators, tower quality and height and, to a lesser extent on size of site portfolio, pricing, operational management and additional services to tenants.

We compete with other Indonesian tower companies as well as with large telecommunications operators that allow co-location on their towers. See "Industry Overview — Telecom Tower Industry in

Indonesia — Overview." We compete principally on the basis of our long-term relationships with major Indonesian telecommunications operators, our service record and customer satisfaction. Since many of our sites are located in densely populated areas where telecommunications operators are experiencing high subscriber traffic, we believe that many of our customers are likely to renew their lease agreements at the end of their current term in order to minimize disruption of coverage in such areas, avoid the potential loss of revenue and also avoid the expense they would incur from the relocation of their antenna equipment.

See "Risk Factors — Risks Relating to Our Business — Competition in the tower leasing industry is substantial and may create pricing pressures that materially and adversely affect us."

Intellectual Property

Other than our logo, batik patterns, software programs, flexible stacking and tower configurations, which we have registered with the Directorate General of Intellectual and Property Rights, we do not have any patents, copyrights, industrial designs, registered trademarks or trade names.

Employees

As of June 30, 2021, we had a total of 646 permanent employees. The table below sets out the number of employees, by category, as of each of December 31, 2018, 2019 and 2020 and June 30, 2021:

	As of December 31,			As of June 30,
	2018	2019	2020	2021
Office of Chief Executive Officer, Board of Directors and Board of Commissioners and Cross-Functional Staff	47	46	44	44
Marketing Unit	34	36	34	37
Product and Innovation Unit	60	59	37	37
Project and Implementation Unit	97	105	93	96
Asset and Operation Unit	221	226	230	231
Finance Unit	74	73	82	80
Business Support Unit	115	117	115	103
Risk Management Unit	19	18	20	18
Total	**667**	**680**	**655**	**646**

Our marketing unit markets our build-to-suit capabilities and our existing tower and DAS network portfolios to Indonesian telecommunications operators.

Our product and innovation unit manages tower and site design in order to achieve capital expenditure and operational efficiency, oversees enhancements to tower design to enable additional tenancy carrying capacity, produces site layout standardization to maximize additional tenant potential and evaluates new components and services.

Our project and implementation unit is responsible for on-time delivery performance of all build-to-suit, co-location and DAS network projects.

Our asset and operation unit is responsible for SITAC, CME, maintenance and regulatory compliance functions and ensuring that the benefits and advantages of our nationwide experience and knowledge base reach each of our regional management units.

Our finance unit is responsible for financial control, financial reporting, cash cycle management (especially invoicing and collection of receivables), maintenance of fixed asset register, and actual capital expenditure variance analysis.

Our business support unit is responsible for managing procurement, human resource, business process and information technology and other administrative functions.

Our risk management unit is responsible for identifying a range of events which could cause a loss or disruption to the business and analyzing the likelihood of occurrence and the magnitude of the event.

We have adopted all mandatory retirement savings and employment-related insurance programs and provide a number of additional benefit programs for our employees. As of June 30, 2021, we contribute 10.8% of salaries, wages and allowances to employee benefits expense, which includes mandatory savings, employment accident insurance and life policy insurance. In addition, we provide inpatient and outpatient medical insurance for employees and their families. We also annually budget for technical and non-technical training for the development of our employees.

Insurance

We maintain all-risk property insurance, including earthquake insurance, against losses that might arise from damage to our tower infrastructure. As of June 30, 2021, our tower infrastructure had total coverage of Rp.11,297.4 million. Some of our insurance policies have exclusions, including in relation to losses resulting from war.

We carry a comprehensive general liability insurance policy covering public liability, workers compensation, employer's liability of US$10.0 million in aggregate for the insured period. We carry additional motor vehicle and motorcycle insurance covering damages to our vehicles and third party claims. We also have group medical insurance for our employees covering accidents, permanent disablement, medical expenses and death. Each of our insurance policies is subject to deductibles and has exclusions that may prevent us from recovering in full for any loss we may suffer.

Properties

As of June 30, 2021, we owned real property relating to 275 ground-based tower sites and leased real property relating to 18,897 ground-based tower sites. We also currently occupy 12,244 square meters of office space for our head office in Jakarta and our 18 regional offices around Indonesia. In addition, our listed subsidiaries GHON and GOLD have an additional three offices combined.

Environmental, Social and Governance ("ESG")

As a key provider of infrastructure in Indonesia, we assist our telecommunication customers as they work to improve connectivity and bridge the digital divide across the country. We recognize the importance of managing our ESG impact alongside economic considerations, and communicating our ESG initiatives effectively to our stakeholders. We actively strive to create value for all stakeholders — including, but not limited to, our customers, employees, and communities we operate in. We endeavor to do so ethically and responsibly, while empowering the communities we operate in, and with minimal environmental impact.

Certain particular regional governments require that construction of new towers in Indonesia obtain environmental analysis. As the owner and operator of our telecommunications sites, our operations are subject to national and local laws and regulations relating to the management, use, storage, disposal, emission, and remediation of, and exposure to, hazardous and non-hazardous substances, materials and wastes. In general, our lease agreements prohibit our customers from using or storing any hazardous substances on our tower sites in violation of applicable environmental laws and require our customers to provide notice of certain environmental conditions caused by them.

The potential connection between radio frequency emissions and certain negative health effects, including some forms of cancer, has been the subject of substantial study by the scientific community in recent years. We have also experienced local community opposition to the building of certain sites for various reasons, including concerns about alleged health risks. See "Risk Factors — Risks Relating to Our Business — Our costs could increase and the growth of our revenues could decrease due to perceived health risks from radio emissions, especially if these perceived risks are substantiated." As a result of such local community opposition, we could be required by the local authorities to dismantle and relocate certain towers.

We have compliance programs and monitoring projects to help assure that we are in substantial compliance with applicable environmental laws. Nevertheless, there can be no assurance that the costs of compliance with existing or future environmental laws will not have a material adverse effect on our business, results of operations and financial condition.

We began sustainability reporting in 2019 by conducting a materiality assessment. We identified sustainability areas most relevant to our business which best represent the economic, environmental and social impact of our business activities and aligning them with the United Nation's Sustainable Development Goals. In 2020, we became a member of the United Nations Global Compact through the Indonesia Global Compact Network, to support the reduction of greenhouse gasses, to utilize renewable energy, and to focus on improving our community's well-being. We issued our second Sustainability Report in 2021, which was prepared in accordance with the Global Reporting Initiative's Standards: Core option, as well as in line with the Financial Services Authority Regulation ("POJK") No.51/POJK.03/2017.

Through internal engagement processes and validation from our Board of Directors, we have prioritized five key material topics based on our understanding of stakeholders' expectations and concerns, being economic performance, occupational health and safety, employee competency training and development, local communities and energy management. These topics form the basis of our sustainability approach and are outlined in detail in our Sustainability Report 2020, which is available on the Company's website. The information on the Issuer's website does not constitute part of this offering circular.

Corporate Social Responsibility

We have formulated a corporate social responsibility program that demonstrates our commitment to be a socially responsible partner in the communities near our tower sites. Our programs are focused on education, health, culture and environment, including:

- We have undertaken several initiatives in response to the COVID-19 pandemic in 2020. Our group provides support to the government and affected communities by distributing direct assistance for food packages, cloth masks as well as medical equipment. In 2020, our group distributed nine ventilators, more than 130,000 masks and more than 14,000 Personal

Protective Equipment (PPE) to medical personnel who carry out the task of caring for COVID-19 patients in various cities in Indonesia. In addition, Monik TBIG personnel educated communities on the importance of wearing masks and the practicing of safe distancing measures. We also developed a health application called "Si Monik", to assist local communities with analyzing and tracking disease history. In 2021, our Monik TBIG health professionals have also been deployed to assist in the Government's mass vaccination drive.

- We have continued our commitment in the TBIG Leading Curriculum by signing a memorandum of understanding with them, in order to encourage our partners to offer their internships to prospective graduates of the TBIG Leading Curriculum program. This coaching and development program focuses on curriculum infusion to vocational schools to assist vocational secondary education providers in minimizing the competency gap between education and the world of work. In 2019, TBIG expanded its coverage of the Leading Curriculum program to Palembang, South Sumatera.

- In 2018, we launched a new corporate social responsibility education program called "TBIG Activation." TBIG Activation aims to provide young people who want to produce effective and creative technology-based solutions to problems, an opportunity to showcase their talent, knowledge and application. There were six beneficiaries of the TBIG Activation program as of December 31, 2020. Three of the six fostered participants made it to the final phase of the program and succeeded in developing an Android-based application aimed at assisting the business and operations of micro business cooperatives in Central Java.

- The Company helped to construct the Public Vocational High School (SMKN) 7 Palu 2-story classroom as part of our disaster relief efforts in Palu. The construction was completed on November 1, 2019.

- In the area of health, the Company, in collaboration with *Rumah Zakat*, launched the TBIG Mobile Health Clinic to provide free access to medical facilities for people residing in certain areas in Indonesia that lack proper medical services and facilities. The TBIG Mobile Health Clinic is equipped with medical equipment and a doctor who provides medical check-ups and examinations for pregnant women, children, and senior citizens. The TBIG Mobile Health Clinic also provides local residents advice on to health and hygiene, disease prevention, provision of medicines, and proper nutrition for infants. We operate six TBIG Mobile Health Clinics, which include two in Sumatera, three in Java and one in Kalimantan, which together can reach 16 provinces across Indonesia.

- In 2020, the TBIG Mobile Health Clinics provided health services in the form of post-disaster treatment and assistance as well as COVID-19 related support to over 56,300 beneficiaries.

- In the area of culture, we continue to support the *Rumah Batik TBiG* or the TBIG Batik House, which was opened in 2014, as part of our corporate social responsibilities ("CSR") program in the area of Culture through *Bangun Budaya Bersama*/Building Culture Together. In 2019, the TBIG Batik House hosted 37 batik artisans.

- *Rumah Batik TBiG* was built at Desa Waru Pekalongan, and is used as a workshop and cooperative for local batik artisans to promote entrepreneurship and encourage these artisans to start their own businesses. Through the *Rumah Batik TBIG*, we hope to assist efforts to preserve the national art of batik making as well as improve the livelihoods of

batik artisans in Pekalongan. At the TBIG Batik House, we implemented a waste treatment process for the small-scale Batik industry. The process begins with flowing wastewater into a solid wax filtering tank and oil device so that the remaining wax from the wax removal process from batik cloth does not enter into the waste that could clog the filter. After the waste is separated into wax and water, the waste water enters the liquid waste collection basin. Waste water is then pumped up for the process of filtering liquid waste particles using four filtering processes. Once this is done, the water can be channeled to infiltration wells without carrying harmful substances that can damage the environment.

- We also established Koperasi Bangun Bersama, which is a cooperative that provides small and medium scale batik artists located in the Pekalongan area with financial and product distribution assistance. In 2019, the Company developed the online "KOOPERATIF" application platform to enable easier access to Koperasi Bangun Bersama's services. In 2020, we further improved the online application platform with a new name "KBB Mobile", to enable easier access to the services of Koperasi Bangun Bersama. This new platform has improved savings and loan performance as well as facilitated the process of selling and purchasing of batik products.

- In the area of the environment, we launched the TBIG Heart program in 2018, which is a carbon footprint reduction program that involves employees. The TBIG Heart program involves tree planting in conservation areas, including bamboo, quinine, resin, and pine. In 2018, tree planting was carried out in a 5,000 square meter area in the Pekalongan Regency. In October 2019, our employees joined the annual tree planting activities in the Pekalongan Regency. In 2020, due to the COVID-19 pandemic, our employees could not physically participate in planting trees. We expect to resume employee participation in 2021 with appropriate social distancing measures.

In recognition of our CSR efforts, we were recognized by the Pinnacle Group International for the best community program at the Global CSR Summit and Awards in 2018 and by BusinessNews Magazine for being a top leader on CSR commitment. We also received the CSR Brand Equity — Gold Award for the Telecommunication Industry category from ICONOMICS in February 2020. In April 2021, we received the Silver Champion category in Corporate Social Responsibility Program award at the 2021 Bisnis Indonesia Corporate Social Responsibility Award, and TOP CSR Awards #Star 4 award from TOP Business magazine.

Legal Proceedings

We are not currently involved in any material litigation or regulatory actions, the outcome of which would, in our management's judgment, have a material adverse effect on our results of operations or financial condition or the notes, nor is management aware of any such litigation or regulatory actions threatened against us

DESCRIPTION OF MATERIAL INDEBTEDNESS

Overview of Material Indebtedness

Our gross debt was Rp.28,790 billion (US$2.0 billion) as of June 30, 2021. It consisted of aggregate principal indebtedness of Rp.11,822,938 million (US$815.6 million) in U.S. dollar-denominated long-term loans, Rp.9,422,400 million (US$650.0 million) in U.S. dollar-denominated bonds, Rp.91,700 million (US$6.3 million) in Rupiah-denominated long-term loans, Rp.6,810,000 million (US$469.8 million) in Rupiah-denominated bonds, Rp.14,151 million (US$1.0 million) in lease liabilities – vehicles and Rp.629,106 million (US$43.4 million) in lease liabilities – right of use assets. Our gross debt (excluding lease liabilities – right of use assets) was Rp.28,161 billion (US$2.0 billion) for this period. See Notes 22, 23 and 24 to our unaudited interim consolidated financial statements as of June 30, 2021 and for the six months ended June 30, 2020 and 2021 for a further discussion of our gross debt outstanding under our long-term loans.

Our gross debt after taking into account our hedging arrangements was Rp.27,440 billion (US$1.9 billion) as of June 30, 2021. It consisted of Rp.11,356,573 million (US$783.4 million) in syndicated loans, Rp.91,700 million (US$6.3 million) in non-syndicated loans, Rp.15,348,263 million (US$1,058.8 million) in notes, and Rp.629,106 million (US$43.4 million) in lease liabilities – vehicles and Rp.14,151 million (US$1.0 million) in lease liabilities – right of use assets. Our gross debt after taking into account our hedging arrangements (excluding lease liabilities – right of use assets) was Rp.26,811 billion (US$1.8 billion) for this period. See Note 40 to our unaudited interim consolidated financial statements as of June 30, 2021 and for the six months ended June 30, 2020 and 2021 and "Management's Discussion and Analysis of Financial Condition and Results of Operations — Market Risk Disclosures" for further details of our financial risk management.

We set forth below a summary of the 2017 RLF, the 2018 RCF, the 2019 RLF, the 2020 RCF, the 2020 TLF, the 2021 RLF, the Credit Facilities, the IDR Bonds and the Existing USD Notes. The 2017 RLF, the 2018 RCF, the 2019 RLF, the 2020 RCF, the 2020 TLF, the 2021 RLF, the Credit Facilities, the IDR Bonds and the Existing USD Notes are intended to be used for loan payment, capital expenditure, acquisition of investment properties, and funding our working capital.

US$200.0 Million Revolving Loan Facility

On March 30, 2017, the Company, as parent, PT Triaka Bersama, PT Metric Solusi Integrasi, PT Telenet Internusa, PT United Towerindo, PT Tower Bersama, PT Tower One, PT Batavia Towerindo, PT Prima Media Selaras, PT Bali Telekom, PT Solu Sindo Kreasi Pratama, PT Mitrayasa Sarana Informasi, PT Solusi Menara Indonesia and PT Menara Bersama Terpadu, as original borrowers and original guarantors (the "Obligors" and each, an "Obligor") entered into a revolving loan facility agreement (the "2017 RLF Agreement"), pursuant to which the lenders specified therein granted us a US$200.0 million revolving loan facility (the "2017 RLF"). The original lenders under the 2017 RLF are Oversea-Chinese Banking Corporation Limited, PT Bank UOB Indonesia, The Bank of Tokyo-Mitsubishi UFJ, Ltd., Jakarta Branch, PT Bank CIMB Niaga Tbk, DBS Bank Ltd., The Hongkong and Shanghai Banking Corporation Limited, Jakarta Branch, CIMB Bank Berhad, Singapore Branch, PT Bank ANZ Indonesia, PT Bank BNP Paribas Indonesia and PT Bank DBS Indonesia. The proceeds of the loans under the 2017 RLF facility are to be applied towards our general funding requirements, including but not limited to capital expenditure and financing any permitted acquisitions. The RLF is irrevocably and unconditionally guaranteed by the Obligors.

The final repayment date of the 2017 RLF is June 30, 2022.

The rate of interest payable on each loan under the 2017 RLF is the percentage rate per annum which is the aggregate of LIBOR and a margin equivalent to:

- in relation to offshore lenders, 1.75% per annum; and
- in relation to onshore lenders, 2.00% per annum.

The 2017 RLF Agreement requires the Obligors to maintain (a) a Senior Leverage Ratio (as defined below) not exceeding 5.0 to 1.0, and (b) a Top Tier Revenue Ratio (as defined below) not less than 0.5 to 1.0.

Subject in each case to certain permitted exceptions as specified in the 2017 RLF Agreement, the 2017 RLF Agreement prohibits each Obligor from, among other things, creating or permitting to subsist any security over its assets, selling or disposing of any of its assets, paying or declaring any dividend or distribution, entering into any merger or corporate reconstruction, making any acquisition or investment, giving any guarantee or indemnity or becoming a creditor in respect of any financial indebtedness (other than in respect of any intercompany loans that are subordinated to the 2017 RLF Agreement in accordance with the 2017 Subordination Deed (as defined below)).

The "Senior Leverage Ratio" is calculated as the ratio of Total Net Senior Debt on a relevant quarter date to annualized adjusted EBITDA for the month ended on that quarter date.

"Total Net Senior Debt" is calculated as Total Senior Debt less cash and cash equivalent investment, and so that no amount shall be included or excluded more than once.

"Total Senior Debt" is calculated as the aggregate amount of all obligations of the Obligors for or in respect of financial indebtedness other than financial indebtedness that may be eliminated or disregarded for the purposes of preparing our consolidated accounts in accordance with GAAP, and includes financial indebtedness owing by an Obligor to a member of our group that is not an Obligor. To the extent that any financial indebtedness is hedged by an agreement relating to currency exchange protection, Total Senior Debt will be calculated taking into account the effects of any such currency exchange protection.

The "Top Tier Revenue Ratio" is calculated, for each relevant period, for the Obligors in aggregate, the ratio of revenue from certain specified customers to all revenue received for such relevant period (which shall be calculated by reference to the most recent financial statements delivered pursuant to the 2017 RLF Agreement).

We cannot assure you that we will be able to satisfy the conditions precedent to any future utilization of the 2017 RLF and, accordingly, we cannot assure you that we will be able to continue utilizing the 2017 RLF on the terms as described herein or at all. See "Risk Factors — Risks Relating to Our Business — We have a substantial amount of indebtedness. In the event we do not repay or refinance such indebtedness, we could face substantial liquidity issues and might be required to issue equity securities or securities convertible into equity securities, or sell some of our assets to meet our debt payment obligations."

As of June 30, 2021, an aggregate principal amount of Rp.1,617,753.6 million (US$111.6 million) of the 2017 RLF was outstanding.

2017 Subordination Deed

In connection with the 2017 RLF, the Obligors entered into a subordination deed dated March 30, 2017 (the "2017 Subordination Deed") with United Overseas Bank Limited, as agent of the finance parties (the "2017 RLF Agent") specified under the 2017 RLF Agreement. The Subordination Deed provides for the subordination of intercompany liabilities (the "2017 RLF Subordinated Liabilities") among the Obligors to the liabilities of the Issuer and the Obligors owing to the finance parties specified under the 2017 RLF Agreement and the other finance documents specified under the 2017 RLF Agreement.

Pursuant to the 2017 Subordination Deed, the 2017 RLF Agent's prior written consent is required before, among other things, any of the Obligors may, in their capacity as subordinated creditors:

(i) demand or accept payment or repayment in respect of the 2017 RLF Subordinated Liabilities;

(ii) create or permit to exist any security to secure payment and/or repayment of the 2017 RLF Subordinated Liabilities;

(iii) assign, transfer or otherwise dispose of any of the 2017 RLF Subordinated Liabilities;

(iv) take, accept or receive any payment or distribution of assets of any Obligor ("Distribution");

(v) (save only to the extent it is required to do so under any applicable law) set-off any 2017 RLF Subordinated Liabilities against the liabilities of the debtor to the subordinated creditor ("Debtor Liabilities");

(vi) take any enforcement action in relation to the 2017 RLF Subordinated Liabilities;

(vii) enter into any transactions causing to arise any Debtor Liabilities; or

(viii) agree to any variation of the agreements giving rise to the 2017 RLF Subordinated Liabilities (the "Subordinated Agreements") that could make any amount payable earlier or more frequently or subject any debtor to more onerous obligations.

For so long as no event of default shall be continuing, the Obligors are entitled to receive payments under the Subordinated Agreements and to do any of the matters listed above, other than the matters set out in clause (ii) above.

Pursuant to the 2017 Subordination Deed, the 2017 RLF Agent's prior written consent is required before, among other things, any of the Obligors may, in their capacity as subordinated debtors:

(i) pay or repay or otherwise seek to reduce any 2017 RLF Subordinated Liabilities;

(ii) create or permit to exist any security to secure payment or repayment of the 2017 RLF Subordinated Liabilities;

(iii) make any Distribution;

(iv) (save only to the extent it is required to do so under any applicable law) set-off any 2017 RLF Subordinated Liabilities against any Debtor Liabilities;

(v) take any enforcement action in relation to the 2017 RLF Subordinated Liabilities, enter into any transactions (other than permitted indebtedness pursuant to the Credit Facilities Agreement) causing to arise any Debtor Liabilities; or

(vi) agree to any variation of the Subordinated Agreements that could make any amount payable earlier or more frequently or subject any debtor to more onerous obligations.

For so long as no event of default shall be continuing, the Obligors are entitled to make payments under the Subordinated Agreements and to do any of the matters listed above, other than the matters set out in clause (ii) above.

US$375.0 Million Revolving Loan Facility

On June 28, 2019, the Obligors entered into a revolving loan facility agreement (the "2019 RLF Agreement"), pursuant to which the original lenders specified therein granted us a US$375.0 million revolving loan facility (the "2019 RLF"). The original lenders under the 2019 RLF are Oversea-Chinese Banking Corporation Limited, United Overseas Bank Limited, DBS Bank Ltd., Mizuho Bank, Ltd., Singapore Branch, Crédit Agricole Corporate and Investment Bank, Australia and New Zealand Banking Group Limited, Singapore Branch, CIMB Bank Berhad, Singapore Branch, PT Bank HSBC Indonesia, PT Bank CIMB Niaga Tbk, PT Bank OCBC NISP Tbk, The Hongkong and Shanghai Banking Corporation Limited, Singapore Branch, PT Bank BNP Paribas Indonesia and PT Bank DBS Indonesia. The proceeds of loans under the 2019 RLF facility are to be applied towards our general funding requirements, including but not limited to, capital expenditure and financing any permitted acquisitions and prepayment of existing indebtedness. The RLF is irrevocably and unconditionally guaranteed by the Obligors.

The final repayment date of the 2019 RLF is January 24, 2025.

The rate of interest payable on each loan under the 2019 RLF is the percentage rate per annum which is the aggregate of LIBOR and a margin equivalent to:

- in relation to offshore lenders, 1.75% per annum; and

- in relation to onshore lenders, 1.85% per annum.

The 2019 RLF Agreement requires the Obligors to maintain (a) a Senior Leverage Ratio (as defined below) not exceeding 5.0 to 1.0, and (b) a Top Tier Revenue Ratio (as defined below) not less than 0.5 to 1.0.

Subject in each case to certain permitted exceptions as specified in the 2019 RLF Agreement, the 2019 RLF Agreement prohibits each Obligor from, among other things, creating or permitting to subsist any security over its assets, selling or disposing of any of its assets, paying or declaring any dividend or distribution, entering into any merger or corporate reconstruction, making any acquisition or investment, giving any guarantee or indemnity or becoming a creditor in respect of any financial indebtedness (other than in respect of any intercompany loans that are subordinated to the 2019 RLF Agreement in accordance with the 2019 Subordination Deed (as defined below)).

The "Senior Leverage Ratio" is calculated as the ratio of Total Net Senior Debt on a relevant quarter date to annualized adjusted EBITDA for the month ended on that quarter date.

"Total Net Senior Debt" is calculated as Total Senior Debt less cash and cash equivalents, and so that no amount shall be included or excluded more than once.

"Total Senior Debt" is calculated as the aggregate amount of all obligations of the Obligors for or in respect of financial indebtedness other than financial indebtedness that may be eliminated or disregarded for the purposes of preparing our consolidated accounts in accordance with GAAP, and includes financial indebtedness owing by an Obligor to a member of our group that is not an Obligor. To the extent that any financial indebtedness is hedged by an agreement relating to currency exchange protection, Total Senior Debt will be calculated taking into account the effects of any such currency exchange protection.

The "Top Tier Revenue Ratio" is calculated, for each relevant period, for the Obligors in aggregate, the ratio of revenue from certain specified customers to all revenue received for such relevant period (which shall be calculated by reference to the most recent financial statements delivered pursuant to the 2019 RLF Agreement).

We cannot assure you that we will be able to satisfy the conditions precedent to any future utilization of the 2019 RLF and, accordingly, we cannot assure you that we will be able to continue utilizing the 2019 RLF on the terms as described herein or at all. See "Risk Factors — Risks Relating to Our Business — We have a substantial amount of indebtedness. In the event we do not repay or refinance such indebtedness, we could face substantial liquidity issues and might be required to issue equity securities or securities convertible into equity securities, or sell some of our assets to meet our debt payment obligations."

As of June 30, 2021, an aggregate principal amount of Rp.4,841,664 million (US$334.0 million) of the 2019 RLF was outstanding.

2019 Subordination Deed

In connection with the 2019 RLF, the Obligors entered into a subordination deed dated June 28, 2019 (the "2019 Subordination Deed") with United Overseas Bank Limited, as agent of the finance parties (the "Agent") specified under the 2019 RLF Agreement. The 2019 Subordination Deed provides for the subordination of intercompany liabilities (the "2019 RLF Subordinated Liabilities") among the Obligors to the liabilities of the Issuer and the Obligors owing to the finance parties specified under the 2019 RLF Agreement and the other finance documents specified under the 2019 RLF Agreement.

Pursuant to the 2019 Subordination Deed, the Agent's prior written consent is required before, among other things, any of the Obligors may, in their capacity as subordinated creditors:

(i) demand or accept payment or repayment in respect of the 2019 RLF Subordinated Liabilities;

(ii) create or permit to exist any security to secure payment and/or repayment of the 2019 RLF Subordinated Liabilities;

(iii) assign, transfer or otherwise dispose of any of the 2019 RLF Subordinated Liabilities;

(iv) take, accept or receive any payment or distribution of assets of any Obligor ("Distribution");

(v) (save only to the extent it is required to do so under any applicable law) set-off any 2019 RLF Subordinated Liabilities against the liabilities of the debtor to the subordinated creditor ("Debtor Liabilities");

(vi) take any enforcement action in relation to the 2019 RLF Subordinated Liabilities;

(vii) enter into any transactions causing to arise any Debtor Liabilities; or

(viii) agree to any variation of the agreements giving rise to the 2019 RLF Subordinated Liabilities (the "Subordinated Agreements") that could make any amount payable earlier or more frequently or subject any debtor to more onerous obligations.

For so long as no event of default shall be continuing, the Obligors are entitled to receive payments under the Subordinated Agreements and to do any of the matters listed above, other than the matters set out in clause (ii) above.

Pursuant to the 2019 Subordination Deed, the Agent's prior written consent is required before, among other things, any of the Obligors may, in their capacity as subordinated debtors:

(i) pay or repay or otherwise seek to reduce any 2019 RLF Subordinated Liabilities;

(ii) create or permit to exist any security to secure payment or repayment of the 2019 RLF Subordinated Liabilities;

(iii) make any Distribution;

(iv) (save only to the extent it is required to do so under any applicable law) set-off any 2019 RLF Subordinated Liabilities against any Debtor Liabilities;

(v) take any enforcement action in relation to the 2019 RLF Subordinated Liabilities, enter into any transactions (other than permitted indebtedness pursuant to the Credit Facilities Agreement) causing to arise any Debtor Liabilities; or

(vi) agree to any variation of the Subordinated Agreements that could make any amount payable earlier or more frequently or subject any debtor to more onerous obligations.

For so long as no event of default shall be continuing, the Obligors are entitled to make payments under the Subordinated Agreements and to do any of the matters listed above, other than the matters set out in clause (ii) above.

US$1.0 Billion Credit Facilities

On November 6, 2015, the Obligors entered into an amendment and restatement agreement, amending and restating the original credit facilities agreement entered into on November 21, 2014 between the Obligors and certain lenders specified therein (together, the "Credit Facilities Agreement"), pursuant to which the lenders (as defined in the Credit Facilities Agreement) granted us a US$400.0 million term loan facility ("Facility A"), a US$300.0 million revolving loan facility

("Facility B") and a US$275.0 million term loan facility ("Facility D", and together with Facility A and Facility B, the "Credit Facilities"). The final repayment date of Facility A was January 31, 2020. Pursuant to a request from the Obligors, the lenders agreed to reduce the available facility of Facility B by US$200.0 million, from US$300.0 million to US$100.0 million with effect from March 16, 2020. The original lenders under the Credit Facilities are The Bank of Tokyo-Mitsubishi UFJ, Ltd., Jakarta Branch, Oversea-Chinese Banking Corporation Limited, United Overseas Bank Limited, DBS Bank Ltd., PT Bank ANZ Indonesia, Sumitomo Mitsui Banking Corporation, Singapore Branch, CIMB Bank Berhad, Singapore Branch, The Hongkong and Shanghai Banking Corporation Limited, Jakarta Branch, The Hongkong and Shanghai Banking Corporation Limited, Crédit Agricole Corporate and Investment Bank, PT Bank BNP Paribas Indonesia, CTBC Bank Co., Ltd., Singapore and Chang Hwa Commercial Bank, Ltd, Singapore Branch. The proceeds of loans under the Credit Facilities are to be applied towards our general funding requirements, including but not limited to capital expenditure and financing any permitted acquisitions and prepayment of existing indebtedness. The Credit Facilities are irrevocably and unconditionally guaranteed by the Obligors.

With respect to Facility B, the final repayment date is June 30, 2022.

With respect to Facility D, the final repayment date was June 29, 2021. We have fully prepaid and refinanced Facility D in January 2021 with the funds drawn from the 2021 RLF. The final repayment date of the 2021 RLF is June 30, 2026.

The rate of interest payable on each loan under the Credit Facilities is the percentage rate per annum which is the aggregate of LIBOR and a margin equivalent to, in relation to Facility B, (in the case of offshore lenders) 1.75% and (in the case of onshore lenders) 1.85%.

The Credit Facilities Agreement requires the Obligors to maintain (a) a Senior Leverage Ratio (as defined below) not exceeding 5.0 to 1.0, and (b) a Top Tier Revenue Ratio (as defined below) not less than 0.5 to 1.0.

Subject in each case to certain permitted exceptions as specified in the Credit Facilities Agreement, the Credit Facilities Agreement prohibits each Obligor from, among other things, creating or permitting to subsist any security over its assets, selling or disposing of any of its assets, paying or declaring any dividend or distribution, entering into any merger or corporate reconstruction, making any acquisition or investment, giving any guarantee or indemnity or becoming a creditor in respect of any financial indebtedness (other than in respect of any intercompany loans that are subordinated to the Credit Facilities Agreement in accordance with the 2014 Subordination Deed (as defined below)).

The "Senior Leverage Ratio" is calculated as the ratio of Total Net Senior Debt on a relevant quarter date to annualized adjusted EBITDA for the month ended on that quarter date.

"Total Net Senior Debt" is calculated as total senior debt less cash and cash equivalent investments, and so that no amount shall be included or excluded more than once.

"Total Senior Debt" is calculated as the aggregate amount of all obligations of the Obligors for or in respect of financial indebtedness other than financial indebtedness that may be eliminated or disregarded for the purposes of preparing our consolidated accounts in accordance with GAAP, and includes financial indebtedness owing by an Obligor to a member of our group that is not an Obligor. To the extent that any financial indebtedness is hedged by an agreement relating to currency exchange protection, Total Senior Debt will be calculated taking into account the effects of any such currency exchange protection.

The "Top Tier Revenue Ratio" is calculated, for each relevant period, for the Obligors in aggregate, the ratio of revenue from certain specified customers to all revenue received for such relevant period (which shall be calculated by reference to the most recent financial statements delivered pursuant to the Credit Facilities Agreement).

We cannot assure you that we will be able to satisfy the conditions precedent to any future utilization of the Credit Facilities and, accordingly, we cannot assure you that we will be able to continue utilizing the Credit Facilities on the terms as described herein or at all. See "Risk Factors — Risks Relating to Our Business — We have a substantial amount of indebtedness. In the event we do not repay or refinance such indebtedness, we could face substantial liquidity issues and might be required to issue equity securities or securities convertible into equity securities, or sell some of our assets to meet our debt payment obligations."

As of June 30, 2021, we have outstanding principal amounts of Rp.1,377,120 million (US$95.0 million) under Facility B, and our committed and undrawn amounts under Facility B was Rp.72,480 million (US$5.0 million).

2014 Subordination Deed

In connection with the Credit Facilities, the Obligors entered into a subordination deed dated November 21, 2014 (the "2014 Subordination Deed") with United Overseas Bank Limited, as agent of the finance parties (the "Agent") specified under the Credit Facilities Agreement. The Subordination Deed provides for the subordination of intercompany liabilities (the "Subordinated Liabilities") among the Obligors to the liabilities of the Issuer and the Obligors owing to the finance parties specified under the Credit Facilities Agreement and the other finance documents specified under the Credit Facilities Agreement.

Pursuant to the 2014 Subordination Deed, the Agent's prior written consent is required before, among other things, any of the Obligors may, in their capacity as subordinated creditors:

(i) demand or accept payment or repayment in respect of the Subordinated Liabilities;

(ii) create or permit to exist any security to secure payment and/or repayment of the Subordinated Liabilities;

(iii) assign, transfer or otherwise dispose of any of the Subordinated Liabilities;

(iv) take, accept or receive any payment or distribution of assets of any Obligor ("Distribution");

(v) (save only to the extent it is required to do so under any applicable law) set-off any Subordinated Liabilities against the liabilities of the debtor to the subordinated creditor ("Debtor Liabilities");

(vi) take any enforcement action in relation to the Subordinated Liabilities;

(vii) enter into any transactions causing to arise any Debtor Liabilities; or

(viii) agree to any variation of the agreements giving rise to the Subordinated Liabilities (the "Subordinated Agreements") that could make any amount payable earlier or more frequently or subject any debtor to more onerous obligations.

For so long as no event of default shall be continuing, the Obligors are entitled to receive payments under the Subordinated Agreements and to do any of the matters listed above, other than the matters set out in clause (ii) above.

Pursuant to the 2014 Subordination Deed, the Agent's prior written consent is required before, among other things, any of the Obligors may, in their capacity as subordinated debtors:

(i) pay or repay or otherwise seek to reduce any Subordinated Liabilities;

(ii) create or permit to exist any security to secure payment or repayment of the Subordinated Liabilities;

(iii) make any Distribution;

(iv) (save only to the extent it is required to do so under any applicable law) set-off any Subordinated Liabilities against any Debtor Liabilities;

(v) take any enforcement action in relation to the Subordinated Liabilities, enter into any transactions (other than permitted indebtedness pursuant to the Credit Facilities Agreement) causing to arise any Debtor Liabilities; or

(vi) agree to any variation of the Subordinated Agreements that could make any amount payable earlier or more frequently or subject any debtor to more onerous obligations.

For so long as no event of default shall be continuing, the Obligors are entitled to make payments under the Subordinated Agreements and to do any of the matters listed above, other than the matters set out in clause (ii) above.

Rp.150,000 Million Revolving Credit Facility

On October 31, 2018, a subsidiary of the Company, PT Gihon Telekomunikasi Indonesia Tbk (the "2018 RCF Borrower"), and PT Bank UOB Indonesia entered into a revolving credit facility agreement, as amended from time to time, and as most recently amended on March 9, 2021 (the "2018 RCF Agreement"), which granted the 2018 RCF Borrower with: (i) an uncommitted revolving facility in the amount of Rp.100,000 million ("RCF 1") which can be withdrawn within the period starting from October 31, 2020 until October 31, 2021 and (ii) a committed revolving facility in the amount of Rp.50,000 million ("RCF 2" and, together with RCF 1, the "2018 RCF") which can be withdrawn within the period starting from January 10, 2021 until January 10, 2023. The facilities under the 2018 RCF Agreement are to be applied towards the working capital and capital expenditure of the 2018 RCF Borrower. The 2018 RCF Agreement is unsecured.

The final repayment date for each of the RCF 1 and RCF 2 is 180 days from the date of withdrawal of the facility, subject to an extension with the prior written approval from PT Bank UOB Indonesia.

The rates of interest payable on each loan under the 2018 RCF Agreement are as follows:

In the case when the Total Debt (as defined below) to EBITDA ratio is less than 3 times, in relation to:

- RCF 1, JIBOR plus 1.75% per annum; and
- RCF 2, JIBOR plus 2.50% per annum.

In the case when the Total Debt to EBITDA ratio is 3 times or more, in relation to:

- RCF 1, JIBOR plus 2.25% per annum; and
- RCF 2, JIBOR plus 3.00% per annum.

The 2018 RCF Agreement requires the 2018 RCF Borrower to maintain: (i) a maximum Total Debt to EBITDA ratio of 3.75 times and (ii) top tier revenue ratio in the minimum of 50%.

Subject to prior written approval from PT Bank UOB Indonesia, the 2018 RCF Agreement prohibits the 2018 RCF Borrower from, among other things, creating or permitting to subsist any security over its assets, selling or disposing of any of its assets, entering into any merger, consolidation or spin-off, making any acquisition or investment, giving any guarantee or indemnity or becoming a creditor in respect of any financial indebtedness.

The "Total Debt" means short term loans, long term loans and any debt of the 2018 RCF Borrower which bears an interest.

As of June 30, 2021, an aggregate of principal amount of Rp.46,700 million of the 2018 RCF Agreement was outstanding.

Rp.50,000 Million Term Loan Facility

On December 22, 2020, a subsidiary of the Company, PT Gihon Telekomunikasi Indonesia Tbk (the "2020 TLF Borrower") and PT Bank QNB Indonesia Tbk, entered into the Rp.50,000 million term loan facility with an interest rate of 2.75% plus one-month JIBOR per annum as set out in a term loan facility agreement (the "2020 TLF Agreement"). This committed facility will mature on December 22, 2025. Under the 2020 TLF Agreement, the 2020 TLF Borrower is required to adhere to the following conditions, among other things: (i) a debt to equity ratio of a maximum of 2 times; and (ii) a Debt Service Coverage Ratio of a minimum of 2 times. The "Debt Service Coverage Ratio" means EBITDA over total scheduled loan repayment and interest in the previous year.

The proceeds under the 2020 TLF Agreement are for the refinancing of capital expenditure of the 2020 TLF Borrower. The 2020 TLF Agreement is unsecured. Subject to prior written approval from PT Bank QNB Indonesia Tbk, the 2020 TLF Agreement prohibits the 2020 TLF Borrower from, among other things, providing any loan to a third party or its shareholders, making any investment outside its current business, giving any guarantee for the interest of other parties, having a total debt of more than Rp.200,000 million due to a new indebtedness and entering into any merger, consolidation, acquisition, spin-off or other corporate actions with the effect of violating the maximum credit limit set by PT Bank QNB Indonesia Tbk.

Rp.200,000 Million Revolving Credit Facility

On November 9, 2020, a subsidiary of the Company, PT Permata Karya Perdana (the "2020 RCF Borrower") and PT Bank UOB Indonesia entered into the 2020 RCF Agreement which granted the 2020 RCF Borrower with the 2020 RCF, an uncommitted revolving facility in the amount of Rp.200,000 million which can be withdrawn within the period starting from November 9, 2020 until November 9, 2021. The 2020 RCF Borrower may immediately withdraw the 2020 RCF in the amount of Rp.100,000 million after the signing of the 2020 RCF Agreement, and subsequent withdrawal is subject to the construction completion of 166 new towers by the 2020 RCF Borrower. The proceeds of the 2020 RCF is to be applied towards the 2020 RCF Borrower's general funding purposes, including the working capital of the 2020 RCF Borrower. The 2020 RCF Agreement is unsecured.

Under the 2020 RCF Agreement, the repayment date for the 2020 RCF shall be stated in a letter of withdrawal instruction approved by PT Bank UOB Indonesia. The rate of interest is JIBOR plus 2.00% (floating) per annum. The 2020 RCF Agreement requires the 2020 RCF Borrower to maintain: (i) a maximum Total Debt with Interest to EBITDA ratio of 4.00 times and (ii) top tier revenue ratio in the minimum of 30%. The "Total Debt with Interest" means short term loans, long term loans, shareholder loans, debt securities and capital lease (if any).

Subject to prior written approval from PT Bank UOB Indonesia, the 2020 RCF Agreement prohibits the 2020 RCF Borrower from, among other things, creating any security over its assets, selling or disposing of any of its assets, entering into any merger, consolidation or spin-off, making any acquisition or capital investment, giving any guarantee or becoming a creditor in respect of any financial indebtedness outside its ordinary course of business to non-affiliated parties.

US$275.0 Million Revolving Loan Facility

On January 20, 2021, the Obligors entered into a revolving loan facility agreement (the "2021 RLF Agreement"), pursuant to which the original lenders specified therein granted us a US$275.0 million revolving loan facility (the "2021 RLF"). The original lenders under the 2021 RLF are PT Bank BNP Paribas Indonesia, PT Bank CIMB Niaga Tbk, Crédit Agricole Corporate and Investment Bank, DBS Bank Ltd., PT Bank HSBC Indonesia, PT Bank Mizuho Indonesia, Oversea-Chinese Banking Corporation Limited, PT Bank OCBC NISP Tbk, Sumitomo Mitsui Banking Corporation Singapore Branch and United Overseas Bank Limited. The proceeds of loans under the 2021 RLF facility are to be applied towards our general funding requirements, including but not limited to, repayment of existing debt, capital expenditure and financing any acquisitions which are permitted under the Finance Documents (as defined in the 2021 RLF Agreement). The RLF is irrevocably and unconditionally guaranteed by the Obligors.

The final repayment date of the 2021 RLF is June 30, 2026.

The rate of interest payable on each loan under the 2021 RLF is the percentage rate per annum which is the aggregate of LIBOR and a margin equivalent to:

- in relation to offshore lenders, 1.75% per annum; and
- in relation to onshore lenders, 1.85% per annum.

The 2021 RLF Agreement requires the Obligors to maintain (a) a Senior Leverage Ratio (as defined below) not exceeding 5.0 to 1.0, and (b) a Top Tier Revenue Ratio (as defined below) not less than 0.5 to 1.0.

Subject in each case to certain permitted exceptions as specified in the 2021 RLF Agreement, the 2021 RLF Agreement prohibits each Obligor from, among other things, creating or permitting to subsist any security over its assets, selling or disposing of any of its assets, paying or declaring any dividend or distribution, entering into any amalgamation, demerger, merger or corporate reconstruction, making any acquisition or investment, giving any guarantee or indemnity or becoming a creditor in respect of any financial indebtedness (other than in respect of any intercompany loans that are subordinated to the 2021 RLF Agreement in accordance with the 2021 Subordination Deed (as defined below)).

The "Senior Leverage Ratio" is calculated as the ratio of Total Net Senior Debt on a relevant quarter date to annualized adjusted EBITDA for the month ended on that quarter date, and so that no amount shall be included or excluded more than once.

"Total Net Senior Debt" is calculated as Total Senior Debt less cash and cash equivalents, and so that no amount shall be included or excluded more than once.

"Total Senior Debt" is calculated as the aggregate amount of all obligations of the Obligors for or in respect of financial indebtedness other than financial indebtedness that may be eliminated or disregarded for the purposes of preparing our consolidated accounts in accordance with GAAP, and includes financial indebtedness owing by an Obligor to a member of our group that is not an Obligor. To the extent that any financial indebtedness included in the calculation of Total Senior Debt is hedged by an agreement relating to currency exchange protection, Total Senior Debt will be calculated taking into account the effects of any such currency exchange protection.

The "Top Tier Revenue Ratio" is calculated, for each relevant period, for the Obligors in aggregate, the ratio of revenue from certain specified customers to all revenue received for such relevant period (which shall be calculated by reference to the most recent financial statements delivered pursuant to the 2021 RLF Agreement).

We cannot assure you that we will be able to satisfy the conditions precedent to any future utilization of the 2021 RLF and, accordingly, we cannot assure you that we will be able to continue utilizing the 2021 RLF on the terms as described herein or at all. See "Risk Factors — Risks Relating to Our Business — We have a substantial amount of indebtedness. In the event we do not repay or refinance such indebtedness, we could face substantial liquidity issues and might be required to issue equity securities or securities convertible into equity securities, or sell some of our assets to meet our debt payment obligations."

As of June 30, 2021, an aggregate principal amount of Rp.3,986,400 million (US$275.0 million) of the 2021 RLF was outstanding.

2021 Subordination Deed

In connection with the 2021 RLF, the Obligors entered into a subordination deed dated January 20, 2021 (the "2021 Subordination Deed") with United Overseas Bank Limited, as agent of the finance parties (the "Agent") specified under the 2021 RLF. The 2021 Subordination Deed provides for the subordination of intercompany liabilities (the "2021 RLF Subordinated Liabilities") among the Obligors (save for the Issuer) to the liabilities of the Obligors owing to the finance parties specified under the 2021 RLF Agreement and the other finance documents specified under the 2021 RLF Agreement.

Pursuant to the 2021 Subordination Deed, the Agent's prior written consent is required before, among other things, any of the Obligors may, in their capacity as subordinated creditors:

(i) demand or accept payment or repayment in respect of the 2021 RLF Subordinated Liabilities;

(ii) take, accept, create, receive or permit to exist any security to secure payment and/or repayment of the 2021 RLF Subordinated Liabilities;

(iii) assign, transfer or otherwise dispose of any of the 2021 RLF Subordinated Liabilities;

(iv) take, accept or receive any payment or distribution of assets of any Obligor (save for the Issuer) ("Distribution");

(v) (save only to the extent it is required to do so under any applicable law) set-off any 2021 RLF Subordinated Liabilities against the liabilities of the subordinated creditor to the Obligors (save for the Issuer) ("Debtor Liabilities");

(vi) take any enforcement action in relation to the 2021 RLF Subordinated Liabilities;

(vii) enter into any transactions constituting or otherwise suffer to arise any Debtor Liabilities; or

(viii) agree to any variation of the agreements giving rise to the 2021 RLF Subordinated Liabilities (the "Subordinated Agreements") that could make any amount payable earlier or more frequently or subject any debtor to more onerous obligations or which could conflict with any provision of the 2021 Subordination Deed.

For so long as no event of default shall be continuing, the Obligors are entitled to receive payments under the Subordinated Agreements and to do any of the matters listed above, other than the matters set out in clause (ii) above.

Pursuant to the 2021 Subordination Deed, the Agent's prior written consent is required before, among other things, any of the Obligors may, in their capacity as subordinated debtors:

(i) pay or repay or otherwise seek to reduce any 2021 RLF Subordinated Liabilities;

(ii) create or permit to exist any security to secure payment or repayment of the 2021 RLF Subordinated Liabilities;

(iii) make any Distribution;

(iv) (save only to the extent it is required to do so under any applicable law) set-off any 2021 RLF Subordinated Liabilities against any Debtor Liabilities;

(v) take any enforcement action in relation to the 2021 RLF Subordinated Liabilities, enter into any transactions (other than permitted indebtedness pursuant to the 2021 RLF Agreement) constituting, or otherwise resulting in, any Debtor Liabilities; or

(vi) agree to any variation of the Subordinated Agreements that could make any amount payable earlier or more frequently or subject any debtor to more onerous obligations or which could conflict with any provision of the 2021 Subordination Deed.

For so long as no event of default shall be continuing, the Obligors are entitled to make payments under the Subordinated Agreements and to do any of the matters listed above, other than the matters set out in clause (ii) above.

Continuous Bonds

Continuous Bonds III Tower Bersama Infrastructure Phase IV Year 2020 ("Continuous Bonds III Phase IV")

On March 24, 2020, the Company issued Continuous Bonds III Phase IV with fixed interest rates, which are payable on a quarterly basis, in an aggregate principal amount of Rp.1.5 trillion. The Continuous Bonds III Phase IV constitute unsecured obligations of the Company, ranking *pari passu* with all other present and future unsecured obligations of the Company.

The Continuous Bonds III Phase IV comprised two series:

- Series A bonds in an aggregate amount of Rp.633 billion bearing interest at a fixed rate of 6.25% per annum. The Series A bonds was fully repaid on April 4, 2021; and

- Series B bonds in an aggregate amount of Rp.867 billion bearing interest at a fixed rate of 7.75% per annum. The maturity date of the Series B bonds is March 24, 2023.

Subject in each case to certain permitted exceptions as specified in the trust deed of the Continuous Bonds III Phase IV, the Company is prohibited from, among other things, entering into any merger or consolidation, creating any encumbrance over its assets or permitting the creation of any encumbrance over its consolidated subsidiaries' assets, disposing any of its fixed assets and/or permitting the disposal of any of its consolidated subsidiaries' fixed assets either in one or a series of transactions with a value of more than 10% of its total assets based on recent audited consolidated financial statements, issuing any secured bond or other secured securities through capital markets and providing any loan to, or giving any corporate guarantee for the benefit of, third parties and/or its affiliates. Further, the Company and/or its consolidated subsidiaries may incur new indebtedness provided that the Company maintains the ratio of total pro forma consolidation loans with pro forma EBITDA from the last quarter multiplied by 4 (four) of no more than 6.25 times on the date of incurring of such new indebtedness.

Net proceeds from the issuance of the Continuous Bonds III Phase IV were used to refinance parts of outstanding indebtedness of PT Solu Sindo Kreasi Pratama under the 2019 RLF Agreement.

As of June 30, 2021, an aggregate principal amount of Rp.867 billion (US$59.8 million) of the Continuous Bonds III Phase IV with respect to the Series B bonds was outstanding.

Continuous Bonds IV Tower Bersama Infrastructure Phase I Year 2020 ("Continuous Bonds IV Phase I")

On September 8, 2020, the Company issued Continuous Bonds IV Phase I with fixed interest rates, which are payable on a quarterly basis, in an aggregate principal amount of Rp.700 billion. The Continuous Bonds IV Phase I constitute unsecured obligations of the Company, ranking *pari passu* with all other present and future unsecured obligations of the Company.

The Continuous Bonds IV Phase I comprised two series:

- Series A bonds in an aggregate amount of Rp.231 billion bearing interest at a fixed rate of 6.30% per annum. The Series A bonds have been fully repaid on September 18, 2021; and

- Series B bonds in an aggregate amount of Rp.469 billion bearing interest at a fixed rate of 8.00% per annum. The maturity date of the Series B bonds is September 8, 2023.

Subject in each case to certain permitted exceptions as specified in the trust deed of the Continuous Bonds IV Phase I, the Company is prohibited from, among other things, entering into any merger or consolidation, creating any encumbrance over its assets or permitting the creation of any encumbrance over its consolidated subsidiaries' assets, disposing any of its fixed assets and/or permitting the disposal of any of its consolidated subsidiaries' fixed assets either in one or a series of transactions with a value of more than 10% of its total assets based on recent audited consolidated financial statements, issuing any secured bond or other secured securities through capital markets and providing any loan to, or giving any corporate guarantee for the benefit of, third parties and/or its affiliates. Further, the Company and/or its consolidated subsidiaries may incur new indebtedness provided that the Company maintains the ratio of total pro forma consolidation loans with pro forma EBITDA from the last quarter multiplied by 4 (four) of no more than 6.25 times on the date of incurring of such new indebtedness.

Net proceeds from the issuance of the Continuous Bonds IV Phase I were used to refinance parts of outstanding indebtedness of the Company under the trust deed of the Company's Continuous Bonds II Phase III issued in 2017.

As of June 30, 2021, an aggregate principal amount of Rp.700 billion (US$48.3 million) of the Continuous Bonds IV Phase I was outstanding.

Continuous Bonds IV Tower Bersama Infrastructure Phase II Year 2020 ("Continuous Bonds IV Phase II")

On December 2, 2020, the Company issued Continuous Bonds IV Phase II with fixed interest rates, which are payable on a quarterly basis, in an aggregate principal amount of Rp.750 billion. The Continuous Bonds IV Phase II constitute unsecured obligations of the Company, ranking *pari passu* with all other present and future unsecured obligations of the Company.

The Continuous Bonds IV Phase II comprised two series:

- Series A bonds in an aggregate amount of Rp.295 billion bearing interest at a fixed rate of 5.75% per annum. The maturity date of the Series A bonds is December 12, 2021; and

- Series B bonds in an aggregate amount of Rp.455 billion bearing interest at a fixed rate of 7.25% per annum. The maturity date of the Series B bonds is December 2, 2023.

Subject in each case to certain permitted exceptions as specified in the trust deed of the Continuous Bonds IV Phase II, the Company is prohibited from, among other things, entering into any merger or consolidation, creating any encumbrance over its assets or permitting the creation of any encumbrance over its consolidated subsidiaries' assets, disposing any of its fixed assets and/or permitting the disposal of any of its consolidated subsidiaries' fixed assets either in one or a series of

transactions with a value of more than 10% of its total assets based on recent audited consolidated financial statements, issuing any secured bond or other secured securities through capital markets and providing any loan to, or giving any corporate guarantee for the benefit of, third parties and/or its affiliates. Further, the Company and/or its consolidated subsidiaries may incur new indebtedness provided that the Company maintains the ratio of total pro forma consolidation loans with pro forma EBITDA from the last quarter multiplied by 4 (four) of no more than 6.25 times on the date of incurring of such new indebtedness.

Net proceeds from the issuance of the Continuous Bonds IV Phase II were used to refinance parts of outstanding indebtedness of PT Solu Sindo Kreasi Pratama under the 2019 RLF Agreement.

As of June 30, 2021, an aggregate principal amount of Rp.750 billion (US$51.7 million) of the Continuous Bonds IV Phase II was outstanding.

Continuous Bonds IV Tower Bersama Infrastructure Phase III Year 2021 ("Continuous Bonds IV Phase III")

On February 17, 2021, the Company issued Continuous Bonds IV Phase III with fixed interest rates, which are payable on a quarterly basis, in an aggregate principal amount of Rp.2,915 billion. The Continuous Bonds IV Phase III constitute unsecured obligations of the Company, ranking *pari passu* with all other present and future unsecured obligations of the Company.

The Continuous Bonds IV Phase III comprised two series:

- Series A bonds in an aggregate amount of Rp.1,898 billion bearing interest at a fixed rate of 5.50% per annum. The maturity date of the Series A bonds is February 27, 2022; and

- Series B bonds in an aggregate amount of Rp.1,017 billion bearing interest at a fixed rate of 6.75% per annum. The maturity date of the Series B bonds is February 17, 2024.

Subject in each case to certain permitted exceptions as specified in the trust deed of the Continuous Bonds IV Phase III, the Company is prohibited from, among other things, entering into any merger or consolidation, creating any encumbrance over its assets or permitting the creation of any encumbrance over its consolidated subsidiaries' assets, disposing any of its fixed assets and/or permitting the disposal of any of its consolidated subsidiaries' fixed assets either in one or a series of transactions with a value of more than 10% of its total assets based on recent audited consolidated financial statements, issuing any secured bond or other secured securities through capital markets and providing any loan to, or giving any corporate guarantee for the benefit of, third parties and/or its affiliates. Further, the Company and/or its consolidated subsidiaries may incur new indebtedness provided that the Company maintains the ratio of total pro forma consolidation loans with pro forma EBITDA from the last quarter multiplied by 4 (four) of no more than 6.25 times on the date of incurring of such new indebtedness.

Net proceeds from the issuance of the Continuous Bonds IV Phase III were used to refinance all of outstanding indebtedness of PT Solu Sindo Kreasi Pratama and parts of outstanding indebtedness of PT Tower Bersama under the 2021 RLF Agreement.

As of June 30, 2021, an aggregate principal amount of Rp.2,915 billion (US$201.1 million) of the Continuous Bonds IV Phase III was outstanding.

Continuous Bonds IV Tower Bersama Infrastructure Phase IV Year 2021 ("Continuous Bonds IV Phase IV")

On April 9, 2021, the Company issued Continuous Bonds IV Phase IV with a fixed interest rate, which are payable on a quarterly basis, in an aggregate principal amount of Rp.970 billion. The Continuous Bonds IV Phase IV constitute unsecured obligations of the Company, ranking *pari passu* with all other present and future unsecured obligations of the Company.

The Continuous Bonds IV Phase IV bear interest at a fixed rate of 5.50% per annum. The maturity date of the Continuous Bonds IV Phase IV is April 19, 2022.

Subject in each case to certain permitted exceptions as specified in the trust deed of the Continuous Bonds IV Phase IV, the Company is prohibited from, among other things, entering into any merger or consolidation, creating any encumbrance over its assets or permitting the creation of any encumbrance over its consolidated subsidiaries' assets, disposing any of its fixed assets and/or permitting the disposal of any of its consolidated subsidiaries' fixed assets either in one or a series of transactions with a value of more than 10% of its total assets based on recent audited consolidated financial statements, issuing any secured bond or other secured securities through capital markets and providing any loan to, or giving any corporate guarantee for the benefit of, third parties and/or its affiliates. Further, the Company and/or its consolidated subsidiaries may incur new indebtedness provided that the Company maintains the ratio of total pro forma consolidation loans with pro forma EBITDA from the last quarter multiplied by 4 (four) of no more than 6.25 times on the date of incurring of such new indebtedness.

Net proceeds from the issuance of the Continuous Bonds IV Phase IV were used to refinance parts of outstanding indebtedness of PT Solu Sindo Kreasi Pratama under the 2019 RLF Agreement.

As of June 30, 2021, an aggregate principal amount of Rp.970 billion (US$66.9 million) of the Continuous Bonds IV Phase IV was outstanding.

Continuous Bonds V Phase I

On August 19, 2021, the Company issued Continuous Bonds V Phase I with a fixed interest rate, which are payable on a quarterly basis, in an aggregate principal amount of Rp.1.2 trillion. The Continuous Bonds V Phase I constitute unsecured obligations of the Company, ranking *pari passu* with all other present and future unsecured obligations of the Company.

The Continuous Bonds V Phase I bear interest at a fixed rate of 4.25% per annum. The maturity date of the Continuous Bonds V Phase I is August 29, 2022.

Subject in each case to certain permitted exceptions as specified in the trust deed of the Continuous Bonds V Phase I, the Company is prohibited from, among other things, entering into any merger or consolidation, creating any encumbrance over its assets or permitting the creation of any encumbrance over its consolidated subsidiaries' assets, disposing any of its fixed assets and/or permitting the disposal of any of its consolidated subsidiaries' fixed assets either in one or a series of transactions with a value of more than 10% of its total assets based on recent audited consolidated financial statements, issuing any secured bond or other secured securities through capital markets and providing any loan to, or giving any corporate guarantee for the benefit of, third parties and/or its affiliates.

Net proceeds from the issuance of the Continuous Bonds V Phase I were used to refinance parts of outstanding indebtedness of PT Solu Sindo Kreasi Pratama under the 2019 RLF Agreement.

As of the date of this Offering Circular, an aggregate principal amount of Rp.1.2 trillion (US$82.8 million) of the Continuous Bonds V Phase I was outstanding.

US$350.0 million 4.25% Senior Unsecured Notes due 2025

On January 21, 2020, the Company issued the 2025 Existing USD Notes. Interest on the Existing USD Notes is payable at 5.25% per annum on a semi-annual basis. The Existing USD Notes will mature on February 21, 2025.

The 2025 Existing USD Notes contain, among others, covenants relating to asset sales, restricted payments, restrictions on incurrence of indebtedness and issuance of preferred stock, limitations on liens, limitations on sale and leaseback transactions, dividend and payment restrictions affecting certain restricted subsidiaries of the Company, merger, consolidation or sale of assets and limitations on issuance of guarantees of indebtedness.

The net proceeds of the 2025 Existing USD Notes were used to refinance outstanding indebtedness under certain revolving loan facilities and credit facilities.

As of June 30, 2021, an aggregate principal amount of Rp.5,073,600 million (US$350.0 million) of the 2025 Existing USD Notes was outstanding.

US$300.0 million 2.75% Senior Unsecured Notes due 2026

On January 20, 2021, the Company issued the 2026 Existing USD Notes. Interest on the 2026 Existing USD Notes is payable at 2.75% per annum on a semi-annual basis. The 2026 Existing USD Notes will mature on January 20, 2026.

The 2026 Existing USD Notes contain, among others, covenants relating to negative pledge, merger, consolidation or sale of assets and payments for consent.

The net proceeds of the 2026 Existing USD Notes were used to repay outstanding indebtedness under certain revolving credit facilities and for general corporate purposes.

As of June 30, 2021, an aggregate principal amount of Rp.4,348,000 million (US$300.0 million) of the 2026 Existing USD Notes was outstanding.

REGULATION OF THE TOWER LEASING INDUSTRY IN INDONESIA

Overview

The tower leasing industry in Indonesia is subject to a variety of national and local regulations.

National Regulations

Investment Law

Foreign direct investment in Indonesia is governed under Law No. 25 of 2007 on Investment as amended by the Omnibus Law ("Investment Law"). Not all foreign investment, however, is governed by the Investment Law or is under the authority of BKPM. A number of sectors, including forestry, mining, and oil and gas, are wholly or partly subject to separate regulatory regimes. On February 2, 2021, the Government issued Presidential Regulation No. 10 of 2021 on Investment Business Activities as further amended by Presidential Regulation No. 49 of 2021 ("Priority Investment List"), which revokes the Presidential Regulation No. 44 of 2016 on List of Lines of Business Closed and Conditionally Open for Investment ("2016 Negative List"). The Priority Investment List specifies the prioritized lines of business eligible for fiscal and/or non-fiscal incentives, lines of business reserved for or in partnership with micro, small and medium businesses and lines of business that are open with certain conditions. Previously, the 2016 Negative List restricted foreign direct investment in telecommunication tower business but such restriction has been removed under the Priority Investment List, meaning that 100% foreign direct investment is now allowed for the telecommunication tower business.

Building Law

Prior to the enactment of the Omnibus Law, construction of any building, including telecommunication towers, must be completed with a Building Construction Permit (*Izin Mendirikan Bangunan* or "IMB") as required under Law No. 28 of 2002 on Building. Following the enactment of the Omnibus Law, the IMB has been replaced by a new permit referred to as a Building Approval (*Persetujuan Bangunan Gedung* or "PBG") to be issued by the central or regional government according to their respective authorities.

Pursuant to Government Regulation No. 16 of 2021 on Implementing Regulation of Law No. 28 of 2002 on Building ("GR No. 16/2021") which was issued on February 2, 2021, existing building licenses such as IMBs shall remain valid until the expiry of the said licenses. After the enactment of GR No. 16/2021, PBG must be obtained before starting construction. The application of PBG is to be submitted online via the Building Management Information System (Sistem Informasi Manajemen Bangunan Gedung or SIMBG).

In addition, GR No. 16/2021 allows a single PBG to be issued for several buildings which are to be erected within one area with the same technical plan, provided that such buildings are owned by the same party. In other words, the applicant will not be required to file for separate construction permits for each building if they meet the above criteria.

Telecommunication Law

In 2020, Law No 36 of 1999 regarding Telecommunication was amended by the Omnibus Law (the "Telecommunication Law"). As amended, the Telecommunication Law introduces several new

provisions relating to the construction and usage of passive infrastructures such as telecommunication towers. Under the Telecommunication Law, the Central Government and Regional Governments shall facilitate the construction of passive infrastructures for collective and affordable use by telecommunications operators.

The Telecommunication Law also provides that tower companies must provide access for operators to use their towers in a fair, reasonable and non-discriminative manner. On February 2, 2021, the Government issued Government Regulation 46 of 2021 on Postal, Telecommunication and Broadcasting ("GR No. 46/2021"), which further regulates the usage of passive infrastructures (including telecommunication towers). Pursuant to GR No. 46/2021, the cooperation between telecommunications operators and providers of passive infrastructures should be conducted with reasonable and cost-based pricing. The providers of passive infrastructures are expected to set their pricing by considering national efficiency, market conditions, positive impact on the economy and public interest. If the pricing set by providers of passive infrastructures is deemed to not be made with such considerations, the Minister of Communication and Informatics ("MOCI") has the authority to set a pricing threshold applicable for providers of passive infrastructures.

On April 1, 2021, the MOCI enacted the Regulation No. 5 of 2021 on Telecommunication Operation ("MOCI Regulation No. 5/2021") to implement GR No. 46/2021. Under MOCI Regulation No. 5/2021, passive infrastructure providers are required to provide access to telecommunication operators and disclose the availability of passive infrastructure capacity in a transparent and non-discriminative manner. The providers can only refuse access to operators due to any of the following reasons: (i) there is unavailable capacity; (ii) access is reserved for wider public interest; and/or (iii) access is not technically feasible. In such cases, the passive infrastructure providers must provide the reasons of its refusal in writing to the operators.

The cooperation on the use of passive infrastructure must be set forth in a written agreement. Such agreement must contain at least the following: (i) rights and obligations of operators and passive infrastructure providers, (ii) tariff, (iii) usage capacity, (iv) term of cooperation, and (v) dispute settlement. In relation to tariffs for the use of passive infrastructure, MOCI Regulation No. 5/2021 requires passive infrastructure providers: (i) to set the tariff at a reasonable and on a cost-basis price by taking into account, among others, the investment costs, operational costs, maintenance costs and reasonable profit, (ii) to publish and disclose the tariff in a transparent and non-discriminative manner, (iii) to provide the calculation of the tariff, if requested by operators, and (iv) to abide by MOCI's policies if MOCI sets a ceiling tariff for the use of passive infrastructure.

The Omnibus Law also introduces provisions relating to the sharing of radio frequency spectrum which is further implemented in GR No. 46/2021 and MOCI Regulation No. 7 of 2021 on Use of Radio Frequency Spectrum ("MOCI Regulation No. 7/2021"). Under GR No. 46/2021, the use of radio frequency spectrum must obtain prior license from the MOCI. With prior evaluation and approval from MOCI, telecommunication operators having radio frequency license may cooperate with other telecommunication operators in terms of jointly using the radio frequency spectrum for the application of new technology. Under GR No. 46/2021 and MOCI Regulation No. 7/2021, cooperation between telecommunication operators with radio frequency license will be facilitated by the Government with the aim of, among others, expanding telecommunication coverage area, providing more affordable telecommunication services for the public as well as presenting new types of telecommunication services.

The Joint Regulation

In 2009, the Minister for Communication and Informatics, the Minister of Home Affairs, the Minister of Public Works and the Head of the Investment Coordinating Board issued a joint regulation providing guidelines on the construction and joint operation of telecommunications towers (the "Joint Regulation"). The Joint Regulation regulates the construction and operation of co-location towers although its acceptance and adoption varies in different regions of Indonesia. Under the Joint Regulation, tower sites for mobile telecommunications can only be constructed and operated by telecommunications operators or tower companies.

The Joint Regulation requires all tower companies to adopt the provisions of the Joint Regulation within two years of its promulgation (March 30, 2011). Although the Joint Regulation imposes minor additional requirements on tower construction, including requirements as to the supporting facilities as described above, it supports strict compliance with local zoning plans and recognizes the authority of local governments to supervise implementation. The Joint Regulation sets out administrative and technical requirements that must be met prior to issuing the IMBM. Aside from general corporate matters, administrative requirements include, most importantly (i) approval from each of the household of the surrounding community within a radius in accordance with the height of the tower; (ii) confirmation of zoning compliance; or (iii) recommendation from relevant authorities for towers in specific areas. The Joint Regulation further provides that all towers must satisfy Indonesian or other internationally applicable standards to ensure safety. The general standards are set out in the Joint Regulation.

Under the Joint Regulation, tower companies must be wholly owned by Indonesian persons or entities, unless the tower operator company is a publicly listed company. Publicly issued shares of tower companies may be owned by Indonesian or foreign persons or entities. Privately owned tower companies with foreign shareholding must comply with this requirement within two years, or by March 30, 2011. Whether the removal of foreign shareholding restriction in telecommunication tower business as introduced by the Priority Investment List will be followed by an amendment to provisions of the Joint Regulation that remains to be seen.

It also remains to be seen whether the provision under this Joint Regulation will be affected by changes introduced in the further implementing regulations of the Omnibus Law, particularly whether the requirement to obtain IMBM will be replaced by PBG.

Tower Sharing Arrangements

Co-locations provided by tower companies must allow equal, non-discriminatory opportunity to telecommunications providers to utilize the towers in line with the relevant towers' technical capacity. Tower companies must transparently inform co-location applicants of the towers' available capacity and employ a queuing mechanism on a first-come, first-serve basis.

Subject to requirements under MOCI Regulation No. 5/2021 as mentioned above, tower companies may charge the telecommunications provider for co-locations based on reasonable and on a cost-basis rates determined by reference to capital investment, operational costs, maintenance costs and return on investment including profits.

Environmental Management

Environmental protection in Indonesia is governed by disparate laws, regulations and decrees, including:

- Law No. 32 of 2009 on Environmental Protection and Management ("Law No. 32 of 2009") as amended by the Omnibus Law (the "Environmental Law");

- Government Regulation No. 22 of 2021 on Environment Protection and Management, which superseded among others, Government Regulation No. 27 of 2012 on Environmental License;

- Minister of Environment and Forestry Regulation No. 4 of 2021 on List of Businesses and/or Activities Requiring Environmental Impact Analysis, Environmental Management Plan and Environmental Monitoring Plan or Statement Letter of Undertaking on Environment Management and Monitoring ("Regulation No. 4/2021"), which superseded Minister of Environment and Forestry Regulation No. P.38/MENLHK/SETJEN/KUM.1/7/2019 on Types of Business and/or Activity Plans Requiring Environmental Impact Analysis; and

- Minister of Environment Regulation No. 03 of 2013 on Environmental Audit ("Regulation No. 03/2013").

The Environmental Law contains several material provisions, including:

- Following the enactment of the Omnibus Law, the requirement to obtain an Environmental License has been removed and replaced by an Environmental Approval (*Persetujuan Lingkungan*). This Environmental Approval can be in the form of a Decree of Environmental Feasibility (*Keputusan Kelayakan Lingkungan Hidup*) or Statement on the Undertaking of Environmental Management (*Pernyataan Kesanggupan Pengelolaan Lingkungan Hidup*) which has been approved by the central or regional government according to their respective authorities;

- Any company conducting business and/or activity that has a potentially significant impact on the environment is required to conduct an Environmental Impact Analysis (*Analisis Mengenai Dampak Lingkungan* or AMDAL) and prepare certain documents containing such analysis. The AMDAL documents must then be evaluated and approved by the central government or the regional government according to their respective authorities. If the government approves the AMDAL documents, the government will issue an Environmental Approval (*Persetujuan Lingkungan*) in the form of a Decree of Environmental Feasibility (*Keputusan Kelayakan Lingkungan Hidup*). The issuance of a Decree of Environmental Feasibility (Keputusan Kelayakan Lingkungan Hidup) must be announced to the public. The types of businesses and activities requiring AMDAL are stipulated in Regulation No. 4/2021;

- If a company's business does not fall within the types of businesses and activities requiring AMDAL, it must fulfill the Environmental Management Plan and Environmental Monitoring Plan (*Upaya Pengelolaan Lingkungan Hidup dan Upaya Pemantauan Lingkungan Hidup* or UKL-UPL standard). The UKL-UPL documents must be evaluated and approved by the central government or the regional government according to their respective authorities. The fulfillment of UKL-UPL standard is declared in a Statement on the Undertaking of Environmental Management (*Pernyataan Kesanggupan Pengelolaan Lingkungan Hidup*) which shall also serve as Environmental Approval;

- In the event that the business and/or activity do not require a UKL-UPL, the company is required to provide a Statement Letter on the Undertaking of Environmental Management and Monitoring (*Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup* or SPPL) which is to be integrated with the Business Identification Number (*Nomor Induk Berusaha* or NIB);

- Any business that imposes significant risk of environmental impact and/or does not appear to comply with the environmental regulations are required to conduct environmental audit;

- On March 7, 2013, the Minister of Environment ("MOE") enacted Regulation No. 03/2013, setting out the requirements of voluntary and mandatory environmental audits. Each environmental audit, whether voluntary or mandatory is to be performed by a certified environmental auditor team. The mandatory environmental audit may be imposed at the MOE's direction on businesses that do not appear to be in compliance with the environmental regulations, at the cost and expense of the businesses being audited;

  The mandatory environmental audit process is to be stated in an audit result report and reviewed by the MOE. Later, MOE will determine any follow-up actions to be imposed on the audited business. Such follow-up actions are limited to the following: (i) improvement in performance of environmental management and monitoring of the audited business; (ii) amendment of the audited business's environmental permit; (iii) imposing restrictions and conditions on the extension of environmental protection and management permits; and/or (iv) legal enforcement actions;

- The holder of Environmental Approval is required to post an environmental rehabilitation bond with a designated state-owned bank in order to ensure that environmental rehabilitation is properly carried out, with the exception that the environmental rehabilitation bond may be managed privately for businesses and/or activities that fulfill certain criteria as determined by the Government;

- Any business that disposes of hazardous and toxic waste is required to obtain approval from the central government, and such waste may only be disposed of at certain designated locations;

- Preventative and remedial measures and sanctions (such as the obligation to rehabilitate contaminated areas, the imposition of substantial criminal penalties and fines and the revocation of business license) may be imposed in order to prevent or remedy the impacts of pollution caused by commercial operations; and

- Sanctions of between one and 15 years' imprisonment, and/or fines of between Rp.500 million and Rp.15 billion, may be imposed on any person causing environmental pollution or damage. The sanctions imposed (both prison terms and fines) will be increased by one-third if the offense is perpetrated upon order of a party to commit such offense or a party acted as the leader of such offense.

All of the ancillary regulations issued under the previous environmental legislation, including Law No. 32 of 2009, remain in effect to the extent that they do not conflict with the Environmental Law. However, if new implementing regulations are issued, which may result in the revocation of the previous implementing regulations, we will be required to comply with the new regulations to the extent applicable.

Local Regulations

Tower Permits, Licenses

Under the Joint Regulation, every construction of ground-based tower with height of more than 6 meters will be subject to the requirement to obtain a permit to build the tower in the form of building construction permit (*Izin Mendirikan Bangunan Menara* or IMBM) issued by the central or regional government. The Joint Regulation also states that IMB (which, by virtue of the Omnibus Law, has been replaced by PBG) or IMBM for a ground-based tower have no expiry in so far as there are no changes to the tower's construction; however, the tower companies must annually assess the towers "construction worthiness" and report the findings to the local authorities.

The Joint Regulation appears to exempt specific permit requirements for towers which are placed on top of buildings (provided the height does not exceed the maximum limit) or other structures. However, if the tower installation changes the construction of the building, approval may be required for such changes.

It remains to be seen whether the change from IMB to PBG as introduced by the Omnibus Law will be followed by an amendment to provisions of the Joint Regulation.

In addition to the above, certain municipalities and regencies require telecommunication towers to have tower operational licenses (*Izin Operasional Menara* or IOM). These local regulations prescribe various penalties for failure to obtain such IOMs which are largely administrative in nature, although some of the local regulations introduced by certain municipalities and regencies may require tower dismantling and/or impose criminal sanctions in the event of non-compliance. As the Regional Autonomy Law provides that regional regulations must not be in conflict with laws and regulations which are higher on the hierarchy, it remains to be seen whether these regional requirements to obtain IOM will be adjusted to conform with requirements of a PBG.

Tower Locations

The placement of towers must be in line with local zoning requirements which may include restricted and permitted areas for tower construction and restrictions on tower population and density. Construction in specific areas, such as airport/ports, protected forest or secured areas, must also comply with prevailing rules for the relevant industrial sector, such as the "borrow and use" permit for forest areas.

In June 2010, the Minister of Home Affairs issued Regulation No. 32 of 2010 on Guidelines for Issuance of Building Construction Permit ("MHA Regulation 32"), which provides guidance over the issuance of IMB. Although MHA Regulation 32 does not specifically regulate telecommunication towers, it generally recognizes tower construction as an activity requiring IMB. Under MHA Regulation 32, the issuance of IMB is based on detailed zoning plan issued by the relevant local government. Buildings constructed prior to the issuance of a zoning plan are allowed to remain in place subject to subsequent application for an IMB. Buildings constructed after the issuance of the zoning plan must be in compliance with the zoning plan and require an IMB to be approved and issued by the local authorities, without which the building may be ordered to be dismantled. However, as the IMB has been replaced by a PBG, it remains to be seen how the provisions under this MHA Regulation 32 will be adjusted to conform with such replacement.

Jakarta

The Governor of Jakarta has issued Regulation No. 14 of 2014 on Telecommunication Tower Implementation ("Regulation No. 14/2014") on February 11, 2014, which governs, among other things: (i) existing telecommunication towers; (ii) the construction of new telecommunication towers; (iii) the placement of equipment and the location and forms of the towers; (iv) tower zoning; (v) building construction permits for towers; (vi) the issue of Telecommunication Equipment Placement Permit or *Izin Penempatan Perangkat Telekomunikasi* ("IPPT"); and (vii) technical requirements for tower construction.

Regulation No. 14/2014 specifies the designated areas in which towers may be constructed, comprising the following zones: (i) new tower zones; (ii) existing tower zones that have been jointly utilized by at least two telecommunications operators; or (iii) existing tower zones where the condition of the existing towers is not technically compatible with height or construction requirements. In addition, certain specifications are imposed on the construction of new towers, including, among others, (i) the availability of land in accordance with technical specifications of the towers; (ii) height technical requirements imposed by flight operation safety areas or *Kawasan Keselamatan Operasi Penerbangan*; (iii) the requirement for tower structures to be able to accommodate telecommunication equipment from at least two telecommunication operators; and (iv) the requirement for tower coordinates, frequency spectrums and radiation levels to be assessed by Communications, Information and Public Relations Office of Jakarta.

Under Regulation No. 14/2014, the following permits and documents are required for existing towers: (i) the Tower IMB; (ii) IPPT; and (iii) the Tower Construction Feasibility Letter or *Surat Kelayakan Konstruksi Menara*. In addition, the existing towers are required to be located in permitted tower zones. Regulation 14/2014 provides a six-month grace period from the date of its issuance for: (i) technical recommendations to be obtained from Communications, Information and Public Relations Office of Jakarta for existing towers located within tower zones to be converted to co-location towers; (ii) tower IMBs to be applied for illegal existing towers located within permitted tower zones; and (iii) relocation of existing towers constructed outside permitted tower zones. Sanctions for breaches to Regulation 14/2014 range from the issuance of warning letters to the enforced dismantlement of towers that are not built in compliance with the regulation.

Based on a letter No. 1195/-1.817 dated June 12, 2006, the Governor of Jakarta has confirmed that the Company, through one of its subsidiaries, PT Batavia Towerindo, has been assigned as one of Jakarta's partners for development of telecommunications towers in the Jakarta area.

Batam

The Municipality of Batam has issued Regional Regulation No. 6 of 2009 on Telecommunication Towers in Batam Municipality ("Batam Regulation 6"), whereby the placement and distribution of tower sites in Batam must comply with the regulation issued by the Batam Mayor upon consultation with the Regional House of Representatives of Batam Municipality. Batam Regulation 6 envisages the distribution of tower placements within several zones based on population density, building proximity and infrastructure in the relevant areas, to be detailed in a separate regulation issued by the Batam Mayor.

Batam Regulation 6 classifies tower sites into single and co-location towers if they are used by at least three telecommunications operators. Batam Regulation 6 envisages tower constructions to be implemented under a co-location framework and any application for construction of new towers must

comply with the specification for co-location towers. Further, it requires that towers existing prior to the promulgation of Batam Regulation 6, insofar as their specification permits, must be operated as collocation towers.

Batam Regulation 6 requires any tower construction to obtain prior recommendation for tower construction and IMB to be issued by the Batam Mayor or designated officers. The tower companies must conduct periodic assessment of tower construction worthiness and report the findings annually to the mayor of Batam or designated officers. The tower companies must also insure their towers while remaining liable for any accidents resulting from construction of their towers.

Tower companies are expected to contribute to local development through third party contribution to the Batam Municipality budget or corporate social responsibility programs. The amount and procedures of such contribution are to be set out in an agreement between tower companies and the Batam Municipality.

Failure to comply with certain provisions of Batam Regulation 6, may subject the tower company to administrative sanctions in the form of written warnings, permit suspensions or revocations, and/or tower dismantlement orders. Non-compliant tower specifications resulting in tower malfunction that endangers the surrounding community is a misdemeanor punishable by maximum of six months, imprisonment and a fine of at most Rp.50 million.

Tower companies must, comply with Batam Regulation 6 within two years as of its issuance, or be subject to tower relocation at their own expense.

Based on a letter No. B/42/PDSI/X/2007 dated October 24, 2007, Batam Island Industrial Area Development Authority ("Otorita Batam") confirmed that the Company, through one of its subsidiaries, PT Telenet Internusa, has been assigned as one of Otorita Batam's partner for the development of towers in the Batam area.

Our Board of Commissioners consists of four members (including two independent commissioners) and our Board of Directors consists of five members. Commissioners and Directors are elected for a five-year term, without prejudice to the rights of the general meeting of shareholders to dismiss a Commissioner or a Director during their term of office or to reappoint a Commissioner or Director whose term of office has expired. Members of our Board of Directors and Board of Commissioners are each appointed through a general meeting of shareholders. The duties and authority of each member of the Board of Commissioners and the Board of Directors are regulated by our articles of association.

The Board of Commissioners and Board of Directors of the Company were elected for a term of five years at the Annual General Meeting of Shareholders held on May 18, 2020.

Board of Commissioners

Our Board of Commissioners is responsible for providing supervision and advice to the Board of Directors. As of June 30, 2021, our Board of Commissioners consisted of four members.

Name	Age	Position
Edwin Soeryadjaya	72	President Commissioner
Winato Kartono	50	Commissioner
Ludovicus Sensi Wondabio	57	Independent Commissioner
Wahyuni Bahar	60	Independent Commissioner

Edwin Soeryadjaya has been the President Commissioner since March 2010. Edwin is one of the major shareholders of SRTG. Edwin is an Indonesian citizen and earned a Bachelor of Business Administration from University of Southern California, United States, in 1974. Besides his role as President Commissioner in SRTG, he currently also serves as the President Commissioner and/or Commissioner of other companies, including PT Adaro Energy Tbk., PT Merdeka Copper Gold Tbk and PT Mitra Pinasthika Mustika Tbk. He previously held several positions at PT Astra International Tbk from 1978 to 1993, with his last position as vice president director.

Winato Kartono has been a Commissioner since March 2010. Winato is a major shareholder of PT Provident Capital Indonesia. Winato is an Indonesian citizen and he received a Bachelor of Economics from Trisakti University, Indonesia. He co-established Provident Capital Indonesia, a major shareholder of the Company, in 2005. Winato was previously the head of investment banking in Indonesia for Citigroup Global Markets. During his eight years at Citigroup, he also served as director in telecommunications and as vice president in mergers and acquisitions. Prior to joining Citigroup, he worked for Arthur Andersen and Bank Sumitomo Niaga in Jakarta.

Ludovicus Sensi Wondabio has been an Independent Commissioner since May 2020. Ludovicus is an Indonesian Citizen. He received a Bachelor of Economics in 1987, a Master of Management – Management Accounting Concentration in 1994 and a Doctorate in Accounting in January 2010, in each case from the University of Indonesia. He held the position of Specialist Accounting Expert at the World Bank from 2012 to 2017, and is currently a lecturer for the Bachelor's program and a Master's program in the Faculty of Accounting Economics, University of Indonesia and a Senior Audit Partner at the Public Accounting Firm (KAP) Mirawati Sensi Idris (MSId), a Moore Stephens International member. He has held the position of Expert Finance Consultant Team at PT Pertamina (Persero) since 2006, and has been a member of the Audit Committee at PT Indocement Tunggal Prakarsa Tbk since 2019.

Wahyuni Bahar has been an Independent Commissioner since December 2012. Wahyuni is an Indonesian citizen and has a Master of Laws degree from McGill University, Montreal, Canada, a Postgraduate Diploma in Law from the Institute of Social Studies, the Hague, Netherlands and a Law Degree from the Universitas Padjajaran, Bandung, Indonesia. Wahyuni has over 19 years of experience as a legal consultant specializing in Corporate Finance and the Capital Markets. He is the founder and managing partner of Bahar & Partners Law Firm. Wahyuni previously was a commissioner of PT Mitra Bhadra Consulting from 2010 to 2012 and PT Baris Capital from 2007 to 2011. Wahyuni was also the founder and an executive director of the Center of Finance, Investment & Securities Law from 2006 to 2010, and the founder and research manager of the Indonesian Environmental Law Center from 1993 to 1996.

Board of Directors

Name	Age	Position
Herman Setya Budi	58	President Director & Chief Operating Officer
Hardi Wijaya Liong	51	Vice President Director & Chief Executive Officer
Budianto Purwahjo	58	Director & Chief of Business Development
Helmy Yusman Santoso	45	Director & Chief Financial Officer
Gusandi Sjamsudin	54	Director & Chief of Product and Innovation (Independent Director)

Herman Setya Budi has been the President Director and Chief Operating Officer since March 2010. Herman is an Indonesian citizen and he earned a Bachelor of Civil Engineering from University of Parahyangan, Indonesia. Prior to joining the Company in September 2008, Herman was the managing director of PT Finansia Multi Finance.

Hardi Wijaya Liong has been Chief Executive Officer since 2004 and Vice President Director since July 2010. Hardi is a major shareholder of PT Provident Capital Indonesia. He is an Indonesian citizen and he received a Bachelor of Economics with a major in Accounting from Trisakti University. Hardi co-founded Provident Capital Indonesia, a shareholder of the Company, with Winato Kartono in 2005 and has since been managing the Tower Bersama Group. Hardi previously spent six years at Citigroup, where he was Vice President of Citigroup's Indonesia investment banking and director of PT Citigroup Securities Indonesia. Before joining Citigroup, he was at Arthur Andersen in Jakarta.

Budianto Purwahjo has been a Director and Chief of Business Development since March 2010. Budianto Purwahjo is an Indonesian citizen and he earned a Bachelor of Engineering with a specialization in Electrical Engineering from the Institute Sains & Technology National, Indonesia. He began his career in 1986 with PT Astra Graphia, a subsidiary of PT Astra Internasional Tbk. Most recently, he served as Marketing Manager for PT Astra Graphia. He was then appointed as director of business development in PT Ariawest International.

Helmy Yusman Santoso has been a Director and Chief Financial Officer since March 2010. Helmy is an Indonesian citizen. He earned of Bachelor of Economics with a major in Accounting from Trisakti University and is a Certified Public Accountant in Indonesia. Prior to joining the Company in 2008, he was the president director of PT Astra Auto Finance (part of the Astra Credit Companies Group, a joint venture with GE). Helmy joined Astra in 2002 as part of PT Astra Sedaya Finance, a subsidiary of PT Astra International Tbk. Most recently, he served as the head of the treasury & finance division, where he was in charge of all fundraising activities including syndicated loans, bond issuance, cash management and all treasury functions. Helmy began his career at Arthur Andersen in 1997, where he was a team leader for various general audit, business advisory and corporate finance projects.

Gusandi Sjamsudin has been Director since March 2010 and Chief of Product and Innovation since January 2012. Prior to this, Gusandi served as the Company's Chief Marketing Officer since March 2010. Gusandi is an Indonesian citizen and he graduated with a Master of Telecommunications Engineering from the Aachen Technological University (RWTH-Aachen) in Germany. Gusandi started his career with Siemens Indonesia as a Service Engineer, and subsequently carried out various assignments in the areas of research, planning, implementation and operations for information technology and telecommunications companies that include PT Ariawest International (KSO Telkom) and PT Sisindokom Lintasbuana (IT Integrator).

Advisor to the Board of Directors

Decisions regarding major corporate actions such as acquisitions, debt raising and major customer strategies and initiatives are the responsibility of the Board of Directors. Our Board of Directors is assisted by Gavin Arnold Caudle, Advisor to the Board of Directors:

Gavin Arnold Caudle has been an Advisor to the Board of Directors since 2004. He obtained a Bachelor of Commerce degree from the University of Western Australia in 1988 and qualified as a Chartered Accountant in 1991. Gavin is currently a director in PT Merdeka Copper Gold Tbk. He previously served as the head of investment banking and head of mergers and acquisitions and private equity for Citigroup in Indonesia. Prior to Citigroup, Gavin worked for Arthur Andersen. He joined the firm in 1988 and became a manager in 1993. He transferred to Indonesia in 1998 and eventually became a partner in the Jakarta office.

Compensation

The total compensation paid to our Board of Commissioners and Board of Directors in 2018, 2019 and 2020 and in the six months ended June 30, 2020 and 2021 was Rp.39,838 million (US$2.7 million), Rp.40,428 million (US$2.8 million), Rp.41,001 million (US$2.8 million), Rp.28,968 million (US$2.0 million) and Rp.31,252 million (US$2.2 million), respectively.

The basis of determining the remuneration of the Board of Directors is through an annual general meeting of shareholders. The authority to determine the remuneration of the Board of Directors can be delegated to the Board of Commissioners by a general meeting of shareholders. The basis to determining the remuneration for the Board of Commissioners is through an annual general meeting of shareholders.

Corporate Governance Process

Our Board of Commissioners acts as the overall supervisory and monitoring body of the Company. Decisions above certain monetary thresholds have to be referred by our Board of Directors to our Board of Commissioners or shareholders for their review and approval. Our Board of Directors acts as the primary approval and decision-making body.

Our corporate governance framework provides for checks and balances while allowing our management flexibility for prompt decision making in the ordinary course of business. Post implementation audits of significant expenditures are conducted and reviewed by designated committees and by our Board of Directors.

We continue to monitor our compliance with the principles of good corporate governance ("GCG") as stipulated by the OJK which replaced the function, duty and authority of Bapepam-LK as of December 31, 2012 as regulated under Law No. 21 of 2011 regarding Financial Services Authority

and IDX rules. In connection with the implementation of GCG principles in our business and in accordance with OJK Rule No. 33/POJK.04/2014 dated December 8, 2014 on Board of Directors and Board of Commissioners of Issuers or Public Companies and OJK Rule No. 35/POJK.04/2014, dated December 8, 2014 on Corporate Secretary of Issuers or Public Companies, the Company has established the following:

- Independent Commissioners: Wahyuni Bahar and Ludovicus Sensi Wondabio
- Corporate Secretary: Helmy Yusman Santoso

We also have an internal audit division for supervising the implementation of policies established by the management.

Audit Committee

In order to meet the requirements of OJK Rule No. 55/POJK.04/2015 dated December 29, 2015 on the Establishment and Work Performance Guidance of an Audit Committee, on June 5, 2020, the Board of Commissioners have appointed the following individuals as members of the Audit Committee:

- Ludovicus Sensi Wondabio (Chairman)
- Agustino Sunarko (member)
- Agung Nugroho Soedibyo (member)

The term of office of the members of the Audit Committee lasts until the closing of the annual general meeting of shareholders in 2025. The duties of the Audit Committee include providing professional, independent advice to the Board of Commissioners and identifying matters that require the attention of the Board of Commissioners, including a review of the following: our financial information (including financial reports and projections); the independence and objectivity of our public accountant; the adequacy of our public accountant's audits that all material risks have been considered; the adequacy of our internal controls; our compliance as a listed company with the prevailing capital markets regulations and other regulations related to our business and our internal auditors' duties. The Audit Committee also examines and reports complaints to the Board of Commissioners, maintains the confidentiality of documents, data and information relating to us, conducts an audit of any alleged mistake in the resolutions of a Board of Directors' meeting or deviations in the implementation of the resolutions of such meetings.

Nomination and Remuneration Committee

Under OJK Rule No. 34/POJK.04/2014 dated December 8, 2014 on Nomination and Remuneration Committee of Issuers or Public Companies, a public company is required to have a function of nomination and remuneration which can be conducted by a Board of Commissioners.

The function of nomination and remuneration are to provide recommendations on the composition of Board of Directors and Board of Commissioners, make policies and criteria required in nomination process and assist in conducting evaluation to the performance of, and create remuneration structure and policies for, members of Board of Directors and Board of Commissioners. We have determined this function under the Guidance of Function of Nomination and Remuneration as approved by our Board of Commissioners on December 2, 2015.

Internal Audit

According to Decree No. 954/TBG-SKP-00/HOS/03/XII/2014 dated May 7, 2014, we have appointed Mr. Supriatno Arham as the Head of Internal Audit Unit. In accordance with OJK Rule No. 56/POJK.04/2015 dated December 29, 2015 on the Establishment and Development Guidelines for Internal Audit Charter, we have defined the roles and functions of the internal audit division under the Internal Audit Charter stipulated by the Board of Directors on June 24, 2020 and approved by the Board of Commissioners on June 22, 2020. The role of the internal audit division is to audit, evaluate, and analyze our operations and to identify any potential risks related to our activities. The internal audit division provides recommendations to the Board of Directors for potential improvements.

Corporate Secretary

As provided in OJK Rule No. 35/POJK.04/2014 dated December 8, 2014 on Corporate Secretary of Issuers or Public Companies, the functions of a corporate secretary are, among others, to keep himself or herself up-to-date with capital market regulations, to ensure that information on the company is accessible to investors, to provide input to the Board of Directors and Board of Commissioners with respect to the compliance to Law No. 8 of 1995 on Capital Markets and its implementing regulations and act as contact person between the Company on the one hand, and the relevant authorities and the public on the other. We appointed Helmy Yusman Santoso as the Company's Corporate Secretary based on Letter No. 157/ TBG-TBI-001/FAL/01/VII/2010 dated July 8, 2010 regarding Appointment of Corporate Secretary of PT Tower Bersama Infrastructure Tbk. See "— Board of Directors" for the biography of our Corporate Secretary, Mr. Helmy Yusman Santoso.

Principal Shareholders

The following table sets forth certain information, as of June 30, 2021, with respect to the ownership of the Company's equity shares by (i) members of the Board of Commissioners or Board of Directors of the Company, and (ii) each person who, according to the Shareholders Register of the Company, issued by PT Datindo Entrycom as Share Registrar of the Company, owned more than 5% of the Company's equity shares.

	Number of Shares	Percentage of Voting Rights
Board of Commissioners:		
Edwin Soerjadjaya	71,481,830	0.33%
Winato Kartono	490,159,500	2.28%
Board of Directors:		
Herman Setya Budi	4,625,000	0.02%
Hardi Wijaya Liong	287,803,863	1.33%
Budianto Purwahjo	5,025,000	0.02%
Helmy Yusman Santoso	3,125,000	0.01%
Gusandi Sjamsudin	1,950,000	0.01%
Principal shareholders:		
PT Wahana Anugerah Sejahtera	7,755,471,093	35.85%
PT Provident Capital Indonesia	5,036,352,510	23.28%
Others:		
Members of the public	7,975,060,149	36.87%
Treasury shares	1,025,945,500	*

* Not meaningful.

PT Wahana Anugerah Sejahtera

Wahana is a 99.96% owned subsidiary of SRTG, which is a leading active investment company with investments in key sectors of the Indonesian economy, such as consumer, infrastructure and natural resources.

PT Provident Capital Indonesia

PCI was founded in 2005 as an investment company. PCI's first investment was in the Tower Bersama Group and its other significant investment is in PT Merdeka Copper Gold Tbk, a gold, silver, copper and other related minerals mining business. The founding shareholders of PCI had extensive banking and accounting experience prior to commencing the tower business and therefore provide significant leadership in ensuring that proper risk management controls as well as cost-effective financing are in place. Our management has sought to leverage the relationships and expertise of both its shareholders in building our business.

Related Party Transactions

We have not entered into any material related party transactions during the period from January 1, 2018 to the date of this offering circular. In connection with related party transactions, it is

our policy to comply with Indonesian securities laws, the rules and regulations of OJK, as well as the accounting standards regarding disclosure of information concerning related persons and companies as determined by the Indonesian Institute of Accountants. Any of our future transactions with persons with possible conflicts of interest will be reviewed by our conflict of interest committee to consider the reasonableness of any such transaction. OJK distinguishes between an affiliated party transaction and a conflict of interest transaction. Under OJK Rule No. 42/POJK.04/2020 dated July 2, 2020 on Affiliated Party Transactions and Conflict of Interest Transactions ("Rule 42/2020"), an affiliated party transaction includes a transaction between (i) a publicly listed company or its controlled company, and (ii) its affiliated party or the affiliated party of its member of Board of Directors/Board of Commissioners, controlling shareholder or substantial shareholder (i.e. the party which directly/indirectly holds at least 20.0% shares in the publicly listed company) and also a transaction conducted by the publicly listed company or its controlled company for the interest of its affiliated party or the affiliated party of its member of Board of Directors/Board of Commissioners, controlling shareholder or substantial shareholder. However, not all affiliated party transaction will be considered as a conflict of interest transaction. Under Rule 42/2020, a conflict of interest is defined as the difference between the economic interests of a publicly listed company and the personal economic interests of its members of Board of Directors/Board of Commissioners, controlling shareholder or substantial shareholder which may cause losses to the publicly listed company.

To enter into an affiliated party transaction, we are required to (i) initially assess, through our internal procedure, whether the transaction can be concluded based on normal market terms and arms-length principle compared with a similar transaction entered into with an unaffiliated party, and (ii) subsequently report the transaction to OJK accompanied with supporting documents, and make a public announcement of the transaction on our website and the website of IDX, within two business days following the date of such transaction (i.e. the date on which the agreement regarding the transaction is executed). The public announcement must include, among others, a summary of the appraisal report of the transaction which is produced by an independent appraiser registered with OJK. We are required to follow a procedure of material transaction under the Material Transactions Rule if we enter into an affiliated party transaction with value of 20.0% or more of the Company's equity, as determined by the latest of its audited annual financial statements, quarterly financial statements (accompanied with accountant's report on the review or audit results) or other audited interim financial statements.

Under Rule 42/2020, an affiliated party transaction with value exceeding 50.0% of a publicly listed company's equity, as determined by the latest of its audited annual financial statements, quarterly financial statements (accompanied with accountant's report on the review or audit results) or other audited interim financial statements, must firstly be approved by a general meeting of independent shareholders. Independent shareholders are shareholders that (i) do not have any personal economic interest in the particular transaction and (ii) are not the directors, commissioners, controlling shareholders or substantial shareholders of the publicly listed company and are not affiliated with any of them. Approval from independent shareholders is also required if an affiliated party transaction could potentially disrupt the business continuity of the publicly listed company or if requested by OJK, at its discretion. Rule 42/2020 provides clarification regarding 'potential disruption to business continuity' as situations where the affiliated party transaction may cause at least 80% reduction of the operating revenue of the publicly listed company, or the publicly listed company suffers losses for the current year, on a pro forma basis. In addition, Rule 42/2020 introduces a general provision stating that any transactions (i.e. other than affiliated party transactions and conflict of interest transactions) that could disrupt the publicly listed company's business continuity shall also be subject to independent shareholders' approval.

There are also several exemptions of affiliated party transactions provided in Rule 42/2020:

(i) certain transactions, among others, a transaction with a value which does not exceed 0.5% of the paid-up capital of a publicly listed company or does not exceed Rp.5,000,000,000, whichever is lower, or a transaction between a publicly listed company and its subsidiary whose shares are at least 99% held by it or between subsidiaries whose shares are at least 99% held by it, do not need to be assessed through internal procedure, announced to the public and approved by the independent shareholders, and only need to be reported to OJK within two business days after the date of the affiliated party transactions. An appraisal report is also not required for such transactions; and

(ii) transactions involving operational activities which are regularly conducted to generate revenue, are not required to be announced to the public, approved by the independent shareholders and reported to OJK. These typical transactions also do not require an appraisal report. However, the management of the publicly listed company must still perform the internal procedure and disclose the transactions in its annual report or financial statements.

To enter into a conflict of interest transaction, we are required to receive a prior approval of the transaction from more than 50.0% of independent shareholders.

DESCRIPTION OF THE NOTES

You can find the definitions of certain terms used in this description under the subheading "Certain Definitions." In this description, the word "Issuer" refers only to PT Tower Bersama Infrastructure Tbk, a company incorporated with limited liability under the laws of the Republic of Indonesia, and not to any of its Subsidiaries.

The Issuer will issue the Notes under an indenture (the "Indenture") among itself, and The Bank of New York Mellon, London Branch, as Trustee, in a private transaction that is not subject to the registration requirements of the Securities Act. Holders of Notes will not be entitled to any registration rights. See "Transfer Restrictions." The terms of the Notes will include those stated in the Indenture.

The following description is a summary of the material provisions of the Indenture. It does not restate the Indenture in its entirety and is qualified by reference to the Indenture. We urge you to read the Indenture because it, and not this description, defines your rights as holders of the Notes. Copies of the Indenture will be available on or after the original issue date during regular business hours at the Corporate Trust Office of the Trustee at One Canada Square, London E14 5AL, United Kingdom. Certain defined terms used in this description but not defined below under "— Certain Definitions" have the meanings assigned to them in the Indenture.

The registered holder of a Note (a "Holder") will be treated as the owner of it for all purposes. Only registered holders will have rights under the Indenture.

Brief Description of the Notes

The Notes

The Notes will be:

- general unsecured obligations of the Issuer;
- pari passu in right of payment with all future unsecured senior indebtedness of the Issuer;
- senior in right of payment to any future subordinated indebtedness of the Issuer; and
- effectively subordinated to all secured indebtedness of the Issuer to the extent of the value of the assets serving as security therefor and to all liabilities (including trade payables) of each subsidiary of the Issuer.

The operations of the Issuer are conducted through its Subsidiaries and, therefore, the Issuer will depend on the cash flow of its Subsidiaries to meet obligations, including its obligations under the Notes. None of the Issuer's Subsidiaries will initially guarantee the Notes, and the Notes will be effectively subordinated to all indebtedness, including all borrowings under our Existing Credit Facilities and other liabilities (including trade payables and lease obligations), of such Subsidiaries. Any right of the Issuer to receive assets of any of its Subsidiaries upon the liquidation or reorganization of such Subsidiaries, and the consequent right of the Holders of the notes to participate in those assets, will be effectively subordinated to the claims of that Subsidiary's creditors, except to the extent that the Issuer is itself recognized as an unsubordinated creditor of such Subsidiary. Even if the Issuer is recognized as a creditor of such Subsidiary, the claims of the Issuer would still be subordinate in right of payment to any indebtedness of such Subsidiary to the extent of any security interest in the assets of that Subsidiary securing such indebtedness and to any indebtedness of that Subsidiary senior to that held by the Issuer.

As of June 30, 2021 and after giving effect to the issuance and sale of the Notes and the application of the net proceeds therefrom, the Issuer would have had gross debt of Rp.28,848,279 million (US$1,990.1 million) outstanding.

As of June 30, 2021 and after giving effect to the issuance and sale of the Notes and the application of the net proceeds therefrom, the Issuer's Subsidiaries would have had gross debt of Rp.6,817,479 million (US$470.3 million) including lease liabilities and indebtedness under the Existing Credit Facilities (including Facility B, the 2017 RLF Agreement, the 2018 GHON RCF Agreement, the 2019 RLF Agreement, the 2020 GHON TLF Agreement, the 2020 GOLD RCF Agreement and the 2021 RLF Agreement), all of which would be structurally senior to the Notes and would have had the ability to borrow up to an additional US$551.7 million under the Existing Credit Facilities. Further, the Issuer and its Subsidiaries have entered into subordination deeds in connection with the 2017 RLF Agreement, the 2019 RLF Agreement, the 2021 RLF Agreement and the Facility Agreement, pursuant to which intercompany liabilities between the Issuer's Subsidiaries or owing by the Issuer's Subsidiaries to the Issuer are subordinated to the liabilities of such subsidiaries owing under the 2017 RLF Agreement, the 2019 RLF Agreement, the 2021 RLF Agreement and the Facility Agreement, as applicable. Under the subordination deeds, the prior written consent of the agent for the finance parties specified under the 2017 RLF Agreement, the 2019 RLF Agreement, the 2021 RLF Agreement or the Facility Agreement, as applicable, may be required for, among other things, any payment of such intercompany liabilities between such subsidiaries or taking, accepting or receiving any payment or distribution of assets of such subsidiaries if an event of default is continuing. See "Description of Material Indebtedness" for more details on the subordination deeds. As a result of the subordination deeds and other covenants under the Existing Credit Facilities, the ability of the Issuer's Subsidiaries to dividend or distribute cash flow or assets to the Issuer is materially restricted. See "Risk Factors — Risks Relating to the Notes — We are a holding company. Holders of the Notes are effectively subordinated to all our subsidiaries' indebtedness and obligations, and the Notes are unsecured obligations."

Principal, Maturity and Interest

The Issuer will issue US$400,000,000 in aggregate principal amount of Notes in this offering. The Issuer may issue additional Notes under the Indenture from time to time after this offering. Any issuance of additional Notes will be subject to all of the covenants in the Indenture, including the covenant described below under the caption "— Further Issues." The Notes and any additional Notes subsequently issued under the Indenture will be treated as a single class for all purposes under the Indenture, including, without limitation, waivers, amendments, redemptions and offers to purchase. The Issuer will issue Notes in denominations of US$200,000 and integral multiples of US$1,000 in excess of thereof. The Notes will mature on May 2, 2027.

Interest on the Notes will accrue at the rate of 2.80% per annum and will be payable semi-annually in arrears on May 2 and November 2, commencing on May 2, 2022. Interest on overdue principal and interest, if any, will accrue at a rate that is 1% higher than the then applicable interest rate on the Notes. The Issuer will make each interest payment to the holders of record on the immediately preceding April 17 and October 18 (each, a "Record Date"), notwithstanding any transfer, exchange or cancellation thereof after a Record Date and prior to the immediately following interest payment date. So long as the Notes are held in global form, each payment in respect of the Global Note will be made to the person shown as the Holder at the close of business on the Clearing System Business Day before the due date for such payments, where "Clearing System Business Day" means a weekday (Monday to Friday, inclusive) except December 25 and January 1.

Interest on the Notes will accrue from the date of original issuance or, if interest has already been paid, from the date it was most recently paid. Interest will be computed on the basis of a 360-day year comprised of twelve 30-day months.

Methods of Receiving Payments on the Notes

All payments on the Notes will be made by wire transfer in U.S. dollars by the Issuer at the office or agency of the Issuer maintained for that purpose (which initially will be an office of the Paying Agent, currently located at One Canada Square, London E14 5AL, United Kingdom), and the Notes may be presented for registration of transfer or exchange at such office or agency; *provided* that, if the Notes are in certificated form and the Issuer is acting as its own paying agent, at the option of the Issuer, payment of interest may be made by check mailed to the address of the Holders at such address appears in the register maintained by the Registrar or by wire transfer. Interest payable on the Notes held through Euroclear or Clearstream will be available to Euroclear or Clearstream participants on the Business Day following payment thereof.

Paying Agent, Transfer Agent and Registrar for the Notes

The Bank of New York Mellon, London Branch will initially act as the Trustee and as Paying Agent and The Bank of New York Mellon SA/NV, Dublin Branch, will initially act as the Transfer Agent and as the Registrar with respect to the Notes. The Issuer may change the Paying Agent, Transfer Agent or Registrar without prior notice to the Holders of the Notes, and the Issuer or any of its Subsidiaries may act as paying agent, transfer agent or registrar under the Indenture.

Transfer and Exchange

A Holder may transfer or exchange Notes in accordance with the provisions of the Indenture. The Transfer Agent and the Trustee may require a Holder, among other things, to furnish appropriate endorsements and transfer documents in connection with a transfer of Notes. Holders will be required to pay all taxes due on transfer. The Issuer will not be required to transfer or exchange any Note selected for redemption. Also, the Issuer will not be required to transfer or exchange any Note for a period of 15 days before a selection of Notes to be redeemed.

Further Issues

Subject to the covenants and in accordance with the terms of the Indenture described below, the Issuer may, from time to time, without notice to or the consent of the Holders of the Notes, create and issue additional Notes having the same terms and conditions as the Notes in all respects (or in all respects except for the issue date, issue price and the first payment of interest on them and, to the extent necessary, certain temporary securities law transfer restrictions) so that such additional Notes may be consolidated and form a single class with the previously outstanding Notes and vote together as one class on all matters with respect to the Notes; provided that the additional Notes will not be issued under the same ISIN or Common Code as the Notes unless such additional Notes are fungible with the Notes for U.S. federal income tax purposes.

Additional Amounts

All payments made by or on behalf of the Issuer under or with respect to the Notes (whether or not in the form of definitive Notes) will be made free and clear of and without withholding or deduction for, or on account of, any present or future Taxes unless the withholding or deduction of

such Taxes is then required by law. If any deduction or withholding for, or on account of, any Taxes imposed or levied by or on behalf of any jurisdiction in which the Issuer is then incorporated, is considered a resident for tax purposes, or any political subdivision thereof or therein or any jurisdiction by or through which payment is made by or on behalf of the Issuer (each, a "Tax Jurisdiction"), will at any time be required to be made from any payments made by or on behalf of the Issuer under or with respect to the Notes, including payments of principal, redemption price, purchase price, interest or premium, the Issuer will pay such additional amounts (the "Additional Amounts") as may be necessary in order that the net amounts received in respect of such payments by each holder (including Additional Amounts) after such withholding or deduction will equal the respective amounts that would have been received in respect of such payments in the absence of such withholding or deduction; provided that no Additional Amounts will be payable with respect to:

(1) any Taxes that would not have been imposed but for the existence of any present or former connection between the holder or beneficial owner of such Note (or, if the holder or beneficial owner is an estate, nominee, trust, partnership or corporation, between a fiduciary, settler, beneficiary, partner of, member or shareholder of, or possessor of power over, the holder or beneficial owner) and the Tax Jurisdiction (including, without limitation, being a citizen or resident or national of, or carrying on a business or maintaining a permanent establishment in, or being physically present in, a Tax Jurisdiction) other than a connection resulting merely from the ownership or holding of such Note, the receipt of payments with respect to such Note or the enforcement of rights thereunder;

(2) any Taxes imposed or withheld as a result of the failure of the holder or beneficial owner of the Notes to comply with any written request, made to the relevant holder in writing at least 45 days before any such withholding or deduction would be payable, by the Issuer or any other Person through whom payment may be made or a relevant taxing authority to provide timely or accurate information concerning the nationality, residence or identity of such holder or beneficial owner or to make any valid or timely declaration or similar claim or satisfy any certification information or other reporting requirement applicable to such holder or beneficial owner, which is required or imposed by a statute, regulation or administrative practice of the relevant Tax Jurisdiction as a precondition to exemption from all or part of such Taxes;

(3) any Note presented for payment (where Notes are in the form of definitive Notes and presentation is required) more than 30 days after the relevant payment is first made available for payment to the holder (except to the extent that the holder would have been entitled to Additional Amounts had the Note been presented on the last day of such 30 day period);

(4) any estate, inheritance, gift, sale, value added, use, excise, transfer, personal property or similar Tax;

(5) any Taxes payable otherwise than by deduction or withholding from payments under or with respect to the Notes;

(6) any Taxes imposed or required to be withheld under Sections 1471 to 1474 (or any successor provisions or amendments thereof) of the United States Internal Revenue Code of 1986, as amended (the "Code"), including any regulations or other official guidance thereunder, any law implementing an intergovernmental approach to such Sections, or any agreements entered into pursuant to Section 1471(b) of the Code;

(7) any Taxes imposed or withheld as a result of the presentation of any note for payment by or on behalf of a holder of notes who would have been able to avoid such withholding or deduction by presenting the relevant note elsewhere; or

(8) any combination of items (1) through (7) above.

In addition, no Additional Amounts shall be paid with respect to a holder who is a fiduciary, limited liability company or a partnership or other than the sole beneficial owner of the Notes to the extent that the beneficiary or settlor with respect to such fiduciary, the member of such limited liability company or partnership or the beneficial owner of the Notes would not have been entitled to Additional Amounts had such beneficiary, settlor, member or beneficial owner held such Notes directly.

Notwithstanding the foregoing, the limitations on the obligations of the Issuer to pay Additional Amounts set forth in item (2) above will not apply if the provision of any certification, identification, information, or other reporting requirement described in such item (2) would be materially more onerous, in form, in procedure or in the substance of information disclosed, to a holder or beneficial owner of a Note than comparable information or other reporting requirements imposed under U.S. tax law, regulations, treaty and administrative practice (such as U.S. Internal Revenue Service Forms W-8BEN and W-9). In addition, for the avoidance of doubt, no holder or beneficial owner of the Notes shall be required to provide any form, statement or other information (including, but not limited to, Form DGT or any successor or similar form) to establish an exemption from or a reduced rate of Indonesian withholding taxes under a treaty between Indonesia and any applicable jurisdiction.

In addition to the foregoing, the Issuer will pay and indemnify the holder for any present or future stamp, issue, registration, court or documentary taxes, or any other excise or property taxes, charges or similar levies or Taxes levied by any Tax Jurisdiction on the execution, delivery, registration or enforcement of any of the Notes, the Indenture or any other document or instrument referred to therein, or the receipt of any payments with respect to the Notes (other than Taxes excluded under items (1) through (4) or (6) through (8) above).

If the Issuer becomes aware that it will be obligated to pay Additional Amounts with respect to any payment under or with respect to the Notes, the Issuer will deliver to the Trustee and the Paying Agent on a date at least 30 days prior to the date of payment (unless the obligation to pay Additional Amounts arises after the 30th day prior to that payment date, in which case the Issuer shall notify the Trustee and the Paying Agent promptly thereafter) an Officer's Certificate stating the fact that Additional Amounts will be payable and the amount estimated to be so payable. The Officer's Certificate must also set forth any other information reasonably necessary to enable the Paying Agent to pay Additional Amounts to holders on the relevant payment date. The Issuer will provide the Paying Agent with documentation evidencing the payment of Additional Amounts.

The Issuer will make all withholdings and deductions required by law and will remit the full amount deducted or withheld to the relevant Tax authority in accordance with applicable law. The Issuer will use its reasonable efforts to obtain Tax receipts from each Tax authority evidencing the payment of any Taxes so deducted or withheld. The Issuer will furnish to the Paying Agent, upon its request, within 60 days after the date the payment of any Taxes so deducted or withheld is made, certified copies of Tax receipts evidencing payment by the Issuer or if, notwithstanding such entity's efforts to obtain receipts, receipts are not obtained, other evidence of payments by such entity.

Whenever the Indenture or this "Description of the Notes" mentions the payment of amounts based on the principal amount, interest or any other amount payable under, or with respect to, any of

the Notes, such mention shall be deemed to include the payment of Additional Amounts to the extent that, in such context, Additional Amounts are, were or would be payable in respect thereof.

The above obligation will survive any termination, defeasance or discharge of the Indenture and any transfer by a holder or beneficial owner of its Notes and will apply, mutatis mutandis, to any jurisdiction in which any successor Person to the Issuer is organized or resident (or deemed resident) for tax purposes.

Optional Redemption

At any time prior to the Par Call Date, the Issuer may on any one or more occasions redeem all or a part of the Notes, upon not less than 10 nor more than 60 days' notice to the Holders and the Trustee, at a redemption price equal to 100% of the principal amount of the Notes redeemed, plus the Applicable Premium as of, and accrued and unpaid interest, if any, to the date of redemption (subject to the rights of Holders on the relevant record date to receive interest due on the relevant interest payment date). Neither the Trustee nor the Paying Agent will be responsible for verifying or calculating the Applicable Premium.

On or after the Par Call Date, the Issuer may on any one or more occasions redeem all or a part of the Notes, upon not less than 10 nor more than 60 days' notice to the Holders and the Trustee, at a redemption price equal to 100% of the principal amount of the Notes redeemed, plus accrued and unpaid interest, if any, on the Notes redeemed, to the applicable date of redemption (subject to the rights of Holders on the relevant record date to receive interest on the relevant interest payment date).

Unless the Issuer defaults in the payment of the redemption price, interest will cease to accrue on the Notes or portions thereof called for redemption on the applicable redemption date.

Any redemption and notice may, in the Issuer's discretion, be subject to the satisfaction of one or more conditions precedent (including, without limitation, the incurrence of indebtedness the proceeds of which will be used to redeem the Notes). In addition, if such redemption or notice is subject to satisfaction of one or more conditions precedent, such notice may state that, at the Issuer's discretion, the redemption date may be delayed until such time as any or all such conditions shall be satisfied, or such redemption may not occur and such notice may be rescinded if any or all such conditions shall not have been satisfied by the redemption date, or by the redemption date so delayed.

Redemption for Changes in Taxes

The Issuer may redeem the Notes, in whole but not in part, at any time upon giving not less than 10 nor more than 60 days' prior notice to the Holders (which notice will be irrevocable and given in accordance with the procedures described in "— Selection and Notice") and the Trustee, at a redemption price equal to 100% of the principal amount thereof, together with accrued and unpaid interest, if any, to the date fixed by the Issuer for redemption (a "Tax Redemption Date") and all Additional Amounts (if any) then due and that will become due on the Tax Redemption Date as a result of the redemption or otherwise (subject to the right of holders on the relevant record date to receive interest due on the relevant interest payment date and Additional Amounts (if any) in respect thereof), if on the next date on which any amount would be payable in respect of the Notes, the Issuer has or would be required to pay Additional Amounts and the Issuer cannot avoid any such payment obligation by taking reasonable measures available, (provided that changing the jurisdiction of organization of the Issuer is not a reasonable measure for purposes of this section), as a result of:

(1) any change in, or amendment to, the laws or treaties (or any regulations, or rulings promulgated thereunder) of the relevant Tax Jurisdiction affecting taxation which becomes

effective on or after the date of the Indenture (or, if the relevant Tax Jurisdiction has changed since the date of the Indenture, the date on which the then current Tax Jurisdiction became the applicable Tax Jurisdiction under the Indenture); or

(2) any change in, or amendment to, the existing official position or the introduction of an official position regarding the application, administration or interpretation of such laws, regulations or rulings or relevant treaties (including a holding, judgment or order by a court of competent jurisdiction or a change in published practice) which becomes effective on or after the date of the Indenture (or, if the relevant Tax Jurisdiction has changed since the date of the Indenture, the date on which the then current Tax Jurisdiction became the applicable Tax Jurisdiction under the Indenture),

provided that where any such requirements to pay Additional Amounts are in consequence of the laws and treaties of the Republic of Indonesia (or any political subdivision or taxing authority thereof or therein), the Issuer will be permitted to redeem the Notes in accordance with the provisions above only if the rate of withholding or deduction in respect of which the Additional Amounts are required is in excess of 20.0%.

Prior to the publication or, where relevant, mailing of any notice of redemption of the Notes pursuant to the foregoing, the Issuer will deliver to the Trustee (i) an Opinion of Counsel to the effect that there has been such change or amendment which would entitle the Issuer to redeem the Notes hereunder and (ii) an Officer's Certificate stating that the Issuer is entitled to effect the redemption and setting forth a statement of facts showing the conditions precedent to the right to redeem have occurred and stating that the Issuer cannot avoid any obligation to pay Additional Amounts by taking reasonable measures available to it. The Trustee shall have no duty to investigate or verify such certificate or opinion.

The Trustee shall be entitled to conclusively rely on and accept such Opinion of Counsel and Officer's Certificate as sufficient evidence of the satisfaction of the conditions precedent described above, in which event it shall be conclusive and binding on the holders.

Selection and Notice

If less than all of the Notes are to be redeemed at any time, the Notes for redemption will be selected as follows: (1) if the Notes are listed on any securities exchange, in compliance with the requirements of the principal securities exchange on which the Notes are then traded and/or if the Notes are held through the clearing systems, in compliance with the requirements of the applicable clearing systems; or (2) if the Notes are not listed on any securities exchange and/or held through the clearing systems, on a *pro rata* basis, by lot or by such method as the Trustee in its sole discretion deems fair and appropriate, unless otherwise required by applicable law.

No Notes of US$200,000 in principal amount or less can be redeemed in part. Notices of redemption will be mailed by first class mail at least 10 but not more than 60 days before the redemption date to the Trustee and each Holder to be redeemed at the Trustee's registered address, except that redemption notices may be mailed more than 60 days prior to a redemption date if the notice is issued in connection with a defeasance of the Notes or a satisfaction and discharge of the Indenture. Except as set forth under "Optional Redemption," notices of redemption may not be conditional.

If any Note is to be redeemed in part only, the notice of redemption that relates to that Note will state the portion of the principal amount of that Note that is to be redeemed. Any Notes that are

redeemed will be cancelled. A new Note in principal amount equal to the unredeemed portion of the original Note will be issued in the name of the Holder upon cancellation of the original Note. Notes called for redemption become due on the date fixed for redemption. On and after the redemption date, interest ceases to accrue on Notes or portions of Notes called for redemption.

Any Notes that are redeemed will be cancelled.

Mandatory Redemption

The Issuer is not required to make mandatory redemption or sinking fund payments with respect to the Notes.

Repurchase at the Option of Holders Upon a Change of Control Triggering Event

If a Change of Control Triggering Event occurs, the Issuer shall make an offer to repurchase all outstanding Notes pursuant to a Change of Control Offer on the terms set forth in the Indenture. In the Change of Control Offer, the Issuer will offer a Change of Control Payment in cash equal to 101% of the aggregate principal amount of Notes repurchased, plus accrued and unpaid interest, if any, on the Notes repurchased to the date of purchase, subject to the rights of Holders on the relevant record date to receive interest due on the relevant interest payment date. Within ten days following any Change of Control Triggering Event, the Issuer will mail a notice to each holder describing the transaction or transactions that constitute the Change of Control Triggering Event and offering to repurchase Notes on the Change of Control Payment Date specified in the notice, which date will be no earlier than 10 days and no later than 60 days from the date such notice is mailed, pursuant to the procedures required by the Indenture and described in such notice. The Issuer will comply with the requirements of Rule 14e-1 under the Exchange Act and any other securities laws and regulations thereunder to the extent those laws and regulations are applicable in connection with the repurchase of the Notes as a result of a Change of Control Triggering Event. To the extent that the provisions of any securities laws or regulations conflict with provisions of the covenant described hereunder, the Issuer will comply with the applicable securities laws and regulations and will not be deemed to have breached its obligations under the covenant described hereunder by virtue of such compliance.

On the date one Business Day prior to the Change of Control Payment Date, the Issuer will deposit with the Paying Agent an amount equal to the Change of Control Payment in respect of all Notes or portions of Notes properly tendered. On the Change of Control Payment Date, the Issuer will, to the extent lawful:

(1) accept for payment all Notes or portions of Notes properly tendered pursuant to the Change of Control Offer; and

(2) deliver or cause to be delivered to the Paying Agent the Notes properly accepted together with an Officer's Certificate stating the aggregate principal amount of Notes or portions of Notes being purchased by the Issuer.

The Paying Agent will promptly pay to each Holder properly tendered the Change of Control Payment for such Notes, and the Registrar will promptly authenticate and mail (or cause to be transferred by book entry) to each holder a new Note equal in principal amount to any unpurchased portion of the Notes surrendered, if any, provided that each new Note issued shall be in a principal amount of US$200,000 and integral multiples of US$1,000 in excess thereof. The Issuer will publicly announce the results of the Change of Control Offer on or as soon as practicable after the Change of Control Payment Date.

The provisions described above that require the Issuer to make a Change of Control Offer following a Change of Control Triggering Event will be applicable whether or not any other provisions of the Indenture are applicable. Except as described above with respect to a Change of Control Triggering Event, the Indenture does not contain provisions that permit the Holders to require that the Issuer repurchase or redeem the Notes in the event of a takeover, recapitalization or similar transaction.

The Issuer will not be required to make a Change of Control Offer upon a Change of Control Triggering Event if (1) a third party makes the Change of Control Offer in the manner, at the times and otherwise in compliance with the requirements set forth in the Indenture applicable to a Change of Control Offer made by the Issuer and purchases all Notes properly tendered and not withdrawn under the Change of Control Offer, or (2) notice of redemption for all outstanding Notes has been given pursuant to the Indenture as described above under the caption "— Optional Redemption," unless and until there is a default in payment of the applicable redemption price. Notwithstanding anything to the contrary contained herein, a Change of Control Offer may be made in advance of a Change of Control Triggering Event, conditioned upon the occurrence of such Change of Control Triggering Event, if a definitive agreement is in place for the Change of Control Triggering Event at the time the Change of Control Offer is made.

The definition of Change of Control includes a phrase relating to the direct or indirect sale, lease, transfer, conveyance or other disposition of "all or substantially all" of the properties or assets of the Issuer and its Subsidiaries taken as a whole. Although there is a limited body of case law interpreting the phrase "substantially all," there is no precise established definition of the phrase under applicable law. Accordingly, the ability of a Holder to require the Issuer to repurchase the Notes as a result of a sale, lease, transfer, conveyance or other disposition of less than all of the assets of the Issuer and its Subsidiaries taken as a whole to another Person or group may be uncertain.

The agreements (including the Existing Debt Facilities) governing the Issuer's and its Subsidiaries' other indebtedness contain, and future agreements may contain, provisions which may prohibit or restrict our ability to repurchase the Notes upon a Change of Control Triggering Event. In the event a Change of Control Triggering Event occurs at a time when the Issuer is prohibited or restricted from purchasing the Notes, the Issuer could seek the consent of its creditors to the purchase of Notes or could attempt to refinance the borrowings that contain such prohibition or restriction. If the Issuer does not obtain such a consent or repay such borrowings, the Issuer will remain prohibited or restricted from purchasing Notes. In such case, the Issuer's failure to purchase tendered Notes would constitute an Event of Default under the Indenture. In addition, the occurrence of a Change of Control or a Change of Control Triggering Event could result in an event of default under the Existing Credit Facilities or other indebtedness of the Issuer or its Subsidiaries, which could cause, among other things, all indebtedness outstanding thereunder to become due and payable. As a result, the Issuer and/or its Subsidiaries would have to pay all such indebtedness and could result in limiting the Issuer's ability to pay cash to the Holders upon a repurchase. See "Risk Factors — Risks Related to the Notes— We may not have the ability to raise the funds necessary to finance an offer to repurchase the notes upon the occurrence of certain events constituting a change of control as required by the Indenture."

The Trustee shall not be required to take any steps to ascertain whether a Change of Control Triggering Event or any event which could lead to a Change of Control Triggering Event has occurred and shall not be liable to any person for any failure to do so.

Certain Covenants

Negative Pledge

The Issuer will not create or permit to subsist, and the Issuer will ensure that none of its Significant Subsidiaries will create or permit to subsist, any Lien for the benefit of the holders of any Relevant Indebtedness upon the whole or any part of its property or assets, present or future, to secure: (i) payment of any sum due in respect of any Relevant Indebtedness; (ii) any payment under any guarantee of any Relevant Indebtedness; or (iii) any indemnity or other like obligation in respect of any Relevant Indebtedness, without in any such case at the same time or prior thereto making effective provisions thereby the Notes are accorded (x) the same Liens equally and ratably as are created or subsisting to secure such Relevant Indebtedness until such time as such Relevant Indebtedness is no longer secured by such Lien, or (y) such other Lien as may be consented to by the holders of a majority in aggregate principal amount of the outstanding Notes; provided, however, that the foregoing restriction shall not apply to:

(a) any Lien on any property or asset existing at the time of acquisition of such property or asset by the Issuer or any of its Significant Subsidiaries, provided that such Lien was not created in contemplation of such acquisition or in connection therewith and the principal, capital or nominal amount of the Relevant Indebtedness secured by such Lien outstanding at the time of such acquisition is not increased; or

(b) any Lien arising out of the refinancing, extension, refunding or renewal, in whole or in part, of a Lien permitted under clause (a) above or any Relevant Indebtedness secured by any Lien permitted by clause (a) above, provided that the principal, capital or nominal amount of such Relevant Indebtedness is not increased and the Lien is limited to the property or assets originally subject thereto and any improvements thereon.

Merger, Consolidation or Sale of Assets

The Issuer will not, directly or indirectly: (1) consolidate or merge with or into another Person (whether or not the Issuer is the surviving corporation), or (2) sell, assign, transfer, lease, convey or otherwise dispose of all or substantially all of the properties or assets of the Issuer and its Subsidiaries taken as a whole, in one or more related transactions, to another Person, unless:

(1) either: (a) the Issuer is the surviving corporation; or (b) the Person formed by or surviving any such consolidation or merger (if other than the Issuer) or to which such sale, assignment, transfer, lease, conveyance or other disposition has been made is an entity organized or existing under the laws of Indonesia, the Netherlands, the Cayman Islands, the British Virgin Islands, Hong Kong, Singapore, Canada, the United Kingdom, any member state of the European Union, Switzerland, the United States, any state of the United States or the District of Columbia;

(2) the Person formed by or surviving any such consolidation or merger (if other than the Issuer) or the Person to which such sale, assignment, transfer, lease, conveyance or other disposition has been made expressly assumes all the obligations of the Issuer under the Notes and the Indenture pursuant to a supplemental indenture satisfactory to the Trustee; and

(3) immediately after such transaction, no Default or Event of Default exists.

This "Merger, Consolidation or Sale of Assets" covenant will not apply to any sale, assignment, transfer, conveyance, lease or other disposition of assets between or among the Subsidiaries of the Issuer.

Payments for Consent

The Issuer will not, and will not permit any of its Subsidiaries to, directly or indirectly, pay or cause to be paid any consideration to or for the benefit of any Holder for or as an inducement to any consent, waiver or amendment of any of the terms or provisions of the Indenture or the Notes unless such consideration is offered to be paid, and is paid to all Holders that consent, waive or agree to amend in the time frame set forth in the solicitation documents relating to such consent, waiver or agreement.

Listing on the SGX-ST

Approval-in-principle has been received for the listing and quotation of the Notes on the Official List of the SGX-ST. The Issuer will use commercially reasonable efforts to maintain the listing of the Notes on the Official List of the SGX-ST as long as the Notes are outstanding; provided that if at any time it determines not to maintain such listing, it will obtain prior to the delisting of the Notes from the Official List of the SGX-ST, and thereafter use commercially reasonable efforts to maintain, a listing of the Notes on another recognized stock exchange.

As long as the Notes are listed on the SGX-ST and the rules of the SGX-ST so require, the Issuer will appoint and maintain a paying agent in Singapore, where holders may present the Notes for payment or redemption if any Global Note is exchanged for Notes in definitive form. In addition, if any Global Note is exchanged for Notes in definitive form, announcement of such exchange shall be made by or on behalf of the Issuer through the SGX-ST. The announcement will include all material information with respect to the delivery of the Notes in definitive form, including details of the paying agent in Singapore, as long as the Notes are listed on the SGX-ST and the rules of the SGX-ST so require.

Reports

So long as any Notes are outstanding, the Issuer will furnish to the Trustee and, upon request, to Holders, as soon as they are available but in any event not more than 10 calendar days after they are filed with the Indonesian Stock Exchange (or any other recognized exchange on which the Issuer's ordinary shares are at any time listed for trading), true and correct copies (in English) of any financial or other report or document filed with such agency or exchange and, if necessary; provided that if at any time the ordinary shares of the Issuer cease to be listed for trading on a recognized stock exchange, the Issuer will furnish to the Trustee:

(1) as soon as they are available, but in any event within 180 days after the end of the fiscal year of the Issuer, copies of its consolidated financial statements in respect of such fiscal year (including an income statement, balance sheet and cash flow statement and complete footnotes to such financial statements in the English language) prepared in accordance with GAAP and audited by a member firm of an internationally-recognized firm of independent accountants and including the audit report prepared by such firm in relation to such audited financial statements; and

(2) as soon as they are available, but in any event within 90 days after the end of the second fiscal quarter of the Issuer, copies of its consolidated financial statements in respect of such

semi-annual period (including an income statement, balance sheet and cash flow statement and complete footnotes to such financial statements in the English language) prepared on a basis consistent with the audited financial statements of the Issuer together with an Officer's Certificate stating that such financial statements are true in all material respects and present fairly the financial position of the Issuer as at the end of, and the results of its operations for, the relevant semi-annual period.

In addition, so long as any of the Notes remain outstanding, the Issuer will provide to the Trustee:

(1) within 180 days after the end of each fiscal year, an Officer's Certificate stating that a review has been conducted of the activities of the Issuer and its Subsidiaries and their performance under the Indenture and the Notes, and that the Issuer has fulfilled all obligations thereunder or, if there has been a default in the fulfillment of any such obligation, specifying each such default and the nature and status thereof; and

(2) as soon as practicable and in any event within 20 days after the Issuer becomes aware or should reasonably become aware of the occurrence of a Default or Event of Default, an Officer's Certificate setting forth the details thereof and the action which the Issuer proposes to take with respect thereto.

No Registration Rights

The Issuer does not intend to file a registration statement for the public resale of the Notes or for a registered exchange offer with respect to the Notes. Accordingly, Holders may only resell their Notes pursuant to an exemption from the registration requirements of the Securities Act. See "Transfer Restrictions."

Events of Default

The following events will be defined as "Events of Default" in the Indenture:

(a) default in the payment of principal of (or premium, if any, on) the Notes when the same becomes due and payable at maturity, upon acceleration, redemption or otherwise unless (x) such default in payment is caused by administrative or technical error and (y) payment is made within seven days of its due date;

(b) default in the payment of interest on any Note when the same becomes due and payable, and such default continues for a period of 30 consecutive days;

(c) default in the performance or breach of the provisions of the covenants described under the caption "Certain Covenants — Merger, Consolidation or Sale of Assets" or the failure to make or consummate an Offer to Purchase in the manner described under the caption "— Repurchase at the Option of Holders Upon a Change of Control Triggering Event;"

(d) the Issuer or any Subsidiary defaults in the performance of or breaches any other covenant or agreement in the Indenture or under the Notes (other than a default specified in clause (a), (b) or (c) above) and such default or breach continues for a period of 60 consecutive days after written notice by the Trustee or the Holders of 25% or more in aggregate principal amount of the Notes then outstanding;

(e) there occurs with respect to any Indebtedness for Borrowed Money of the Issuer or any Significant Subsidiary or any group of the Issuer's Subsidiaries that, taken together, would constitute a Significant Subsidiary having an outstanding principal amount of US$50.0 million (or the Dollar Equivalent thereof) or more in the aggregate for all such Indebtedness for Borrowed Money of all such Persons, whether such Indebtedness for Borrowed Money now exists or will hereafter be created, (1) an event of default that has caused the holder thereof to declare such Indebtedness for Borrowed Money to be due and payable prior to its Stated Maturity and/or (2) failure to pay principal of, or interest or premium (subject to the applicable grace period in the relevant documents) on, such Indebtedness for Borrowed Money when the same becomes due;

(f) one or more final judgments or orders for the payment of money are rendered against the Issuer or any Significant Subsidiary or any group of its Subsidiaries that, taken together, would constitute a Significant Subsidiary and are not paid or discharged, and there is a period of 60 consecutive days following entry of the final judgment or order that causes the aggregate amount for all such final judgments or orders outstanding and not paid or discharged against all such Persons to exceed US$50.0 million (or the Dollar Equivalent thereof) during which a stay of enforcement, by reason of a pending appeal or otherwise, is not in effect; or

(g) certain events of bankruptcy or insolvency described in the Indenture with respect to the Issuer or any Significant Subsidiary or any group of the Issuer's Subsidiaries that, taken together, would constitute a Significant Subsidiary.

If an Event of Default (other than an Event of Default specified in clause (g) above) occurs and is continuing under the Indenture, the Trustee or the Holders of at least 25% in aggregate principal amount of the Notes, then outstanding, by written notice to the Issuer (and to the Trustee if such notice is given by the Holders) may, and the Trustee at the written request of such Holders shall (subject to being indemnified and/or secured and/or pre-funded to its satisfaction), declare the principal of, premium, if any, and accrued and unpaid interest on the Notes to be immediately due and payable. Upon a declaration of acceleration, such principal of, premium, if any, and accrued and unpaid interest will be immediately due and payable. If an Event of Default specified in clause (g) above occurs with respect to the Issuer or any Significant Subsidiary or any group of the Issuer's Subsidiaries that, taken together, would constitute a Significant Subsidiary, the principal of, premium, if any, and accrued and unpaid interest on the Notes then outstanding will automatically become and be immediately due and payable without any declaration or other act on the part of the Trustee or any Holder.

The Holders of at least a majority in the aggregate principal amount of the outstanding Notes, by written notice to the Issuer and to the Trustee, may on behalf of all Holders waive all past defaults and rescind and annul a declaration of acceleration and its consequences if:

(x) all existing Events of Default, other than the non-payment of the principal of, premium, if any, and interest on the Notes that have become due solely by such declaration of acceleration, have been cured or waived; and

(y) the rescission would not conflict with any judgment or decree of a court of competent jurisdiction.

Upon such waiver, the Default will cease to exist, and any Event of Default arising therefrom will be deemed to have been cured, but no such waiver will extend to any subsequent or other Default or impair any right consequent thereon.

If an Event of Default occurs and is continuing, the Trustee may (subject to being indemnified and/or secured and/or pre-funded to its satisfaction) pursue, in its own name or as trustee of an express trust, any available remedy by proceeding at law or in equity to collect the payment of principal of and interest on the Notes or to enforce the performance of any provision of the Notes or the Indenture. The Trustee may maintain a proceeding even if it does not possess any of the Notes or does not produce any of them in the proceeding.

The Holders of at least a majority in aggregate principal amount of the outstanding Notes may direct the time, method and place of conducting any proceeding for any remedy available to the Trustee or exercising any trust or power conferred on the Trustee. However, the Trustee may refuse to follow any direction that conflicts with law or the Indenture that may involve the Trustee in personal liability or to the extent that it does not receive security and/or indemnification and/or pre-funding to its satisfaction or that may be unduly prejudicial to the rights of Holders not joining in the giving of such direction and may take any other action it deems proper that is not inconsistent with any such direction received from Holders.

A Holder may not pursue any remedy with respect to the Indenture or the Notes, unless:

(1) the Holder has previously given the Trustee written notice of a continuing Event of Default;

(2) the Holders of at least 25% in aggregate principal amount of outstanding Notes make a written request to the Trustee to pursue the remedy;

(3) such Holder or Holders offer the Trustee indemnity and/or security and/or pre-funding satisfactory to the Trustee against any costs, liability or expense to be incurred in compliance with such written request;

(4) the Trustee does not comply with the request within 60 days after receipt of the written request and the offer of indemnity and/or security and/or pre-funding satisfactory to it; and

(5) during such 60-day period, the Holders of a majority in aggregate principal amount of the outstanding Notes do not give the Trustee a written direction that is inconsistent with the request.

However, such limitations do not apply to the right of any Holder to receive payment of the principal of, premium, if any, or interest, and Additional Amounts, if any, on, such Note or to bring suit for the enforcement of any such payment, on or after the due date expressed in the Notes, which right will not be impaired or affected except as set forth under "Amendments and Waiver."

An officer of the Issuer must certify to the Trustee in writing, on or before a date not more than 180 days after the end of each fiscal year, that a review has been conducted of the activities of the Issuer and its Subsidiaries and the Issuer's and its Subsidiaries' performance under the Indenture and the Notes and that the Issuer has fulfilled all obligations thereunder, or, if there has been a default in the fulfillment of any such obligation, specifying each such default and the nature and status thereof. The Issuer will also be obligated to notify the Trustee in writing of any default or defaults in the performance of any covenants or agreements under the Indenture. See "Certain Covenants — Reports."

No Personal Liability of Commissioners, Directors, Officers, Employees and Stockholders

No commissioner, director, officer, employee, incorporator or stockholder of the Issuer, as such, will have any liability for any obligations of the Issuer under the Notes or the Indenture, or for any

claim based on, in respect of, or by reason of, such obligations or their creation. Each Holder by accepting a Note waives and releases all such liability. The waiver and release are part of the consideration for issuance of the Notes.

Defeasance

Defeasance and Discharge

The Indenture will provide that the Issuer will be deemed to have paid and will be discharged from any and all obligations in respect of the Notes on the 366th day after the deposit referred to below, and the provisions of the Indenture will no longer be in effect with respect to the Notes (except for, among other matters, certain obligations to register the transfer or exchange of the Notes, to replace stolen, lost or mutilated Notes, to maintain paying agencies and to hold monies for payment in trust) if, among other things:

(a) the Issuer has or has caused a Person to have (1) deposited with the Trustee (or its agent), in trust, money and/or U.S. Government Obligations or a combination thereof that through the payment of interest and principal in respect thereof in accordance with their terms will provide money in an amount sufficient to pay the principal of, premium, if any, and accrued interest on the Notes on the Stated Maturity of such payments in accordance with the terms of the Indenture and the Notes and (2) delivered to the Trustee an Opinion of Counsel or a certificate of an internationally recognized investment bank, appraisal firm or firm of independent accountants to the effect that the amount deposited by the Issuer is sufficient to provide payment for the principal of, premium, if any, and accrued interest on, the Notes on the Stated Maturity of such payment in accordance with the terms of the Indenture and the Notes and an Opinion of Counsel to the effect that the Holders have a valid, perfected, exclusive security in the trust;

(b) the Issuer has or has caused a Person to have delivered to the Trustee an Opinion of Counsel of recognized international standing to the effect that the creation of the defeasance trust does not violate the U.S. Investment Company Act of 1940, as amended, and after the passage of 366 days following the deposit, the trust fund will not be subject to the effect of Section 547 of the United States Bankruptcy Code or Section 15 of the New York Debtor and Creditor Law;

(c) the Issuer shall have or shall have caused to be delivered to the Trustee an Officer's Certificate stating that the deposit was not made by it with the intent of preferring the Holders over any other of its creditors or with the intent of defeating, hindering, delaying or defrauding any other of its creditors or others;

(d) immediately after giving effect to such deposit on a pro forma basis, no Event of Default, or event that after the giving of notice or lapse of time or both would become an Event of Default, will have occurred and be continuing on the date of such deposit or during the period ending on the 366th day after the date of such deposit, and such defeasance will not result in a breach or violation of, or constitute a default under, any other agreement or instrument to which the Issuer or any Subsidiary is a party or by which the Issuer or any Subsidiary is bound; and

(e) the Issuer must deliver or cause the delivery to the Trustee an Officer's Certificate acceptable to the Trustee and an Opinion of Counsel, each stating that all conditions precedent relating to such defeasance have been complied with.

Amendments and Waiver

Amendments Without Consent of Holders

The Indenture and the Notes may be amended, without the consent of any Holder, to:

(a) cure any ambiguity, defect, omission or inconsistency in the Indenture or the Notes in a manner that does not have a material adverse effect on Holders;

(b) comply with the provisions described under "— Merger, Consolidation or Sale of Assets;"

(c) evidence and provide for the acceptance of appointment by a successor Trustee;

(d) add any guarantor or guarantee with respect to the Notes;

(e) provide for the issuance of Additional Notes in accordance with the limitations set forth in the Indenture;

(f) effect any changes to the Indenture in a manner necessary to comply with the procedures of Euroclear and Clearstream;

(g) provide for uncertificated Notes in addition to or in place of certificated Notes (provided that the uncertificated Notes are issued in registered form for purposes of Section 163(f) of the Code);

(h) make any change that would provide any additional rights or benefits to Holders or that does not materially and adversely affect the rights of any Holder of Notes; or

(i) conform the text of the Indenture or the Notes to any provision of this "Description of the Notes" to the extent that such provision in this "Description of the Notes" was intended to be a verbatim recitation of a provision of the Indenture or the Notes.

Amendments With Consent of Holders

Amendments of the Indenture or the Notes may be made by the Issuer and the Trustee with the consent of the Holders of not less than a majority in aggregate principal amount of the outstanding Notes, and the holders of a majority in principal amount of the outstanding Notes may waive future compliance by the Issuer with any provision of the Indenture or the Notes; provided that, unless consented to by the Holders of at least 90% of the aggregate principal amount of the then outstanding Notes, no such modification, amendment or waiver may:

(a) change the Stated Maturity of the principal of, or any installment of interest on, any Note;

(b) reduce the principal amount of, or premium, if any, or interest on, any Note;

(c) change the currency, time or place of payment of principal of, or premium, if any, or interest on, any Note;

(d) impair the right to institute suit for the enforcement of any payment on or after the Stated Maturity (or, in the case of a redemption, on or after the redemption date) of any Note;

(e) reduce the above stated percentage or aggregate principal amount of outstanding Notes the consent of whose Holders is necessary to modify or amend the Indenture or for waiver of compliance with certain provisions of the Indenture or for waiver of certain defaults;

(f) waive a default in the payment of principal of, premium, if any, or interest on the Notes;

(g) reduce the amount payable upon a Change of Control Offer or change the time or manner by which a Change of Control Offer may be made or by which the Notes must be repurchased pursuant to a Change of Control Offer after the obligation to make such Change of Control Offer has arisen;

(h) change the redemption date or the redemption price of the Notes from that stated under "— Optional Redemption" or "— Redemption for Changes in Taxes;" or

(i) amend, change or modify the obligation of the Issuer or any guarantor to pay Additional Amounts.

Satisfaction and Discharge

The Indenture will be discharged and will cease to be of further effect (except as to surviving rights of registration of transfer or exchange of the Notes, as expressly provided for in the Indenture) as to all outstanding Notes when:

(1) either:

(a) all of the Notes theretofore authenticated and delivered (except lost, stolen or destroyed Notes which have been replaced or paid and Notes for whose payment money has theretofore been deposited in trust by the Issuer and thereafter repaid to the Issuer) have been delivered to the Registrar for cancellation; or

(b) all Notes not theretofore delivered to the Trustee or the Paying Agent for cancellation have become due and payable pursuant to an optional redemption notice or otherwise or will become due and payable within one year, and the Issuer has irrevocably deposited or caused to be deposited with the Trustee or the Paying Agent funds, in cash in U.S. dollars, non-callable U.S. Government Obligations or a combination thereof, in an amount sufficient to pay and discharge the entire indebtedness on the Notes not theretofore delivered to the Trustee or the Paying Agent for cancellation, for principal of, premium, if any, and interest on the Notes to the date of deposit together with irrevocable instructions from the Issuer directing the Trustee or the Paying Agent to apply such funds to the payment thereof at maturity or redemption, as the case may be;

(2) the Issuer has paid all other sums payable under this Indenture; and

(3) no Default or Event of Default will have occurred and be continuing on the date of such deposit or will occur as a result of such deposit and such deposit will not result in a breach or violation of, or constitute a default under, any other instruments to which the Issuer is a party or by which the Issuer is bound.

In addition, the Issuer must deliver to the Trustee an Officer's Certificate and an Opinion of Counsel stating that all conditions precedent to satisfaction and discharge have been satisfied.

Indemnification for Judgment Currency

The obligations of the Issuer to any Holder or the Trustee under the Indenture or the Notes will, notwithstanding any judgment in a currency (the "Judgment Currency") other than U.S. dollars, be discharged only to the extent that on the day following receipt by such party of any amount in the Judgment Currency, such party may in accordance with normal banking procedures purchase U.S. dollars with the Judgment Currency.

If the amount of U.S. dollars so purchased is less than the amount originally to be paid to such party in U.S. dollars, the Issuer agrees as a separate obligation and notwithstanding such judgment, to the extent permitted by applicable law, to pay the difference, and, if the amount of U.S. dollars so purchased exceeds the amount originally to be paid to such party, such party agrees to pay to or for the account of such payor such excess; provided that such party shall not have any obligation to pay any such excess as long as an Event of Default has occurred and is continuing, in which case such excess may be applied by such party to such obligations.

Governing Law, Consent to Jurisdiction and Service of Process

The Notes and the Indenture provide that they will be governed by, and construed in accordance with, the laws of the State of New York.

The Issuer will irrevocably submit to the jurisdiction of any New York state or U.S. federal court located in The Borough of Manhattan, City of New York, State of New York in relation to any legal action or proceeding (i) arising out of, related to or in connection with the Indenture and the Notes or (ii) arising under any U.S. federal or U.S. state securities laws. The Issuer will appoint Corporation Service Company as its agent for service of process in any such action or proceeding.

Concerning the Trustee, Paying Agent, Transfer Agent and Registrar

The Bank of New York Mellon, London Branch will act as the Trustee and as the Paying Agent and The Bank of New York Mellon SA/NV, Dublin Branch, will act as the Transfer Agent and as the Registrar with respect to the Notes. The Paying Agent, the Transfer Agent and the Registrar are collectively referred to as the "Agents."

Except during the continuance of an Event of Default, the Trustee and the Agents will perform only such duties as are specifically set forth in the Indenture and the Notes, and no implied covenant or obligation shall be read into the Indenture and the Notes against the Trustee and the Agents.

The holders of a majority in aggregate principal amount of the then outstanding Notes will have the right to direct the time, method and place of conducting any proceeding for exercising any remedy available to the Trustee, subject to certain exceptions. The Indenture provides that in case an Event of Default has occurred and is continuing, the Trustee will use the same degree of care and skill in its exercise of the rights and power vested in it under the Indenture as a prudent man in the conduct of his own affairs. Subject to such provisions, the Trustee will be under no obligation to exercise any of their rights or powers under the Indenture at the request of any Holder, unless the requisite number of Holders has instructed the Trustee in writing and offered to the Trustee indemnity and/or security and/or pre-funding satisfactory to them against any loss, liability or expense. Furthermore, each Holder, by accepting the Notes will agree, for the benefit of the Trustee, that it is solely responsible for its own independent appraisal of, and investigation into, all risks arising under or in connection with the Indenture and has not relied on and will not at any time rely on the Trustee in respect of such risks.

Notwithstanding anything to the contrary herein, whenever the Trustee is required or entitled by the terms of the Indenture to exercise any discretion or power, take any action of any nature, make any decision or give any direction or certification, the Trustee is entitled, prior to exercising any such discretion or power, taking any such action, making any such decision, or giving any such direction or certification, to solicit Holders for direction, and the Trustee is not responsible for any loss or liability incurred by any person as a result of any delay in it exercising such discretion or power, taking such action, making such decision, or giving such direction or certification where the Trustee is seeking such directions or the non-exercise of such discretion or power, or not taking any such action or making any such decision or giving any such direction or certification in the absence of any such directions from Holders. In any event, and as provided elsewhere herein, even where the Trustee has been directed by the Holders, the Trustee shall not be required to exercise any such discretion, power or take any such action as aforesaid unless it has been indemnified and/or secured and/or pre-funded to its satisfaction.

For so long as the Notes are listed on the SGX-ST and the rules of the SGX-ST so require, if a Global Note is exchanged for Certificated Notes, the Issuer will appoint and maintain a paying agent in Singapore, where the Notes may be presented or surrendered for payment or redemption, and make an announcement of such exchange through the SGX-ST that will include all material information with respect to the delivery of the Certificated Notes, including details of the paying agent in Singapore.

None of the Trustee or the Agents shall be responsible for the performance by any other person appointed by the Issuer in relation to the Notes and, unless notified in writing to the contrary, shall assume that the same are being duly performed. None of the Trustee or the Agents shall be liable to any holder or any other person for any action taken by the holders, the Trustee or the Agents in accordance with the instructions of the holders. Each of the Trustee and the Agents shall be entitled to rely on any direction of the holders which has been given in accordance with the Indenture. None of the Trustee or the Agents shall be deemed to have knowledge of any Default or Event of Default unless a Responsible Officer of the Trustee has been notified in writing of such event. For the avoidance of doubt, a written notice of a Default or Event of Default provided in accordance with the notice provisions of the Indenture shall be deemed to be written notice to a Responsible Officer of the Trustee for such event. The Trustee is entitled to rely conclusively (without liability) on all instructions, notices, declarations, calculations and certifications received pursuant to the Indenture without investigating the accuracy, authenticity and validity of the same. Pursuant to the Indenture and the Notes, the Issuer will reimburse the Trustee and the Agents for all fees, costs and properly incurred expenses.

If the Trustee becomes a creditor of the Issuer, the Indenture limits the right of the Trustee to obtain payment of claims in certain cases, or to realize on certain property received in respect of any such claim as security or otherwise. The Trustee will be permitted to engage in other transactions with the Issuer and its affiliates; however, if it acquires any conflicting interest it must eliminate such conflict within 90 days or resign.

No amendment, waiver or consent shall amend, modify or otherwise affect the rights or duties of any Agent without the prior written consent of such Agent.

Book-Entry; Delivery and Form

The Notes will initially be represented by one or more permanent global notes in definitive, fully registered form without interest coupons (each a "Global Note") and will be deposited with a common depositary and registered in the name of the common depositary or its nominee for the accounts of Euroclear and Clearstream.

Global Note

Ownership of beneficial interests in the Global Note (the "book-entry interests") will be limited to persons that have accounts with Euroclear and/or Clearstream or persons that may hold interests through such participants. Book-entry interests will be shown on, and transfers thereof will be effected only through, records maintained in book-entry form by Euroclear and Clearstream and their participants.

Except as set forth below under "— Individual Definitive Notes," the book-entry interests will not be held in definitive form. Instead, Euroclear and/or Clearstream will credit on their respective book-entry registration and transfer systems a participant's account with the interest beneficially owned by such participant. The laws of some jurisdictions may require that certain purchasers of securities take physical delivery of such securities in definitive form. The foregoing limitations may impair the ability to own, transfer or pledge book-entry interests.

So long as the Notes are held in global form, the common depositary for Euroclear and/or Clearstream (or its nominee) will be considered the sole holder of Global Note for all purposes under the Indenture and "holders" of book-entry interests will not be considered the owners or "Holders" of Notes for any purpose. As such, participants must rely on the procedures of Euroclear and Clearstream and indirect participants must rely on the procedures of the participants through which they own book-entry interests in order to transfer their interests in the Notes or to exercise any rights of Holders under the Indenture.

The Notes are not issuable in bearer form.

Payments on the Global Note

Payments of any amounts owing in respect of the Global Note (including principal, premium, interest and additional amounts) will be made to the paying agent. The paying agent will, in turn, make such payments to the common depositary for Euroclear and Clearstream, which will distribute such payments to participants in accordance with their procedures. The Issuer will make payments of all such amounts without deduction or withholding for, or on account of, any present or future taxes, duties, assessments or governmental charges of whatever nature, except as may be required by law and as described under "— Additional Amounts."

Under the terms of the Indenture, the Issuer and the Trustee will treat the registered holder of the Global Note (i.e., the common depositary or its nominee) as the owner thereof for the purpose of receiving payments and for all other purposes. Consequently, none of the Issuer, the Trustee, the Agents or any of their respective agents has or will have any responsibility or liability for:

- any aspect of the records of Euroclear, Clearstream or any participant or indirect participant relating to or payments made on account of a book-entry interest, for any such payments made by Euroclear, Clearstream or any participant or indirect participants, or for maintaining, supervising or reviewing any of the records of Euroclear, Clearstream or any participant or indirect participant relating to or payments made on account of a book-entry interest; or

- any action or failure to take any action by Euroclear, Clearstream or any participant or indirect participant.

Payments by participants to owners of book-entry interests held through participants are the responsibility of such participants.

Redemption of Global Note

In the event any Global Note, or any portion thereof, is redeemed, the common depositary will distribute the amount received by it in respect of the Global Note so redeemed to Euroclear and/or Clearstream, as applicable, who will distribute such amount to the holders of the book-entry interests in such Global Note. The redemption price payable in connection with the redemption of such book-entry interests will be equal to the amount received by the common depositary, Euroclear or Clearstream, as applicable, in connection with the redemption of such Global Note (or any portion thereof). The Issuer understands that under existing practices of Euroclear and Clearstream, if fewer than all of the Notes are to be redeemed at any time, Euroclear and Clearstream will credit their respective participants' accounts on a proportionate basis (with adjustments to prevent fractions) or by lot or on such other basis as they deem fair and appropriate; *provided* that no book-entry interest of US$200,000 principal amount, or less, as the case may be, will be redeemed in part.

Action by Owners of Book-Entry Interests

Euroclear and Clearstream have advised that they will take any action permitted to be taken by a Holder only at the direction of one or more participants to whose account the book-entry interests in the Global Note are credited and only in respect of such portion of the aggregate principal amount of Notes as to which such participant or participants has or have given such direction. Euroclear and Clearstream will not exercise any discretion in the granting of consents, waivers or the taking of any other action in respect of the Global Note.

Transfers

Transfers between participants in Euroclear and Clearstream will be effected in accordance with Euroclear and Clearstream's rules and will be settled in immediately available funds. If a Holder requires physical delivery of individual definitive notes for any reason, including to sell the Notes to persons in jurisdictions which require physical delivery of such securities or to pledge such securities, such Holder must transfer its interest in the Global Note in accordance with the normal procedures of Euroclear and Clearstream and in accordance with the provisions of the Indenture.

Any book-entry interest in a Global Note that is transferred to a person who takes delivery in the form of a book-entry interest in another Global Note will, upon transfer, cease to be a book-entry interest in the first-mentioned Global Note and become a book-entry interest in the other Global Note and, accordingly, will thereafter be subject to all transfer restrictions, if any, and other procedures applicable to book-entry interests in such other Global Note for as long as it retains such a book-entry interest.

Global Clearance and Settlement Under the Book-Entry System

Book-entry interests owned through Euroclear or Clearstream accounts will follow the settlement procedures applicable. Book-entry interests will be credited to the securities custody accounts of Euroclear and Clearstream holders on the Business Day following the settlement date against payment for value on the settlement date.

The book-entry interests will trade through participants of Euroclear or Clearstream, and will settle in immediately available funds. Since the purchaser determines the place of delivery, it is

important to establish at the time of trading of any book-entry interests where both the purchaser's and seller's accounts are located to ensure that settlement can be made on the desired value date.

Information Concerning Euroclear and Clearstream

We understand as follows with respect to Euroclear and Clearstream: Euroclear and Clearstream hold securities for participating organizations and facilitate the clearance and settlement of securities transactions between their respective participants through electronic book-entry changes in accounts of such participants. Euroclear and Clearstream provide to their participants, among other things, services for safekeeping, administration, clearance and settlement of internationally traded securities and securities lending and borrowing. Euroclear and Clearstream interface with domestic securities markets. Euroclear and Clearstream participants are financial institutions, such as underwriters, securities brokers and dealers, banks and trust companies, and certain other organizations. Indirect access to Euroclear or Clearstream is also available to others such as banks, brokers, dealers and trust companies that clear through or maintain a custodian relationship with a Euroclear or Clearstream participant, either directly or indirectly.

Although the foregoing sets out the procedures of Euroclear and Clearstream in order to facilitate the original issue and subsequent transfers of interests in the Notes among participants of Euroclear and Clearstream, neither Euroclear nor Clearstream is under any obligation to perform or continue to perform such procedures, and such procedures may be discontinued at any time.

None of the Issuer, the Trustee, the Agents or any of their respective agents will have responsibility for the performance of Euroclear or Clearstream or their respective participants of their respective obligations under the rules and procedures governing their operations, including, without limitation, rules and procedures relating to book-entry interests.

Individual Definitive Notes

If (1) the common depositary or any successor to the common depositary is at any time unwilling or unable to continue as a depositary for the reasons described in the Indenture and a successor depositary is not appointed within 90 days, (2) either Euroclear or Clearstream, or a successor clearing system, is closed for business for a continuous period of 14 days (other than by reason of holidays, statutory or otherwise) or announces an intention to permanently cease business or does in fact do so, or (3) any of the Notes has become immediately due and payable in accordance with "— Events of Default" and the Issuer have received a written request from a Holder, the Issuer will issue individual definitive notes in registered form in exchange for the Global Note. Upon receipt of such notice from the common depositary or the Trustee, as the case may be, the Issuer will use its best efforts to make arrangements with the common depositary for the exchange of interests in the Global Note for individual definitive notes and cause the requested individual definitive notes to be executed and delivered to the Registrar in sufficient quantities and authenticated by the Registrar for delivery to Holders. Persons exchanging interests in a Global Note for individual definitive notes will be required to provide the registrar, through the relevant clearing system, with written instruction and other information required by the Issuer and the registrar to complete, execute and deliver such individual definitive notes. In all cases, individual definitive notes delivered in exchange for any Global Note or beneficial interests therein will be registered in the names, and issued in any approved denominations, requested by the relevant clearing system.

Individual definitive notes will not be eligible for clearing and settlement through Euroclear or Clearstream.

Certain Definitions

Set forth below are certain defined terms used in the Indenture. Reference is made to the Indenture for a full disclosure of all defined terms used therein, as well as any other capitalized terms used herein for which no definition is provided.

"2017 RLF Agreement" means the facility agreement for the US$200,000,000 revolving loan facility dated March 30, 2017 among the Issuer, as Parent, the Borrowers, the Guarantors, the Arrangers, the Lenders and the Agent (each as named therein), as amended, restated, modified, renewed, extended, increased, refunded, replaced or refinanced in whole or in part from time to time.

"2018 GHON RCF Agreement" means the facility agreement for the Rp.150,000 million revolving credit facility agreement dated October 31, 2018 among PT Gihon Telekomunikasi Indonesia Tbk and PT Bank UOB Indonesia, as amended, restated, modified, renewed, extended, increased, refunded, replaced or refinanced in whole or in part from time to time.

"2019 RLF Agreement" means the facility agreement for the US$375,000,000 revolving loan facility dated June 28, 2019 among the Issuer, as Parent, the Borrowers, the Guarantors, the Arrangers, the Lenders and the Agent (each as named therein), as amended, restated, modified, renewed, extended, increased, refunded, replaced or refinanced in whole or in part from time to time.

"2020 GHON TLF Agreement" means the facility agreement for the Rp.50,000 million term loan facility agreement dated December 22, 2020 among PT Gihon Telekomunikasi Indonesia Tbk and PT Bank QNB Indonesia Tbk, as amended, restated, modified, renewed, extended, increased, refunded, replaced or refinanced in whole or in part from time to time. "2020 GOLD RCF Agreement" means the facility agreement for the Rp.200,000 million revolving credit facility agreement dated November 9, 2020 among PT Permata Karya Perdana and PT Bank UOB Indonesia, as amended, restated, modified, renewed, extended, increased, refunded, replaced or refinanced in whole or in part from time to time.

"2021 RLF Agreement" means the facility agreement for the US$275 million revolving loan facility agreement dated January 20, 2021 among the Issuer, as Parent, the Original Borrowers, the Original Guarantors, the Arrangers, the Original Lenders and the Agent (each as named therein), as amended, restated, modified, renewed, extended, increased, refunded, replaced or refinanced in whole or in part from time to time.

"Applicable Premium" means, with respect to any Note on any redemption date, the greater of:

(1) 1.0% of the principal amount of such Note; or

(2) the excess of:

(a) the present value at such redemption date of (i) the redemption price of the Note at the Par Call Date plus (ii) all required interest payments due on the Note through the Par Call Date (excluding accrued but unpaid interest to the redemption date), computed using a discount rate equal to the Treasury Rate as of such redemption date plus 25 basis points; over

(b) the then-outstanding principal amount of such Note.

Calculation of the Applicable Premium will be made by the Issuer or on its behalf by any Person that it may designate; provided that the calculation or the correctness thereof will not be a duty or obligation of the Trustee or any Agent.

"Beneficial Owner" has the meaning assigned to such term in Rule 13d-3 and Rule 13d-5 under the Exchange Act, except that in calculating the beneficial ownership of any particular "person" (as that term is used in Section 13(d)(3) of the Exchange Act), such "person" will be deemed to have beneficial ownership of all securities that such "person" has the right to acquire by conversion or exercise of other securities, whether such right is currently exercisable or is exercisable only after the passage of time.

"Business Day" means a day, other than a Saturday, Sunday or legal holiday or other day on which commercial banking institutions in The City of New York, Singapore, Indonesia or London are authorized or required by law to close.

"Capital Stock" means:

(1) in the case of a corporation, corporate stock;

(2) in the case of an association or business entity, any and all shares, interests, participations, rights or other equivalents (however designated) of corporate stock;

(3) in the case of a partnership or limited liability company, partnership interests (whether general or limited) or membership interests; and

(4) any other interest or participation that confers on a Person the right to receive a share of the profits and losses of, or distributions of assets of, the issuing Person, but excluding from all of the foregoing any debt securities convertible into Capital Stock, whether or not such debt securities include any right of participation with Capital Stock.

"Change of Control" means the occurrence of one or more of the following events:

(1) the direct or indirect sale, transfer, conveyance or other disposition (other than by way of merger or consolidation), in one or a series of related transactions, of all or substantially all of the properties or assets of the Issuer and its Subsidiaries, taken as a whole, to any Person (including any "person" (as that term is used in Section 13(d)(3) of the Exchange Act)), other than one or more Permitted Holders;

(2) the Issuer consolidates with, or merges with or into, any Person (other than one or more Permitted Holders), or any Person (other than one or more Permitted Holders) consolidates with, or merges with or into, the Issuer, in any such event pursuant to a transaction in which any of the outstanding Voting Stock of the Issuer or such other Person is converted into or exchanged for cash, securities or other property, other than any such transaction where the Voting Stock of the Issuer outstanding immediately prior to such transaction is converted into or exchanged for (or continues as) Voting Stock (other than Disqualified Stock) of the surviving or transferee Person constituting a majority of the outstanding shares of Voting Stock of such surviving or transferee Person (immediately after giving effect to such issuance);

(3) any Person (including any "person" (as that term is used in Section 13(d)(3) of the Exchange Act)) other than the Permitted Holders is or becomes the Beneficial Owner, directly or indirectly, of 50% or more of the total voting power of the Voting Stock of the Issuer; or

(4) the adoption of a plan relating to the liquidation or dissolution of the Issuer.

"Change of Control Offer" has the meaning assigned to that term in the Indenture.

"Change of Control Triggering Event" means (i) the occurrence of both a Change of Control and a Ratings Decline, if the Notes are rated by at least one Rating Agency or (ii) the occurrence of a Change of Control if the Notes are not rated.

"Continuing" means, with respect to any Default or Event of Default, that such Default or Event of Default has not been cured or waived.

"Control," in relation to a body corporate, means:

(1) the power (whether by way of ownership of shares, proxy, contract, agency or otherwise) to:

(i) cast, or control the casting of, more than 50% of the maximum number of votes that might be cast at a general meeting of such body corporate; or

(ii) appoint or remove all, or the majority, of the directors or commissioners or other equivalent officers of such body corporate; or

(iii) give directions with respect to the operating and financial policies of such body corporate with which the directors or other equivalent officers of such body corporate are obliged to comply; or

(2) the holding beneficially of more than 50% of the issued share capital of such body corporate (excluding any part of that issued share capital that carries no right to participate beyond a specified amount in a distribution of either profits or capital).

"Corporate Trust Office" means the office of the Trustee at which the corporate trust business of the Trustee is principally administered, which shall initially be located at One Canada Square, London E14 5AL, United Kingdom; facsimile: +44 207 964 2509; attention: Corporate Trust Administration – PT Tower Bersama Infrastructure Tbk.

"Default" means any event that is, or with the passage of time or the giving of notice or both would be, an Event of Default.

"Director" means a director of the Issuer from time to time.

"Disqualified Stock" of any Person means any Capital Stock that, by its terms (or by the terms of any security into which it is convertible, or for which it is exchangeable, in each case, at the option of the holder of the Capital Stock), or upon the happening of any event, matures or is mandatorily redeemable, pursuant to a sinking fund obligation or otherwise, or redeemable at the option of the holder of the Capital Stock, in whole or in part, on or prior to the date on which the Notes mature.

"Dollar Equivalent" means, with respect to any monetary amount in a currency other than U.S. dollars, at any time for the determination thereof, the amount of U.S. dollars obtained by converting

such foreign currency involved in such computation into U.S. dollars at the noon buying rate for U.S. dollars in New York City for cable transfers as certified for customs purposes by the Federal Reserve Bank of New York on the date of determination.

"Existing Credit Facilities" means Facility B, the 2017 RLF Agreement, the 2018 GHON RCF Agreement, the 2019 RLF Agreement, the 2020 GHON TLF Agreement, the 2020 GOLD RCF Agreement and the 2021 RLF Agreement.

"Existing Debt Facilities" means the (i) Existing Credit Facilities; (ii) IDR Bonds; (iii) indenture dated January 21, 2020 among the Issuer, as issuer and The Bank of New York Mellon, London Branch, as trustee, relating to the US$350.0 million 4.25% Senior Unsecured Notes due 2025; and (iv) indenture dated January 20, 2021 among the Issuer, as issuer and The Bank of New York Mellon, London Branch, as trustee, relating to the US$300.0 million 2.75% Senior Unsecured Notes due 2026.

"Facility Agreement" means the facility agreement for US$1,000,000,000 dated November 21, 2014, as amended and restated on November 6, 2015, among, among others, the Issuer, as Parent, and the Borrowers, Guarantors, Arrangers, Lenders and Agent (each as named therein), and as amended, restated, modified, renewed, extended, increased, refunded, replaced or refinanced in whole or in part from time to time.

"Facility B" means the US$100.0 million revolving loan facility with a final repayment date in June 2022 drawn under the Facility Agreement;

"Fitch" means Fitch Inc.

"GAAP" means generally accepted accounting principles in Indonesia as in effect from time to time.

"IDR Bonds" means the continuous bonds issued by the Issuer, being the (i) Continuous Bonds III Tower Bersama Infrastructure Phase IV Year 2020 issued on March 24, 2020, (ii) Continuous Bonds IV Tower Bersama Infrastructure Phase I Year 2020 issued on September 8, 2020, (iii) Continuous Bonds IV Tower Bersama Infrastructure Phase II Year 2020 issued on December 2, 2020, (iv) Continuous Bonds IV Tower Bersama Infrastructure Phase III Year 2021 issued on February 17, 2021, (v) Continuous Bonds IV Tower Bersama Infrastructure Phase IV Year 2021 issued on April 9, 2021, and (vi) Continuous Bonds V Tower Bersama Infrastructure Phase I Year 2021 issued on August 19, 2021.

"Indebtedness for Borrowed Money" means any present or future indebtedness (whether being principal, premium, interest or other amounts) for or in respect of:

(i) money borrowed; or

(ii) any notes, bonds, debentures, debenture stock, loan stock, hybrid securities or redeemable preference shares or other securities offered, issued or distributed whether by way of public offer, private placing, acquisition consideration or otherwise and whether issued for cash or in whole or in part for a consideration other than cash.

The amount of any Indebtedness for Borrowed Money outstanding as of any date will be the outstanding balance at such date of all unconditional obligations as described above.

"Investment Grade" means a rating of "AAA," "AA," "A" or "BBB," as modified by a "+" or "-" indication, or an equivalent rating representing one of the four highest rating categories, by S&P, Fitch or any of their successors or assigns, or a rating of "Aaa," or "Aa," "A" or "Baa," as modified by a "1," "2" or "3" indication, or an equivalent rating representing one of the four highest rating categories, by Moody's or any of its successors or assigns, or a rating of "AAA," "AA," "A" or "BBB," as modified by a "+" or "-" indication, or an equivalent rating representing one of the four highest rating categories of any internationally recognized rating agency or agencies, as the case may be, which shall have been designated by the Issuer as having been substituted for S&P, Fitch or Moody's, as the case may be.

"Lien" means, with respect to any asset, any mortgage, lien, pledge, charge, security interest or encumbrance of any kind in respect of such asset, whether or not filed, recorded or otherwise perfected under applicable law, including any conditional sale or other title retention agreement, any lease in the nature thereof, any option or other agreement to sell or give a security interest in such asset and any filing of or agreement to give any financing statement under the laws of any jurisdiction.

"Moody's" means Moody's Investors Services, Inc.

"Officer's Certificate" means a certificate signed on behalf of the Issuer by (i) the President Director; or (ii) two Directors, that is reasonably satisfactory in form and substance to the Trustee and meets the requirements of the Indenture.

"Opinion of Counsel" means an opinion from legal counsel in form and substance reasonably acceptable to the Trustee, that is reasonably satisfactory in form and substance to the Trustee and meets the requirements of the Indenture. The counsel may be counsel to the Issuer or any Subsidiary of the Issuer.

"Par Call Date" means November 2, 2026.

"Permitted Holder" means any or all of:

(1) the Provident Group;

(2) the Saratoga Group; and

(3) PT Telekomunikasi Indonesia Tbk, any direct or indirect parent of PT Telekomunikasi Indonesia Tbk, any Subsidiary of PT Telekomunikasi Indonesia Tbk and any Subsidiary of a direct or indirect parent of PT Telekomunikasi Indonesia Tbk.

"Person" means any individual, corporation, partnership, joint venture, association, joint-stock company, trust, unincorporated organization, limited liability company or government or other entity.

"President Director" means the president director of the Issuer, as appointed from time to time.

"Provident Group" means any of:

(1) PT Provident Capital Indonesia;

(2) Mr. Winato Kartono;

(3) Mr. Hardi Wijaya Liong;

(4) Mr. Gavin Arnold Caudle;

(5) any entity of which any of the above together or individually has Control; or

(6) any fund which is managed by any of the Persons specified in paragraphs (2) to (5) above (whether individually or collectively).

"Rating Agencies" means (1) S&P, (2) Fitch and (3) Moody's; provided that if S&P, Fitch, Moody's or all of them shall not make a rating of the Notes publicly available, one or more "nationally recognized statistical rating organizations" as defined under Section 3(a)(62) of the Exchange Act selected by the Issuer as a replacement agency for S&P or Fitch or Moody's, as the case may be.

"Ratings Decline" means the occurrence of the following on, or within 60 days after, the date of the public notice of the occurrence of a Change of Control or of the intention by the Issuer or any third party to effect a Change of Control (which period shall be extended for so long as the rating of the Notes is under publicly announced consideration for possible downgrade by any of the Rating Agencies if such period exceeds 60 days): (1) in the event that the Notes have an Investment Grade Rating by all three Rating Agencies, the Notes cease to have an Investment Grade Rating by two of the three Rating Agencies, (2) in the event that the Notes have an Investment Grade Rating by only two Rating Agencies, the Notes cease to have an Investment Grade Rating by both such Rating Agencies, (3) in the event the Notes are rated by one, and only one, of the three Rating Agencies as Investment Grade, the rating of the Notes by such Rating Agency shall be below Investment Grade, or (4) in the event that the Notes do not have an Investment Grade Rating, the rating of the Notes by two of the three Rating Agencies (or, if there are less than three Rating Agencies rating the Notes, the rating of each Rating Agency) decreases by one or more gradations (including gradations within ratings categories as well as between rating categories) or is withdrawn.

"Responsible Officer" means, when used with respect to the Trustee, any managing director, vice president, trust associate, relationship manager, transaction manager, client service manager, any trust officer or any other officer located at the Specified Corporate Trust Office who customarily performs functions similar to those performed by any persons who at the time shall be such officers, respectively, or to whom any corporate trust matter is referred because of such person's knowledge of and familiarity with the particular subject and in each such case, who shall have direct responsibility for the day to day administration of the Indenture.

"Relevant Indebtedness" means bonds, debentures, notes or other similar securities having an original maturity of more than one year from its date of issue which (1) are, or are issued with the intention on the part of the issuer thereof that they should be, quoted, listed or ordinarily dealt in or traded on any stock exchange, over-the-counter or other securities market, and (2) either (A) are by their terms payable, or confer a right to receive payment, in any currency other than Indonesian Rupiah or (B) are denominated in Indonesian Rupiah and more than 50% of the aggregate principal amount of the offering of such international investment securities is initially distributed outside Indonesia by or with the consent of the Issuer or any of its Significant Subsidiaries.

"Saratoga Group" means any of:

(1) PT Wahana Anugerah Sejahtera;

(2) PT Saratoga Investama Sedaya Tbk;

(3) Mr. Edwin Soeryadjaya;

(4) any entity of which any of the above together or individually has Control; or

(5) any fund which is managed by the Persons named in paragraph (3) above, and/or any entity Controlled by any of such Persons (whether individually or collectively).

"SGX-ST" means Singapore Exchange Securities Trading Limited.

"Significant Subsidiary" means any Subsidiary that would be a "significant subsidiary" as defined in Article 1, Rule 1-02 of Regulation S-X, promulgated pursuant to the Securities Act, as such Regulation is in effect on the date of the Indenture.

"Specified Corporate Trust Office" means The Bank of New York Mellon, Singapore Branch, located at One Temasek Avenue, #02-01 Millenia Tower, Singapore 039192; facsimile: +65 6883 0338, attention: Global Corporate Trust – PT Tower Bersama Infrastructure Tbk.

"Stated Maturity" means, with respect to any installment of interest or principal on any series of indebtedness, the date on which the payment of interest or principal was scheduled to be paid in the documentation governing such indebtedness as of the first date it was incurred in compliance with the terms of the Indenture, and will not include any contingent obligations to repay, redeem or repurchase any such interest or principal prior to the date originally scheduled for the payment thereof.

"Subsidiary" means, with respect to any specified Person:

(1) any corporation, association or other business entity of which more than 50% of the total voting power of shares of Capital Stock entitled (without regard to the occurrence of any contingency and after giving effect to any voting agreement or stockholders' agreement that effectively transfers voting power) to vote in the election of commissioners, directors, managers or trustees of the corporation, association or other business entity is at the time owned or controlled (by contract or otherwise), directly or indirectly, by that Person or one or more of the other Subsidiaries of that Person (or a combination thereof);

(2) any partnership or limited liability company of which (a) more than 50% of the capital accounts, distribution rights, total equity and voting interests or general and limited partnership interests, as applicable, are owned or controlled, directly or indirectly, by such Person or one or more of the other Subsidiaries of that Person or a combination thereof, whether in the form of membership, general, special or limited partnership interests or otherwise, and (b) such Person or any Subsidiary of such Person is a controlling general partner or otherwise controls such entity; or

(3) any corporation, association or other business entity which is consolidated in the financial statements of such Person in accordance with GAAP.

"Tax" means any tax, duty, levy, impost, assessment or other governmental charge (including penalties and interest related thereto).

"Treasury Rate" means, as of any redemption date, the yield to maturity as of such redemption date of the most recently issued United States Treasury securities with a constant maturity (as compiled and published in the most recent Federal Reserve Statistical Release H.15 that has become

publicly available at least two Business Days prior to the redemption date (or, if such Statistical Release is no longer published, any publicly available source of similar market data)) most nearly equal to the period from the redemption date to the Par Call Date; provided that if the period from the redemption date to the Par Call Date is less than one year, the weekly average yield on actually traded United States Treasury securities adjusted to a constant maturity of one year will be used.

"U.S. Government Obligations" means securities that are (1) direct obligations of the United States of America for the payment of which its full faith and credit is pledged or (2) obligations of a Person controlled or supervised by and acting as an agency or instrumentality of the United States of America the payment of which is unconditionally guaranteed as a full faith and credit obligation by the United States of America, which, in either case, are not callable or redeemable at the option of the holder thereof at any time prior to the Stated Maturity of the Notes, and will also include a depository receipt issued by a bank or trust company as custodian with respect to any such U.S. Government Obligation or a specific payment of interest on or principal of any such U.S. Government Obligation held by such custodian for the account of the holder of a depository receipt; provided that (except as required by law) such custodian is not authorized to make any deduction from the amount payable to the holder of such depository receipt from any amount received by the custodian in respect of the U.S. Government Obligation or the specific payment of interest on or principal of the U.S. Government Obligation evidenced by such depository receipt.

TAXATION

The discussion below is not intended to constitute a complete analysis of all tax consequences relating to ownership of the notes. Prospective purchasers of the notes should consult their own tax advisers concerning the tax consequences of their particular situations. This description is based on laws, regulations and interpretations as now in effect and available as of the date of this offering circular. The laws, regulations and interpretations, however, may change at any time, and any change could be retroactive to the date of issuance of the notes. These laws and regulations are also subject to various interpretations and the relevant tax authorities or the courts could later disagree with the explanations or conclusions set out below.

Indonesian Taxation

The following is a summary of the principal Indonesian tax consequences relevant to prospective holders of the notes that are not tax resident in Indonesia and have no permanent establishment ("branch") in Indonesia. The summary does not address any laws other than the tax laws of Indonesia in force and as they are applied in practice as of the date of this offering circular. The summary represents a general guide only and should not be relied upon by individual or corporate holders of the notes offered hereby. It is recommended that holders of the notes seek independent tax advice relevant to their facts and circumstances.

The Omnibus Law on Job Creation

The Indonesian President signed the Omnibus Law on Job Creation No 11 Year 2020 ("Job Creation Law"), which became effective on November 2, 2020. On February 2, 2021, the Indonesian Government issued Government Regulation No 9 Year 2021 ("GR-9") and on February 17, 2021, the Minister of Finance ("MOF") issued regulation No. 18/PMK.03/2021 ("PMK-18"). These are the implementing regulations of the Job Creation Law that provide guidelines in respect of taxation to support the ease of doing business in Indonesia.

Several provisions in the previous Income Tax Law and General Tax Provisions and Procedures Law were updated in the Job Creation Law. The key changes in the Income Tax Law include those in relation to the concept of non-resident individuals and a reduction in cross-border interest withholding tax.

General

Resident taxpayers, individual or corporate, are subject to income tax in Indonesia on a worldwide income basis.

Generally, an individual is considered to be a non-resident of Indonesia if the individual does not reside in Indonesia or does not stay in Indonesia for more than 183 days within a 12-month period or is not present in Indonesia during a tax year with the intention of residing in Indonesia. An Indonesian citizen who resides outside Indonesia for more than 183 days within a 12-months period and meets certain conditions (i.e. place of residency, place of main activity, place of habitual abode, tax subject status and/or other certain conditions) is also considered as non-resident of Indonesia. A company will be considered to be a non-resident of Indonesia if it is not established or domiciled in Indonesia.

In determining the residency and tax status of an individual or company and the allocation of taxing rights on income between two countries, consideration will also be given to the provisions of any applicable tax treaty which Indonesia has concluded with other jurisdictions. In this section, both a non-resident individual and a non-resident company will be referred to as "Non-resident Taxpayers."

Subject to the provisions of any applicable tax treaty, Non-resident Taxpayers, who derive income sourced in Indonesia from, (among other things):

- the sale of certain assets situated in Indonesia;
- services performed in or outside Indonesia;
- interest, or payments in the nature of interest, such as premiums; and
- royalties or dividends,

are generally subject to a withholding tax on that income at the final rate of 20.0%, as long as the income is not effectively connected with a permanent establishment held by Non-resident Taxpayers in Indonesia.

If the income is effectively connected to a permanent establishment in Indonesia, then the income is part of the taxable income of the permanent establishment which is subject to corporate income tax. Based on the Tax Regulation Harmonisation Law (*Undang-Undang Harmonisasi Peraturan Perpajakan*), the corporate income tax rate effective from 2022 tax year is 22.0%. Income effectively connected with a permanent establishment is also subject to additional income tax (i.e. branch profit tax) at the rate of 20.0% on the taxable income after tax or a reduced tax rate under the provisions of an applicable tax treaty.

Taxation on Interest and Premium

Payments of principal under the notes by the Issuer should not be subject to withholding tax in Indonesia, but the interest income (including additional amounts) sourced from Indonesia is subject to withholding tax.

Interest paid by the Issuer to the noteholders will generally be subject to withholding tax.

a) Payment of bond interest by the Issuer to the resident taxpayers

Pursuant to Government Regulation No. 91 Year 2021 which is effective from August 30, 2021 ("GR-91"), payment of interest by the Issuer to resident taxpayers is subject to 10.0% final withholding tax, except for 1) pension fund whose establishment has been legalized by the MOF or has obtained permit from the Financial Services Authority ("OJK") and has fulfilled the requirement as stipulated in Article 4(3h) of Indonesian Income Tax Law No. 7 Year 1983 as amended for several times, the latest by Law No 11 Year 2020 on the Job Creation Law ("ITL") and its implementing regulations; and 2) banks incorporated in Indonesia and Indonesian branches of foreign banks.

b) Payment of bond interest by the Issuer to the Non-resident Taxpayers.

Pursuant GR-9 which is the implementing regulation of the Job Creation Law, payment of bond interest by the Issuer to the Non-Indonesian resident Taxpayers, without a permanent establishment in Indonesia, is subject to a reduced withholding tax of 10.0% (from previous rate of 20.0%) or, if an agreement for the avoidance of double taxation ("tax treaty"), provides for a rate lower than 10%, that treaty rate may apply. The reduced withholding tax rate is effective from August 2, 2021.

If a Non-resident Taxpayer which resides in a tax treaty country opts to apply the lower rate of withholding tax under the applicable tax treaty (e.g. 5.0% for Non-resident Taxpayer which is a tax

resident of the Netherlands), that Non-resident Taxpayer will also be required to satisfy the eligibility and reporting requirements for the relevant tax treaty. See "—Requirements for Non-resident Taxpayers to be eligible for the tax treaty benefits."

Taxation on Capital Gains

Income derived by Non-resident Taxpayers, without a permanent establishment in Indonesia, from the disposal of notes to other Non-resident Taxpayers, without a permanent establishment in Indonesia, should not be subject to Indonesian income tax.

Under GR-9, for non-resident individuals and corporations other than permanent establishments in Indonesia may be subject to a 10.0% Indonesian final withholding tax on any gain derived from the sale or disposal of the notes to a resident taxpayer or permanent establishment in Indonesia, or where the transaction is conducted through a securities company, dealer or bank in Indonesia, as such gain would be recharacterized as interest under Indonesian laws in these situations.

However, if the non-resident investor is a tax resident of a country that has signed a tax treaty with Indonesia, a reduced withholding tax rate applicable to interest income may be available if the gain (or a portion thereof) is considered as interest for purposes of the relevant tax treaty. Further, a full relief from the imposition of such withholding tax may be available if the relevant treaty treats the income as gain that is taxable only by the country in which the investor is resident for tax purposes. Under the U.S.-Indonesia tax treaty, interest is generally taxed at a rate of 10.0%, and the term "interest" as used in the treaty means income from bonds, debentures, government securities, notes or other evidence of indebtedness, whether or not secured by a mortgage or other security and whether or not carrying a right to participate in profits, and debt claims of every kind, as well as other income which, under the taxation law of the contracting state in which the income has its source is assimilated to income from money limit. Under such treaty, capital gains derived from the sale or disposal of notes is considered as interest and subject to tax according to the provision in interest article of the treaty.

In addition, if such gains from disposal of the notes are derived by a resident taxpayer, whether an individual or a company (including Non-resident Taxpayers with a permanent establishment in Indonesia), is taxable in Indonesia and subject to final income tax at the reduced rate of 10.0% pursuant to GR-91, except for 1) pension fund whose establishment has been legalized by the MOF or which has obtained permit from the OJK and fulfilled the requirement as stipulated in Article 4(3h) of the ITL and its implementing regulations; and 2) banks incorporated in Indonesia and Indonesian branches of foreign banks.

Requirements for Non-resident Taxpayers to be eligible for the tax treaty benefits

On November 21, 2018, the Director General of Tax ("DGT") issued regulation No. PER-25/PJ/2018 (the "Indonesia's Anti Treaty Abuse Rule") revising the anti-tax treaty abuse rules. The regulation was effective on January 1, 2019. This regulation is of importance to any non-Indonesian resident receiving income from Indonesia.

The Indonesian withholding tax agent is required to withhold tax on the income derived by Non-resident Taxpayers based on Indonesian Income Tax Law ("ITL"). Such provision can be excluded and the provision under the tax treaty will apply, if:

- The provisions of the tax treaty differ from those of the Indonesian ITL;

- The income recipient is not an Indonesian tax resident;

- The non-resident income recipient is an individual or an entity who is a tax resident of the country under the concerned Tax Treaty;

- The non-resident income recipient submits to the Indonesian withholding tax agent its certificate of domicile (i.e. Form DGT) that meets the administrative requirements (see section "Certificate of tax residence" below);

- There is no tax treaty abuse (see "B. No tax treaty abuse test"); and

- If the relevant tax treaty requires the non-resident income recipient to be the beneficial owner of the income, the beneficial owner requirements must be met (see "Beneficial Ownership").

In order to potentially reduce the withholding tax burden on the issuer, the Issuer (or an agent or entity acting on behalf of the Issuer) may, at the Issuer's sole discretion, contact noteholders on a semi-annual basis, via a bondholder beneficial ownership identification exercise as of the coupon record date, to ascertain the noteholders' tax residency and contact details, and further contact selected noteholders bilaterally for certain documentation, including, but not limited to, the certificate of tax residence (as discussed in more detail below) and Form DGT, and their account details. The Issuer may, at its sole discretion, consider making payments, in the form of a filing fee, to selected noteholders who respond to the Issuer (or an agent or entity acting on behalf of the Issuer) by providing such documentation within a stipulated timeline as determined by the Issuer (each such contact and payment, a "Discretionary Filing Exercise"). In connection with the first three coupon payment dates for the 2025 Existing USD Notes in July 2020, January 2021 and July 2021, the Issuer has completed a Discretionary Filing Exercise. In connection with the first coupon payment date for the 2026 Existing USD Notes in July 2021, the Issuer has completed a Discretionary Filing Exercise For the avoidance of doubt, the completion of any future Discretionary Filing Exercises (including in respect of the 2025 Existing USD Notes, 2026 Existing USD Notes or the notes offered hereby) shall be at the Issuer's sole discretion.

A. Certificate of tax residence ("COR") and Form DGT

Pursuant to Indonesia's Anti Treaty Abuse Rule, the administrative requirements to be fulfilled by the Non-resident Taxpayers to enjoy the tax treaty benefits require:

(a) Using Form DGT;

(b) The form must be filled in correctly, completely and clearly by the Non-resident Taxpayers;

(c) Signed by the Non-resident Taxpayers or equivalent mark/ stamp as normally used in its country;

(d) Signed by the authorized official of the treaty country where Non-resident Taxpayers reside or equivalent mark/stamp as normally used in its country;

(e) There is a statement made by the Non-resident Taxpayers stating that there is no tax treaty abuse;

(f) There is statement that the Non-resident Taxpayers is the Beneficial Owner in case it is required by the tax treaty;

(g) Used for the period stated in the Form DGT; and

(h) The signing and marking by the competent tax authority officer must be done in Part II of the Form DGT.

The signing and marking by the competent officer in Part II of the Form DGT can be replaced by a standard COR issued by that competent tax authority. Such COR must fulfill the following requirements.

a. The document must use the English language;

b. At least contains the information concerning the name of the Non-resident Taxpayers, issuance date, and the applicable tax year; and

c. Bears the name and signature of the authorized tax officer of the competent tax authority of the treaty country; or sign/stamp that is equal to the signature of the tax officer and the name of the tax officer as commonly used.

In the event the Non-resident Taxpayers use a COR, it must fill in the Form DGT except for Part II of the Form DGT.

The Non-resident Taxpayers should provide the original COR form to the tax withholder. The tax withholder is required to attach the copy of the COR from the Non-resident Taxpayers, in the relevant monthly tax return.

In the case that there is income received or earned by a Non-resident Taxpayer, but no tax is withheld in Indonesia according to the tax treaty, the tax withholder is still obligated to arrange reporting of the COR.

B. No tax treaty abuse test

In the view of the DGT, tax treaty abuse does not take place if all of the following conditions are fulfilled:

1. If the Non-resident Taxpayer is an individual, he/she does not act as an agent or nominee, or

2. If the Non-resident Taxpayer is an entity:

    a) There is economic substance in the establishment of the entity and execution of the transaction;

    b) The legal form is the same as the economic substance in the establishment of the entity or the execution of the transaction;

    c) The business activities are managed by its own respective management and each of such management has sufficient authority to carry out the transactions;

d) There are fixed assets and non-fixed assets (other than the assets generating income from Indonesia), which are adequate and sufficient to conduct business activities in that treaty country;

e) It has sufficient employees with the expertise and certain skills in accordance with its line of business;

f) It has activities or an active business other than receiving income in the form of dividend, interest, royalty from Indonesia; and

g) There is no arrangement of transactions either directly or indirectly with the objective to obtain benefits from implementation of Tax Treaty, such as

- reduction of tax burden; and/or
- double non-taxation in any country or jurisdiction;
- which contradicts the purpose and objectives of the Tax Treaty.

In the event that there is a difference between the legal form or a transactional structure/scheme and the economic substance, Indonesian tax is applied in accordance with the applicable provisions based on substance over form as indicated in point (a) above.

C. Beneficial ownership

In addition to the requirement the tax treaty abuse is not committed, in the case that the tax treaty requires the Non-resident Taxpayers to be the beneficial owner of the income (for example interest, royalty and dividend income), the Non-resident Taxpayers must certify that:

a) If he is an individual, he does not act as an agent or nominee, or

b) If it is an entity, it does not act as an agent, nominee, or conduit, and it must meet the following criteria:

- It has control in using or enjoying funds, assets, or rights that can generate income from Indonesia;
- Not more than 50% of the total non-consolidated income is used to fulfill obligations to other parties (these obligations do not include fair compensation payments to employees in relation to work, and payments to other parties for normal business costs);
- It bears the risks of assets, capital, and/or liabilities; and
- It does not have written or unwritten obligation to provide part or all of the income derived from Indonesia to another party.

D. Implementing guidelines on the investigation of COR

On May 31, 2021, the DGT issued its Circular Letter No 35/PJ/2021 ("SE-35") as an implementing guideline on the investigation of foreign taxpayer's COR during the process of tax audit, tax objection and reduction or cancellation of a tax assessment letter.

SE-35 is issued to provide uniformity on the investigation procedures on the foreign taxpayer's COR during the above processes as well as to provide legal certainty for dispute resolution related to a foreign taxpayer's COR. SE-35 is effective on the date of issue.

1) Guidelines for a formal investigation on a foreign taxpayer's COR during the process of tax audit, tax objection, and reduction or cancellation of a tax assessment letter:

   a) Tax auditor and/or tax objection reviewer to investigate the fulfillment of formal requirements on a foreign taxpayer's COR, which cover the following:

      1) use a prescribed format of a foreign taxpayer's COR;

      2) the form is accurately, completely, and clearly filled in;

      3) the form is signed or is marked equivalent with the foreign taxpayer's signature in accordance with the prevailing practice in the treaty partner country or jurisdiction;

      4) certified by a signature or marked equivalent with a signature of the competent tax authority in accordance with the prevailing practice in the treaty partner country or jurisdiction;

      5) is used in accordance with the period stated in the foreign taxpayer's COR;

      6) there is a statement from the foreign taxpayer that there is no tax treaty abuse; and

      7) there is a statement from the foreign taxpayer that it is the beneficial owner if it is required by the tax treaty.

   b) The certification of the foreign taxpayer's COR by the competent tax authority can be carried out by using an electronic signature provided it is a prevailing practice in the treaty partner country or jurisdiction.

   c) In case the foreign taxpayer's COR is received by the tax auditor during a tax audit process; or received by the tax objection reviewer during a tax objection process; or during the process of reduction or cancellation of a tax assessment letter, the COR can still be considered as a basis to implement the tax treaty provisions provided all of the formal requirements as stated in 1(a) above are met. This clarification by the DGT is welcomed and should provide clarity in cases where the relevant tax authority of the treaty partner country is unable to provide the COR in advance.

   d) If the foreign taxpayer's COR does not state a clear validity period, the foreign taxpayer through the tax withholder and/or tax collector can complete the COR that has been submitted to the DGT by submitting an additional explanation regarding the validity period of the foreign taxpayer's COR from the competent tax authority of the treaty partner country or jurisdiction; otherwise, the foreign taxpayer's COR is deemed not meeting the formal requirement as stated in 1(a)(5).

2) Guidelines for material investigation on the foreign taxpayer's COR during the process of tax audit, tax objection, and reduction or cancellation of a tax assessment letter:

a) The investigation on the fulfillment of material requirements in the foreign taxpayer's COR is carried out after the formal requirements are met.

b) The material requirements on a foreign taxpayer's COR are:

1) there is no tax treaty abuse; and

2) meeting the requirements as a beneficial owner in case required by the tax treaty; in accordance with the DGT Regulation which determines the procedures to implement a tax treaty.

Multilateral Instrument ("MLI")

The President of Indonesia issued Regulation No. 77 of 2019 ("PP No. 77/2019") on November 12, 2019, which ratifies the multilateral convention implementing tax treaty-related measures to prevent base erosion and profit shifting. Pursuant to PP No. 77/2019, 47 double tax agreements with Indonesia are nominated by Indonesia to become subject to the changes set out under the MLI, including treaties with Australia, Canada, France, Hong Kong, India, Japan, Luxembourg, Malaysia, Netherlands, Singapore, the United Kingdom and the United States of America.

The MLI will become effective and modify a relevant tax treaty at a point (determined in the MLI) after both relevant jurisdictions have deposited the instrument of ratification, acceptance or approval and the entry into force of the MLI. There is also a requirement that Indonesia submits a notification confirming the completion of internal procedures. Indonesia has deposited the ratification to the Organization for Economic Co-operation and Development (OECD) on April 28, 2020. Indonesia has also notified the OECD that it has completed its internal procedures for the entry into effect of the provisions of the Convention with respect to 22 of its tax treaties, on November 26, 2020. Hence, some changes to those 22 treaties that relate to taxes withheld at source, under the MLI positions taken by Indonesia, took effect on January 1, 2021. For other changes to those 22 treaties, or changes in respect of other treaties, entry into effect may be at later dates.

Out of the 47 treaty partner jurisdictions, some treaty partner jurisdictions have already deposited the instrument of ratification, while others have not. As of August 11, 2021, treaty partner jurisdictions that have already deposited the instrument of ratification are Australia, Canada, France, India, Japan, Luxembourg, Netherlands, New Zealand, Singapore, United Kingdom, United Arab Emirates, Belgium, Finland, Poland, Slovakia, Denmark, Russia, Republic of Serbia, Sweden, South Korea, Qatar, Egypt, Portugal, Croatia, Hungary, Malaysia and Pakistan.

To the extent the MLI comes into effect and operates to modify an applicable tax treaty with a noteholder's resident jurisdiction, noteholders should, in particular, note the potential implications, in respect of the payments of interest or premium by the Issuer, of the principle purpose test and limitation of benefits ("LOB") under the MLI, which may operate to limit treaty benefits in certain circumstances. Only some of the nominated tax treaties will be modified to include an LOB.

Other Indonesian Taxes

There are no Indonesian estates, inheritance, succession, or gift taxes generally applicable to the acquisition, ownership or disposition of the notes by Non-resident Taxpayers. There are no Indonesian

stamp, issue, registration or similar taxes or duties payable by the holders of the notes, save for Indonesian stamp duty amounting to Rp.10,000 payable for stamping of any document introduced as evidence in Indonesian court proceedings.

Singapore Taxation

The statements below are general in nature and are based on certain aspects of current tax laws in Singapore and administrative guidelines issued by the Monetary Authority of Singapore (the "MAS") in force as of the date of this offering circular. They are subject to changes in such laws, administrative guidelines or circulars, or the interpretation of those laws, guidelines or circulars, occurring after such date, which changes could be made on a retroactive basis. These laws, guidelines or circulars are also subject to various interpretations and the relevant tax authorities or the courts could later disagree with the explanations or conclusions set out below. Neither these statements nor any other statements in this offering circular are intended or are to be regarded as advice on the tax position of any holder of the notes or of any person acquiring, selling or otherwise dealing with the notes or on any tax implications arising from the acquisition, sale or other dealings in respect of the notes. The statements made herein do not purport to be a comprehensive or exhaustive description of all the tax considerations that may be relevant to a decision to subscribe for, purchase, own or dispose of the notes and do not purport to deal with the tax consequences applicable to all categories of investors, some of which (such as dealers in securities or financial institutions in Singapore which have been granted the relevant Financial Sector Incentive(s)) may be subject to special rules or tax rates.

Prospective holders of the notes should consult their own professional tax advisers as to the Singapore or other tax consequences of the acquisition, ownership of or disposal of the notes, including, in particular, the effect of any foreign, state or local tax laws to which they are subject. It is emphasized that neither the Issuer nor any other persons involved in the issuance of the notes accepts responsibility for any tax effects or liabilities resulting from the subscription for, purchase, holding or disposal of the notes.

General

Singapore adopts a territorial basis of taxation whereby tax is imposed on income of any person accruing in or derived from Singapore (i.e. income sourced in Singapore), or received in Singapore from outside Singapore (i.e. foreign-sourced income), in respect of any trade or business carried on by that person.

Under Section 10(25) of the Income Tax Act, Chapter 134 of Singapore (the "SITA"), foreign-sourced income is deemed to be received in Singapore (whether or not the source from which the income is derived has ceased) if the income is:

(a) remitted to, transmitted, or brought into Singapore;

(b) applied in or towards the satisfaction of any debt incurred in respect of a trade or business carried on in Singapore; or

(c) applied to purchase any movable property which is brought into Singapore.

Section 10(25) will be applied to tax foreign-sourced income received in Singapore only if the income belongs to an individual who is tax resident in Singapore or an entity that is located in and/or operating in Singapore.

Under Section 12(6) of the SITA, the following income shall be deemed to be derived from Singapore (i.e. income sourced in Singapore):

(a) any interest, commission, fee or any other payment in connection with any loan or indebtedness or with any arrangement, management, guarantee, or service relating to any loan or indebtedness which is (i) borne, directly or indirectly, by a person resident in Singapore or a permanent establishment in Singapore (except in respect of any business carried on outside Singapore through a permanent establishment outside Singapore or any immovable property situated outside Singapore) or (ii) deductible against any income accruing in or derived from Singapore; or

(b) any income derived from loans where the funds provided by such loans are brought into or used in Singapore.

Qualifying conditions for Qualifying Debt Securities ("QDS")

For debt securities issued during the period from January 1, 2014 to December 31, 2023 not issued under a programme, they must meet both conditions (a) and (b), and also meet either condition (c) or (d) to qualify as QDS:

(a) the debt securities must be "bonds, notes, commercial papers and certificates of deposits;"

(b) the debt securities must be lead managed in accordance with the prescribed regulations:

  (i) the lead manager is any, or if there is more than one lead manager, more than half of the lead managers are any or any combination, of the following:

    a. a Financial Sector Incentive — Bond Market ("FSI-BM") company;

    b. a Financial Sector Incentive — Capital Market ("FSI-CM") company;

    c. a Financial Sector Incentive — Standard Tier ("FSI-ST") company; or

  (ii) If the issuer is not a Singapore-based issuer, more than half of the debt securities issued under the issue are distributed by any or any combination of the following:

    a. an FSI-BM company;

    b. an FSI-CM company;

    c. an FSI-ST company.

(c) the debt securities must be issued to at least four persons during its primary launch; and

(d) if condition (c) is not met and the debt securities are issued to less than four persons, 50% or more of the issue of the debt securities, at the primary launch, must not be beneficially held or funded, directly or indirectly, by related parties of the issuer of those debt securities.

While the debt securities may meet all the necessary conditions above at its primary launch and therefore qualify as QDS, there is an additional condition that must be met by certain categories of

holders during the life of the debt securities to preserve the tax incentive on Qualifying Income (as defined below), if any, derived from the debt securities. This condition requires that at no time during the life of the debt securities must 50% or more of the debt securities outstanding at any time be beneficially held or funded, directly or indirectly, by related parties of the issuer of those debt securities. If this condition is not met, the tax exemption or concessionary rate of tax, as the case may be, on interest payable and other qualifying receipts on the debt securities will not apply to the following categories of holders:

(a) holders who are related parties of the issuer; and

(b) holders whose purchase of the debt securities is funded, directly or indirectly, by related parties of the issuer.

Holders of the debt securities who fall outside the two categories stated in the above paragraph will continue to enjoy the tax exemption or concessionary rate of tax, as the case may be, notwithstanding that the additional condition (as mentioned in the above paragraph) is not met. In other words, should any holders of the debt securities be related parties or become related parties of the issuer subsequent to the issuance of the debt securities or purchased the debt securities with funds originating from related parties of the issuer, only those holders will be disqualified from the tax exemption or concessionary rate of tax if their combined holdings in the debt securities is above the stipulated threshold. Other holders who are not related parties and did not purchase the debt securities with funds originating from related parties of the issuer are not affected by the disqualification.

Where the debt securities qualify as QDS and subject to certain conditions, interest, discount (not including discount income arising from secondary trading), prepayment fee, redemption premium and break cost ("Qualifying Income") derived may be exempt or subject to Singapore Income tax depending on the identities of the beneficial owner of the debt securities, and not be subject to Singapore withholding tax. See further details of the terms below.

1. "Prepayment fee", in relation to debt securities or QDS, means any fee payable by the issuer of the securities on the early redemption of the securities, the amount of which is determined by the terms of the issuance of the securities.

2. "Redemption premium", in relation to debt securities or QDS, means any premium payable by the issuer of the securities on the redemption of the securities upon their maturity.

3. "Break cost", in relation to debt securities or QDS, means any fee payable by the issuer of the securities on the early redemption of the securities, the amount of which is determined by any loss or liability incurred by the holder of the securities in connection with such redemption.

The tax treatment as described above, is subject to compliance with the following conditions:

a. the debt securities issuer including in all offering documents relating to the debt securities:

   (i) a statement to the effect that the tax exemption on Qualifying Income payable on the debt securities (consequent to its QDS status) shall not apply where the Qualifying Income are derived by a non-resident holder who carries on operations in Singapore through a permanent establishment in Singapore and who uses the funds obtained from such Singapore operations to purchase the debt securities;

(ii) a statement to the effect that any person whose Qualifying Income derived from the debt securities are not exempt from tax shall include such income in a return of income made under the SITA; and

b. the debt securities issuer, or such other person as the MAS may direct, furnishing to the MAS a return on debt securities within one month from the date of issue of the debt securities.

PLAN OF DISTRIBUTION

Barclays Bank PLC, Singapore Branch, BNP Paribas, Crédit Agricole Corporate and Investment Bank, Singapore Branch, DBS Bank Ltd., The Hongkong and Shanghai Banking Corporation Limited, Singapore Branch, Mizuho Securities Asia Limited, Oversea Chinese Banking Corporation Limited, United Overseas Bank Limited, Australia and New Zealand Banking Group Limited, CIMB Bank Berhad, Singapore Branch, MUFG Securities Asia Limited Singapore Branch and SMBC Nikko Securities (Hong Kong) Limited are acting as the joint bookrunners and joint lead managers of the offering of the notes. Subject to the terms and conditions stated in the purchase agreement dated the date of this offering circular (the "Purchase Agreement"), each initial purchaser named below has severally agreed to purchase, and the Issuer has agreed to sell to each such initial purchaser, the principal amount of the notes set forth opposite the name of such initial purchaser.

Initial Purchaser	Principal Amount
Barclays Bank PLC, Singapore Branch	US$48,000,000
BNP Paribas	US$48,000,000
Crédit Agricole Corporate and Investment Bank, Singapore Branch	US$48,000,000
DBS Bank Ltd.	US$48,000,000
The Hongkong and Shanghai Banking Corporation Limited, Singapore Branch	US$48,000,000
Mizuho Securities Asia Limited	US$48,000,000
Oversea Chinese Banking Corporation Limited	US$48,000,000
United Overseas Bank Limited	US$48,000,000
Australia and New Zealand Banking Group Limited	US$4,000,000
CIMB Bank Berhad, Singapore Branch	US$4,000,000
MUFG Securities Asia Limited Singapore Branch	US$4,000,000
SMBC Nikko Securities (Hong Kong) Limited	US$4,000,000
Total	US$400,000,000

The Purchase Agreement provides that the obligations of the initial purchasers to purchase the notes are subject to approval of certain legal matters by counsel and to certain other conditions. The initial purchasers must purchase all of the notes if they purchase any of the notes. The initial offering price is set forth on the cover page of this offering circular. After the notes are released for sale, the initial purchasers may change the offering price and other selling terms. The initial purchasers reserve the right to withdraw, cancel or modify offers to investors and to reject orders in whole or in part.

The Issuer has agreed to indemnify the initial purchasers against certain liabilities, including liabilities under the Securities Act, or to contribute to payments that the initial purchasers may be required to make in respect of any of such liabilities.

The Issuer has been advised that the initial purchasers propose to resell the notes at the offering price set forth on the cover page of this offering circular outside the United States in offshore transactions in reliance on Regulation S. See "Transfer Restrictions."

The Issuer has agreed not to, for a period of 60 days after the date of this offering circular (i) offer for sale, sell, or otherwise dispose of (or enter into any transaction or device that is designed to, or would be expected to, result in the disposition by any person at any time in the future of) any debt securities substantially similar to the notes or securities convertible into or exchangeable for such debt securities, or sell or grant options, rights or warrants with respect to such debt securities or securities convertible into or exchangeable for such debt securities, (ii) enter into any swap or other

derivatives transaction that transfers to another, in whole or in part, any of the economic benefits or risks of ownership of such debt securities, (iii) file or cause to be filed a registration statement, including any amendments, with respect to the registration of debt securities substantially similar to the notes or securities convertible, exercisable or exchangeable into debt securities or (iv) publicly announce an offering of any debt securities substantially similar to the notes or securities convertible or exchangeable into such debt securities, in each case without the prior written consent of the initial purchasers.

The notes have not been registered under the Securities Act and, unless so registered, may not be offered or sold within the United States except in offshore transactions in reliance on Regulation S. See "Transfer Restrictions."

The notes will constitute a new class of securities with no established trading market. Approval in-principle has been received for the listing of the notes on the SGX-ST. The offering and settlement of the notes is not conditioned upon obtaining the listing. The Issuer does not intend to apply for listing or quotation of the notes on any national securities exchange in the United States. However, there can be no assurance that the prices at which the notes will sell in the market after this offering will not be lower than the initial offering price or that an active trading market for the notes after the completion of the offering will develop and continue after this offering. The initial purchasers have advised us that they currently intend to make a market in the notes. However, they are not obligated to do so and may discontinue any market-making activities with respect to the notes at any time without notice. In addition, market-making activity will be subject to the limits imposed by applicable law. Accordingly, there can be no assurance that the trading market for the notes will have any liquidity.

In connection with this offering, The Hongkong and Shanghai Banking Corporation Limited, Singapore Branch, as stabilizing manager, or any person acting for it, may purchase and sell notes in the open market. These transactions may, to the extent permitted by law, include short sales, stabilizing transactions and purchases to cover positions created by short sales. Short sales involve the sale of a greater amount of notes than the initial purchasers are required to purchase in this offering. Stabilizing transactions consist of certain bids or purchases for the purpose of preventing or retarding a decline in the market price of the notes while this offering is in progress. These activities, to the extent permitted by law, may stabilize, maintain or otherwise affect the market price of the notes. These activities may be conducted in the over-the-counter market or otherwise. As a result, the price of the notes may be higher than the price that otherwise might exist in the open market. If these activities are commenced, they may be discontinued at any time and must in any event be brought to an end after a limited time. These activities will be undertaken solely for the account of the stabilizing manager and not for and on behalf of the Issuer.

Some of the initial purchasers and their affiliates have engaged in, and may in the future engage in, investment banking and other commercial dealings in the ordinary course of business with the Issuer or its affiliates. They have received customary, or may in the future receive, customary fees and commissions for these transactions. In particular, BNP Paribas, Crédit Agricole Corporate and Investment Bank, Singapore Branch, DBS Bank Ltd., The Hongkong and Shanghai Banking Corporation Limited, Singapore Branch, Mizuho Securities Asia Limited, Oversea-Chinese Banking Corporation Limited, United Overseas Bank Limited, Australia and New Zealand Banking Group Limited, CIMB Bank Berhad, Singapore Branch and MUFG Securities Asia Limited Singapore Branch and/or their respective affiliates are parties to certain credit agreements with us, including the 2017 RLF Agreement, 2019 RLF Agreement, 2021 RLF Agreement and the Credit Facilities Agreement, that are expected to be repaid using a portion of the proceeds of the offering of the notes. As a result, certain of the initial purchasers and/or their affiliates may receive proceeds of the offering in connection with the repayment of such credit agreements.

The initial purchasers or certain of their respective affiliates may purchase notes and be allocated notes for asset management and/or proprietary purposes and not with a view to distribution.

Delivery of the notes is expected to be made on or about November 2, 2021 which is the fifth business day following the date of this offering circular (such settlement cycle being referred to as T+5). Under Rule 15c6-1 of the Exchange Act, trades in the secondary market generally are required to settle in two business days, unless the parties to any such trade expressly agree otherwise. Accordingly, purchasers who wish to trade the notes on the date of pricing or the next two succeeding business days will be required, because the notes initially will settle in T+5, to specify an alternate settlement cycle at the time of any such trade to prevent a failed settlement. Purchasers who wish to trade the notes on the pricing date or the next succeeding two business days should consult their own advisers.

Selling Restrictions

General

No action has been taken or will be taken in any jurisdiction by the Issuer or the initial purchasers that would permit a public offering of notes, or the possession, circulation or distribution of this offering circular or any other material relating to the notes or this offering, in any jurisdiction where action for that purpose is required. Accordingly, the notes may not be offered or sold, directly or indirectly, and neither this offering circular nor such other material may be distributed or published, in or from any country or jurisdiction except in compliance with any applicable rules and regulations of such country or jurisdiction.

United States

The notes have not been and will not be registered under the Securities Act, and may not be offered or sold in the United States except in offshore transactions in reliance on Regulation S. Each initial purchaser has agreed that it has not offered or sold, and will not offer or sell, any notes within the United States as part of their distribution at any time. Terms used in this section have the meanings given to them by Regulation S. Resale of the notes is restricted as described under "Transfer Restrictions."

In addition, until 40 days following the commencement of this offering, an offer or sale of notes within the United States by a dealer (whether or not participating in the offering) may violate the registration requirements of the Securities Act unless the dealer makes the offer or sell in compliance with an exemption from registration under the U.S. Securities Act.

United Kingdom

This offering circular has been prepared on the basis that any offer of securities in the UK will be made pursuant to an exemption under the FSMA from the requirement to publish a prospectus for offers of securities. The expression FSMA means the Financial Services and Markets Act 2000 (as amended). Neither the Issuer nor the initial purchasers have authorized, nor do they authorize, the making of any offer of notes in circumstances in which an obligation arises for the Issuer or the initial purchasers to publish a prospectus for such offer. Neither the Issuer nor the initial purchasers have authorized, nor do they authorize, the making of any offer of notes through any financial intermediary, other than offers made by the initial purchasers, which constitute the final placement of the notes contemplated in this offering circular.

The initial purchasers have not offered, sold or otherwise made available and will not offer, sell or otherwise make available any notes to any retail investor in the United Kingdom. For the purposes of this provision, the expression "retail investor" means a person who is one (or more) of the following:

(i) a retail client, as defined in point (8) of Article 2 of Regulation (EU) No 2017/565 as it forms part of domestic law by virtue of the European Union (Withdrawal) Act 2018 ("EUWA"); or

(ii) a customer within the meaning of the provisions of the FSMA and any rules or regulations made under the FSMA to implement Directive (EU) 2016/97, where that customer would not qualify as a professional client, as defined in point (8) of Article 2(1) of Regulation (EU) No 600/2014 as it forms part of domestic law by virtue of the EUWA.

This offering circular is for distribution only to persons who (i) fall within Article 43(2)(b) of the Financial Services and Markets Act 2000 (Financial Promotion) Order 2005 (as amended, the "Financial Promotion Order"), (ii) have professional experience in matters relating to investments falling within Article 19(5) of the Financial Promotion Order, (iii) are persons falling within Article 49(2)(a) to (d) ("high net worth companies, unincorporated associations etc") of the Financial Promotion Order, (iv) are outside the United Kingdom, or (v) are persons to whom an invitation or inducement to engage in investment activity (within the meaning of section 21 of the Financial Services and Markets Act 2000 (as amended, the "FSMA")) in connection with the issue or sale of any securities may otherwise lawfully be communicated or caused to be communicated (all such persons together being referred to as "relevant persons"). This offering circular is directed only at relevant persons and must not be acted on or relied on by persons who are not relevant persons. Any investment or investment activity to which this offering circular relates is available only to relevant persons and will be engaged in only with relevant persons.

Each of the initial purchasers has represented, warranted and agreed that:

- it has only communicated or caused to be communicated, and will only communicate or cause to be communicated, any invitation or inducement to engage in investment activity (within the meaning of section 21 of the "FSMA") received by it in connection with the issue or sale of any notes in circumstances in which section 21(1) of the FSMA does not apply to the Issuer; and

- it has complied and will comply with all applicable provisions of the FSMA with respect to anything done by it in relation to the notes in, from or otherwise involving the United Kingdom.

European Economic Area

This offering circular has been prepared on the basis that any offer of notes in any Member State of the European Economic Area will be made pursuant to an exemption under the Prospectus Regulation from the obligation to publish a prospectus for offers of notes. Neither the Issuer nor the initial purchasers have authorized, nor do they authorize, the making of any offer of notes in circumstances in which an obligation arises for the Issuer or the initial purchasers to publish a prospectus for such offer. Neither the Issuer nor the initial purchasers have authorized, nor do they authorize, the making of any offer of notes through any financial intermediary, other than offers made by the initial purchasers, which constitute the final placement of the notes contemplated in this offering circular.

The initial purchasers have not offered, sold or otherwise made available and will not offer, sell or otherwise make available any notes to any retail investor in the European Economic Area. For the purposes of this provision, the expression "retail investor" means a person who is one (or more) of the following:

(i) a retail client as defined in point (11) of Article 4(1) of Directive 2014/65/EU (as amended, "MiFID II"); or

(ii) a customer within the meaning of Directive (EU) 2016/97 (the "Insurance Distribution Directive"), where that customer would not qualify as a professional client as defined in point (10) of Article 4(1) of MiFID II.

Hong Kong

The notes may not be offered or sold in Hong Kong by means of any document other than (i) in circumstances which do not constitute an offer to the public within the meaning of the Companies (Winding Up and Miscellaneous Provisions) Ordinance (Cap. 32, the Laws of Hong Kong), or (ii) to "professional investors" within the meaning of the SFO (Cap. 571, the Laws of Hong Kong) and any rules made thereunder, or (iii) in other circumstances which do not result in the document being a "prospectus" within the meaning of the Companies (Winding Up and Miscellaneous Provisions) Ordinance (Cap. 32, the Laws of Hong Kong) and no advertisement, invitation or document relating to the notes may be issued or may be in the possession of any person for the purpose of issue (in each case whether in Hong Kong or elsewhere), which is directed at, or the contents of which are likely to be accessed or read by, the public in Hong Kong (except if permitted to do so under the laws of Hong Kong) other than with respect to the notes which are or are intended to be disposed of only to persons outside Hong Kong or only to "professional investors" within the meaning of the SFO and any rules made thereunder.

Japan

The notes offered in this offering circular have not been and will not be registered under the Financial Instruments and Exchange Act of Japan. The notes may not and will not, directly or indirectly, be offered or sold in Japan or to, or for the benefit of, any resident of Japan (which term as used herein means any person resident in Japan, including any corporation or other entity organized under the laws of Japan) or to others for reoffering or resale, directly or indirectly, in Japan or to, or for the benefit of, any resident in Japan, except pursuant to an exemption from the registration requirements of, and otherwise in compliance with, the Financial Instruments and Exchange Act of Japan and other relevant laws and regulations of Japan.

Singapore

This offering circular has not been registered as a prospectus with the Monetary Authority of Singapore. Accordingly, this offering circular and any other document or material in connection with the offer or sale, or invitation for subscription or purchase, of the notes may not be circulated or distributed, nor may the notes be offered or sold, or be made the subject of an invitation for subscription or purchase, whether directly or indirectly, to any person in Singapore other than: (i) to an institutional investor (as defined in Section 4A of the Securities and Futures Act, Chapter 289 of Singapore, as modified or amended from time to time (the "SFA")) pursuant to Section 274 of the SFA; (ii) to a relevant person (as defined in Section 275(2) of the SFA pursuant to Section 275(1) of the SFA, or any person pursuant to Section 275(1A) of the SFA, and in accordance with the conditions

specified in Section 275 of the SFA and (where applicable) Regulation 3 of the Securities and Futures (Classes of Investors) Regulations 2018; or (iii) otherwise pursuant to, and in accordance with the conditions of, any other applicable provision of the SFA.

Where the notes are subscribed or purchased under Section 275 of the SFA by a relevant person which is:

(a) a corporation (which is not an accredited investor (as defined in Section 4A of the SFA)) the sole business of which is to hold investments and the entire share capital of which is owned by one or more individuals, each of whom is an accredited investor; or

(b) a trust (where the trustee is not an accredited investor) whose sole purpose is to hold investments and each beneficiary of the trust is an individual who is an accredited investor,

securities or securities-based derivatives contracts (each term as defined in Section 2(1) of the SFA) of that corporation or the beneficiaries' rights and interest (howsoever described) in that trust shall not be transferred within six months after that corporation or that trust has acquired the notes pursuant to an offer made under Section 275 of the SFA except:

(i) to an institutional investor or to a relevant person, or to any person arising from an offer referred to in Section 275(1A) or Section 276(4)(i)(B) of the SFA;

(ii) where no consideration is or will be given for the transfer;

(iii) where the transfer is by operation of law;

(iv) as specified in Section 276(7) of the SFA; or

(v) as specified in Regulation 37A of the Securities and Futures (Offers of Investments) (Securities and Securities-based Derivatives Contracts) Regulations 2018.

Indonesia

This offering does not constitute a public offering or private offering in Indonesia under Law No. 8 of 1995 regarding Capital Markets and its implementing regulations. This offering circular may not be distributed in Indonesia and the further notes may not be offered in Indonesia or sold to Indonesian citizens wherever they are domiciled, or to Indonesian residents and institutions in a manner which constitutes a public offering or private offering under the laws and regulations of Indonesia.

Switzerland

The notes may not be publicly offered, sold or advertised, directly or indirectly, in, into or from Switzerland and will not be listed on the SIX Swiss Exchange or any other exchange or regulated trading facility in Switzerland. Neither this offering circular nor any other offering or marketing material relating to the notes constitutes (i) a prospectus as such term is understood pursuant to Article 652a or 1156 of the Swiss Code of Obligations or (ii) a listing prospectus within the meaning of the listing rules of the SIX Swiss Exchange or any other regulated trading facility in Switzerland, and neither this offering circular nor any other marketing material relating to the notes may be publicly distributed or otherwise made publicly available in Switzerland. In addition, this offering circular nor

any other offering or marketing material relating to the notes may not comply with the Directive for notes of Foreign Borrowers of the Swiss Bankers Association. The notes are being offered in Switzerland by way of private placement, without any public advertisement and only to investors who do not purchase the notes with the intention to distribute them to the public. The investors will be individually approached directly from time to time. This offering circular, as well as any other offering or marketing material relating to the notes, is personal and confidential and does not constitute an offer to any other person. This offering circular, as well as any other offering or marketing material relating to the notes, may only be used by those investors to whom it has been handed out in connection with the offering and may neither directly nor indirectly be distributed or made available to other persons without the Issuer's express consent.

TRANSFER RESTRICTIONS

Because of the following restrictions, purchasers are advised to consult their legal counsel prior to making any offer, sale, resale, pledge or other transfer of the notes.

The notes are subject to restrictions on transfer as summarized below. By purchasing the notes, you will be deemed to have made the following acknowledgements, representations to, and agreements with, us and the initial purchaser:

(1) You understand and acknowledge that:

- the notes have not been registered under the Securities Act or any other applicable securities laws;
- the notes are being offered for resale in transactions that do not require registration under the Securities Act or any other securities laws;
- the notes are being offered and sold only outside of the United States in offshore transactions in reliance on Regulation S under the Securities Act; and
- unless so registered, the notes may not be sold or otherwise transferred except under an exemption from, or in a transaction not subject to, the registration requirements of the Securities Act or any other applicable securities laws, and in each case in compliance with the conditions for transfer set forth in paragraph 5 below.

(2) You represent that you are purchasing the notes in an offshore transaction in accordance with Regulation S.

(3) You acknowledge that neither we nor the initial purchasers nor any person representing us or the initial purchasers have made any representation to you with respect to us or the offering of the notes, other than the information contained in this offering circular. You represent that you are relying only on this offering circular in making its investment decision with respect to the notes. You agree that you have had access to such financial and other information concerning us and the notes as you have deemed necessary in connection with your decision to purchase the notes, including an opportunity to ask questions of and request information from us.

(4) You represent that you are purchasing the notes for your own account, or for one or more investor accounts for which you are acting as a fiduciary or agent, in each case not with a view to, or for offer or sale in connection with, any distribution of the notes in violation of the Securities Act.

(5) You also acknowledge that each note will contain a legend substantially to the following effect:

"THIS NOTE HAS NOT BEEN REGISTERED UNDER THE UNITED STATES SECURITIES ACT OF 1933, AS AMENDED (THE "SECURITIES ACT") OR THE SECURITIES LAWS OF ANY STATE OR OTHER JURISDICTION. NEITHER THIS NOTE NOR ANY INTEREST OR PARTICIPATION HEREIN MAY BE REOFFERED, SOLD, ASSIGNED, TRANSFERRED, PLEDGED, ENCUMBERED OR OTHERWISE

DISPOSED OF IN THE ABSENCE OF SUCH REGISTRATION OR UNLESS SUCH TRANSACTION IS EXEMPT FROM, OR NOT SUBJECT TO, SUCH REGISTRATION. BY ITS ACQUISITION HEREOF, THE HOLDER HEREOF REPRESENTS THAT IT IS ACQUIRING THIS NOTE IN AN OFFSHORE TRANSACTION IN ACCORDANCE WITH REGULATION S UNDER THE SECURITIES ACT."

(6) You acknowledge that we, the Initial Purchasers, the Transfer Agent and others will rely upon the truth and accuracy of the above acknowledgments, representations and agreements. You agree that if any of the acknowledgments, representations or agreements you are deemed to have made by your purchase of the notes is no longer accurate, you will promptly notify us, the Transfer Agent and the Initial Purchasers. If you are purchasing any notes as a fiduciary or agent for one or more investor accounts, you represent that you have sole investment discretion with respect to each of those accounts and that you have full power to make the above acknowledgments, representations and agreements on behalf of each account.

(7) You also acknowledge that this offering circular has not been and will not be registered as a prospectus with the MAS under the SFA. Accordingly, you have represented, warranted and agreed that you have not offered or sold any notes or caused the notes to be made the subject of an invitation for subscription or purchase and will not offer or sell any notes or cause the notes to be made the subject of an invitation for subscription or purchase, and have not circulated or distributed, nor will you circulate or distribute, this offering circular or any other document or material in connection with the offer or sale, or invitation for subscription or purchase, of the notes, whether directly or indirectly, to any person in Singapore other than (i) to an institutional investor under Section 274 of the SFA, (ii) to a relevant person pursuant to Section 275(1), or any person pursuant to Section 275(1A), and in accordance with the conditions specified in Section 275, of the SFA or (iii) otherwise pursuant to, and in accordance with the conditions of, any other applicable provision of the SFA.

LEGAL MATTERS

Certain legal matters with respect to the notes will be passed upon for us by Latham & Watkins LLP with respect to matters of U.S. federal securities and New York laws and by Indrawan Darsyah Santoso with respect to matters of Indonesian laws, and on behalf of the initial purchasers by Shearman & Sterling LLP with respect to matters of U.S. federal securities and New York laws and by Adnan Kelana Haryanto & Hermanto with respect to matters of Indonesian laws.

Each of Latham & Watkins LLP, Shearman & Sterling LLP, Indrawan Darsyah Santoso and Adnan Kelana Haryanto & Hermanto does not make, or purport to make, any statement in this offering circular and is not aware of any statement in this offering circular which purports to be based on a statement made by it and each of them makes no representation, express or implied, regarding, and takes no responsibility for, any statement in or omission from this offering circular.

INDEPENDENT AUDITORS

The consolidated financial statements of the Company as of and for the years ended December 31, 2018, 2019 and 2020 have been audited by KAP Tanubrata Sutanto Fahmi Bambang & Rekan ("TSFBR"), independent public accountants of Jakarta Indonesia (a member of BDO International Limited), as stated in their report appearing elsewhere in this offering circular.

With respect to the unaudited interim consolidated financial information of the Company as of June 30, 2021 and for the six months periods ended June 30, 2020 and 2021, included elsewhere in this offering circular, TSFBR reported that they have applied limited procedures in accordance with professional standards for a review of such information. Accordingly, the degree of reliance on their report on such information should be restricted in light of the limited nature of the review procedures applied.

SUMMARY OF CERTAIN DIFFERENCES BETWEEN INDONESIAN FAS AND IFRS

Our consolidated financial statements included in this offering circular are prepared and presented in accordance with Indonesian FAS, which differs in certain material respects from IFRS. Certain differences between Indonesian FAS and IFRS applicable to us are summarized below. This summary should not be construed to be exhaustive. In making an investment decision, investors must rely upon their own examination of us, the terms of the offering and our financial information. Potential investors should consult their own professional advisers for an understanding of the certain differences between Indonesian FAS and IFRS and how these differences might affect the financial information herein. Our management has not quantified the effects of the certain differences discussed below. Had we undertaken such quantification or reconciliation, other potential accounting and disclosure differences may have come to our attention that are not identified below. Accordingly, we cannot assure you that our consolidated financial statements would not be materially different if prepared in accordance with IFRS. Additionally, no attempt has been made, to identify all disclosure, presentation, or classification differences that would affect the manner in which transactions and events are presented in the consolidated financial statements or notes thereto. Further, no attempt has been made to identify future certain differences between Indonesian FAS and IFRS as the result of prescribed changes in accounting standards. Regulatory bodies that promulgate Indonesian FAS and IFRS have significant projects ongoing that could affect comparisons such as this one in the future.

Consolidation

Under both standards, an entity (parent) that controls one or more other entities (subsidiaries) are required to present consolidated financial statements. An investor controls an investee when the investor is exposed, or has rights, to variable returns from its involvement with the investee and has the ability to affect those returns through its power over the investee.

Under Indonesian FAS, without exemptions, all parent entities are required to present consolidated financial statements. A parent entity is not allowed to present its own separate financial statements as standalone general purpose financial statements, but such may be presented as supplementary information to the consolidated financial statements.

Under IFRS, a parent need not present consolidated financial statements if it meets all the following conditions: (i) it is a wholly-owned subsidiary or is a partially-owned subsidiary of another entity and all its other owners, including those not otherwise entitled to vote, have been informed about, and do not object to, the parent not presenting consolidated financial statements; (ii) its debt or equity instruments are not traded in a public market (a domestic or foreign stock exchange or an over-the-counter market, including local and regional markets); (iii) it did not file, nor is it in the process of filing, its financial statements with a securities commission or other regulatory organization for the purpose of issuing any class of instruments in a public market; and (iv) its ultimate or any intermediate parent produces consolidated financial statements that are available for public use and comply with IFRS.

Business Combination

Under both standards, a business combination has to be accounted for by applying the acquisition method, unless it is a combination involving entities or business under common control. Applying the acquisition method, requires: (a) identifying the acquirer; (b) determining the acquisition date; (c) recognizing and measuring the identifiable assets acquired, the liabilities assumed and any non-controlling interest in the acquiree; and (d) recognizing and measuring goodwill or a gain from a

bargain purchase. The acquirer accounts for the acquisition-related costs which are directly attributable to the purchase, including professional fees, which are accounted for as expenses in the periods in which the costs are incurred and the services are received, except for costs related to the issue of debt or equity instruments.

Under Indonesian FAS, business combinations that qualify as transactions under common control are accounted for using the predecessor accounting approach under PSAK 38 "Business Combination of Entities under Common Control." In principle, the acquirer will not measure to fair value the assets and liabilities of the acquiree. Any difference between the transfer price paid and the carrying value of net asset acquired will be presented as part of the acquirer's additional paid-in capital in equity and is not recycled to profit or loss in the future. Under IFRS, the acquisition method is used for all business combinations but does not apply to business combination of entities under common control. A business combination involving entities or businesses under common control is a business combination in which all of the combining entities or businesses are ultimately controlled by the same party or parties both before and after the business combination, and that control is not transitory. PSAK 38 has no equivalent standard in IFRS for business combination of entities under common control.

Under IFRS 3, accounting for business combinations involving entities under common control, the 'pooling of interests' method and 'fresh start' method are only referred to in the Basis for Conclusions as possible methods of accounting, but are not deemed appropriate for all business combinations. The acquirer in a common control transaction should choose an accounting policy in respect of its consolidated financial statements, to be applied consistently to all similar common control transactions, and may use (a) 'book value (carry-over basis) accounting' (also referred to as 'predecessor accounting', or 'merger accounting' in some jurisdictions) on the basis that the investment has simply been moved from one part of the group to another; or (b) 'acquisition accounting' on the basis that the acquirer is a separate entity in its own right and should not be confused with the economic group as a whole.

Property and Equipment

Under Indonesian FAS, ISAK No. 31, "Interpretation of PSAK 13: Investment Property" (ISAK 31) provides an interpretation of the characteristic of a building that meets the definition of investment property by PSAK 13, "Investment Property." An asset qualifies as a building if it possesses the physical characteristics generally associated with a building, such as the walls, floors and roofs attached to the asset. Further, OJK issued SE OJK No.36/SEOJK.04/2016: Revocation Circular Letter of Indonesian Financial Service Authority (OJK) No.27/SEOJK.04/2015 concerning the accounting treatment for the leasing of telecommunication tower assets. Hence, the telecommunication tower assets were classified as property and equipment instead of investment property.

There is no equivalent standard under IFRS for the ISAK 31.

Financial Instruments

Recognition and Measurement

Effective financial year beginning January 1, 2020, PSAK 71 "Financial Instruments" has been adopted in Indonesia. In contrast, IFRS 9 has been applied for annual reporting periods beginning on or after January 1, 2018 and earlier application was permitted. Both standards on financial instruments apply to all financial instruments, except for those specifically excluded from their scope. This standard provides new requirements on the classification and measurement of financial assets and

liabilities and includes an expected credit losses model that replaces the incurred loss impairment model and also includes new requirements for hedge accounting. PSAK 71 and IFRS 9 are consistent in all significant respects.

Revenue Recognition

Effective financial year beginning January 1, 2020, PSAK 72, "Revenue from Contracts with Customers" has been adopted in Indonesia. In contrast, IFRS 15 has been applied for annual reporting periods beginning on or after January 1, 2018 and earlier application was permitted. Under both frameworks, the core principle is that an entity recognizes revenue to depict the transfer of promised goods or services to customers in an amount that reflects the consideration to which the entity expects to be entitled in exchange for those goods or services. To achieve this, an entity should apply the five-step approach outlined in the new revenue standard: (1) identify the contract with a customer; (2) identify the performance obligations in the contract; (3) determine the transaction price; (4) allocate the transaction price to the performance obligations in the contract; and (5) recognize revenue when (or as) the entity satisfies a performance obligation.

PSAK 72 supersedes PSAK 23 "Revenue," PSAK 34 "Construction Contracts," ISAK 10 "Customer Loyalty Programmes," ISAK 21 "Agreements for the Construction of Real Estate," ISAK 27 "Transfers of Assets from Customers" and PSAK 44 "Accounting for Real Estate Development."

IFRS 15 is consistent with PSAK 72 in all significant respects. IFRS 15 supersedes IAS 11 "Construction Contracts," IAS 18 "Revenue," IFRIC 13 "Customer Loyalty Programmes," IFRIC 15 "Agreements for the Construction of Real Estate," IFRIC 18 "Transfers of Assets from Customers" and SIC-31 "Revenue-Barter Transactions Involving Advertising Services."

Leases

Effective financial year beginning January 1, 2020, PSAK 73 "Leases" has been adopted in Indonesia. In contrast, IFRS 16 has been applied for annual reporting periods beginning on or after January 1, 2019. Earlier application was permitted for entities that applied IFRS 15 at or before the date of initial application of PSAK 73. This standard sets out the principles for the recognition, measurement, presentation and disclosure of leases. Under both standards, an entity shall assess whether the contract is, or contains, a lease. At the inception of a contract. A contract is, or contains, a lease if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration. PSAK 73 and IFRS 15 are consistent in all significant respects.

PSAK 73 supersedes PSAK 30 "Leases," ISAK 8 "Determining whether an Arrangement Contains a Lease," ISAK 23 "Operating Leases – Incentives," ISAK 24 "Evaluating the Substance of Transactions Involving the Legal Form of a Lease" and ISAK 25 "Land Rights."

IFRS 16 is consistent with PSAK 73 in all significant respects. IFRS 16 supersedes IAS 17 "Leases," IFRIC 4 "Determining whether an Arrangement Contains a Lease," SIC-15 "Operating Leases – Incentives" and SIC-27 "Evaluating the Substance of Transactions Involving the Legal Form of a Lease."

Fair Value Measurement

Both PSAK 68 "Fair value measurement" and IFRS 13 "Fair value measurement" provide a definition of fair value, set out in a single standard a framework for measuring fair value and require

disclosures about fair value measurements. Under both standards, fair value is defined as the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date.

A fair value measurement is for a particular asset or liability. Therefore, when measuring fair value, an entity shall take into account characteristics of the asset or liability if market participants would take those characteristics into account when pricing the asset or liability at the measurement date.

Under the same framework, the standard applies when another standard requires or permits fair value measurements or disclosures about fair value measurements (and measurements, such as fair value less costs to sell, based on fair value or disclosures about those measurements), except in specified circumstances in which other standards govern. The measurement and disclosure requirements of these standards do not apply to: (a) share-based payment transactions within the scope of PSAK 53/IFRS 2), Share-based Payment; (b) leasing transactions within the scope of PSAK 71/IFRS 16; and (c) measurements that have some similarities to fair value but are not fair value, such as net realizable value in inventories (as defined in PSAK 14/IAS 2) or value in use in impairment of assets (as defined in PSAK 48/IAS 36).

To increase consistency and comparability in fair value measurements and related disclosures, both standards establish a fair value hierarchy that categorizes into three levels the inputs to valuation techniques used to measure fair value. The fair value hierarchy gives the highest priority to quoted prices (unadjusted) in active markets for identical assets or liabilities (Level 1 inputs) and the lowest priority to unobservable inputs (Level 3 inputs).

IFRS 13 is consistent with PSAK 68 in all significant respects.

No attempt has been made to quantify the impact of the above accounting pronouncements or to identify any future differences between Indonesian FAS and IFRS that may affect the financial information of our Company.

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PT TOWER BERSAMA INFRASTRUCTURE Tbk
DAN ENTITAS ANAK / *AND ITS SUBSIDIARIES*

LAPORAN KEUANGAN KONSOLIDASIAN/
CONSOLIDATED FINANCIAL STATEMENTS

UNTUK TAHUN YANG BERAKHIR 31 DESEMBER 2020, 2019 DAN 2018/
FOR THE YEARS ENDED 31 DECEMBER 2020, 2019 AND 2018

DAN / *AND*

LAPORAN AUDITOR INDEPENDEN/
INDEPENDENT AUDITORS' REPORT

These Consolidated Financial Statements are Originally Issued in Indonesian Language

PT TOWER BERSAMA INFRASTRUCTURE Tbk
DAN ENTITAS ANAK
LAPORAN KEUANGAN KONSOLIDASIAN
UNTUK TAHUN YANG BERAKHIR
31 DESEMBER 2020, 2019 DAN 2018

PT TOWER BERSAMA INFRASTRUCTURE Tbk
AND SUBSIDIARIES
CONSOLIDATED FINANCIAL STATEMENTS
FOR THE YEARS ENDED
31 DECEMBER 2020, 2019 AND 2018

D A F T A R I S I

C O N T E N T S

Pernyataan Direksi		***Directors' Statement***
Laporan Auditor Independen		***Independent Auditors' Report***
	Ekshibit/ *Exhibit*	
Laporan Posisi Keuangan Konsolidasian	A	*Consolidated Statement of Financial Position*
Laporan Laba Rugi dan Penghasilan Komprehensif Lain Konsolidasian	B	*Consolidated Statement of Profit or Loss and Other Comprehensive Income*
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SURAT PERNYATAAN DIREKSI
TENTANG TANGGUNG JAWAB ATAS
LAPORAN KEUANGAN KONSOLIDASIAN
UNTUK TAHUN YANG BERAKHIR PADA
31 DESEMBER 2020, 31 DESEMBER 2019
DAN 31 DESEMBER 2018
PT TOWER BERSAMA INFRASTUCTURE Tbk
DAN ENTITAS ANAK

Kami yang bertandatangan di bawah ini :

1. Nama : Herman Setya Budi
   Alamat kantor : The Convergence Indonesia Lt. 11, Kawasan Rasuna Epicentrum, Jl. HR Rasuna Said, Jakarta Selatan 12940
   Alamat Domisili sesuai KTP atau kartu identitas lain : Mega Kebon Jeruk F/26 RT. 005, RW. 001 Joglo, Kembangan Jakarta Barat
   Nomor Telepon : +62 21 2924 8900
   Jabatan : Presiden Direktur
2. Nama : Helmy Yusman Santoso
   Alamat kantor : The Convergence Indonesia Lt. 11, Kawasan Rasuna Epicentrum, Jl. HR Rasuna Said, Jakarta Selatan 12940
   Alamat Domisili sesuai KTP atau kartu identitas lain : Jl. Gedong Sawah IV/2 RT. 002, RW. 001, Pabaton Bogor Tengah Bogor
   Nomor Telepon : +62 21 2924 8900
   Jabatan : Direktur

Menyatakan bahwa :

1. Bertanggung jawab atas penyusunan dan penyajian Laporan Keuangan Perusahaan.
2. Laporan Keuangan Perusahaan telah disusun dan disajikan sesuai dengan prinsip akuntansi yang berlaku umum/ standar akuntansi keuangan yang berlaku di Indonesia.
3. a. Semua informasi dalam laporan keuangan perusahaan telah dimuat secara lengkap dan benar; dan
   b. Laporan keuangan perusahaan tidak mengandung informasi atau fakta material yang tidak benar, dan tidak menghilangkan informasi atau fakta material.
4. Bertanggung jawab atas sistim pengendalian intern dalam Perusahaan.

Demikian pernyataan ini dibuat dengan sebenarnya.

Jakarta, 24 September 2021

Presiden Direktur / President Director

(Herman Setya Budi)

DIRECTORS' STATEMENT LETTER
ABOUT RESPONSIBILITY TO
THE CONSOLIDATED FINANCIAL STATEMENTS
FOR THE YEARS ENDED
31 DECEMBER 2020, 31 DECEMBER 2019
AND 31 DECEMBER 2018
PT TOWER BERSAMA INFRASTUCTURE Tbk
AND SUBSIDIARIES

We, the undersigned :

1. Name : Herman Setya Budi
   Office address : The Convergence Indonesia Lt. 11, Kawasan Rasuna Epicentrum, Jl. HR Rasuna Said, Jakarta Selatan 12940
   Domicile as stated in ID Card or other identity : Mega Kebon Jeruk F/26 RT. 005, RW. 001 Joglo, Kembangan Jakarta Barat
   Phone Number : +62 21 2924 8900
   Position : President Director
2. Name : Helmy Yusman Santoso
   Office address : The Convergence Indonesia Lt. 11, Kawasan Rasuna Epicentrum, Jl. HR Rasuna Said, Jakarta Selatan 12940
   Domicile as stated in ID Card or other identity : Jl. Gedong Sawah IV/2 RT. 002, RW. 001, Pabaton Bogor Tengah Bogor
   Phone Number : +62 21 2924 8900
   Position : Director

State that :

1. We are responsible for the preparation and presentation of the Company's Financial Statements.
2. The Company's Consolidated Financial Statements have been prepared in accordance with accounting principles generally accepted in Indonesia.
3. a. All information has been fully and correctly disclosed in the Company's Financial Statements.
   b. The Company's Financial Statements do not contain false material information or facts, nor do they omit material information or facts, and
4. We are responsible for the Company's internal control systems.

This statement has been prepared base on the facts.

Jakarta, 24 September 2021

Direktur / Director

(Helmy Yusman Santoso)

METERAI TEMPEL A0C4CAJX129438449

PT. Tower Bersama Infrastructure, Tbk
Gedung The Convergence Indonesia (TCI), Lantai 11
Kawasan Rasuna Epicentrum
Jl. H.R. Rasuna Said, Jakarta Selatan 12940
Telp : +62 21 2924 8900
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Tel : +62-21 5795 7300
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www.bdo.co.id

Tanubrata Sutanto Fahmi Bambang & Rekan
Certified Public Accountant
Licence No. 622/KM.1/2016

Prudential Tower, 17th Floor
Jl. Jend. Sudirman Kav. 79
Jakarta 12910 - Indonesia

This report is originally issued in Indonesian language

No. : 00665/2.1068/AU.1/06/0007-2/1/IX/2021
Hal : **Laporan Keuangan Konsolidasian 31 Desember 2020, 2019 dan 2018**

Laporan Auditor Independen

D i r e k s i
PT Tower Bersama Infrastructure Tbk
dan entitas anak
J a k a r t a

Kami telah mengaudit laporan keuangan konsolidasian PT Tower Bersama Infrastructure Tbk dan entitas anak, yang terdiri dari laporan posisi keuangan konsolidasian tanggal 31 Desember 2020, 2019 dan 2018, serta laporan laba rugi dan penghasilan komprehensif lain, laporan perubahan ekuitas, dan laporan arus kas konsolidasian untuk tahun yang berakhir pada tanggal-tanggal tersebut, dan suatu ikhtisar kebijakan akuntansi signifikan dan informasi penjelasan lainnya.

Tanggung jawab manajemen atas laporan keuangan konsolidasian

Manajemen bertanggung jawab atas penyusunan dan penyajian wajar laporan keuangan konsolidasian tersebut sesuai dengan Standar Akuntansi Keuangan di Indonesia, dan atas pengendalian internal yang dianggap perlu oleh manajemen untuk memungkinkan penyusunan laporan keuangan konsolidasian yang bebas dari kesalahan penyajian material, baik yang disebabkan oleh kecurangan maupun kesalahan.

Tanggung jawab auditor

Tanggung jawab kami adalah untuk menyatakan suatu opini atas laporan keuangan tersebut berdasarkan audit kami. Kami melaksanakan audit kami berdasarkan Standar Audit yang ditetapkan oleh Institut Akuntan Publik Indonesia. Standar tersebut mengharuskan kami untuk mematuhi ketentuan etika serta merencanakan dan melaksanakan audit untuk memperoleh keyakinan yang memadai tentang apakah laporan keuangan tersebut bebas dari kesalahan penyajian material.

No. : 00665/2.1068/AU.1/06/0007-2/1/IX/2021
*Re : **Consolidated Financial Statements 31 December 2020, 2019 and 2018***

Independent Auditors' Report

The Directors
PT Tower Bersama Infrastructure Tbk
and subsidiaries
J a k a r t a

We have audited the consolidated financial statements of PT Tower Bersama Infrastructure Tbk and subsidiaries, which comprise the consolidated statement of financial position as of 31 December 2020, 2019 and 2018, and the consolidated statements of profit or loss and other comprehensive income, changes in equity, and cash flows for the years then ended, and a summary of significant accounting policies and other explanatory information.

Management's responsibility for the consolidated financial statements

Management is responsible for the preparation and fair presentation of such consolidated financial statements in accordance with Indonesian Financial Accounting Standards, and for such internal control as management determines is necessary to enable the preparation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

Auditors' responsibility

Our responsibility is to express an opinion on such financial statements based on our audit. We conducted our audit in accordance with Standards on Auditing established by the Indonesian Institute of Certified Public Accountants. Those standards require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether such financial statements are free from material misstatement.

Tanubrata Sutanto Fahmi Bambang & Rekan (Certified Public Accountant), an Indonesian partnership, is a member of BDO International Limited, a UK company limited by guarantee, and forms part of the international BDO network of independent member firms.

Tanggung jawab auditor (Lanjutan)

Suatu audit melibatkan pelaksanaan prosedur untuk memperoleh bukti audit tentang angka-angka dan pengungkapan dalam laporan keuangan konsolidasian. Prosedur yang dipilih bergantung pada pertimbangan auditor, termasuk penilaian atas risiko kesalahan penyajian material dalam laporan keuangan konsolidasian, baik yang disebabkan oleh kecurangan maupun kesalahan. Dalam melakukan penilaian risiko tersebut, auditor mempertimbangkan pengendalian internal yang relevan dengan penyusunan dan penyajian wajar laporan keuangan entitas untuk merancang prosedur audit yang tepat sesuai dengan kondisinya, tetapi bukan untuk tujuan menyatakan opini atas keefektivitasan pengendalian internal entitas. Suatu audit juga mencakup pengevaluasian atas ketepatan kebijakan akuntansi yang digunakan dan kewajaran estimasi akuntansi yang dibuat oleh manajemen, serta pengevaluasian atas penyajian laporan keuangan konsolidasian secara keseluruhan.

Kami yakin bahwa bukti audit yang telah kami peroleh adalah cukup dan tepat untuk menyediakan suatu basis bagi opini audit kami.

***Auditors' responsibility** (Continued)*

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the consolidated financial statements. The procedures selected depend on the auditors' judgment, including the assessment of the risks of material misstatement of the consolidated financial statements, whether due to fraud or error. In making those risk assessments, the auditors consider internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates made by management, as well as evaluating the overall presentation of the consolidated financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opini

Menurut opini kami, laporan keuangan konsolidasian menyajikan secara wajar, dalam semua hal yang material, posisi keuangan konsolidasian PT Tower Bersama Infrastructure Tbk dan entitas anak tanggal 31 Desember 2020, 2019 dan 2018, serta kinerja keuangan dan arus kas konsolidasiannya untuk tahun yang berakhir pada tanggal-tanggal tersebut, sesuai dengan Standar Akuntansi Keuangan di Indonesia.

Opinion

In our opinion, the consolidated financial statements present fairly, in all material respects, the consolidated financial position of PT Tower Bersama Infrastructure Tbk and subsidiaries as of 31 December 2020, 2019 and 2018, and their consolidated financial performance and cash flows for the years then ended, in accordance with Indonesian Financial Accounting Standards.

Hal Lainnya

Sebelum laporan ini, kami telah menerbitkan laporan auditor independen No. 00501/2.1068/AU.1/06/0007-2/1/IV/2021, No. 00291/2.1068/AU.1/06/0007-2/1/IV/2021, No. 00316/2.1068/AU.1/06/0007-1/1/III/2020 dan No. 00362/2.1068/AU.1/06/0115-1/1/III/2019 tanggal 18 Juni 2021, 27 April 2021, 27 Maret 2020 dan 22 Maret 2019 atas laporan keuangan konsolidasian PT Tower Bersama Infrastructure Tbk dan entitas anak untuk tahun yang berakhir 31 Desember 2020, 2019 dan 2018 dengan opini tanpa modifikasian. Sehubungan dengan penambahan pengungkapan informasi dalam laporan keuangan konsolidasian Perusahaan terkait dengan rencana untuk melakukan penawaran sekuritas seperti yang dijelaskan dalam Catatan 48 atas laporan keuangan konsolidasian, manajemen Perusahaan menerbitkan kembali laporan keuangan konsolidasian untuk tahun yang berakhir 31 Desember 2020, 2019 dan 2018.

Other Matters

Prior to this report, we have issued an independent auditors' report No. 00501/2.1068/AU.1/06/0007-2/1/IV/2021, No. 00291/2.1068/AU.1/06/0007-2/1/IV/2021, No. 00316/2.1068/AU.1/06/0007-1/1/III/2020 and No. 00362/2.1068/AU.1/06/0115-1/1/III/2019 dated 18 June 2021, 27 April 2021, 27 March 2020 and 22 March 2019, respectively, on the consolidated financial statement of PT Tower Bersama Infrastructure Tbk and subsidiaries for the years ended 31 December 2020, 2019 and 2018 and expressed an unmodified opinion. In connection with additional disclosures information in the Company's consolidated financial statements regarding with the plan for security offering as disclosed in Note 48 to the consolidated financial statements, the Company's management reissued the consolidated financial statements for the years ended 31 December 2020, 2019 and 2018.

Hal lainnya (Lanjutan)

Laporan ini diterbitkan dengan tujuan untuk dicantumkan dalam *offering memorandum* sehubungan dengan rencana penerbitan surat utang berdenominasi mata uang asing PT Tower Bersama Infrastrucure Tbk dan entitas anak, serta tidak ditujukan dan tidak diperkenankan untuk digunakan untuk tujuan lain.

Other matters *(Continued)*

This report is issued with purpose to be included in the offering memorandum in connection with the plan for issuance of the notes denominated in foreign currency of PT Tower Bersama Infrastructure Tbk and subsidiaries, and are not intended and shall not be used for any other purposes.

Kantor Akuntan Publik
TANUBRATA SUTANTO FAHMI BAMBANG & Rekan



Sutomo, SE, Ak, MM, CPA, CA, SAS
NIAP AP.0007/
License No. AP.0007

24 September 2021 / *24 September 2021*

MF/yn

These Consolidated Financial Statements are Originally Issued in Indonesian Language

Ekshibit A

PT TOWER BERSAMA INFRASTRUCTURE Tbk
DAN ENTITAS ANAK
LAPORAN POSISI KEUANGAN KONSOLIDASIAN
31 DESEMBER 2020, 2019 DAN 2018
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

Exhibit A

PT TOWER BERSAMA INFRASTRUCTURE Tbk
AND ITS SUBSIDIARIES
CONSOLIDATED STATEMENT OF FINANCIAL POSITION
31 DECEMBER 2020, 2019 AND 2018
(Expressed in million Rupiah, unless otherwise stated)

	Catatan/ *Notes*	2020	2019	2018	
ASET					***ASSETS***
ASET LANCAR					***CURRENT ASSETS***
Kas dan setara kas	**4**	947.341	525.242	220.586	*Cash and cash equivalents*
Piutang usaha - pihak ketiga	**5**	710.722	466.547	383.303	*Trade receivables - third parties*
Piutang lain-lain	**6**	262.885	305.778	77.660	*Other receivables*
Surat sanggup bayar	**6,7**	-	-	221.425	*Promissory notes*
Pendapatan yang masih harus diterima	**9**	491.190	522.332	546.608	*Accrued revenue*
Persediaan dan perlengkapan	**10**	118.312	17.708	22.723	*Inventories and supplies*
Uang muka dan beban dibayar di muka	**11**	534.604	170.957	154.803	*Advance payments and prepaid expenses*
Pajak dibayar di muka	**21a**	162.340	69.134	119.206	*Prepaid taxes*
Sewa lahan jangka panjang - bagian lancar	**12**	-	297.534	279.643	*Long-term landlease - current portion*
Investasi	**8**	-	1.508	1.508	*Investment*
Jumlah Aset Lancar		3.227.394	2.376.740	2.027.465	***Total Current Assets***
ASET TIDAK LANCAR					***NON-CURRENT ASSETS***
Aset pajak tangguhan - bersih	**21d**	60.726	249.591	344.703	*Deferred tax assets - net*
Aset tetap (setelah dikurangi akumulasi penyusutan sebesar Rp 241.511, Rp 298.360 dan Rp 250.344 masing-masing pada 31 Desember 2020, 2019 dan 2018)	**13**	28.738.362	24.649.294	21.878.608	*Property and equipment (net of accumulated depreciation of Rp 241,511, Rp 298,360 and Rp 250,344 as of 31 December 2020, 2019 and 2018, respectively)*
Properti investasi - nilai wajar	**14**	388.020	266.186	181.608	*Investment properties - fair value*
Aset hak guna (setelah dikurangi akumulasi penyusutan sebesar Rp 1.580.994 pada 31 December 2020)	**15**	2.614.882	-	-	*Right of use assets (net of accumulated depreciation of Rp 1,580,994 as of 31 December 2020)*
Uang jaminan	**16**	1.708	2.281	2.067	*Refundable deposits*
Aset keuangan derivatif	**17**	1.084.975	1.312.140	2.605.591	*Derivative financial assets*
Taksiran klaim pajak penghasilan	**21e**	15.903	15.903	60.368	*Estimated claims for income tax refund*
Goodwill	**38**	381.189	381.189	428.610	*Goodwill*
Sewa lahan jangka panjang	**12**	-	1.612.596	1.578.873	*Long-term landlease*
Aset tidak lancar lainnya	**18**	8.144	5.790	5.854	*Other non-current assets*
Jumlah Aset Tidak Lancar		33.293.909	28.494.970	27.086.282	***Total Non-Current Assets***
JUMLAH ASET		36.521.303	30.871.710	29.113.747	***TOTAL ASSETS***

Lihat Catatan atas Laporan Keuangan Konsolidasian pada Ekshibit E terlampir yang merupakan bagian tidak terpisahkan dari Laporan Keuangan Konsolidasian secara keseluruhan

See accompanying Notes to Consolidated Financial Statements on Exhibit E which are an integral part of the Consolidated Financial Statements taken as a whole

These Consolidated Financial Statements are Originally Issued in Indonesian Language

Ekshibit A/2

PT TOWER BERSAMA INFRASTRUCTURE Tbk
DAN ENTITAS ANAK
LAPORAN POSISI KEUANGAN KONSOLIDASIAN
31 DESEMBER 2020, 2019 DAN 2018
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

Exhibit A/2

PT TOWER BERSAMA INFRASTRUCTURE Tbk
AND ITS SUBSIDIARIES
CONSOLIDATED STATEMENT OF FINANCIAL POSITION
31 DECEMBER 2020, 2019 AND 2018
(Expressed in million Rupiah, unless otherwise stated)

	Catatan/ *Notes*	2020	2019	2018	
LIABILITAS DAN EKUITAS					***LIABILITIES AND EQUITY***
LIABILITAS JANGKA PENDEK					***CURRENT LIABILITIES***
Utang usaha - pihak ketiga	**19**	571.000	247.591	231.711	*Trade payables - third parties*
Utang lain-lain	**20**	21.057	40.939	104.028	*Other payables*
Utang pajak	**21b**	56.522	44.071	60.065	*Taxes payable*
Pendapatan yang diterima di muka	**22**	1.061.994	860.882	668.543	*Unearned income*
Beban masih harus dibayar	**23**	1.156.790	1.168.585	1.466.028	*Accrued expenses*
Liabilitas sewa - bagian yang jatuh tempo dalam waktu satu tahun	**27**	152.617	-	-	*Lease liabilities - current portion*
Surat utang bagian jangka pendek	**26**	6.900.451	2.146.911	624.283	*Notes - current portion*
Pinjaman jangka panjang - bagian yang jatuh tempo dalam waktu satu tahun					*Long-term loans - current portion*
Sewa pembiayaan	**24**	-	4.644	5.095	*Finance leases*
Pihak ketiga	**25**	3.857.445	-	3.265.184	*Third parties*
Jumlah Liabilitas Jangka Pendek		13.777.876	4.513.623	6.424.937	***Total Current Liabilities***
LIABILITAS JANGKA PANJANG					***NON-CURRENT LIABILITIES***
Liabilitas pajak tangguhan - bersih	**21d**	11.411	12.000	12.509	*Deferred tax liabilities - net*
Liabilitas sewa - setelah dikurangi bagian yang jatuh tempo dalam satu tahun	**27**	313.895	-	-	*Lease liabilities - non-current portion*
Surat utang - setelah dikurangi bagian yang jatuh tempo dalam satu tahun	**26**	6.668.031	5.678.296	7.264.742	*Notes - net of current portion*
Pinjaman jangka panjang - setelah dikurangi bagian yang jatuh tempo dalam satu tahun					*Long-term loans - net of current portion*
Sewa pembiayaan	**24**	-	14.247	12.868	*Finance leases*
Pihak ketiga	**25**	6.421.402	15.115.908	11.688.940	*Third parties*
Cadangan imbalan pasca-kerja	**35**	24.850	14.352	30.186	*Provision for post-employment benefits*
Jumlah Liabilitas Jangka Panjang		13.439.589	20.834.803	19.009.245	***Total Non-Current Liabilities***
Jumlah Liabilitas		27.217.465	25.348.426	25.434.182	***Total Liabilities***

Lihat Catatan atas Laporan Keuangan Konsolidasian pada Ekshibit E terlampir yang merupakan bagian tidak terpisahkan dari Laporan Keuangan Konsolidasian secara keseluruhan

See accompanying Notes to Consolidated Financial Statements on Exhibit E which are an integral part of the Consolidated Financial Statements taken as a whole

These Consolidated Financial Statements are Originally Issued in Indonesian Language

Ekshibit A/3

PT TOWER BERSAMA INFRASTRUCTURE Tbk
DAN ENTITAS ANAK
LAPORAN POSISI KEUANGAN KONSOLIDASIAN
31 DESEMBER 2020, 2019 DAN 2018
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

Exhibit A/3

PT TOWER BERSAMA INFRASTRUCTURE Tbk
AND ITS SUBSIDIARIES
CONSOLIDATED STATEMENT OF FINANCIAL POSITION
31 DECEMBER 2020, 2019 AND 2018
(Expressed in million Rupiah, unless otherwise stated)

	Catatan/ *Notes*	2020	2019	2018	
EKUITAS					***EQUITY***
Modal saham					*Share capital*
Pada 31 Desember 2020, 2019 dan 2018 nilai nominal masing-masing Rp 20, Rp 20 dan Rp 100 (nilai penuh) per saham. Modal dasar sebanyak 72.100.600.000 saham, 72.100.600.000 saham dan 14.420.120.000 saham					*As of 31 December 2020, 2019 and 2018 par value Rp 20, Rp 20 and Rp 100 (full amount) per shares, repectively. Authorized capital of 72,100,600,000 shares, 72,100,600,000 shares and 14,420,120,000 shares*
Modal ditempatkan dan disetor penuh: 31 Desember 2020, 2019 dan 2018 masing-masing sebanyak 22.656.999.445 saham	**28**	453.140	453.140	453.140	*Issued and fully paid-in capital: 31 December 2020, 2019 and 2018 are 22,656,999,445 shares, respectively*
Saham treasuri	**29**	(1.028.268)	(1.028.268)	(985.379)	*Treasury stock*
Tambahan modal disetor - bersih	**30**	(520.500)	(519.015)	(499.660)	*Additional paid-in capital - net*
Penghasilan komprehensif lain	**31**	7.600.888	4.476.604	3.060.932	*Other comprehensive income*
Saldo laba					*Retained earnings*
Cadangan wajib	**37**	62.100	61.600	61.100	*Statutory reserves*
Belum ditentukan penggunaannya	**37**	2.142.322	1.549.511	1.280.546	*Unappropriated*
Jumlah ekuitas yang diatribusikan kepada pemilik entitas induk		8.709.682	4.993.572	3.370.679	***Total equity attributable to equity holder of the parent company***
Kepentingan non-pengendali	**39**	594.156	529.712	308.886	***Non-controlling interest***
Jumlah Ekuitas		9.303.838	5.523.284	3.679.565	***Total Equity***
JUMLAH LIABILITAS DAN EKUITAS		36.521.303	30.871.710	29.113.747	***TOTAL LIABILITIES AND EQUITY***

Lihat Catatan atas Laporan Keuangan Konsolidasian pada Ekshibit E terlampir yang merupakan bagian tidak terpisahkan dari Laporan Keuangan Konsolidasian secara keseluruhan

See accompanying Notes to Consolidated Financial Statements on Exhibit E which are an integral part of the Consolidated Financial Statements taken as a whole

These Consolidated Financial Statements are Originally Issued in Indonesian Language

Ekshibit B

PT TOWER BERSAMA INFRASTRUCTURE Tbk
DAN ENTITAS ANAK
LAPORAN LABA RUGI DAN
PENGHASILAN KOMPREHENSIF LAIN KONSOLIDASIAN
UNTUK TAHUN YANG BERAKHIR
31 DESEMBER 2020, 2019 DAN 2018
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

Exhibit B

PT TOWER BERSAMA INFRASTRUCTURE Tbk
AND ITS SUBSIDIARIES
CONSOLIDATED STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME
FOR THE YEARS ENDED
31 DECEMBER 2020, 2019 AND 2018
(Expressed in million Rupiah, unless otherwise stated)

	Catatan/ *Notes*	2020	2019	2018	
PENDAPATAN	**32**	5.327.689	4.698.742	4.318.137	***REVENUE***
BEBAN POKOK PENDAPATAN	**33**	1.093.065	903.454	784.082	***COST OF REVENUE***
LABA KOTOR		4.234.624	3.795.288	3.534.055	***GROSS PROFIT***
BEBAN USAHA	**34**	418.623	426.434	381.463	***OPERATING EXPENSES***
LABA DARI OPERASI		3.816.001	3.368.854	3.152.592	***INCOME FROM OPERATIONS***
PENDAPATAN (BEBAN) LAIN-LAIN					***OTHER INCOME (CHARGES)***
Laba selisih kurs - Bersih		37.452	8.966	2.221	*Gain on foreign exchange - Net*
Kenaikan nilai wajar atas properti investasi	**14**	34.778	79.427	7.728	*Increase of fair value of investment properties*
Pendapatan bunga		14.869	10.440	8.431	*Interest income*
Penurunan nilai *goodwill*	**38**	-	(47.421)	(15.722)	*Impairment of goodwill*
Penurunan nilai wajar atas menara telekomunikasi		(4.584)	(40.405)	-	*Decrease of fair value of telecommunication towers*
Beban kerugian kredit ekspektasian aset keuangan	**5,6,9**	(23.810)	-	-	*Expected credit losses expense - financial assets*
Pajak penghasilan final	**21c**	(155.723)	(81.394)	(17.310)	*Final income tax*
Beban keuangan - Pinjaman dan surat utang	**24,25,26**	(1.943.161)	(1.940.149)	(2.003.573)	*Financial expenses - long term loans and notes*
Beban keuangan - Lainnya	**36**	(191.345)	(76.761)	(68.024)	*Financial expenses - Others*
Lainnya - Bersih		(75.023)	(58.962)	(49.368)	*Others - Net*
Beban Lain-lain - Bersih		(2.306.547)	(2.146.259)	(2.135.617)	***Other Charges - Net***
LABA SEBELUM PAJAK PENGHASILAN		1.509.454	1.222.595	1.016.975	***PROFIT BEFORE INCOME TAX***
BEBAN PAJAK PENGHASILAN	**21c,d**				***INCOME TAX EXPENSES***
Kini		(254.752)	(261.448)	(187.395)	*Current*
Tangguhan		(188.126)	(95.026)	(126.948)	*Deferred*
Beban Pajak Penghasilan - Bersih		(442.878)	(356.474)	(314.343)	***Income Tax Expenses - Net***
LABA BERSIH TAHUN BERJALAN		1.066.576	866.121	702.632	***NET PROFIT FOR THE CURRENT YEAR***

Lihat Catatan atas Laporan Keuangan Konsolidasian pada Ekshibit E terlampir yang merupakan bagian tidak terpisahkan dari Laporan Keuangan Konsolidasian secara keseluruhan

See accompanying Notes to Consolidated Financial Statements on Exhibit E which are an integral part of the Consolidated Financial Statements taken as a whole

These Consolidated Financial Statements are Originally Issued in Indonesian Language

Ekshibit B/2

PT TOWER BERSAMA INFRASTRUCTURE Tbk
DAN ENTITAS ANAK
LAPORAN LABA RUGI DAN
PENGHASILAN KOMPREHENSIF LAIN KONSOLIDASIAN
UNTUK TAHUN YANG BERAKHIR
31 DESEMBER 2020, 2019 DAN 2018
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

Exhibit B/2

PT TOWER BERSAMA INFRASTRUCTURE Tbk
AND ITS SUBSIDIARIES
CONSOLIDATED STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME
FOR THE YEARS ENDED
31 DECEMBER 2020, 2019 AND 2018
(Expressed in million Rupiah, unless otherwise stated)

	Catatan/ *Notes*	2020	2019	2018	
LABA BERSIH TAHUN BERJALAN		1.066.576	866.121	702.632	***NET PROFIT FOR THE CURRENT YEAR***
PENGHASILAN KOMPREHENSIF LAIN					***OTHER COMPREHENSIVE INCOME***
Pos-pos yang tidak akan direklasifikasi ke laba rugi					***Items that will not be reclassified to profit or loss***
Surplus revaluasi	**13**	3.405.454	1.600.720	83.074	*Revaluation surplus*
Keuntungan (kerugian) aktuaria	**35**	(4.889)	12.236	8.033	*Actuarial gains (loss)*
Pos-pos yang akan direklasifikasi ke laba rugi					***Items that may be reclassified to profit or loss***
Selisih translasi mata uang asing		(548)	16	349	*Difference translation of foreign currency*
Perubahan nilai wajar investasi - tersedia untuk dijual		-	-	14.837	*Changes in fair value investment - available-for-sale*
Perubahan lindung nilai arus kas	**31**	(67.806)	(80.275)	963.650	*Changes in value of cash flow hedges*
JUMLAH PENGHASILAN KOMPREHENSIF TAHUN BERJALAN		4.398.787	2.398.818	1.772.575	***TOTAL COMPREHENSIVE INCOME FOR THE CURRENT YEAR***
Laba bersih yang diatribusikan kepada:					***Net profit attributable to:***
Pemilik entitas induk		1.009.625	819.454	680.581	*Equity holder of the parent company*
Kepentingan non-pengendali	**39**	56.951	46.667	22.051	*Non-controlling interest*
Jumlah		1.066.576	866.121	702.632	***Total***
Jumlah laba komprehensif yang dapat diatribusikan kepada:					***Total comprehensive income attributable to:***
Pemilik entitas induk		4.323.265	2.285.137	1.740.522	*Equity holder of the parent company*
Kepentingan non-pengendali	**39**	75.522	113.681	32.053	*Non-controlling interest*
Jumlah		4.398.787	2.398.818	1.772.575	***Total***
LABA BERSIH PER SAHAM DASAR YANG DAPAT DIATRIBUSIKAN KEPADA PEMEGANG SAHAM BIASA ENTITAS INDUK (nilai penuh)	**28,40**	48,40	39,26	31,26*)	***BASIC EARNINGS PER SHARE ATTRIBUTABLE TO THE EQUITY HOLDER OF PARENT COMPANY (full amount)***

***) Laba bersih per saham dasar tahun 2018 disajikan kembali sehubungan dengan pemecahan nilai nominal saham.**

****) Basic earnings per share in 2018 were restated with regards to the stock split.***

Lihat Catatan atas Laporan Keuangan Konsolidasian pada Ekshibit E terlampir yang merupakan bagian tidak terpisahkan dari Laporan Keuangan Konsolidasian secara keseluruhan

See accompanying Notes to Consolidated Financial Statements on Exhibit E which are an integral part of the Consolidated Financial Statements taken as a whole

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Ekshibit C

PT TOWER BERSAMA INFRASTRUCTURE Tbk DAN ENTITAS ANAK
LAPORAN PERUBAHAN EKUITAS KONSOLIDASIAN
UNTUK TAHUN YANG BERAKHIR 31 DESEMBER 2020, 2019 DAN 2018
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

Exhibit C

PT TOWER BERSAMA INFRASTRUCTURE Tbk AND ITS SUBSIDIARIES
CONSOLIDATED STATEMENT OF CHANGES IN EQUITY
FOR THE YEARS ENDED 31 DECEMBER 2020, 2019 AND 2018
(Expressed in million Rupiah, unless otherwise stated)

				Penghasilan komprehensif lain/ *Other comprehensive income*				Saldo laba/ *Retained earnings*				
	Modal saham/ *Capital share*	Tambahan modal disetor - Bersih/ *Additional paid-in capital - Net*	Saham treasuri/ *Treasury stock*	Surplus revaluasi/ *Revaluation surplus*	Cadangan lindung nilai arus kas/ *Cash flows hedging reserves*	Selisih translasi atas mata uang asing/ *Difference translation of foreign currency*	Keuntungan aktuaria/ *Actuarial gain*	Cadangan wajib/ *Statutory reserves*	Belum ditentukan penggunaannya/ *Unappropriated*	Jumlah ekuitas yang diatribusikan kepada pemilik entitas induk/ *Total equity attribute to equity holder of parent company*	Kepentingan non-pengendali/ *Non-controlling interest*	Jumlah ekuitas konsolidasian/ *Total consolidated equity*	
Saldo per 1 Januari 2020	453.140	(519.015)	(1.028.268)	4.570.827	(43.811)	(61.761)	11.349	61.600	1.549.511	4.993.572	529.712	5.523.284	*Balance as of 1 January 2020*
Laba bersih tahun berjalan	-	-	-	-	-	-	-	-	1.009.625	1.009.625	56.951	1.066.576	*Net profit for the current year*
Surplus revaluasi (Catatan 13)	-	-	-	3.386.700	-	-	-	-	-	3.386.700	18.754	3.405.454	*Revaluation surplus (Note 13)*
Selisih penyusutan nilai wajar dengan biaya perolehan	-	-	-	(189.356)	-	-	-	-	189.356	-	-	-	*Difference in fair value depreciation with acquisition cost*
Cadangan lindung nilai arus kas (Catatan 31a)	-	-	-	-	(67.008)	-	-	-	-	(67.008)	(798)	(67.806)	*Cash flows hedging reserves (Note 31a)*
Kerugian aktuaria (Catatan 35)	-	-	-	-	-	-	(5.504)	-	-	(5.504)	615	(4.889)	*Actuarial loss (Note 35)*
Selisih translasi atas mata uang asing (Catatan 31b)	-	-	-	-	-	(548)	-	-	-	(548)	-	(548)	*Difference translation of foreign currency (Note 31b)*
Selisih aset pengampunan pajak	-	(1.485)	-	-	-	-	-	-	-	(1.485)	(23)	(1.508)	*Difference of tax amnesty asset*
Cadangan wajib (Catatan 37)	-	-	-	-	-	-	-	500	(500)	-	-	-	*Statutory reserves (Note 37)*
Pembagian dividen tunai - entitas anak (Catatan 37)	-	-	-	-	-	-	-	-	-	-	(11.055)	(11.055)	*Cash dividends - subsidiaries (Note 37)*
Pembagian dividen tunai (Catatan 37)	-	-	-	-	-	-	-	-	(605.670)	(605.670)	-	(605.670)	*Cash dividends (Note 37)*
Saldo per 31 Desember 2020	453.140	(520.500)	(1.028.268)	7.768.171	(110.819)	(62.309)	5.845	62.100	2.142.322	8.709.682	594.156	9.303.838	*Balance as of 31 December 2020*
	Catatan 28/ *Note 28*	Catatan 30/ *Note 30*	Catatan 29/ *Note 29*	Catatan 31/ *Note 31*	Catatan 31a/ *Note 31a*	Catatan 31b/ *Note 31b*	Catatan 35/ *Note 35*	Catatan 37/ *Note 37*			Catatan 39/ *Note 39*		

Lihat Catatan atas Laporan Keuangan Konsolidasian pada Ekshibit E terlampir yang merupakan bagian tidak terpisahkan dari Laporan Keuangan Konsolidasian secara keseluruhan

See accompanying Notes to Consolidated Financial Statements on Exhibit E which are an integral part of the Consolidated Financial Statements taken as a whole

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Ekshibit C/2

PT TOWER BERSAMA INFRASTRUCTURE Tbk DAN ENTITAS ANAK
LAPORAN PERUBAHAN EKUITAS KONSOLIDASIAN
UNTUK TAHUN YANG BERAKHIR 31 DESEMBER 2020, 2019 DAN 2018
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

Exhibit C/2

PT TOWER BERSAMA INFRASTRUCTURE Tbk AND ITS SUBSIDIARIES
CONSOLIDATED STATEMENT OF CHANGES IN EQUITY
FOR THE YEARS ENDED 31 DECEMBER 2020, 2019 AND 2018
(Expressed in million Rupiah, unless otherwise stated)

	Penghasilan komprehensif lain/ *Other comprehensive income*							Saldo laba/ *Retained earnings*					
	Modal saham/ *Capital share*	Tambahan modal disetor - Bersih/ *Additional paid-in capital - Net*	Saham treasuri/ *Treasury stock*	Surplus revaluasi/ *Revaluation surplus*	Cadangan lindung nilai arus kas/ *Cash flows hedging reserves*	Selisih translasi atas mata uang asing/ *Difference translation of foreign currency*	Keuntungan aktuaria/ *Actuarial gain*	Cadangan wajib/ *Statutory reserves*	Belum ditentukan penggunaannya/ *Unappropriated*	Jumlah ekuitas yang diatribusikan kepada pemilik entitas induk/ *Total equity attribute to equity holder of parent company*	Kepentingan non-pengendali/ *Non-controlling interest*	Jumlah ekuitas konsolidasian/ *Total consolidated equity*	
Saldo per 1 Januari 2019	453.140	(499.660)	(985.379)	3.089.803	33.907	(61.777)	(1.001)	61.100	1.280.546	3.370.679	308.886	3.679.565	*Balance as of 1 January 2019*
Laba bersih tahun berjalan	-	-	-	-	-	-	-	-	819.454	819.454	46.667	866.121	*Net profit for the current year*
Surplus revaluasi (Catatan 13)	-	-	-	1.531.035	-	-	-	-	-	1.531.035	69.685	1.600.720	*Revaluation surplus (Note 13)*
Selisih penyusutan nilai wajar dengan biaya perolehan	-	-	- (	50.011)	-	-	-	-	50.011	-	-	-	*Difference in fair value depreciation with acquisition cost*
Cadangan lindung nilai arus kas (Catatan 31a)	-	-	-	- (	77.718)	-	-	-	- (	77.718) (	2.557) (	80.275)	*Cash flows hedging reserves (Note 31a)*
Penyesuaian perubahan kepemilikan efektif pada entitas anak	-	-	-	-	-	-	-	-	-	-	116.342	116.342	*Adjustment for effect on ownership changes in subsidiaries*
Selisih translasi atas mata uang asing (Catatan 31b)	-	-	-	-	-	16	-	-	-	16	-	16	*Difference translation of foreign currency (Note 31b)*
Keuntungan aktuaria (Catatan 35)	-	-	-	-	-	-	12.350	-	-	12.350 (	114)	12.236	*Actuarial gain (Note 35)*
Saham treasuri (Catatan 29)	-	- (	42.889)	-	-	-	-	-	- (	42.889)	- (	42.889)	*Treasury stock (Note 29)*
Cadangan wajib (Catatan 37)	-	-	-	-	-	-	-	500 (	500)	-	-	-	*Statutory reserves (Note 37)*
Pembagian dividen tunai - entitas anak (Catatan 37)	-	-	-	-	-	-	-	-	-	- (	9.197) (	9.197)	*Cash dividends - subsidiaries (Note 37)*
Pembagian dividen tunai (Catatan 37)	-	-	-	-	-	-	-	- (	600.000) (	600.000)	- (	600.000)	*Cash dividends (Note 37)*
Selisih transaksi dengan pihak non-pengendali (Catatan 30)	- (	19.355)	-	-	-	-	-	-	- (	19.355)	- (	19.355)	*Difference arising from transaction with non-controlling interest (Note 30)*
Saldo per 31 Desember 2019	453.140 (	519.015) (	1.028.268)	4.570.827 (	43.811) (	61.761)	11.349	61.600	1.549.511	4.993.572	529.712	5.523.284	*Balance as of 31 December 2019*
	Catatan 28/ *Note 28*	Catatan 30/ *Note 30*	Catatan 29/ *Note 29*	Catatan 31/ *Note 31*	Catatan 31a/ *Note 31a*	Catatan 31b/ *Note 31b*	Catatan 35/ *Note 35*	Catatan 37/ *Note 37*			Catatan 39/ *Note 39*		

Lihat Catatan atas Laporan Keuangan Konsolidasian pada Ekshibit E terlampir yang merupakan bagian tidak terpisahkan dari Laporan Keuangan Konsolidasian secara keseluruhan

See accompanying Notes to Consolidated Financial Statements on Exhibit E which are an integral part of the Consolidated Financial Statements taken as a whole

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Ekshibit C/3

PT TOWER BERSAMA INFRASTRUCTURE Tbk DAN ENTITAS ANAK
LAPORAN PERUBAHAN EKUITAS KONSOLIDASIAN
UNTUK TAHUN YANG BERAKHIR 31 DESEMBER 2020, 2019 DAN 2018
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

Exhibit C/3

PT TOWER BERSAMA INFRASTRUCTURE Tbk AND ITS SUBSIDIARIES
CONSOLIDATED STATEMENT OF CHANGES IN EQUITY
FOR THE YEARS ENDED 31 DECEMBER 2020, 2019 AND 2018
(Expressed in million Rupiah, unless otherwise stated)

	Penghasilan komprehensif lain/ *Other comprehensive income*						Saldo laba/ *Retained earnings*					
	Modal saham/ *Capital stock*	Tambahan modal disetor - Bersih/ *Additional paid-in capital - Net*	Saham treasuri/ *Treasury stock*	Surplus revaluasi/ *Revaluation surplus*	Cadangan lindung nilai arus kas/ *Cash flows hedging reserves*	Selisih translasi atas mata uang asing/ *Difference translation of foreign currency*	Keuntungan (kerugian) aktuaria/ *Actuarial gain (loss)*	Cadangan wajib/ *Statutory reserves*	Belum ditentukan penggunaannya/ *Unappropriated*	Jumlah ekuitas yang diatribusikan kepada pemilik entitas induk/ *Total equity attribute to equity holder of parent company*	Kepentingan non-pengendali/ *Non-controlling interest*	Jumlah ekuitas konsolidasian/ *Total consolidated equity*	
Saldo per 1 Januari 2018	453.140	(309.548)	(467.618)	3.102.433	(920.198)	(62.126)	(8.946)	60.100	1.256.573	3.088.030	97.050	3.185.080	*Balance as of 1 January 2018*
Laba tahun berjalan	-	-	-	-	-	-	-	-	680.581	680.581	22.051	702.632	*Profit for the current year*
Surplus revaluasi (Catatan 13)	-	-	-	81.762	-	-	-	-	-	81.762	1.312	83.074	*Revaluation surplus (Note 13)*
Selisih penyusutan nilai wajar dengan biaya perolehan	-	-	-	(94.392)	-	-	-	-	94.392	-	-	-	*Difference in fair value depreciation with acquisition cost*
Cadangan lindung nilai arus kas (Catatan 31a)	-	-	-	-	954.105	-	-	-	-	954.105	9.545	963.650	*Cash flows hedging reserves (Note 31a)*
Perubahan nilai wajar investasi - tersedia untuk dijual (Catatan 31b)	-	-	-	-	-	-	-	-	-	15.780	(943)	14.837	*Change in fair value of investment - available for sale (Note 31b)*
Penyesuaian perubahan kepemilikan efektif pada entitas anak	-	-	-	-	-	-	-	-	-	-	190.751	190.751	*Adjustment for effect on ownership changes in subsidiaries*
Selisih transaksi dengan pihak non-pengendali (Catatan 30)	-	(51.886)	-	-	-	-	-	-	-	(51.886)	-	(51.886)	*Difference arising from transaction with non-controlling interest (Note 30)*
Selisih translasi atas mata uang asing (Catatan 31b)	-	-	-	-	-	349	-	-	-	349	-	349	*Difference translation of foreign currency (Note 31b)*
Keuntungan aktuaria (Catatan 35)	-	-	-	-	-	-	7.945	-	-	7.945	88	8.033	*Actuarial gain (Note 35)*
Saham treasuri (Catatan 29)	-	-	(517.761)	-	-	-	-	-	-	(517.761)	-	(517.761)	*Treasury stock (Note 29)*
Cadangan wajib (Catatan 37)	-	-	-	-	-	-	-	1.000	(1.000)	-	-	-	*Statutory reserves (Note 37)*
Pembagian dividen tunai - entitas anak (Catatan 37)	-	-	-	-	-	-	-	-	-	-	(10.968)	(10.968)	*Cash dividends - subsidiaries (Note 37)*
Pembagian dividen tunai (Catatan 37)	-	-	-	-	-	-	-	-	(750.000)	(750.000)	-	(750.000)	*Cash dividends (Note 37)*
Selisih nilai transaksi restrukturisasi entitas sepengendali (Catatan 30)	-	(138.226)	-	-	-	-	-	-	-	(138.226)	-	(138.226)	*Difference arising from restructuring transaction of under common control (Note 30)*
Saldo per 31 Desember 2018	453.140	(499.660)	(985.379)	3.089.803	33.907	(61.777)	(1.001)	61.100	1.280.546	3.370.679	308.886	3.679.565	*Balance as of 31 December 2018*
	Catatan 28/ *Note 28*	Catatan 30/ *Note 30*	Catatan 29/ *Note 29*	Catatan 31/ *Note 31*	Catatan 31a/ *Note 31a*	Catatan 31b/ *Note 31b*	Catatan 35/ *Note 35*	Catatan 37/ *Note 37*			Catatan 39/ *Note 39*		

Lihat Catatan atas Laporan Keuangan Konsolidasian pada Ekshibit E terlampir yang merupakan bagian tidak terpisahkan dari Laporan Keuangan Konsolidasian secara keseluruhan

See accompanying Notes to Consolidated Financial Statements on Exhibit E which are an integral part of the Consolidated Financial Statements taken as a whole

These Consolidated Financial Statements are Originally Issued in Indonesian Language

Ekshibit D

PT TOWER BERSAMA INFRASTRUCTURE Tbk
DAN ENTITAS ANAK
LAPORAN ARUS KAS KONSOLIDASIAN
UNTUK TAHUN YANG BERAKHIR
31 DESEMBER 2020, 2019 DAN 2018
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

Exhibit D

PT TOWER BERSAMA INFRASTRUCTURE Tbk
AND ITS SUBSIDIARIES
CONSOLIDATED STATEMENT OF CASH FLOWS
FOR THE YEARS ENDED 31 DECEMBER 2020, 2019 AND 2018
(Expressed in million Rupiah, unless otherwise stated)

	Catatan/ *Notes*	2020	2019	2018	
ARUS KAS DARI AKTIVITAS OPERASI					***CASH FLOWS FROM OPERATING ACTIVITIES***
Penerimaan kas dari pelanggan		5.329.911	4.822.066	4.319.731	*Cash received from customers*
Penerimaan jasa giro dan bunga deposito		14.869	12.324	8.431	*Interest received from current accounts and deposits*
Pembayaran kas ke karyawan		(200.305)	(247.353)	(228.894)	*Cash paid to employees*
Pembayaran pajak penghasilan		(497.775)	(272.610)	(190.563)	*Payments of income tax*
Pembayaran kas ke pemasok		(860.243)	(623.010)	(668.753)	*Cash paid to supplier*
Kas bersih diperoleh dari aktivitas operasi		3.786.457	3.691.417	3.239.952	***Net cash flows provided by operating activities***
ARUS KAS DARI AKTIVITAS INVESTASI					***CASH FLOWS FROM INVESTING ACTIVITIES***
Penjualan aset tetap		-	-	18.647	*Sale proceeds of property and equipment*
Penjualan investasi saham		-	-	1.817	*Sale of investment in share*
Pembelian saham		-	-	(371.511)	*Purchase of shares*
Penambahan properti investasi	**14**	(87.056)	(5.151)	(5.190)	*Acquisition of investment property*
Pembayaran sewa lahan	**15**	-	(345.684)	(390.377)	*Payments for land lease*
Penambahan aset hak guna	**15**	(610.007)	-	-	*Acquisition of right of use assets*
Penambahan aset tetap	**13**	(1.354.824)	(1.688.650)	(1.458.245)	*Acquisition of property and equipment*
Kas bersih yang digunakan untuk aktivitas investasi		(2.051.887)	(2.039.485)	(2.204.859)	***Net cash flows used in investing activities***
ARUS KAS DARI AKTIVITAS PENDANAAN					***CASH FLOWS FROM FINANCING ACTIVITIES***
Penerbitan surat utang	**26**	7.728.900	750.000	1.236.000	*Issuance of notes*
Penerimaan pinjaman jangka panjang	**25**	5.911.224	10.512.614	3.887.051	*Receipt from long-term loans*
Penerimaan derivatif	**17**	439.625	452.727	1.014.857	*Receipt from settlement of derivative*
Penerimaan dari penerbitan saham baru - entitas anak		-	32.580	-	*Proceeds from the issuance of new shares - subsidiaries*
Penerimaan dari pihak berelasi		-	1.200	-	*Receipt from related party*
Pembayaran biaya terkait penerbitan saham baru - entitas anak		-	(1.940)	-	*Payment of fees related to the issuance of new shares - subsidiaries*
Pembayaran sewa pembiayaan	**24**	-	(6.272)	(4.839)	*Payments of finance lease*
Pembelian kembali saham		-	-	(4.995)	*Share repurchase*
Saham treasuri	**29**	-	(42.889)	(517.761)	*Treasury stock*
Pembayaran liabilitas sewa - kendaraan	**27**	(8.445)	-	-	*Payments of lease liabilities - vehicles*
Pembayaran dividen - entitas anak	**37**	(11.055)	(9.197)	-	*Dividend payment - subsidiaries*
Pembayaran liabilitas sewa - aset hak guna	**27**	(22.199)	-	-	*Payments of lease liabilities - right of use assets*
Pembayaran dividen	**37**	(605.670)	(600.000)	(760.910)	*Dividend payment*
Pembayaran bunga dan biaya pinjaman jangka panjang dan surat utang	**25,36**	(1.775.421)	(2.105.771)	(1.983.036)	*Payments of interest and cost of borrowing for long-term loan and notes*
Pembayaran pinjaman jangka panjang dan surat utang	**25,36**	(12.973.527)	(10.322.752)	(4.095.560)	*Payments of long term loans and notes*
Kas bersih yang digunakan untuk aktivitas pendanaan		(1.316.568)	(1.339.700)	(1.229.193)	***Net cash flows used in financing activities***

Lihat Catatan atas Laporan Keuangan Konsolidasian pada Ekshibit E terlampir yang merupakan bagian tidak terpisahkan dari Laporan Keuangan Konsolidasian secara keseluruhan

See accompanying Notes to Consolidated Financial Statements on Exhibit E which are an integral part of the Consolidated Financial Statements taken as a whole

These Consolidated Financial Statements are Originally Issued in Indonesian Language

Ekshibit D/2

PT TOWER BERSAMA INFRASTRUCTURE Tbk
DAN ENTITAS ANAK
LAPORAN ARUS KAS KONSOLIDASIAN
UNTUK TAHUN YANG BERAKHIR
31 DESEMBER 2020, 2019 DAN 2018
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

Exhibit D/2

PT TOWER BERSAMA INFRASTRUCTURE Tbk
AND ITS SUBSIDIARIES
CONSOLIDATED STATEMENT OF CASH FLOWS
FOR THE YEARS ENDED
31 DECEMBER 2020, 2019 AND 2018
(Expressed in million Rupiah, unless otherwise stated)

	Catatan/ *Notes*	2020	2019	2018	
Pengaruh perubahan kurs mata uang asing pada kas dan setara kas		4.097	(7.576)	7.242	*Effect from changes in foreign exchange rates on cash and cash equivalents*
KENAIKAN BERSIH KAS DAN SETARA KAS		422.099	304.656	(186.858)	*NET INCREASE ON CASH AND CASH EQUIVALENTS*
KAS DAN SETARA KAS PADA AWAL TAHUN		525.242	220.586	407.444	*CASH AND CASH EQUIVALENTS AT BEGINNING OF YEAR*
KAS DAN SETARA KAS PADA AKHIR TAHUN	4	947.341	525.242	220.586	*CASH AND CASH EQUIVALENTS AT THE END OF YEAR*

Lihat Catatan atas Laporan Keuangan Konsolidasian pada Ekshibit E terlampir yang merupakan bagian tidak terpisahkan dari Laporan Keuangan Konsolidasian secara keseluruhan

See accompanying Notes to Consolidated Financial Statements on Exhibit E which are an integral part of the Consolidated Financial Statements taken as a whole

1. UMUM

a. Pendirian Perusahaan

PT Tower Bersama Infrastructure Tbk ("Perusahaan"), berdomisili di Jakarta Selatan, didirikan berdasarkan akta Notaris No. 14 tanggal 8 November 2004 yang dibuat di hadapan Notaris Dewi Himijati Tandika, S.H, Notaris di Jakarta, dan telah disahkan oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Keputusan No. C-28415HT.01.01.TH.2004 tanggal 12 November 2004. Anggaran dasar Perusahaan telah mengalami beberapa kali perubahan, terakhir berdasarkan akta Notaris No. 43 tanggal 18 Mei 2020, yang dibuat dihadapan Jose Dima Satria, S.H., M.Kn., Notaris di Jakarta Selatan ("Akta No. 43/2020"), yang telah diberitahukan kepada Menteri Hukum dan Hak Asasi Manusia Republik Indonesia (Menkumham) berdasarkan Surat Penerimaan Pemberitahuan Perubahan Anggaran Dasar No. AHU-AH.01.03-0233270 tanggal 2 Juni 2020 dan didaftarkan pada Daftar Perusahaan No. AHU-0087844.AH.01.11.TAHUN 2020 tanggal 2 Juni 2020. Berdasarkan Akta No. 43/2020, para pemegang saham dalam Rapat Umum Pemegang Saham (RUPS) Perusahaan telah menyetujui: perubahan dan penyusunan Kembali anggaran dasar Perusahaan dalam rangka penyesuaian dengan Peraturan OJK No. 15/POJK.04/2020 tentang Rencana dan Penyelenggaraan Rapat Umum Pemegang Saham Perusahaan Terbuka dan Peraturan OJK No.16/POJK.04/2020 tentang Pelaksanaan Rapat Umum Pemegang Saham Perusahaan Terbuka secara Elektronik.

Berdasarkan Pasal 3 dari anggaran dasar Perusahaan, kegiatan usaha utama Perusahaan, aktivitas Perusahaan dan aktivitas konsultasi manajemen lainnya. Untuk menunjang kegiatan usaha utama, Perusahaan dapat melakukan kegiatan usaha penunjang yaitu:

a. konstruksi sentral komunikasi;
b. instalasi telekomunikasi; dan
c. aktivitas telekomunikasi dengan kabel

Perusahaan, melalui entitas anak, telah memulai kegiatan komersialnya pada tahun 2004. Pada saat ini, kegiatan utama Perusahaan adalah melakukan investasi atau penyertaan pada entitas anak. Pada tahun laporan yang disajikan, Perusahaan tidak melakukan ekspansi atau perampingan usaha yang signifikan.

Perusahaan merupakan entitas induk Perusahaan dan entitas anak terakhir. Perusahaan tidak memiliki entitas induk terakhir tertentu.

Perusahaan beralamat di Gedung The Convergence Indonesia lantai 11, Kawasan Rasuna Epicentrum, Jl HR Rasuna Said, Jakarta Selatan 12940.

1. GENERAL

a. The Company's Establishment

PT Tower Bersama Infrastructure Tbk (the "Company"), domiciled in South Jakarta, was established based on the Notarial deed No. 14 dated 8 November 2004 drawn up in the presence of Dewi Himijati Tandika, S.H, a Notary in Jakarta, and was approved by the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. C-28415.HT.01.01.TH.2004 dated 12 November 2004. The articles of association of the Company have been amended several times, most recently based on notarial deed No. 43 dated 18 May 2020, which was created in front of Jose Dima Satria, S.H., M.Kn., Notary in South Jakarta ("Deed No. 43/2020"), which has been notified to the Minister of Law and Human Rights of the Republic of Indonesia (Menkumham) based on the Letter of Acceptance Notification of Change Articles of Association No. AHU-AH.01.03-0233270 dated 2 June 2020 and registered in the Company Register No. AHU-0087844.AH.01.11.TAHUN 2020 dated 2 June 2020. Based on Deed No. 43/2020, the shareholders at the Company's General Meeting of Shareholders (GMS) have approved: amendments and rearrangements of the Company's articles of association in order to comply with OJK Regulation No. 15 / POJK.04 / 2020 concerning the Planning and Implementation of General Meeting of Shareholders of Public Companies and OJK Regulation No.16 / POJK.04 / 2020 concerning the Implementation of Electronic General Meeting of Shareholders of Public Companies.

Based on Article 3 of the Company's articles of association, the Company's main business activities, Company activities and other management consulting activities. To support the main business activities, the Company can conduct supporting business activities, namely:

a. central construction of communication;
b. telecommunications installation; and
c. telecommunications activities with cables

The Company, through its subsidiaries, commenced its commercial operations in 2004. Currently, the Company's main activity is investing in subsidiaries. In the reporting year, the Company did not conduct significant expansion or downsizing.

The Company is the ultimate parent of the group. The Company has no the ultimate parent entity.

The Company's address is at The Convergence Indonesia, 11th floor, Kawasan Rasuna Epicentrum, Jl HR Rasuna Said, Jakarta Selatan 12940.

1. UMUM (Lanjutan)

b. **Dewan Komisaris, Direksi, Komite Audit dan Karyawan**

Berdasarkan akta notaris No. 43 tanggal 18 Mei 2020 yang dibuat di hadapan Notaris Jose Dima Satria, S.H, M.Kn, Notaris di Jakarta, dan telah disahkan oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Keputusan No. AHU-AH.01.03-0233282 mengenai Perubahan Direksi dan Komisaris Perusahaan.

Susunan Komisaris Perusahaan pada tanggal 31 Desember 2020, 2019 dan 20218 adalah sebagai berikut:

*1. **GENERAL** (Continued)*

*b. **Boards of Commissioners, Directors, Audit Committee and Employees***

In accordance with notarial deed No. 43 dated 18 May 2020 drawn up in the presence of Jose Dima Satria, S.H, M.Kn., a Notary in Jakarta, and has been approved by Ministry of Law and Human Rights of the Republic of Indonesia as stated in his Decision Letter No. AHU-AH.01.03-0233282 regarding Changes the Directors and the Commissioners of the Company.

The Commissioners of the Company as of 31 December 2020, 2019 and 2018 are as follows:

		31 Desember 2020 / *31 December 2020*		
Presiden Komisaris	:	Edwin Soeryadjaya	:	*President Commissioner*
Komisaris	:	Winato Kartono	:	*Commissioner*
Komisaris Independen	:	Ludovicus Sensi Wondabio	:	*Independent Commissioners*
		Wahyuni Bahar		
		31 Desember 2019 dan 2018 / *31 December 2019 and 2018*		
Presiden Komisaris	:	Edwin Soeryadjaya	:	*President Commissioner*
Komisaris	:	Winato Kartono	:	*Commissioner*
Komisaris Independen	:	Herry Tjahjana	:	*Independent Commissioners*
		Wahyuni Bahar		

Susunan Direksi Perusahaan pada tanggal 31 Desember 2020, 2019 dan 2018 adalah sebagai berikut:

The Directors of the Company as of 31 December 2020, 2019 and 2018 are as follows:

Presiden Direktur & *Chief Operating Officer*	:	Herman Setya Budi	:	*President Director & Chief Operating Officer*
Wakil Presiden Direktur & *Chief Executive Officer*	:	Hardi Wijaya Liong	:	*Vice President Director & Chief Executive Officer*
Direktur & *Chief of Business Development*	:	Budianto Purwahjo	:	*Director & Chief of Business Development*
Direktur & *Chief Financial Officer*	:	Helmy Yusman Santoso	:	*Director & Chief Financial Officer*
Direktur Independen & *Chief of Product & Innovation*	:	Gusandi Sjamsudin	:	*Independent Director & Chief of Product & Innovation*

Susunan Komite Audit Perusahaan pada tanggal 31 Desember 2020, 2019 dan 2018 adalah sebagai berikut:

The Audit Committee of the Company as of 31 December 2020, 2019 and 2018 are as follows:

		31 Desember 2020 / *31 December 2020*		
Ketua	:	Ludovicus Sensi Wondabio	:	*Chairman*
Anggota	:	Agustino Sunarko	:	*Members*
		Agung Nugroho Soedibyo		
		31 Desember 2019 dan 2018 / *31 December 2019 and 2018*		
Ketua	:	Wahyuni Bahar	:	*Chairman*
Anggota	:	Aria Kanaka	:	*Members*
		Ignatius Andy		

Berdasarkan Surat Edaran Dewan Komisaris tanggal 5 Juni 2020, Dewan Komisaris memutuskan untuk merubah susunan Komite Audit Perusahaan.

In accordance with Circular Approval Letter of Board of Commissioner dated 5 June 2020, Board of Commissioner has decided to change the composition of the Audit Commitee of the Company.

Cakupan manajemen kunci Perusahaan adalah para komisaris dan direksi.

The scope of the Company's key management is the commissioners and directors.

Pada tanggal 9 Juli 2010, Perusahaan menunjuk Bapak Helmy Yusman Santoso sebagai Sekretaris Perusahaan.

On 9 July 2010, the Company appointed Mr. Helmy Yusman Santoso as the Corporate Secretary.

1. UMUM (Lanjutan)

b. **Dewan Komisaris, Direksi, Komite Audit dan Karyawan** (Lanjutan)

Sesuai dengan Peraturan No. IX.I.7, Lampiran Keputusan No. Kep-496/BL/2008 tanggal 28 November 2008 tentang Pembentukan dan Pedoman Penyusunan Piagam Unit Audit Internal yang telah diubah dengan peraturan Otoritas Jasa Keuangan (OJK) No. 56/POJK.04/2015 tentang Pembentukan dan Pedoman Penyusunan Piagam Unit Audit Internal, Perusahaan telah memiliki Piagam Audit Internal tanggal 10 Januari 2011. Perusahaan telah menunjuk Bapak Supriatno Arham sebagai kepala unit Audit Internal berdasarkan Surat Keputusan Direksi No. 954/TBG-SKP-00/HOS/03/XII/2014 tanggal 7 Mei 2014.

Jumlah remunerasi yang dibayarkan untuk Dewan Komisaris Perusahaan untuk tahun yang berakhir 31 Desember 2020, 2019 dan 2018 masing-masing sebesar Rp 13.136, Rp 11.623 dan Rp 10.279.

Jumlah remunerasi yang dibayarkan untuk Dewan Direksi Perusahaan untuk tahun yang berakhir 31 Desember 2020, 2019 dan 2018 masing-masing sebesar Rp 27.865, Rp 28.805 dan Rp 29.559.

Pada tanggal 31 Desember 2020, 2019 dan 2018, Perusahaan dan entitas anak masing-masing mempekerjakan 655 karyawan, 680 karyawan, dan 612 karyawan (tidak diaudit).

c. **Struktur Entitas Anak**

Perusahaan secara langsung memiliki lebih dari 50% saham di entitas anak sebagai berikut:

***1. GENERAL** (Continued)*

*b. **Boards of Commissioners, Directors, Audit Committee and Employees** (Continued)*

In accordance with Regulation No. IX.I.7, Decision No. Kep-496/BL/2008 dated 28 November 2008 on the Establishment and Development Guidelines for Internal Audit Charter, which has been changed with Otoritas Jasa Keuangan (OJK) rule No. 56/POJK.04/2015 on the Establishment and Development Guidelines for Internal Audit Charter the Company has Internal Audit Charter dated 10 January 2011. The Company appointed Mr. Supriatno Arham as the Head Of Internal Auditor based on the Directors' Decree No. 954/TBG-SKP-00/HOS/03/XII/ 2014 dated 7 May 2014.

Total remuneration paid to the Board of Commissioners of the Company for the year ended 31 December 2020, 2019 and 2018 amounted to Rp 13,136, Rp 11,623 and Rp 10,279, respectively.

Total remuneration paid to the Board of Directors of the Company for the year ended 31 December 2020, 2019 and 2018 amounted to Rp 27,865, Rp 28,805 and Rp 29.559, respectively.

As of 31 December 2020, 2019 and 2018, the Company and its subsidiaries employed 655 staffs, 680 staffs and 612 karyawan (unaudited), respectively.

*c. **Structure of Subsidiaries***

The Company owns directly the shareholding greater than 50% in the following subsidiaries:

Entitas anak / *Subsidiaries*	Dimulainya kegiatan operasi/ *Commencement of operation*	Persentase kepemilikan pada 31 Desember 2020/ *Percentage of ownership at 31 December 2020*	Jumlah aset sebelum eliminasi/ *Total assets before elimination*		
			2020	2019	2018
PT Tower Bersama dan entitas anak/ *and subsidiaries*	2006	98,00%	19.888.827	16.938.219	14.718.992
TBG Global Pte Ltd dan entitas anak/ *and subsidiary*	2013	100,00%	14.367.102	14.128.039	14.689.156
PT Metric Solusi Integrasi dan entitas anak/ *and subsidiary*	2010	100,00%	13.088.528	9.770.337	9.990.982
PT Solusi Menara Indonesia	2011	99,91%	7.799.522	6.952.365	7.075.500
PT Gihon Telekomunikasi Indonesia Tbk dan entitas anak/ *and subsidiary*	2001	50,43%	827.629	740.433	485.157
PT United Towerindo dan entitas anak/ *and subsidiaries*	2004	100,00%	507.332	683.464	516.136
PT Tower One dan entitas anak/ *and subsidiary*	2006	99,90%	427.525	515.416	460.823
PT Visi Telekomunikasi Infrastruktur Tbk dan entitas anak/ *and subsidiary*	1995	51,09%	338.352	329.963	239.216
PT Telenet Internusa	1999	99,50%	305.742	341.651	243.412
PT Triaka Bersama	2010	100,00%	107.033	141.670	108.638
PT Menara Bersama Terpadu	2013	99,99%	10.000	10.079	10.143

1. **UMUM** (Lanjutan)

c. **Struktur Entitas Anak** (Lanjutan)

Semua entitas anak berdomisili di Jakarta dan memiliki alamat yang sama dengan Perusahaan, kecuali TBG Global Pte Ltd yang berdomisili di Singapura.

Perusahaan melalui entitas anak memiliki kepemilikan tidak langsung lebih dari 50% pada perusahaan-perusahaan sebagai berikut:

*1. **GENERAL** (Continued)*

*c. **Structure of Subsidiaries** (Continued)*

All subsidiaries are domiciled in Jakarta and their address is the same as the Company's address, except for TBG Global Pte Ltd which is domiciled in Singapore.

The Company owns indirectly through subsidiaries the shareholdings greater than 50% in the following companies:

Entitas anak / *Subsidiaries*	Kepemilikan melalui entitas anak/ *Ownership of subsidiaries*	Dimulainya kegiatan operasi/ *Commencement of operation*	Persentase kepemilikan pada 31 Desember 2020/ *Percentage of ownership at 31 December 2020*	Jumlah aset sebelum eliminasi/ *Total assets before elimination*		
				2020	2019	2018
PT Solu Sindo Kreasi Pratama	PT Metric Solusi Integrasi	1999	99,71%	10.365.003	8.711.286	9.155.342
Tower Bersama Singapore Pte Ltd	TBG Global Pte Ltd	2012	100,00%	7.183.932	7.065.643	7.396.111
PT Mitrayasa Sarana Informasi	PT Tower Bersama dan/ *and* PT Solu Sindo Kreasi Pratama	2004	100,00%	1.049.688	1.277.075	981.932
PT Towerindo Konvergensi	PT Tower Bersama	2009	100,00%	634.160	507.452	416.868
PT Permata Karya Perdana	PT Visi Telekomunikasi Infrastruktur Tbk	2013	99,99%	327.408	323.559	238.437
PT Bali Telekom	PT Tower One	2003	100,00%	289.786	391.475	345.991
PT Prima Media Selaras	PT Tower Bersama	2003	100,00%	232.343	297.094	212.251
PT Batavia Towerindo	PT United Towerindo dan/ *and* PT Tower Bersama	2006	99,80%	191.277	173.365	161.955
PT Jaringan Pintar Indonesia	PT Tower Bersama	2015	83,44%	26.033	35.884	35.368
PT Gihon Lima Jaya	PT Gihon Telekomunikasi Indonesia Tbk	2018	99,00%	1.246	1.249	1.251
PT Selaras Karya Makmur	PT United Towerindo	2013	75,00%	15	52	52
PT Infrastruktur Digital Indonesia	PT Tower Bersama	2017	-	-	487	507

Pada 31 Januari 2020, PT Tower Bersama, entitas anak melepaskan kepemilikan 90% saham atas PT Infrastruktur Digital Indonesia.

On 31 January 2020, PT Tower Bersama, a subsidiary, released 90% ownership of PT Infrastruktur Digital Indonesia.

Berikut adalah keterangan dari masing-masing entitas anak.

The followings are the information about the subsidiaries.

c.1 **PT Telenet Internusa**

PT Telenet Internusa ("TI") adalah suatu Perseroan Terbatas didirikan di Indonesia berdasarkan akta pendirian No. 8 tanggal 6 September 1999, dibuat dihadapan Dr. Wiratni Ahmadi, S.H, Notaris di Bandung.

*c.1 **PT Telenet Internusa***

PT Telenet Internusa ("TI") is a Limited Liability Company established in Indonesia based on the deed of establishment No. 8 dated 6 September 1999, drawn up in the presence of Dr. Wiratni Ahmadi, S.H, a Notary in Bandung.

1. **UMUM** (Lanjutan)

c. **Struktur Entitas Anak** (Lanjutan)

c.1 **PT Telenet Internusa** (Lanjutan)

Akta Pendirian TI telah disahkan oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dalam Surat Keputusan No. C-18566.HT.01.01.TH. 2001 tanggal 6 November 2001 dan akta tersebut telah diumumkan dalam Berita Negara Republik Indonesia No. 15 tanggal 21 Februari 2006, Tambahan No. 1896.

Anggaran dasar TI telah mengalami beberapa kali perubahan, terakhir dengan Akta No. 181 tanggal 23 Desember 2019, dibuat dihadapan Darmawan Tjoa, S.H, S.E, Notaris di Jakarta, mengenai perubahan Pasal 3 maksud dan tujuan serta kegiatan usaha. Perubahan anggaran dasar tersebut telah disetujui oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Keputusan No. AHU-0108920.AH.01.02 Tahun 2019 tanggal 26 Desember 2019.

Berdasarkan Pasal 3 dari anggaran dasar TI, ruang lingkup usaha TI adalah konstruksi sentral telekomunikasi dan perdagangan besar peralatan komunikasi.

c.2 **PT United Towerindo dan entitas anak**

PT United Towerindo ("UT") adalah suatu Perseroan Terbatas didirikan di Indonesia berdasarkan akta pendirian No. 40 tanggal 30 Juni 2004, dibuat dihadapan Darmawan Tjoa, S.H, S.E, Notaris di Jakarta. Akta pendirian UT telah disahkan oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dalam Surat Keputusan No. C-18090. HT.01.01.TH.2004 tanggal 20 Juli 2004 dan telah diumumkan dalam Berita Negara Republik Indonesia No. 65 tanggal 13 Agustus 2004, Tambahan No. 7930.

Anggaran dasar UT telah mengalami beberapa kali perubahan, terakhir dengan akta No. 170 tanggal 23 Desember 2019, dibuat dihadapan Darmawan Tjoa, S.H, S.E, Notaris di Jakarta, mengenai perubahan Pasal 3 maksud dan tujuan serta kegiatan usaha. Perubahan anggaran tersebut telah disetujui oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Keputusan No. AHU-0108319.AH.01.02 Tahun 2019 tanggal 23 Desember 2019.

Berdasarkan Pasal 3 dari anggaran dasar UT, ruang lingkup usaha UT adalah konstruksi sentral komunikasi dan perdagangan besar peralatan komunikasi.

UT memiliki 2 (dua) entitas anak yaitu PT Batavia Towerindo dan PT Selaras Karya Makmur.

1. ***GENERAL** (Continued)*

*c. **Structure of Subsidiaries** (Continued)*

*c.1 **PT Telenet Internusa** (Continued)*

TI's deed of Establishment was approved by the Ministry of Law and Human Rights the Republic of Indonesia in his Decree No. C-18566.HT.01.01.TH. 2001 dated 6 November 2001 and was published in the State Gazette Republic Indonesia No. 15 dated 21 February 2006, Supplement No.1896.

TI's articles of association have been amended several times, the latest amendment was based on Deed No. 181 dated 23 December 2019, drawn up in the presence of Darmawan Tjoa, S.H, S.E, a Notary in Jakarta, regarding the amendment to Article 3 of the purposes and objectives as well as business activities. This amendment has been approved by the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. AHU-0108920. AH.01.02 Tahun 2019 dated 26 December 2019.

In accordance with Article 3 of TI articles of association, the scope of the TI business is the telecommunications central construction and the wholesale trade of communications equipment.

*c.2 **PT United Towerindo and subsidiaries***

PT United Towerindo ("UT") is a Limited Liability Company established in Indonesia based on the deed of establishment No. 40 dated 30 June 2004, drawn up in the presence of Darmawan Tjoa, S.H, S.E, a Notary in Jakarta. UT's deed of establishment was approved by the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. C-18090.HT.01.01. TH.2004 dated 20 July 2004 and was published in the State Gazette of the Republic of Indonesia No. 65 dated 13 August 2004, Supplement No. 7930.

UT's articles of association have been amended several times, the latest amendment was based on deed No. 170 dated 23 December 2019, drawn up in the presence of Darmawan Tjoa, S.H, S.E, a Notary in Jakarta, regarding the amendment to Article 3 of the purposes and objectives as well as business activities. This amendment has been approved by the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. AHU-0108319.AH.01.02 Tahun 2019 dated 23 December 2019.

In accordance with Article 3 of UT's articles of association, the scope of UT's business is the central construction of communications and the trade in communication equipment.

UT has 2 (two) subsidiaries company which are PT Batavia Towerindo and PT Selaras Karya Makmur.

1. **UMUM** (Lanjutan)

c. **Struktur Entitas Anak** (Lanjutan)

c.3 **PT Tower Bersama dan entitas anak**

PT Tower Bersama ("TB") adalah suatu Perseroan Terbatas didirikan di Indonesia berdasarkan akta pendirian No. 5 tanggal 4 Juli 2006, dibuat dihadapan Darmawan Tjoa, S.H, S.E, Notaris di Jakarta. Akta pendirian TB telah disahkan oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dalam Surat Keputusan No. C-20821.HT.01.01.TH.2006 tanggal 17 Juli 2006 dan telah diumumkan dalam Berita Negara Republik Indonesia No. 104 tanggal 29 Desember 2006, Tambahan No.13530.

Anggaran dasar TB telah mengalami beberapa kali perubahan, terakhir dengan akta No. 168 tanggal 23 Desember 2019, dibuat dihadapan Darmawan Tjoa, S.H, S.E, Notaris di Jakarta, mengenai perubahan Pasal 3 maksud dan tujuan serta kegiatan usaha. Perubahan anggaran dasar tersebut telah disetujui oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Keputusan No. AHU-0108308.AH.01.02.Tahun 2019 tanggal 23 Desember 2019.

Berdasarkan Pasal 3 dari anggaran dasar TB, ruang lingkup usaha entitas anak adalah konstruksi sentral komunikasi, perdagangan besar peralatan komunikasi, perdagangan besar mesin, peralatan dan perlengkapan lainnya, aktivitas telekomunikasi dengan kabel, *internet service provider* dan jasa system komunikasi.

TB memiliki 4 (empat) entitas anak yaitu PT Prima Media Selaras, PT Mitrayasa Sarana Informasi PT Towerindo Konvergensi dan PT Jaringan Pintar Indonesia dimiliki oleh PT Tower Bersama masing-masing sejak Juni 2008, 8 Agustus 2011, 7 Oktober 2011 dan 4 Oktober 2016.

c.4 **PT Tower One dan entitas anak**

PT Tower One ("TO") adalah suatu Perseroan Terbatas didirikan di Indonesia berdasarkan akta pendirian No. 6 tanggal 21 September 2006, dibuat dihadapan Angela Meilany Basiroen, S.H, Notaris di Jakarta.

*1. **GENERAL** (Continued)*

*c. **Structure of Subsidiaries** (Continued)*

*c.3 **PT Tower Bersama and subsidiaries***

PT Tower Bersama ("TB") is a Limited Liability Company established in Indonesia based on the deed of establishment No. 5 dated 4 July 2006, drawn up in the presence of Darmawan Tjoa, S.H, S.E, a Notary in Jakarta. TB's deed of establishment was approved by the Ministry of Law and Human Rights of the Republic of Indonesia No. C-20821.HT.01.01.TH.2006 dated 17 July 2006 and was published in the State Gazette of the Republic of Indonesia in his Decree No. 104 dated 29 December 2006, Supplement No. 13530.

TB's articles of association have been amended several times, the latest amendment was based on deed No. 169 dated 23 December 2019, drawn up in the presence of Darmawan Tjoa, SH, SE, a Notary in Jakarta, regarding the amendment to Article 3 of the purposes and objectives as well as business activities. This amendment has been approved by the Ministry of Law and Human Rights of the Republic of Indonesia No. AHU-0108308.AH.01.02.Tahun 2019 dated 23 December 2019.

In accordance with Article 3 of TB's articles of association, the scope of its the central construction of communications, the wholesale trade of communications equipment, the wholesale trade of machinery, equipment and other equipment, telecommunications activities with cable, internet service providers and communication system services.

TB has 4 (four) subsidiaries companies which are PT Prima Media Selaras, PT Mitrayasa Sarana Informasi, PT Towerindo Konvergensi and PT Jaringan Pintar Indonesia were acquired by PT Tower Bersama on June 2008, 8 August 2011, 7 October 2011 and 4 October 2016, respectively.

*c.4 **PT Tower One and subsidiary***

PT Tower One ("TO") is a Limited Liability Company established in Indonesia based on the Deed of Establishment No. 6 dated 21 September 2006, drawn up in the presence of Angela Meilany Basiroen, S.H, a Notary in Jakarta.

1. **UMUM** (Lanjutan)

c. **Struktur Entitas Anak** (Lanjutan)

c.4 **PT Tower One dan entitas anak** (Lanjutan)

Akta pendirian TO telah disahkan oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dalam Surat Keputusan No. W7-03499.HT.01.01-TH.2006 tanggal 8 Desember 2006 dan akta tersebut telah diumumkan dalam Berita Negara Republik Indonesia No. 63 tanggal 7 Agustus 2009, Tambahan No. 21141.

Anggaran dasar TO telah mengalami beberapa kali perubahan, terakhir dengan Akta No. 174 tanggal 23 Desember 2019, dibuat dihadapan Darmawan Tjoa, S.H, S.E, Notaris di Jakarta, mengenai perubahan Pasal 3 maksud dan tujuan serta kegiatan usaha. Perubahan Anggaran Dasar tersebut telah disetujui oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Keputusan No. AHU-0108326.AH.01.02.Tahun 2019 tanggal 23 Desember 2019. Berdasarkan Pasal 3 dari anggaran dasar TO, ruang lingkup usaha TO adalah aktivitas perusahaan holding dan aktivitas konsultasi manajemen lainnya.

TO memiliki entitas anak yaitu PT Bali Telekom.

c.5 **PT Triaka Bersama**

PT Triaka Bersama ("TRB") adalah suatu Perseroan Terbatas didirikan di Indonesia berdasarkan akta pendirian No. 33 tanggal 15 Mei 2009, dibuat dihadapan Darmawan Tjoa, S.H, S.E, Notaris di Jakarta. Akta pendirian TRB telah disahkan oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dalam Surat Keputusan No. AHU-24774.AH.01.01.Tahun 2009 tanggal 5 Juni 2009 dan telah diumumkan dalam Berita Negara Republik Indonesia No. 63 tanggal 7 Agustus 2009, Tambahan No. 20847.

Anggaran dasar TRB terakhir diubah dengan akta No. 175 tanggal 23 Desember 2019, dibuat dihadapan Darmawan Tjoa, S.H, S.E, Notaris di Jakarta, mengenai perubahan Pasal 3 maksud dan tujuan serta kegiatan usaha. Perubahan anggaran dasar tersebut telah disetujui oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Keputusan No. AHU-0108325.AH.01.02.Tahun 2019 tanggal 23 Desember 2019.

Berdasarkan Pasal 3 dari anggaran dasar TRB, ruang lingkup usaha TRB adalah berusaha dalam jasa konstruksi sentral komunikasi dan perdagangan besar peralatan komunikasi.

*1. **GENERAL** (Continued)*

*c. **Structure of Subsidiaries** (Continued)*

*c.4 **PT Tower One and subsidiary** (Continued)*

TO's deed of establishment was approved by the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. W7-03499.HT.01.01-TH.2006 dated 8 December 2006 and was published in the State Gazette of the Republic of Indonesia in his Decree No. 63 dated 7 August 2009, Supplement No. 21141.

TO's articles of association have been amended several times, the latest amendment was based on Deed No. 174 dated 23 December 2019, drawn up in the presence of Darmawan Tjoa, S.H, S.E, a Notary in Jakarta, regarding the purposes and objectives as well as business activities. This amendment has been approved by the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. AHU-0108326.AH.01.02.Tahun 2019 dated 23 December 2019. In accordance with Article 3 of TO's articles of association, the scope of its activities of the holding company and other management consulting activities.

TO has a subsidiary company which is PT Bali Telekom.

*c.5 **PT Triaka Bersama***

PT Triaka Bersama ("TRB") is a Limited Liability Company established in Indonesia based on the deed of establishment No. 33 dated 15 May 2009, drawn up in the presence of Darmawan Tjoa, S.H, S.E, a Notary in Jakarta. TRB's Deed of Establishment was approved by the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. AHU-24774.AH.01.01. Tahun 2009 dated 5 June 2009 and was published in the State Gazette of the Republic of Indonesia No. 63 dated 7 August 2009, Supplement No. 20847.

TRB's articles of association were last amended by the deed No.175 dated 23 Decemeber 2019, drawn up in the presence of Darmawan Tjoa, S.H, S.E, a Notary in Jakarta, regarding the purposes and objectives as well as business activities. This amendment has been approved by the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. AHU-0108325.AH.01.02.Tahun 2019 dated 23 December 2019.

In accordance with Article 3 of TRB's articles of association, the scope of its activities the central construction of communications and the trade in communication equipment.

1. **UMUM** (Lanjutan)

c. **Struktur Entitas Anak** (Lanjutan)

c.6 **PT Metric Solusi Integrasi dan entitas anak**

PT Metric Solusi Integrasi ("MSI") adalah suatu Perseroan Terbatas didirikan di Indonesia berdasarkan akta pendirian No. 20 tanggal 12 Maret 2010, dibuat dihadapan Darmawan Tjoa, S.H, S.E, Notaris di Jakarta. Akta pendirian MSI telah disahkan oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dalam Surat Keputusan No. AHU-13915.AH.01.01.Tahun 2010 tanggal 18 Maret 2010. Anggaran dasar MSI telah mengalami beberapa kali perubahan. Terakhir dengan akta No. 176 tanggal 23 Desember 2019, dibuat dihadapan Darmawan Tjoa, S.H, S.E, Notaris di Jakarta, mengenai perubahan Pasal 3 maksud dan tujuan serta kegiatan usaha. Perubahan anggaran dasar tersebut telah disetujui oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Keputusan No. AHU-0108321.AH.01.02 Tahun 2019 tanggal 23 Desember 2019.

Berdasarkan Pasal 3 dari anggaran dasar MSI, ruang lingkup usaha MSI adalah aktivitas perusahaan holding dan aktivitas konsultasi manajemen lainnya.

MSI memiliki entitas anak yaitu PT Solu Sindo Kreasi Pratama.

c.7 **PT Solusi Menara Indonesia**

PT Solusi Menara Indonesia ("SMI") adalah suatu Perseroan Terbatas yang didirikan di Indonesia berdasarkan Akta pendirian No. 77 tanggal 19 Desember 2011, dibuat dihadapan Darmawan Tjoa, S.H, S.E, Notaris di Jakarta. Akta pendirian SMI telah disahkan oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia sesuai dengan Surat Keputusan No. AHU-63259.AH.01.01.Tahun 2011 tanggal 22 Desember 2011.

Anggaran dasar SMI terakhir diubah dengan akta No. 178 tanggal 23 Desember 2019, dibuat dihadapan Darmawan Tjoa, S.H, S.E, Notaris di Jakarta, mengenai perubahan Pasal 3 maksud dan tujuan serta kegiatan usaha. Perubahan anggaran dasar tersebut telah disetujui oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Keputusan No. AHU-0108324.40.AH.01.02.Tahun 2019 tanggal 23 Desember 2019.

Berdasarkan Pasal 3 dari anggaran dasar SMI, ruang lingkup usaha SMI adalah konstruksi sentral telekomunikasi dan perdagangan besar peralatan.

1. ***GENERAL** (Continued)*

*c. **Structure of Subsidiaries** (Continued)*

*c.6 **PT Metric Solusi Integrasi and subsidiary***

PT Metric Solusi Integrasi ("MSI") is a Limited Liability Company established in Indonesia based on the deed of establishment No. 20 dated 12 March 2010 drawn up in the presence of Darmawan Tjoa, SH, SE, a Notary in Jakarta. MSI's deed of establishment was approved by the Ministry of Law and Human Rights the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. AHU-13915.AH.01.01.Tahun 2010 dated 18 March 2010. MSI's articles of association have been amended several times. The latest amendment was based on deed No. 176 dated 23 December 2019, drawn up in the presence of Darmawan Tjoa, S.H, S.E, a Notary in Jakarta, regarding the purposes and objectives as well as business activities. This amendment has been approved by the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. AHU-0108321.AH.01.02 Tahun 2019 dated 23 December 2019.

In accordance with Article 3 of MSI's articles of association, the scope of its activities of holding companies and other management consulting activities.

MSI has a subsidiary company which is PT Solu Sindo Kreasi Pratama.

*c.7 **PT Solusi Menara Indonesia***

PT Solusi Menara Indonesia ("SMI") is a Limited Liability Company established in Indonesia under the deed of establishment No. 77 dated 19 December 2011, drawn up in the presence of Darmawan Tjoa, S.H, S.E, a Notary in Jakarta. SMI's Deed of Establishment was approved by the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. AHU-63259. AH.01.01.Tahun 2011 dated 22 December 2011.

SMI's articles of association have been amended based on the deed No. 178 dated 23 December 2019, drawn up in the presence of Darmawan Tjoa, S.H, S.E, a Notary in Jakarta, regarding the purposes and objectives as well as business activities. This amendment has been approved by the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. AHU-0108324.40.AH.01.02.Tahun 2019 dated 23 December 2019.

According to Article 3 of SMI's articles of association, the scope of its telecommunication central construction and the wholesale trade of equipment.

1. **UMUM** (Lanjutan)

c. **Struktur Entitas Anak** (Lanjutan)

c.8 **TBG Global Pte Ltd. dan entitas anak**

TBG Global Pte Ltd. ("TBGG") adalah suatu Perseroan Terbatas yang didirikan berdasarkan hukum Negara Singapura sesuai dengan nomor pendaftaran 201302879K di tahun 2013.

TBGG memiliki entitas anak yaitu Tower Bersama Singapore Pte Ltd.

c.9 **PT Menara Bersama Terpadu**

PT Menara Bersama terpadu ("MBT") adalah suatu Perseroan Terbatas yang didirikan di Indonesia berdasarkan akta pendirian No. 11 tanggal 8 Januari 2013, dibuat dihadapan Darmawan Tjoa, S.H, S.E, Notaris di Jakarta. Akta pendirian MBT telah disahkan oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia sesuai dengan Surat Keputusan No. AHU-02685.AH.01.01.Tahun 2013 tanggal 25 Januari 2013.

Berdasarkan Pasal 3 dari anggaran dasar MBT, ruang lingkup usaha MBT adalah konstruksi sentral telekomunikasi dan perdagangan besar peralatan.

c.10 **PT Gihon Telekomunikasi Indonesia Tbk dan entitas anak**

PT Gihon Telekomunikasi Indonesia Tbk ("GHON"), bertempat kedudukan di Jakarta, didirikan berdasarkan akta Notaris Nurmiati, S.H., No. 58 tanggal 27 April 2001 dan telah mendapat pengesahan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Keputusan No. C-00679.HT.01.01.TH.2001 tanggal 10 Mei 2001.

Anggaran dasar GHON telah mengalami beberapa kali perubahan dan yang terakhir berdasarkan Akta Notaris Jose Dima Satria S.H., M.Kn., Notaris di Kota Jakarta, No. 43 tanggal 8 Oktober 2019, mengenai hasil keputusan rapat umum pemegang saham. Perubahan anggaran dasar tersebut telah memperoleh persetujuan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia sebagaimana tercantum dalam Surat Keputusan No. AHU-0080079.AH.01.02 tanggal 8 Oktober 2019.

1. ***GENERAL** (Continued)*

*c. **Structure of Subsidiaries** (Continued)*

*c.8 **TBG Global Pte Ltd. and subsidiary***

TBG Global Pte Ltd. ("TBGG") is a Limited Liability Company incorporated under the law of Republic of Singapore based on registration number 201302879K in 2013.

TBGG has a subsidiary company which is Tower Bersama Singapore Pte Ltd.

*c.9 **PT Menara Bersama Terpadu***

PT Menara Bersama Terpadu ("MBT") is a Limited Liability Company Incorporated in Indonesia under deed of establishment No. 11 dated 8 January 2013, drawn up in the presence of Darmawan Tjoa, S.H, S.E, a Notary in Jakarta. MBT's deed establishment was approved by the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. AHU-02685.AH.01.01.Tahun 2013 dated 25 January 2013.

According to Article 3 of MBT's articles of association, the scope of its telecommunications central construction and the wholesale trade of equipment.

*c.10 **PT Gihon Telekomunikasi Indonesia Tbk and subsidiary***

PT Gihon Telekomunikasi Indonesia Tbk ("GHON") was established in Jakarta, based on the Notarial deed Nurmiati, S.H., No. 58 dated 27 April 2001 and was approved by the Ministry of Law and Human Rights based on its Decision Letter No. C-00679.HT.01.01.TH.2001 dated 10 May 2001.

GHON's articles of association has been amended several times, the latest based on Notarial Jose Dima Satria, S.H., M.Kn., Notary in Jakarta, No. 43 dated 8 October 2019, regarding cicular resolution of the general meeting of shareholders. The amendment has been approved which late approved by Minister of Law and Human Rights of Republic Indonesia on its Decision Letter No. AHU-0080079.AH.01.02 dated 8 October 2019.

1. **UMUM** (Lanjutan)

c. **Struktur Entitas Anak** (Lanjutan)

c.10 **PT Gihon Telekomunikasi Indonesia Tbk dan entitas anak** (Lanjutan)

Berdasarkan pasal 3 dari anggaran dasar GHON, kegiatan usaha GHON adalah menjalankan usaha dalam bidang jasa, khususnya penunjang telekomunikasi, meliputi penyewaan dan operational leasing mesin dan peralatan industri. Untuk menunjang kegiatan usaha utama, Perusahaan dapat melakukan kegiatan usaha penunjang yaitu konstruksi sentral telekomunikasi, instalasi telekomunikasi, dan aktivitas telekomunikasi dengan kabel.

GHON memiliki entitas anak yaitu PT Gihon Lima Jaya.

c.11 **PT Visi Telekomunikasi Infrastruktur Tbk dan entitas anak**

PT Visi Telekomunikasi Infrastruktur Tbk ("GOLD"), dahulu didirikan dengan nama PT Bima Nuansa Cempaka berdasarkan Akta Notaris Afdal Gazali, S.H., No. 136 tanggal 8 November 1995 dan telah mendapat pengesahaan dari Menteri Kehakiman Republik Indonesia berdasarkan Surat Keputusan No. C2-17.467.HT.01.01 Tahun 1995 tanggal 29 Desember 1995 dan telah diumumkan dalam Berita Negara Republik Indonesia No. 36, Tambahan No. 4144 tanggal 3 Mei 1996. Berdasarkan Akta Notaris No. 120 tanggal 26 Mei 2016 dari Hasbullah Abdul Rasyid, S.H., M.Kn., Notaris di Jakarta, nama Entitas Induk diubah menjadi PT Visi Telekomunikasi Infrastruktur Tbk. Akta tersebut telah disahkan oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia berdasarkan Surat Keputusan No. AHU-0011039.AH.01.02. Tahun 2016 tanggal 10 Juni 2016 dan telah diumumkan dalam Berita Negara Republik Indonesia No. 59, Tambahan No. 12851 tanggal 26 Juli 2016.

Anggaran Dasar GOLD telah mengalami beberapa kali perubahan, terakhir berdasarkan Akta Notaris Jose Dima Satria, S.H., M.Kn., No. 131 tanggal 24 Juli 2020, sehubungan dengan Perubahan Anggaran Dasar. Perubahan tersebut telah dilaporkan kepada Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia berdasarkan Surat No. AHU.AH.01.03-0335356 tanggal 7 Agustus 2020.

1. ***GENERAL*** *(Continued)*

c. ***Structure of Subsidiaries*** *(Continued)*

c.10 ***PT Gihon Telekomunikasi Indonesia Tbk and subsidiary*** *(Continued)*

Based on Article 3 of GHONs articles of association, the main business activities of GHON is providing services, specifically supporting telecommunications including rental and operational lease for industrial machinery and equipment. To support the main business activities, the Company can conduct supporting business activities, namely central telecommunications constructions, telecommunication installation, and cable telecommunications activities.

GHON has a subsidiary company which is PT Gihon Lima Jaya.

c.11 ***PT Visi Telekomunikasi Infrastruktur Tbk and subsidiary***

PT Visi Telekomunikasi Infrastruktur Tbk ("GOLD") formerly was established by name PT Bima Nuansa Cempaka based on the Notarial deed Afdal Gazali, S.H., No. 136 dated 8 November 1995 and was approved by the Ministry of Justice based on its Decision Letter No. C2-17.467.HT.01.01 Year 1995 dated 29 December 1995 and was published in the Official Gazette of the Republic of Indonesia No. 36, Supplement No. 4144 dated 3 May 1996. Based on Notarial Deed No. 120 dated 26 May 2016 from Hasbullah Abdul Rasyid, S.H., M.Kn., Notary in Jakarta, the name of the Parent Entity was changed to PT Visi Telekomunikasi Infrastruktur Tbk. Th deed was approved by the Minister of Law and Human Rights of the Republic of Indonesia based on Decree No. AHU-0011039.AH.01.02.Tahun 2016 dated 10 June 2016 and has been announced in the State Gazette of the Republic of Indonesia No. 59, Supplement No. 12851 dated 26 July 2016.

GOLD's Articles of Association have been amended several times, most recently based on Jose Dima Satria, S.H., M.Kn., Notarial Deed, No. 131 dated 24 July 2020, in connection with the Amendment to the Article of Association. The amendment has been approved which late approved by Minister of Law and Human Rights of Republic Indonesia on its Decision Letter No. AHU.AH.01.03-0335356 dated 7 August 2020.

1. **UMUM** (Lanjutan)

c. **Struktur Entitas Anak** (Lanjutan)

c.11 **PT Visi Telekomunikasi Infrastruktur Tbk dan entitas anak** (Lanjutan)

Berdasarkan pasal 3 anggaran dasar GOLD, ruang lingkup kegiatan GOLD adalah dalam bidang jasa penyediaan infrastruktur telekomunikasi, termasuk melakukan investasi atau penyertaan pada perusahaan lain yang bergerak di bidang kegiatan penunjang telekomunikasi dan berusaha dalam bidang jasa, khususnya jasa penunjang telekomunikasi.

GOLD memiliki entitas anak yaitu PT Permata Karya Perdana.

d. **Penawaran Umum Saham**

Pada tanggal 15 Oktober 2010, Perusahaan memperoleh pernyataan efektif dari Ketua Badan Pengawas Pasar Modal dan Lembaga Keuangan (Bapepam-LK) dengan suratnya No. S-9402/BL/2010 untuk melakukan penawaran umum sebanyak 551.111.000 saham dengan nilai nominal Rp 100 (nilai penuh) per saham kepada masyarakat melalui Bursa Efek Indonesia dengan harga penawaran perdana sebesar Rp 2.025 (nilai penuh) per saham. Pada tanggal 26 Oktober 2010, seluruh saham tersebut telah dicatatkan di Bursa Efek Indonesia.

e. **Penawaran Umum Obligasi**

Pada tanggal 2 Desember 2020, Perusahaan menerbitkan Obligasi Berkelanjutan IV Tower Bersama Infrastructure Tahap II Tahun 2020 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan IV Tahap II"). Nominal Obligasi Berkelanjutan IV Tahap II ini adalah sebesar Rp 750.000 (Catatan 26). Obligasi ini dicatatkan pada Bursa Efek Indonesia pada tanggal 3 Desember 2020.

Obligasi Berkelanjutan IV Tahap II ini diterbitkan dalam 2 (dua) seri sebagai berikut:

a. Obligasi seri A dengan nilai nominal sebesar Rp 295.000 dengan tingkat bunga tetap sebesar 5,75% per tahun. Jangka waktu obligasi seri A adalah 370 (tiga ratus tujuh puluh) Hari Kalender.

b. Obligasi seri B dengan nilai nominal sebesar Rp 455.000 dengan tingkat bunga tetap sebesar 7,25% per tahun berjangka waktu 3 (tiga) tahun.

*1. **GENERAL** (Continued)*

*c. **Structure of Subsidiaries** (Continued)*

*c.11 **PT Visi Telekomunikasi Infrastruktur Tbk and subsidiary** (Continued)*

Based on Article 3 of the GOLD's articles of association, the scope of GOLD activities is the field of providing telecommunications infrastructure services, including investing or participating in similar companies engaged in telecommunication support activities and business in the field of services, particularly telecommunications support services.

GOLD has a subsidiary company which is PT Permata Karya Perdana.

*d. **Share Public Offering***

On 15 October 2010, the Company received an effective statement from the Chairman of the Capital Market and Financial Institution Supervisory Agency (Bapepam-LK) in its Decision Letter No. S-9402/BL/2010 to offer 551,111,000 of its shares to the public with par value of Rp 100 (full amount) per share through the Indonesia Stock Exchange, at an initial offering price of Rp 2,025 (full amount) per share. On 26 October 2010, those shares were listed on the Indonesia Stock Exchange.

*e. **Bonds Offering***

On 2 December 2020, The Company issued Continous Bonds IV Tower Bersama Infrastructure Phase II Year 2020 with a Fixed Interest Rate ("Continuous Bonds IV Phase II"). The Continuous Bonds IV Phase II has a total principal of Rp 750,000 (Note 26). These bonds are listed on the Indonesia stock exchange on 3 December 2020.

These Continuous Bonds IV Phase II were issued in series consisting of:

a. Series A Bonds with nominal value of Rp 295,000 at a fixed interest rate of 5.75% per year. The term of the Series A Bonds is 370 (three hundred and seventy) Calendar Days.

b. Series B Bonds with nominal value of Rp 455,000 at a fixed interest rate of 7.25% per year. The term of the Series B Bonds is 3 (three) years.

1. **UMUM** (Lanjutan)

e. **Penawaran Umum Obligasi (**Lanjutan)

Pada tanggal 8 September 2020, Perusahaan menerbitkan Obligasi Berkelanjutan IV Tower Bersama Infrastructure Tahap I Tahun 2020 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan IV Tahap I"). Nominal Obligasi Berkelanjutan IV Tahap I ini adalah sebesar Rp 700.000 (Catatan 26). Obligasi ini dicatatkan pada Bursa Efek Indonesia pada tanggal 9 September 2020.

Obligasi Berkelanjutan IV Tahap I ini diterbitkan dalam 2 (dua) seri sebagai berikut:

1. Obligasi seri A dengan nilai nominal sebesar Rp 231.000 dengan tingkat bunga tetap sebesar 6,30% per tahun. Jangka waktu obligasi seri A adalah 370 (tiga ratus tujuh puluh) Hari Kalender.

2. Obligasi seri B dengan nilai nominal sebesar Rp 469.000 dengan tingkat bunga tetap sebesar 8,00% per tahun, berjangka waktu 3 (tiga) tahun.

Pada tanggal 24 Maret 2020, Perusahaan menerbitkan Obligasi Berkelanjutan III Tower Bersama Infrastructure Tahap IV Tahun 2020 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan III Tahap IV"). Nominal Obligasi Berkelanjutan III Tahap IV ini adalah sebesar Rp 1.500.000 (Catatan 26). Obligasi ini dicatatkan pada Bursa Efek Indonesia pada tanggal 26 Maret 2020.

Obligasi Berkelanjutan III Tahap IV ini diterbitkan dalam 2 (dua) seri sebagai berikut:

1. Obligasi seri A dengan nilai nominal sebesar Rp 633.000 dengan tingkat bunga tetap sebesar 6,25% per tahun. Jangka waktu obligasi seri A adalah 370 (tiga ratus tujuh puluh) Hari Kalender.

2. Obligasi seri B dengan nilai nominal sebesar Rp 867.000 dengan tingkat bunga tetap sebesar 7,75% per tahun, berjangka waktu 3 (tiga) tahun.

Pada tanggal 24 Mei 2019, Perusahaan menerbitkan Obligasi Berkelanjutan III Tower Bersama Infrastructure Tahap III Tahun 2019 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan III Tahap III") sebesar 8,0% per tahun. Nominal Obligasi Berkelanjutan III Tahap III ini adalah sebesar Rp 750.000 (Catatan 26). Obligasi ini dicatatkan pada Bursa Efek Indonesia pada tanggal 27 Mei 2019.

Pada tanggal 18 Oktober 2018, Perusahaan menerbitkan Obligasi Berkelanjutan III Tower Bersama Infrastructure Tahap II Tahun 2018 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan III Tahap II") sebesar 8,5% per tahun. Nominal Obligasi Berkelanjutan III Tahap II ini adalah sebesar Rp 628.000 (Catatan 26). Obligasi ini dicatatkan pada bursa efek Indonesia pada tanggal 19 Oktober 2018.

*1. **GENERAL** (Continued)*

*e. **Bonds Offering (**Continued**)***

On 8 September 2020, the Company issued Continuous Bonds IV phase I Year 2020 with a Fixed Interest Rate ("Continuous Bonds IV Phase I"). The Continuous Bonds IV Phase I has a total principal of Rp 700,000 (Note 26). These bonds are listed on the Indonesia stock exchange on 9 September 2020.

These Continuous Bonds IV Phase I were issued in 2 (two) series consisting of:

1. Series A Bonds with nominal value of Rp 231,000 at a fixed interest rate of 6.30% per year. The term of the Series A Bonds is 370 (three hundred and seventy) Calendar Days.

2. Series B Bonds with nominal value of Rp 469,000 at a fixed interest rate of 8.00% per year. The term of the Series B Bonds is 3 (three) years.

On 24 March 2020, the Company issued Continuous Bonds III phase IV Year 2020 with a Fixed Interest Rate ("Continuous Bonds III Phase IV"). The Continuous Bonds III Phase IV has a total principal of Rp 1,500,000 (Note 26). These bonds are listed on the Indonesia stock exchange on 26 March 2020.

These Continuous Bonds III Phase IV were issued in 2 (two) series consisting of:

1. Series A Bonds with nominal value of Rp 633,000 at a fixed interest rate of 6.25% per year. The term of the Series A Bonds is 370 (three hundred and seventy) Calendar Days.

2. Series B Bonds with nominal value of Rp 867,000 at a fixed interest rate of 7.75% per year. The term of the Series B Bonds is 3 (three) years.

On 24 May 2019, the Company issued Continuous Bonds III phase III Year 2019 with a Fixed Interest Rate ("Continuous Bonds III Phase III") of 8.0% per annum. The Continous Bonds III Phase III has a total principal of Rp 750,000 (Note 26). These bonds are listed on the Indonesia stock exchange on 27 May 2019.

On 18 October 2018, the Company issued Continous Bonds III phase II Year 2018 with a Fixed Interest Rate ("Continous Bonds III Phase II") of 8.5% per annum. The Continous Bonds III Phase II has a total principal of Rp 628,000 (Note 26). These bonds are listed on the Indonesia stock exchange on 19 October 2018.

1. **UMUM** (Lanjutan)

e. **Penawaran Umum Obligasi (**Lanjutan**)**

Pada tanggal 5 Juli 2018, Perusahaan menerbitkan Obligasi Berkelanjutan III Tower Bersama Infrastructure Tahap I Tahun 2018 dengan jumlah pokok obligasi sebesar Rp 608.000 (Catatan 26). Obligasi ini dicatatkan pada Bursa Efek Indonesia pada tanggal 6 Juli 2018.

Pada tanggal 19 September 2017, Perusahaan menerbitkan Obligasi Berkelanjutan II Tower Bersama Infrastructure Tahap III Tahun 2017 dengan jumlah pokok obligasi sebesar Rp 700.000 (Catatan 26). Obligasi ini dicatatkan pada Bursa Efek Indonesia pada tanggal 19 September 2017.

Pada tanggal 21 April 2017, Perusahaan menerbitkan Obligasi Berkelanjutan II Tower Bersama Infrastructure Tahap II Tahun 2017 dengan jumlah pokok obligasi sebesar Rp 700.000 (Catatan 26). Obligasi ini dicatatkan pada Bursa Efek Indonesia pada tanggal 25 April 2017.

Pada tanggal 1 Juli 2016, Perusahaan menerbitkan Obligasi Berkelanjutan II Tower Bersama Infrastructure Tahap I Tahun 2016 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan II Tahap I") sebesar 9,25% per tahun. Nominal Obligasi Berkelanjutan II Tahap I ini adalah sebesar Rp 230.000 (Catatan 26). Obligasi ini dicatatkan pada bursa efek Indonesia pada tanggal 1 Juli 2016.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN**

a. **Dasar penyajian laporan keuangan konsolidasian**

Laporan keuangan konsolidasian ini telah disajikan sesuai dengan standar akuntansi keuangan di Indonesia yang mencakup Pernyataan Standar Akuntansi Keuangan (PSAK) serta peraturan Badan Pengawas Pasar Modal dan Lembaga Keuangan (Bapepam-LK), yang fungsinya dialihkan kepada Otoritas Jasa Keuangan ("OJK") sejak tanggal 1 Januari 2013) yaitu Peraturan No. VIII.G.7 tanggal 25 Juni 2012 tentang "Pedoman Penyajian Laporan Keuangan".

Laporan keuangan konsolidasian disusun berdasarkan basis akrual, dan dasar pengukuran dengan menggunakan konsep biaya historis, kecuali untuk akun tertentu yang diukur dengan menggunakan dasar seperti yang disebutkan dalam catatan yang relevan.

1. ***GENERAL** (Continued)*

e. ***Bonds Offering (**Continued**)***

On 5 July 2018, the Company issued Continuous Bonds III Tower Bersama Infrastructure Phase I Year 2018 with nominal value of Rp 608,000 (Note 26). These bonds were listed on the Indonesia Stock Exchange on 6 July 2018.

On 19 September 2017, the Company issued Continuous Bonds II Tower Bersama Infrastructure Phase III Year 2017 with nominal value of Rp 700,000 (Note 26). These bonds were listed on the Indonesia Stock Exchange on 19 September 2017.

On 21 April 2017, the Company issued Continuous Bonds II Tower Bersama Infrastructure Phase II Year 2017 with nominal value of Rp 700,000 (Note 26). These bonds were listed on the Indonesia Stock Exchange on 25 April 2017.

On 1 July 2016, the Company issued Continuous Bonds II phase I Year 2016 with a Fixed Interest Rate ("Continuous Bonds II Phase I") of 9.25% per annum. The Continuous Bonds II Phase I has a total principal of Rp 230,000 (Note 26). These bonds are listed on the Indonesia stock exchange on 1 July 2016.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES***

a. ***Basis of preparation of the consolidated financial statements***

The consolidated financial statements have been prepared in accordance with generally accepted accounting principles in Indonesia comprising of the Statements of Financial Accounting Standards (PSAK) and rules established by the Capital Market and Financial Institution Supervisory Agency (Bapepam-LK), which function has been transferred to Financial Service Authority ("OJK") starting at 1 January 2013) No. VIII.G. dated 25 June 2012 regarding "Financial Statements Presentation Guidance".

The consolidated financial statements have been prepared using the accrual basis, and the measurement basis used is historical cost concept, except for certain accounts which are measured on the bases described in the relevant notes herein.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

a. **Dasar penyajian laporan keuangan konsolidasian** (Lanjutan)

Laporan arus kas konsolidasian disusun dengan menggunakan metode langsung, menyajikan penerimaan dan pengeluaran kas dan setara kas yang dikelompokkan ke dalam aktivitas operasi, investasi dan pendanaan.

Laporan keuangan konsolidasian Perusahaan dan entitas anak disajikan dalam Rupiah (IDR) yang merupakan mata uang fungsional, kecuali untuk entitas anak TBG Global Pte Ltd disajikan dalam Dolar Amerika Serikat (USD) yang merupakan mata uang fungsional. Seluruh angka dalam laporan keuangan konsolidasian dibulatkan menjadi jutaan Rupiah, kecuali dinyatakan lain.

Penyusunan laporan keuangan konsolidasian berdasarkan PSAK mensyaratkan penggunaan estimasi akuntansi kritikal tertentu. Penyusunan laporan keuangan konsolidasian juga mensyaratkan manajemen Perusahaan untuk menggunakan pertimbangan dalam menerapkan kebijakan akuntansi Perusahaan. Hal-hal di mana pertimbangan dan estimasi yang signifikan telah dibuat dalam penyusunan laporan keuangan konsolidasian beserta dampaknya diungkapkan dalam Catatan 3.

b. **Standar baru, amandemen, revisi, penyesuaian dan Interpretasi Standar Akuntansi Keuangan efektif 1 Januari 2020**

Standar baru, amandemen, revisi, penyesuaian dan interpretasi yang telah diterbitkan, dan yang berlaku efektif untuk tahun buku yang dimulai pada 1 Januari 2020, dan relevan terhadap aktifitas Perusahaan dan entitas anak, adalah sebagai berikut:

- PSAK 71 "Instrumen Keuangan"

  Pernyataan ini bertujuan untuk menetapkan prinsip untuk pelaporan keuangan atas aset keuangan dan liabilitas keuangan yang akan menyajikan informasi relevan dan berguna bagi pengguna laporan keuangan untuk melakukan penilaian terhadap jumlah, waktu dan ketidakpastian arus kas masa depan Perusahaan.

  Perusahaan dan entitas anak telah melakukan penerapan PSAK 71 Instrumen Keuangan, yang menggantikan PSAK 55 Instrumen Keuangan: Pengakuan dan Pengukuran mulai 1 Januari 2020

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

a. ***Basis of preparation of the consolidated financial statements*** *(Continued)*

The consolidated statement of cash flows, which has been prepared using direct method, present receipts and disbursements of cash and cash equivalent classified into operating, investing and financing activities.

The consolidated financial statements of the Company and subsidiaries are presented in Rupiah (IDR) which is the functional currency, except TBG Global Pte Ltd the subsidiary of the Company, is presented in United States Dollar (USD), which is the fuctional currency. Amounts in the consolidated financial statements are rounded to and stated in millions of Rupiah, unless otherwise stated.

The preparation of consolidated financial statements in compliance with PSAK requires the use of certain critical accounting estimates. It also requires the Company management to exercise judgment in applying the Company's accounting policies. The areas where significant judgments and estimates have been made in preparing the consolidated financial statements and their effects are disclosed in Note 3.

b. ***New Standards, Amendments, Improvements and Interpretations of Financial Accounting Standards effective from 1 January 2020***

New standards, amendments, improvements and interpretations issued and effective for the financial year at 1 January 2020, and relevant to the Company and subsidiaries's activities, are as follows:

- *PSAK 71 "Financial Instrument"*

  This statement to establish principles for financial reporting on financial assets and financial liabilities that will present relevant and useful information for users of financial statements to make an assessment of the amount, time and uncertainty of the Company's future cash flow.

  The Company dan subsidiaries has applicated PSAK 71 Financial Instrument, which replaces PSAK 55 Financial Instruments: Recognition and Measurement from 1 January 2020.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

b. **Standar baru, amandemen, revisi, penyesuaian dan Interpretasi Standar Akuntansi Keuangan efektif 1 Januari 2020** (Lanjutan)

- PSAK 72 "Pendapatan dari kontrak dengan pelanggan"

  Pernyataan ini bertujuan untuk menetapkan prinsip yang diterapkan Perusahaan untuk melaporkan informasi yang berguna kepada pengguna laporan keuangan tentang sifat, jumlah, waktu dan ketidakpastian pendapatan dan arus kas yang timbul dari kontrak dengan pelanggan.

  Pernyataan ini tidak berdampak secara subtansial terhadap kebijakan akuntansi Perusahaan dan entitas anak dan tidak berpengaruh material terhadap laporan keuangan konsolidasian.

- PSAK 73 "Sewa"

  Pernyataan ini bertujuan untuk memastikan bahwa penyewa dan pesewa memberikan informasi relevan dengan cara yang mempresentasikan dengan tepat transaksi tersebut. Informasi tersebut memberikan dasar bagi pengguna laporan keuangan untuk menilai dampak sewa terhadap posisi keuangan, kinerja keuangan dan arus kas Perusahaan.

Standar baru, amendemen, penyesuaian dan interpretasi yang telah diterbitkan, dan yang akan berlaku efektif untuk tahun buku yang dimulai pada atau setelah 1 Januari 2020 namun tidak berdampak secara subtansial terhadap kebijakan akuntansi Perusahaan dan entitas anak dan pengaruh material terhadap laporan keuangan konsolidasian adalah sebagai berikut:

- Amendemen PSAK 1: Penyajian Laporan Keuangan Dan Amendemen PSAK 25 Kebijakan Akuntansi, Perubahan Estimasi Akuntansi, Dan Kesalahan Tentang Definisi Material

  Amendemen PSAK 1 dan PSAK 25 mengklarifikasi definisi material dengan tujuan untuk menyelaraskan definisi yang digunakan dalam kerangka konseptual dan beberapa PSAK yang relevan. Selain itu Amendemen tersebut juga memberikan panduan yang lebih jelas terkait definisi material dalam konteks mengurangi over disclosure karena perubahan ambang batas (thresholds) dari definisi material tersebut.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

b. ***New Standards, Amendments, Improvements and Interpretations of Financial Accounting Standards effective from 1 January 2020 (****Continued)*

- *PSAK 72 "Revenue from contracts with customers"*

  This statements to establish the principles applied by Company to report useful information to users of financial statements about nature, amount, time and uncertainty of revenues and cash flows arising from contracts with customers.

  This Statement do not have substantial changes to the Company and subsidiaries's accounting policies and do not have material impact on the consolidated financial statement.

- *PSAK 73 "Lease"*

  This statements to ensure that leasee and leasor relevant information that present the transactions appropriately. This information provides a basis for users of financial statements to asses the impact of leases on the Company's financial statements, financial performance and cash flow.

New standards, amendments, improvements and interpretations issued and effective for the financial year at or after 1 January 2020 which do not have substantial changes to the Company and subsidiaries's accounting policies and had material impact on the consolidated financial statement are as follows:

- *Amendments to PSAK 1: Presentation of Financial Statements and Amendments to PSAK 25 Accounting Policies, Changes in Accounting Estimates, and Errors About Material Definitions*

  Amendments to PSAK 1 and PSAK 25 clarify the definition of material with the aim of harmonizing definitions used in the conceptual framework and several relevant PSAK. In addition, the amendments also provide clearer guidance regarding the definition of material in the context of reducing over disclosure due to changes in the thresholds of the material definition.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

b. **Standar baru, amendemen, revisi, penyesuaian dan Interpretasi Standar Akuntansi Keuangan efektif 1 Januari 2020** (Lanjutan)

- ISAK 35: Penyajian Laporan Keuangan Entitas Berorientasi Non-Laba

  Standar ini mengatur tentang penyajian laporan keuangan entitas berorientasi nirlaba. Standar ini juga memberikan contoh bagaimana entitas berorientasi nirlaba membuat penyesuaian baik:

  (i) Penyesuaian deskripsi yang digunakan untuk pos pos tertentu dalam laporan keuangan; dan
  (ii) penyesuaian deskripsi yang digunakan untuk laporan keuangan itu sendiri. ISAK 35 dilengkapi dengan contoh ilustratif dan dasar kesimpulan yang bukan merupakan bagian dari ISAK 35.

- Amendemen PSAK 15: Investasi pada Entitas Asosiasi dan Ventura Bersama tentang Kepentingan Jangka Panjang pada Entitas Asosiasi dan Ventura Bersama

  Amendemen PSAK 15 mengatur bahwa entitas juga menerapkan PSAK 71 atas instrumen keuangan pada entitas asosiasi atau ventura bersama di mana metode ekuitas tidak diterapkan. Hal ini termasuk kepentingan jangka panjang yang secara substansi membentuk bagian investasi neto entitas pada entitas asosiasi atau ventura bersama sebagaimana dimaksud dalam PSAK 15 paragraf 38.

- Amendemen PSAK 62: Kontrak asuransi

  Amendemen ini merupakan amendemen lanjutan dikarenakan oleh penerbitan PSAK 71. Standar yang diamendemen memberikan petunjuk bagi entitas yang mengeluarkan kontrak asuransi, terutama perusahaan asuransi, tentang bagaimana menerapkan PSAK 71.

- Amendemen PSAK 71, Amendemen PSAK 55, dan Amendemen PSAK 60: Reformasi Acuan Suku Bunga

  Amendemen tersebut memberikan keringanan tertentu terkait dengan reformasi acuan suku bunga. Keringanan tersebut terkait dengan akuntansi lindung nilai dan bahwa dampak dari reformasi umumnya tidak menyebabkan akuntansi lindung nilai dihentikan. Namun, ketidakefektifan lindung nilai harus terus dicatat dalam laporan laba rugi. Mengingat sifat lindung nilai yang pervasif melibatkan kontrak berbasis IBOR, keringanan akan memengaruhi perusahaan di semua industry.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

b. ***New Standards, Amendments, Improvements and Interpretations of Financial Accounting Standards effective from 1 January 2020 (****Continued)*

- *ISAK 35: Presentation of Financial Statements for Non-Profit Oriented Entities*

  This standar manage the presentation of the financial statements of non-profit oriented entities. This Standard also provides examples of how non-profit oriented entities make good adjustments:

  (i) adjustments to the descriptions used for certain items in the financial statements; and
  (ii) adjustments to the descriptions used for the financial statements themselves. ISAK 35 is equipped with illustrative examples and basis for conclusions that are not part of ISAK 35.

- *Amendments to PSAK 15: Investments in Associates and Joint Ventures regarding Long-Term Interests in Associates and Joint Ventures*

  The amendments to PSAK 15 require that the entity also applies PSAK 71 to financial instruments in associates or joint ventures where the equity method is not applied. This includes long-term interests that substantially form part of the entity's net investment in associates or joint ventures as referred to in paragraph 38 of PSAK 15.

- *Amendment PSAK 62: Insurance contract's*

  The amendment is a consequential amendment due to the issuance of PSAK 71. The amended standard provides guidance for entity who's issuing insurance contract, especially insurance company, on how to implementing PSAK 71.

- *Amendment of PSAK 71, Amendment of PSAK 55, and Amendment to PSAK 60: Interest Rate Benchmark Reform*

  The amendments provide certain reliefs in relation to interest rate benchmark reforms. The reliefs relate to hedge accounting and have the effect that the reforms should not generally cause hedge accounting to terminate. However, any hedge ineffectiveness should continue to be recorded in the income statement. Given the pervasive nature of hedges involving IBOR-based contracts, the reliefs will affect companies in all industries.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

b. **Standar baru, amendemen, revisi, penyesuaian dan Interpretasi Standar Akuntansi Keuangan efektif 1 Januari 2020** (Lanjutan)

- Amendemen PSAK 73: Konsesi sewa terkait Covid-19

Sebagai akibat dari pandemi COVID-19, konsesi sewa telah diberikan kepada penyewa. Konsesi tersebut dapat diberikan dalam berbagai bentuk, termasuk pengampunan pembayaran dan penangguhan pembayaran sewa. Dewan standar membuat amendemen terhadap PSAK 73 Sewa yang memberi penyewa pilihan untuk memperlakukan konsesi sewa yang memenuhi syarat dengan cara yang sama seperti jika mereka bukan modifikasi sewa. Dalam banyak kasus, hal ini akan menghasilkan perlakuan akuntansi untuk konsesi sebagai pembayaran sewa variabel selama periode pemberiannya.

Entitas yang menerapkan panduan praktis harus mengungkapkan fakta ini, apakah panduan telah diterapkan pada semua konsesi sewa yang memenuhi syarat atau, jika tidak, informasi tentang sifat kontrak yang telah diterapkan, serta jumlah yang diakui dalam laba rugi, yang timbul dari konsesi sewa.

Standar baru, interpretasi dan amendemen yang belum efektif:

- Amendemen PSAK 1: Penyajian Laporan Keuangan

Amendemen PSAK 1 Penyajian Laporan Keuangan mengklarifikasi bahwa kewajiban diklasifikasikan sebagai lancar atau tidak lancar, berdasarkan pada hak yang ada pada akhir periode pelaporan. Klasifikasi tidak terpengaruh oleh ekspektasi entitas atau peristiwa setelah tanggal pelaporan (misalnya penerimaan waver atau pelanggaran perjanjian). Amendemen tersebut juga mengklarifikasi apa yang dimaksud PSAK 1 perihal 'penyelesaian' liabilitas.

Amendemen tersebut dapat memengaruhi klasifikasi liabilitas, terutama untuk entitas yang sebelumnya mempertimbangkan intensi manajemen untuk menentukan klasifikasi dan untuk beberapa liabilitas yang dapat dikonversi menjadi ekuitas.

Standar ini harus diterapkan secara retrospektif sesuai dengan persyaratan normal dalam PSAK 25 Kebijakan Akuntansi, Perubahan Estimasi Akuntansi, dan Kesalahan. Amendemen tersebut akan berlaku efektif pada 1 Januari 2023 dan penerapan lebih awal diizinkan.

2. *SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)*

b. ***New Standards, Amendments, Improvements and Interpretations of Financial Accounting Standards effective from 1 January 2020 (****Continued)*

- *Amendments to PSAK 73: Covid-19 related Rent Concessions*

As a result of the COVID-19 pandemic, rent concessions have been granted to lessees. Such concessions might take a variety of forms, including payment holidays and deferral of lease payments. The standard board made an amendment to PSAK 73 Leases which provides lessees with an option to treat qualifying rent concessions in the same way as they would if they were not lease modifications. In many cases, this will result in accounting for the concessions as variable lease payments in the period in which they are granted.

Entities applying the practical expedients must disclose this fact, whether the expedient has been applied to all qualifying rent concessions or, if not, information about the nature of the contracts to which it has been applied, as well as the amount recognised in profit or loss arising from the rent concessions.

New standard, interpretasi, and amendment that are not yet effective:

- *Amendement PSAK 1: Presentation of Financial Statement*

The amendments PSAK 1 Presentation of Financial Statement clarify that liabilities are classified as either current or non-current, depending on the rights that exist at the end of the reporting period. Classification is unaffected by the expectations of the entity or events after the reporting date (eg the receipt of a waver or a breach of covenant). The amendments also clarify what PSAK 1 means when it refers to the 'settlement' of a liability.

The amendments could affect the classification of liabilities, particularly for entities that previously considered management's intentions to determine classification and for some liabilities that can be converted into equity.

This standard must be applied retrospectively in accordance with the normal requirements in PSAK 25 Accounting Policies, Changes in Accounting Estimates and Errors. The amendments will become effective on 1 January 2023 and earlier application is permitted.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

b. **Standar baru, amendemen, revisi, penyesuaian dan Interpretasi Standar Akuntansi Keuangan efektif 1 Januari 2020** (Lanjutan)

- Amendemen PSAK 22: Kombinasi bisnis

  Amendemen ini mengklarifikasi definisi bisnis dengan tujuan untuk membantu entitas dalam menentukan apakah suatu transaksi seharusnya dicatat sebagai kombinasi bisnis atau akuisisi aset. Secara umum, Amendemen PSAK 22 tersebut:

  a. mengamendemen definisi bisnis;
  b. menambahkan pengujian konsentrasi opsional yang mengizinkan penilaian yang disederhanakan apakah rangkaian aktivitas dan aset yang diakuisisi bukan merupakan suatu bisnis;
  c. mengklarifikasi unsur bisnis bahwa untuk dipertimbangkan sebagai suatu bisnis, suatu rangkaian terintegrasi dari aktivitas dan aset yang diakuisi mencakup, minimum, input dan proses substantif yang bersama-sama berkontribusi secara signifikan terhadap kemampuan untuk menghasilkan output;
  d. menambahkan pedoman dan contoh ilustratif untuk membantu entitas menilai apakah proses substantif telah diakuisisi.

Atas penerapan PSAK 71 dan PSAK 73, Perusahaan mengakui efek kumulatif dari penerapan awal standar baru sebagai berikut:

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

b. ***New Standards, Amendments, Improvements and Interpretations of Financial Accounting Standards effective from 1 January 2020 (****Continued)*

- *Amendment PSAK 22: Business Combination*

  This amendment clarifies the definition of business for the purpose of assisting the entity in determining whether a transaction should be accounted for as a business combination or an asset acquisition. In general, the Amendments to PSAK 22:

  a. amend the definition of business;
  b. added an optional concentration test that allows a simplified assessment of whether the acquired set of activities and assets is not a business;
  c. clarify the business element that to be considered as a business, an integrated set of activities and assets acquired includes, as a minimum, substantive inputs and processes that together contribute significantly to the ability to produce outputs;
  d. adds illustrative guidance and examples to help the entity assess whether substantive processes have been acquired.

The Company has applied PSAK 71 and 73 by recognizing the cumulative effect of initially applying the new standards as follows:

	1 Januari/ *1 January* 2020	
Penyesuaian atas penerapan awal PSAK 71:		***Adjustment upon the application of PSAK 71:***
Penyisihan kerugian kredit ekspektasian pada:		***Allowance for expected credit losses for:***
Piutang usaha	2.132	*Trade receivables*
Piutang lain-lain	1.578	*Other receivables*
Pendapatan yang masih harus diterima	3.522	*Accrued revenue*
Dampak penerapan awal PSAK 71	7.232	*Impact of implementation PSAK 71*

	1 Januari/ *1 January* 2020	
Penyesuaian atas penerapan awal PSAK 73:		***Adjustment upon the application of PSAK 73:***
Aset hak guna - bersih	2.239.436	*Right of use assets - net*
Sewa lahan jangka panjang	(1.910.130)	*Long term land lease*
Liabilitas sewa	(337.344)	*Lease liabilities*
Dampak penerapan awal PSAK 73	(8.038)	*Impact of implementation PSAK 73*

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

b. **Standar baru, amendemen, revisi, penyesuaian dan Interpretasi Standar Akuntansi Keuangan efektif 1 Januari 2020** (Lanjutan)

Manajemen berpendapat dampak kumulatif tersebut tidak material, sehingga seluruh dampak kumulatif tersebut dibebankan pada periode berjalan dan tidak diperlakukan sebagai penyesuaian saldo laba sesuai ketentuan transisi dalam PSAK tersebut.

c. **Prinsip-prinsip konsolidasian**

Laporan keuangan konsolidasian meliputi akun-akun Induk Perusahaan dan seluruh entitas anak seperti yang dijelaskan di Catatan 1c. Pengendalian didapat ketika Perusahaan dan entitas anak terekspos atau memiliki hak atas imbal hasil variabel dari keterlibatannya dengan *investee* dan memiliki kemampuan untuk mempengaruhi imbal hasil tersebut melalui kekuasaannya atas *investee*. Dengan demikian, Perusahaan dan entitas anak mengendalikan *investee* jika dan hanya jika Perusahaan dan entitas anak memiliki:

- kekuasaan atas *investee* (contoh hak saat ini yang memberikan kemampuan kini untuk mengarahkan aktivitas relevan *investee*);
- eksposur atau hak atas imbal hasil variabel dari keterlibatannya dengan *investee*; dan
- kemampuan untuk menggunakan kekuasaannya atas *investee* untuk mempengaruhi jumlah imbal hasilnya.

Ketika Perusahaan dan entitas anak mempunyai hak suara kurang dari mayoritas atau hak serupa terhadap *investee*, Perusahaan dan entitas anak mempertimbangkan seluruh fakta dan keadaan dalam menilai apakah terdapat kekuasaan atas sebuah *investee*, termasuk:

- pengaturan kontraktual dengan pemilik hak suara lain *investee*;
- hak yang timbul dari pengaturan kontraktual lain; dan
- hak suara Perusahaan dan entitas anak dan hak suara potensial.

Perusahaan dan entitas anak menilai kembali apakah terdapat atau tidak pengendalian terhadap *investee* jika fakta dan keadaan yang menunjukkan bahwa ada perubahan satu atau lebih dari tiga elemen pengendalian. Entitas anak dikonsolidasi secara penuh sejak tanggal pengendalian dialihkan ke Perusahaan dan entitas anak dan dihentikan untuk dikonsolidasi sejak tanggal pengendalian ditransfer keluar dari Perusahaan dan entitas anak. Aset, liabilitas, pendapatan dan beban dari entitas anak, yang diakuisisi atau dijual selama tahun berjalan, termasuk dalam laporan laba rugi dari tanggal Perusahaan dan entitas anak mendapatkan pengendalian sampai dengan tanggal Perusahaan dan entitas anak berhenti untuk mengendalikan entitas anak.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

b. ***New Standards, Amendments, Improvements and Interpretations of Financial Accounting Standards effective from 1 January 2020 (****Continued)*

In the management's opinion that the cumulative adjustment is not material, the cumulative adjustments was charged entirely into the current period and not treated as adjusments to the retained earnings as stipulated in the transition provisions on those PSAKs.

c. ***Principles of consolidation***

The consolidated financial statements include the accounts of the Parent Company and all the subsidiaries mentioned in Note 1c. Control is achieved when the Company and subsidiaries is exposed, or has rights, to variable returns from its involvement with the investee and has the ability to affect those returns through power over the investee. Specifically, the Company and subsidiaries controls an investee if and only if the Company and subsidiaries has:

- *power over the investee (i.e. existing rights that give the current ability to direct the relevant activities of the investee);*
- *exposure, or rights, to variable returns from its involvement with the investee; and*
- *the ability to use its power over the investee to affect its returns.*

When the Company and subsidiaries has less than majority of the voting rights or similar rights to an investee, the Company and subsidiaries considers all relevant facts and circumstances in assessing whether it has power over an investee, including:

- *the contractual arrangement with the other vote holders of the investee;*
- *rights arising from other contractual arrangements; and*
- *voting rights of the Company and subsidiaries and potential voting rights.*

The Company and subsidiaries re-assesses whether or not it controls an investee if facts and circumstances indicate that there are changes to one or more of the three elements of control. Subsidiaries are fully consolidated from the date control is transferred to the Company and subsidiaries and cease to be consolidated from the date control is transferred out of the Company and subsidiaries. Assets, liabilities, income and expenses of a subsidiary acquired or disposed of during the year are included in the statement of income from the date the Company and subsidiaries gains control until the date the Company and subsidiaries ceases to control the subsidiary.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

c. **Prinsip-prinsip konsolidasian** (Lanjutan)

Laba rugi dan setiap komponen penghasilan komprehensif lain diatribusikan ke pemilik entitas induk dari Perusahaan dan entitas anak dan kepentingan non-pengendali, meskipun hal tersebut mengakibatkan kepentingan non-pengendali memiliki saldo defisit. Ketika diperlukan, penyesuaian dibuat pada laporan keuangan entitas anak agar kebijakan akuntansinya seragam dengan kebijakan akuntansi Perusahaan dan entitas anak. Seluruh aset dan liabilitas, ekuitas, pendapatan, beban dan arus kas dalam intra Perusahaan dan entitas anak terkait dengan transaksi antar entitas dalam Perusahaan dan entitas anak dieliminasi seluruhnya dalam konsolidasi.

Jika kehilangan pengendalian atas suatu entitas anak, maka Perusahaan dan entitas anak:

- menghentikan pengakuan aset (termasuk setiap *goodwill*) dan liabilitas entitas anak;
- menghentikan pengakuan jumlah tercatat setiap KNP;
- menghentikan pengakuan akumulasi selisih penjabaran, yang dicatat di ekuitas, bila ada;
- mengakui nilai wajar pembayaran yang diterima;
- mengakui setiap sisa investasi pada nilai wajarnya;
- mengakui setiap perbedaan yang dihasilkan sebagai keuntungan atau kerugian dalam laporan laba rugi dan penghasilan komprehensif lain konsolidasian; dan
- mereklasifikasi bagian induk atas komponen yang sebelumnya diakui sebagai penghasilan komprehensif ke laporan laba rugi dan penghasilan komprehensif lain konsolidasian, atau mengalihkan secara langsung ke saldo laba.

Perubahan dalam bagian kepemilikan entitas induk pada entitas anak yang tidak mengakibatkan hilangnya pengendalian dicatat sebagai transaksi ekuitas. Ketika pengendalian atas entitas anak hilang, bagian kepemilikan yang tersisa di entitas tersebut diukur kembali pada nilai wajarnya dan keuntungan atau kerugian yang dihasilkan diakui dalam laporan laba rugi dan penghasilan komprehensif lain konsolidasian.

Kepentingan Non-Pengendali ("KNP") mencerminkan bagian atas laba rugi dan aset bersih dari entitas anak yang tidak dapat diatribusikan secara langsung maupun tidak langsung oleh Perusahaan, yang masing-masing disajikan dalam laporan laba rugi dan penghasilan komprehensif lain konsolidasian dan dalam ekuitas pada laporan posisi keuangan konsolidasian, terpisah dari bagian yang dapat diatribusikan kepada pemilik entitas induk.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

c. ***Principles of consolidation*** *(Continued)*

Profit or loss and each component of other comprehensive income are attributed to the equity holders of the parent of the Company and subsidiaries and to the non-controlling interests, even if this results in the non-controlling interests having a deficit balance. When necessary, adjustments are made to the financial statements of subsidiaries to bring their accounting policies into line with accounting policies of the Company and subsidiaries. All intra-Company and subsidiaries assets and liabilities, equity, income expenses and cash flows relating to transactions between members of the Company and subsidiaries are eliminated in full on consolidation.

In case of loss of control over a subsidiary, the Company and subsidiaries:

- *derecognizes the assets (including goodwill) and liabilities of the subsidiary;*
- *derecognizes the carrying amount of any NCI;*
- *derecognizes the cumulative translation differences, recorded in equity, if any;*
- *recognizes the fair value of the consideration received;*
- *recognizes the fair value of any investment retained;*
- *recognizes the surplus or deficit in profit or loss in consolidated statement of profit or loss and other comprehensive income; and*
- *reclassifies the parent's share of components previously recognized in comprehensive income to consolidated statement of profit or loss and other comprehensive income or retained earnings, as appropriate.*

Changes in the parent's ownership interest in a subsidiary that do not result in the loss of control are accounted for as equity transactions. When control over a previous subsidiary is lost, any remaining interest in the entity is remeasured at fair value and the resulting gain or loss is recognised in consolidated statement of profit or loss and other comprehensive income.

Non-Controlling Interest ("NCI") represents the portion of the profit or loss and net assets of the subsidiary attributable to equity interests that are not owned directly or indirectly by the Company, which is presented in the consolidated statement of comprehensive income and under the equity section of the consolidated statement of financial position, respectively, separately from the corresponding portion attributable to the equity holders of the parent company.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

d. **Kombinasi bisnis**

Ketika Perusahaan dan entitas anak melakukan akuisisi atas sebuah bisnis, Perusahaan dan entitas anak mengklasifikasikan dan menentukan aset keuangan yang diperoleh dan liabilitas keuangan yang diambil alih berdasarkan pada persyaratan kontraktual, kondisi ekonomi dan kondisi terkait lain yang ada pada tanggal akuisisi. Hal ini termasuk pengelompokan derivatif melekat dalam kontrak utama oleh pihak yang diakuisisi.

Kombinasi bisnis dicatat dengan menggunakan metode akuisisi *(acquisition method)*. Biaya perolehan dari sebuah akuisisi diukur pada nilai agregat imbalan yang dialihkan, diukur pada nilai wajar pada tanggal akuisisi dan jumlah setiap KNP pada pihak yang diakuisisi. Untuk setiap kombinasi bisnis, pihak pengakuisisi mengukur KNP pada entitas yang diakuisisi baik pada nilai wajar ataupun pada proporsi kepemilikan KNP atas aset bersih yang teridentifikasi dari entitas yang diakuisisi. Biaya-biaya akuisisi yang timbul dibebankan langsung dalam laporan laba rugi dan penghasilan komprehensif lain konsolidasian.

Jika imbalan tersebut kurang dari nilai wajar aset bersih entitas anak yang diakuisisi, selisih tersebut diakui sebagai keuntungan dari pembelian dengan diskon pada laporan laba rugi dan penghasilan komprehensif lain konsolidasian. Sebelum mengakui keuntungan dari pembelian dengan diskon, Perusahaan menilai kembali apakah telah mengidentifikasi dengan tepat seluruh aset yang diperoleh dan liabilitas yang diambil-alih serta mengakui setiap aset atau liabilitas tambahan yang dapat diidentifikasi dalam pengkajian kembali tersebut. Perusahaan selanjutnya mengkaji kembali prosedur yang digunakan untuk mengukur jumlah yang dipersyaratkan untuk diakui pada tanggal akuisisi untuk seluruh hal-hal berikut ini:

a. aset teridentifikasi yang diperoleh dan liabilitas yang diambil-alih;
b. kepentingan non-pengendali pada pihak yang diakuisisi, jika ada;
c. untuk kombinasi bisnis yang dilakukan secara bertahap, kepentingan ekuitas pihak pengakuisisi yang dimiliki sebelumnya pada pihak yang diakuisisi; dan
d. imbalan yang dialihkan.

Tujuan dari kajian kembali ini untuk meyakinkan bahwa pengukuran tersebut telah mencerminkan dengan tepat semua informasi yang tersedia pada tanggal akuisisi.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

*d. **Business combination***

When the Company and subsidiaries acquires a business, it assesses the financial assets acquired and liabilities assumed for appropriate classification and designation in accordance with the contractual terms, economic circumstances and pertinent conditions as at the acquisition date. This includes the separation of embedded derivatives in host contracts by the acquiree.

Business combinations are accounted for using the acquisition method. The cost of an acquisition is measured as the aggregate of the consideration transferred, measured at acquisition date fair value and the amount of any NCI in the acquiree. For each business combination, the acquirer measures the NCI in the acquiree either at fair value or at the proportionate share of the acquiree's identifiable net assets. Transaction costs incurred are directly expensed in the consolidated statement of profit or loss and other comprehensive income.

If the consideration is less than the fair value of the net assets of the subsidiary acquired, the difference is recognized as a gain from a bargain purchase in the consolidated statement of profit or loss and other comprehensive income. Prior to recognizing the gain from the bargain purchase, the Company reassesses whether it has correctly identified all of the assets acquired and liabilities taken over and recognizes any additional assets or liabilities that may be identified in the reassessment. The Company further reviews the procedures used to measure the amount required to be recognized at the acquisition date for all of the following:

a. identifiable assets acquired and liabilities taken over;
b. non-controlling interests of the acquired party, if any;
c. for business combinations achieved in stages, the acquirer's previously held equity interests in the acquired party; and
d. consideration transferred.

The purpose of the review is to ensure that the remeasurement accurately reflects all the information available at the acquisition date.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

d. **Kombinasi bisnis** (Lanjutan)

Imbalan kontinjensi yang dialihkan oleh pihak pengakuisisi diakui pada nilai wajar tanggal akuisisi. Perubahan nilai wajar atas imbalan kontinjensi setelah tanggal akuisisi yang diklasifikasikan sebagai aset atau liabilitas, akan diakui dalam laporan laba rugi dan penghasilan komprehensif lain konsolidasian atau penghasilan komprehensif lain sesuai dengan PSAK 55 (Revisi 2014). Jika diklasifikasikan sebagai ekuitas, imbalan kontinjensi tidak diukur kembali dan Penyelesaian selanjutnya diperhitungkan dalam ekuitas.

Dalam suatu kombinasi bisnis yang dilakukan secara bertahap, pihak pengakuisisi mengukur kembali kepentingan ekuitas yang dimiliki sebelumnya pada pihak yang diakuisisi pada nilai wajar tanggal akuisisi dan mengakui keuntungan atau kerugian yang dihasilkan melalui laporan laba atau rugi.

Pada tanggal akuisisi, *goodwill* awalnya diukur pada biaya perolehan yang merupakan selisih lebih nilai agregat dari imbalan yang dialihkan dan jumlah setiap KNP atas selisih jumlah dari aset teridentifikasi yang diperoleh dan liabilitas yang diambil alih. Jika imbalan tersebut kurang dari nilai wajar aset bersih entitas anak yang diakuisisi, selisih tersebut diakui sebagai laba atau rugi.

Setelah pengakuan awal, *goodwill* diukur pada jumlah tercatat dikurangi akumulasi kerugian penurunan nilai. Untuk tujuan uji penurunan nilai, *goodwill* yang diperoleh dari suatu kombinasi bisnis, sejak tanggal akuisisi dialokasikan kepada setiap Unit-Penghasil Kas ("UPK") dari Perusahaan dan entitas anak yang diharapkan akan bermanfaat dari sinergi kombinasi tersebut, terlepas dari apakah aset atau liabilitas lain dari pihak yang diakuisisi ditetapkan atas UPK tersebut.

Jika *goodwill* telah dialokasikan pada suatu UPK dan operasi tertentu atas UPK tersebut dihentikan, maka *goodwill* yang diasosiasikan dengan operasi yang dihentikan tersebut termasuk dalam jumlah tercatat operasi tersebut ketika menentukan keuntungan atau kerugian dari penjualan operasi. *Goodwill* yang dilepaskan tersebut diukur berdasarkan nilai relatif operasi yang dihentikan dan porsi UPK yang ditahan.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

d. ***Business combination*** *(Continued)*

Any contingent consideration to be transferred by the acquirer will be recognized at fair value at the acquisition date. Subsequent changes to the fair value of the contingent consideration which is deemed to be an asset or liability will be recognized in accordance with PSAK 55 (Revised 2014) either in consolidated statement of profit or loss and other comprehensive income or as other comprehensive income. If the contingent consideration is classified as equity, it should not be remeasured until it is finally settled within equity.

In a business combination achieved in stages, the acquisition date fair value of the acquirer's previously held equity interest in the acquire is remeasured to fair value at the acquisition date through profit or loss.

At acquisition date, goodwill is initially measured at cost being the excess of the aggregate of the consideration transferred and the amount recognized for NCI over the net identifiable assets acquired and liabilities assumed. If this consideration is lower than the fair value of the net assets of the subsidiary acquired, the difference is recognized in profit or loss.

After initial recognition, goodwill is measured at cost less any accumulated impairment losses. For the purpose of impairment testing, goodwill acquired in a business combination is allocated from the acquisition date, to each Cash-Generating Units ("CGU") of the Company and subsidiaries that are expected to benefit from the combination, irrespective of whether other assets or liabilities of the acquirer are assigned to those CGUs.

Where goodwill forms part of a CGU and part of the operation within that CGU is disposed of, the goodwill associated with the operation disposed of is included in the carrying amount of the operation when determining the gain or loss on disposal of the operation. Goodwill disposed of in this circumstance is measured based on the relative values of the operation disposed of and the portion of the CGU retained.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

e. **Penjabaran mata uang asing**

Transaksi dalam mata uang asing dicatat berdasarkan kurs yang berlaku pada saat terjadinya transaksi. Pada tanggal laporan posisi keuangan konsolidasian, aset dan liabilitas moneter dalam mata uang asing disesuaikan ke dalam Rupiah untuk mencerminkan kurs tengah Bank Indonesia pada tanggal tersebut. Jika ada keuntungan atau kerugian akan dikreditkan atau dibebankan pada laporan laba rugi dan penghasilan komprehensif lain konsolidasian pada tahun berjalan.

Laba rugi kurs yang terjadi dikreditkan atau dibebankan pada operasi tahun berjalan, kecuali rugi kurs yang dikapitalisasi.

Pembukuan akun TBG Global Pte. Ltd., entitas anak (Catatan 1c), dilakukan di dalam mata uang selain Rupiah. Untuk tujuan penyajian Laporan keuangan konsolidasian, aset dan liabilitas entitas anak pada tanggal laporan posisi keuangan konsolidasian, dijabarkan ke dalam mata uang Rupiah dengan menggunakan kurs nilai tukar pada tanggal laporan posisi keuangan konsolidasian, sementara laporan laba rugi dan penghasilan komprehensif lain konsolidasian dijabarkan dengan menggunakan kurs nilai tukar tahun yang bersangkutan. Hasil penyesuaian penjabaran ditampilkan sebagai bagian ekuitas sebagai *"Selisih Translasi atas Mata Uang Asing"*.

Pada tanggal 31 Desember 2020, 2019 dan 2018 kurs tengah yang digunakan untuk US$ 1 masing-masing adalah Rp 14.105, Rp 13.901 dan Rp 14.481 (nilai penuh).

f. **Aset dan liabilitas keuangan dan instrumen ekuitas**

Perusahaan dan entitas anak mengakui aset keuangan atau liabilitas keuangan dalam laporan posisi keuangan konsolidasian, jika dan hanya jika, Perusahaan dan entitas anak menjadi salah satu pihak dalam ketentuan kontrak instrumen keuangan tersebut.

1. Aset keuangan

Aset keuangan diklasifikasikan sebagai aset keuangan yang diukur pada biaya perolehan diamortisasi, nilai wajar melalui penghasilan komprehensif lain atau nilai wajar melalui laporan laba rugi, dengan menggunakan dua dasar, yaitu:

a) Model bisnis entitas dalam mengelola aset keuangan dan
b) Karakteristik arus kas kontraktual dari aset keuangan.

Perusahaan dan entitas anak menentukan klasifikasi aset keuangannya pada saat pengakuan awalnya, sepanjang diperbolehkan, mengevaluasi penentuan klasifikasi aset keuangan pada setiap akhir tahun.

2. *SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)*

e. Foreign currency translations

Transactions involving foreign currencies are recorded at the rates prevailing at the time the transactions are made. At the consolidated statement of financial position date, monetary assets and liabilities denominated in foreign currencies are adjusted to Rupiah to reflect Bank Indonesia's middle rate on the said date. Any resulting gains or losses are credited or charged to the consolidated statement of profit or loss and other comprehensive income for the current year.

Foreign exchange gains and losses are credited or charged to operations for the year, except for capitalized foreign exchange losses.

The accounting of TBG Global Pte. Ltd., a subsidiary (Note 1c), is maintained in currency other than Rupiah. For presentation purposes of the consolidated financial statements, assets and liabilities of the subsidiaries at consolidated statements of financial position date are translated into Rupiah using the exchange rates at consolidated financial position date, while consolidated statements of profit or loss and other comprehensive income are translated at the average rates of exchange for the respective year. Resulting translation adjustments are shown as part of equity as "Difference from Translation of Foreign Currency".

As of 31 December 2020, 2019 and 2018 the exchange rates per US$ 1 equivalents to Rp 14,105, Rp 13,901 and Rp 14,481 (full amount), respectively.

f. Financial assets and liabilities and equity instruments

The Company and subsidiaries recognized financial assets or financial liabilities in consolidated statement of financial position, when and only when, the Company and subsidiaries become party to contractual provision of the financial instrument.

1. Financial assets

Financial assets are classified as financial assets measures at amortized cost fair value through other comprehensive income or fair value through profit or loss, using two basis, are:

a) The entity's business model in managing financial assets and
b) Characteristics of contractual cash flows from financial assets.

The Company and subsidiaries determine the classification of its financial assets at initial recognition, and when allowed, reevaluates the classification of such financial assets at each year-end.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

f. **Aset dan liabilitas keuangan dan instrumen ekuitas** (Lanjutan)

1. Aset keuangan (Lanjutan)

Aset keuangan yang diukur pada nilai wajar melalui laporan laba atau rugi

Kategori ini meliputi aset keuangan "yang dimiliki untuk diperdagangkan" dan aset keuangan yang ditetapkan pada nilai wajar melalui laporan laba rugi pada awal penentuan. Suatu aset keuangan diklasifikasikan sebagai dimiliki untuk dijual apabila secara prinsip diperoleh untuk tujuan dijual dalam jangka pendek. Aset keuangan yang ditetapkan pada nilai wajar melalui laporan laba rugi pada saat penetapan awal adalah aset keuangan yang dikelola, dan kinerjanya dievaluasi berdasarkan nilai wajar, sesuai dengan suatu strategi investasi yang terdokumentasi. Derivatif juga dikategorikan sebagai investasi yang dimiliki untuk tujuan diperdagangkan, kecuali ditetapkan sebagai lindung nilai efektif. Aset keuangan, yang diukur pada nilai wajar melalui laporan laba rugi diukur pada nilai wajar, dan segala perubahan nilai wajar diakui pada laporan laba rugi.

Perusahaan dan entitas anak memiliki aset keuangan yang diukur pada nilai wajar melalui laporan laba atau rugi berupa kas dan setara kas, uang jaminan, aset keuangan derivatif, taksiran klaim pajak penghasilan dan aset tidak lancar lainnya.

Aset keuangan diukur pada biaya perolehan diamortisasi

Setelah pengakuan awal, aset keuangan tersebut dicatat pada biaya perolehan diamortisasi dengan menggunakan metode suku bunga efektif *(effective interest rate method)*, dimana metode yang digunakan untuk menghitung biaya perolehan yang diamortisasi dari aset keuangan atau liabilitas keuangan (atau Perusahaan dan entitas anak aset keuangan atau liabilitas keuangan) dan alokasi pendapatan bunga atau biaya bunga melebihi tahun yang bersangkutan. Keuntungan dan kerugian terkait diakui dalam laporan laba rugi dan penghasilan komprehensif lain konsolidasian pada saat pinjaman yang diberikan dan piutang dihentikan pengakuannya atau mengalami penurunan nilai, demikian juga melalui proses amortisasi.

Perusahaan dan entitas anak memiliki aset keuangan diukur pada biaya perolehan diamortisasi berupa pendapatan yang masih harus diterima, piutang usaha, dan piutang lain-lain.

Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain

Perusahaan dan entitas anak tidak memiliki aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain pada tanggal 31 Desember 2020.

2. *SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)*

f. Financial assets and liabilities and equity instruments (Continued)

1. Financial assets (Continued)

Financial assets measured at fair value through profit or loss

This category includes financial assets "held for trading" and those designated at fair value through profit or loss at inception. A financial asset is classified as held for trading if acquired principally for the purpose of selling in the short term. Financial assets designated at fair value through profit or loss at inception are those that are managed, and their performance evaluated on a fair value basis, in accordance with a documented investment strategy. Derivatives are also categorized as held for trading, unless they are designated as effective hedges. Financial assets, at fair value through profit or loss are measured at fair value, and any fair value changes are recognized in profit or loss.

Financial assets of the Company and subsidiaries measured at fair value through profit or loss include cash and cash equivalents, derivative financial assets, estimated claims for income tax refund and others non-current assets.

Financial assets are measured at amortized costs

After initial recognition, such financial assets are recorded at amortized cost using the effective interest rate method, which is the method used for calculating the amortized cost of a financial asset or financial liability (or group of financial assets or financial liabilities) and for allocatiing interest income or expense interest in future years. Gains and losses are recognized in the consolidated statement of profit or loss and other comprehensive income when the loans and receivables are derecognized or impaired, as well as through the amortization process.

Fiancial assets are measured at amotized costs of the Company and subsidiaries include accrued revenue, trade receivables, and other receivables.

Financial assets measured at fair value through other comprehensive income

The Company and subsidiaries has no financial assets measured at fair value through other comprehensive income as of 31 December 2020.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

f. **Aset dan liabilitas keuangan dan instrumen ekuitas** (Lanjutan)

2. Liabilitas keuangan dan instrumen ekuitas

Instrumen utang dan ekuitas dikelompokkan sebagai liabilitas keuangan atau sebagai ekuitas sesuai dengan substansi pengaturan kontraktual.

Liabilitas keuangan diklasifikasikan sebagai liabilitas keuangan yang diukur pada nilai wajar melalui laporan laba atau rugi dan liabilitas keuangan lainnya. Perusahaan dan entitas anak menentukan klasifikasi liabilitas keuangan pada saat pengakuan awal.

Instrumen ekuitas

Instrumen ekuitas adalah setiap kontrak yang memberikan hak residual atas aset suatu entitas setelah dikurangi dengan seluruh liabilitasnya. Instrumen ekuitas yang diterbitkan oleh Perusahaan dan entitas anak akan dicatat sebesar jumlah yang diperoleh, setelah dikurangi dengan biaya emisi langsung.

Sebuah instrumen merupakan instrumen ekuitas jika, dan hanya jika, kedua kondisi di bawah ini terpenuhi:

(i) Instrumen tersebut tidak memiliki liabilitas kontraktual:
  (a) Untuk memberikan kas atau aset keuangan lainnya kepada entitas lain; atau
  (b) Untuk menukar aset keuangan atau liabilitas keuangan dengan entitas lain dalam kondisi yang tidak menguntungkan bagi penerbit.

(ii) Jika instrumen akan atau dapat diselesaikan oleh penerbit yang memiliki instrumen ekuitas, apabila instrumen itu:
  (a) Non-derivatif yang tidak memiliki liabilitas kontraktual terhadap penerbit untuk memberikan sejumlah variabel terhadap instrumen ekuitas pemilik; atau
  (b) Derivatif yang akan diselesaikan oleh penerbit hanya dengan menukarkan sejumlah uang tunai atau aset keuangan lainnya untuk sejumlah instrumen ekuitas pemilik. Untuk kepentingan ini, instrumen ekuitas milik penerbit tidak meliputi instrumen yang terikat kontrak untuk penerimaan di masa mendatang atau pengiriman instrumen ekuitas milik penerbit.

2. *SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)*

f. Financial assets and liabilities and equity instruments (Continued)

2. *Financial liabilities and equity instruments*

Debt and equity instruments are classified as financial liabilities or as equity in accordance with the substance of the contractual arrangement.

Financial liabilities are classified as financial liabilities measured at fair value through profit or loss and other financial liabilities. The Company and subsidiaries determines the classification of financial liabilities at initial recognition.

Equity instruments

An equity instrument is any contract that gives the right to the residual assets of an entity after deducting all of its liabilities. Equity instruments issued by the Company and subsidiaries will be recorded at the amounts received, after deducting direct issurance costs.

An instrument is an equity instrument if, and only if, both following conditions below are met:

(i) The instrument does not have a contractual liabilities:
  (a) To deliver cash or another financial asset to another entity; or
  (b) To exchange financial assets or financial liability with another entity under conditions that are not profitable for issuers.

(ii) If the instrument will or may be settled by the issuer which has an equity instrument, an instrument that:
  (a) Non-derivatives that have no contractual liabilities to the issuer to deliver a variable number of owner's equity instruments; or

  (b) Derivatives that will be completed by the issuer only in exchange for some cash or another financial asset for a number of owner's equity instruments. For this purpose, the instrument does not include the issuer's equity instruments that are under contract for the future receipt or delivery of issuer's equity instruments.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

f. **Aset dan liabilitas keuangan dan instrumen ekuitas** (Lanjutan)

2. Liabilitas keuangan dan instrumen ekuitas (Lanjutan)

Instrumen ekuitas (Lanjutan)

Instrumen keuangan majemuk, seperti obligasi atau instrumen konversi sejenis yang diubah menjadi sejumlah saham biasa oleh pemegangnya, diklasifikasikan secara terpisah sebagai liabilitas keuangan dan ekuitas sesuai dengan materi dalam perjanjian kontraktual. Pada tanggal penerbitan instrumen keuangan majemuk, nilai wajar dari komponen liabilitas diestimasi menggunakan tingkat suku bunga pasar yang berlaku untuk instrumen non-konversi yang sejenis. Jumlah ini dicatat sebagai liabilitas atas dasar biaya perolehan yang diamortisasi dengan menggunakan metode suku bunga efektif sampai dengan pelaksanaan konversi atau pada tanggal jatuh tempo instrumen. Komponen ekuitas ditentukan dengan mengurangi jumlah komponen liabilitas dari nilai wajar instrumen keuangan majemuk secara keseluruhan. Jumlah ini diakui dan dimasukkan ke dalam ekuitas, setelah dikurangi dengan efek pajak penghasilan, dan tidak diperhitungkan kembali.

Instrumen ekuitas Perusahaan dan entitas anak meliputi modal saham.

Liabilitas keuangan

(i) Liabilitas keuangan diukur melalui laporan laba atau rugi

Liabilitas keuangan yang diukur pada nilai wajar melalui laporan laba atau rugi termasuk liabilitas keuangan untuk diperdagangkan dan liabilitas keuangan yang ditetapkan pada saat pengakuan awal untuk diukur pada nilai wajar melalui laporan laba atau rugi.

Liabilitas keuangan diklasifikasikan sebagai kelompok diperdagangkan jika mereka diperoleh untuk tujuan dijual kembali dalam waktu dekat. Liabilitas derivatif juga diklasifikasikan sebagai kelompok diperdagangkan kecuali derivatif yang ditetapkan sebagai instrumen lindung nilai yang efektif. Aset dan liabilitas keuangan diukur pada nilai wajar melalui laporan laba atau rugi dicatat pada laporan posisi keuangan konsolidasian pada nilai wajar dengan pengakuan keuntungan atau kerugian pada laporan laba rugi dan penghasilan komprehensif lain konsolidasian.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

f. ***Financial assets and liabilities and equity instruments*** *(Continued)*

2. *Financial liabilities and equity instruments (Continued)*

Equity instruments (Continued)

Compound financial instruments, such as convertible bonds or similar instruments convertible into a number of common shares by the holder, are classified separately as financial liabilities and equity in accordance with the substance of the contractual agreement. On the date of issuance of a compound financial instrument, the fair value of the liability component is estimated using market interest rates applicable to similar non-convertible instruments. This amount is recorded as a liability on the basis of amortized cost using the effective interest rate method until the conversion or execution on the maturity date of the instrument. The equity component is determined by deducting the liability component from the fair value of the compound financial instrument taken as a whole. This amount is recognized and included in equity, net of income tax effects, and not recomputed.

Equity instruments of the Company and subsidiaries include share capital.

Financial liabilities

(i) Financial liabilities measured at fair value through profit or loss

Financial liabilities measured at fair value through profit or loss include the financial liabilities held for trading and liabilities designated upon initial recognition at fair value through profit or loss.

Financial liabilities are classified as held for trading if they are acquired for the purpose of resale in the near future. Derivative liabilities are also classified as held for trading unless the derivatives are designated as effective hedging instruments. Financial assets and financial liabilities at fair value through profit or loss are recorded in the consolidated statement of financial position at fair value with gains or losses recognized in the consolidated statement of profit or loss and other comprehensive income.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

f. **Aset dan liabilitas keuangan dan instrumen ekuitas** (Lanjutan)

2. Liabilitas keuangan dan instrumen ekuitas (Lanjutan)

Liabilitas keuangan (Lanjutan)

(i) Liabilitas keuangan diukur melalui laporan laba atau rugi (Lanjutan)

Perusahaan dan entitas anak tidak memiliki liabilitas keuangan yang diukur pada nilai wajar melalui laporan laba atau rugi pada tanggal 31 Desember 2020, 2019 dan 2018.

(ii) Liabilitas keuangan lainnya

Kategori ini berhubungan dengan liabilitas keuangan yang tidak dimiliki untuk diperdagangkan atau diukur pada nilai wajar melalui keuntungan atau kerugian pada saat pengakuan liabilitas awal. Termasuk dalam liabilitas yang berasal dari operasi atau pinjaman dan utang.

Liabilitas keuangan lainnya diukur pada biaya perolehan diamortisasi dengan menggunakan metode suku bunga efektif. Pada tanggal laporan posisi keuangan konsolidasian, beban bunga masih harus dibayar dicatat secara terpisah dari pokok pinjaman terkait dalam bagian liabilitas lancar. Keuntungan dan kerugian diakui dalam laporan laba rugi dan penghasilan komprehensif lain konsolidasian ketika liabilitas dihentikan pengakuannya serta melalui proses amortisasi menggunakan metode suku bunga efektif.

Perusahaan dan entitas anak memiliki liabilitas keuangan lainnya berupa utang usaha, utang lain-lain, beban masih harus dibayar, pinjaman jangka panjang dan surat utang.

3. Pengakuan

Pada pengakuan awal, aset atau liabilitas keuangan diukur pada nilai wajar, kecuali untuk aset dan liabilitas keuangan yang diukur pada nilai wajar melalui laporan laba atau rugi, ditambah atau dikurangi dengan biaya transaksi yang secara langsung dapat dibagikan untuk perolehan dari aset atau liabilitas keuangan tersebut. Pengukuran dari aset dan liabilitas keuangan tersebut bergantung pada klasifikasi dari aset dan liabilitas keuangan.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

f. ***Financial assets and liabilities and equity instruments*** *(Continued)*

2. *Financial liabilities and equity instruments (Continued)*

Financial liabilities (Continued)

(i) Financial liabilities measured at fair value through profit or loss (Contiued)

The Company and subsidiaries has no financial liabilities measured at fair value through profit or loss as of 31 December 2020, 2019 and 2018.

(ii) Other financial liabilities

This category pertains to financial liabilities that are not held for trading or designated as fair value through profit or loss upon the inception of the liability. This includes liabilities arising from operations or loans and borrowings.

Other financial liabilities are subsequently measured at amortized cost using the effective interest rate method. On the consolidated statement of financial position date, accrued interest is recorded separately from the principal involved in the current liabilities. Gains and losses are recognized in consolidated statement of profit or loss and other comprehensive income when the liability is derecognized, as well as through the amortization using the effective interest rate method.

The Company and subsidiaries have other financial liabilities consisting of trade payables, other payables, accrued expenses, long-term loan and notes.

3. Recognition

At initial recognition, financial assets or liabilities are measured at fair value, except for financial assets and liabilities measured at fair value through profit or loss, plus or minus the transaction costs that are directly attributable to the acquisition of financial assets or issuance of financial liabilities. The subsequent measurement of financial assets and liabilities depends on the classification of financial assets and liabilities.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

f. **Aset dan liabilitas keuangan dan instrumen ekuitas** (Lanjutan)

4. Nilai wajar

Nilai wajar adalah harga yang akan diterima untuk menjual suatu aset atau harga yang akan dibayarkan untuk mengalihkan suatu liabilitas dalam transaksi teratur antara pelaku pasar pada tanggal pengukuran. Pengukuran nilai wajar mengasumsikan bahwa transaksi untuk menjual aset atau mengalihkan liabilitas terjadi:

- di pasar utama untuk aset dan liabilitas tersebut; atau
- jika terdapat pasar utama, di pasar yang paling menguntungkan untuk aset dan liabilitas tersebut

Pasar utama atau pasar yang paling menguntungkan harus dapat diakses oleh Perusahaan dan entitas anak.

Nilai wajar suatu aset atau liabilitas menggunakan asumsi yang akan digunakan pelaku pasar ketika menentukan harga aset atau liabilitas tersebut, dengan asumsi bahwa pelaku pasar bertindak dalam kepentingan ekonomik terbaiknya.

Pengukuran nilai wajar aset non-keuangan memperhitungkan kemampuan pelaku pasar untuk menghasilkan manfaat ekonomik dengan menggunakan aset dalam penggunaan tertinggi dan terbaiknya atau dengan menjualnya kepada pelaku pasar lain yang akan menggunakan aset tersebut dalam penggunaan tertinggi dan terbaiknya.

Perusahaan dan entitas anak menggunakan teknik penilaian yang sesuai dalam keadaan dan dimana data yang memadai tersedia untuk mengukur nilai wajar, memaksimalkan penggunaan input yang dapat diobservasi yang relevan dan meminimalkan penggunaan input yang tidak dapat diobservasi.

PSAK 68 mensyaratkan pengungkapan tertentu yang mensyaratkan klasifikasi aset keuangan dan liabilitas keuangan yang diukur pada nilai wajar dengan menggunakan hirarki nilai wajar yang mencerminkan signifikansi input yang digunakan di dalam melakukan pengukuran nilai wajar. Hirarki nilai wajar memiliki tingkatan sebagai berikut:

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

f. ***Financial assets and liabilities and equity instruments*** *(Continued)*

4. Fair value

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. The fair value measurement is based on the presumption that the transaction to sell or transfer the liability takes place either:

- *in the principal market for the asset or liability; or*
- *in the absence of a principal market, in the most advantageous market for the asset or liability*

The principal or the most advantageous market must be accessible by the Company and subsidiaries.

The fair value of an asset or a liability is measured using the assumptions that market participants would use when pricing the asset or liability, assuming that market participants act in their economic best interest.

A fair value measurement of a non-financial asset takes into account a market participant's ability to generate economic benefits by using its highest and best use or by selling it to another market participant that would use the asset in its highest and best use.

The Company and subsidiaries uses valuation techniques that are appropriate in the circumstances and for which sufficient data are available to measure fair value, maximizing the use of relevant observable inputs and minimizing the use of unobservable inputs.

PSAK 68 requires certain disclosures which require the classification of financial assets and financial liabilities measured at fair value using a fair value hierarchy that reflects the significance of the inputs used in measuring fair value. Fair value hierarchy has the following levels:

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

f. **Aset dan liabilitas keuangan dan instrumen ekuitas** (Lanjutan)

4. Nilai wajar (Lanjutan)

Tingkat 1: Harga kuotasian (tidak disesuaikan) dalam pasar aktif untuk aset atau liabilitas yang identik
Tingkat 2: Input selain harga kuotasian yang termasuk dalam Tingkat 1 yang dapat diobservasi untuk aset atau liabilitas, baik secara langsung (misalnya harga) atau secara tidak langsung (misalnya derivasi dari harga)
Tingkat 3: Input untuk aset atau liabilitas yang bukan berdasarkan data pasar yang dapat diobservasi (input yang tidak dapat diobservasi)

Untuk aset dan kewajiban yang diakui dalam laporan keuangan secara berulang, Perusahaan dan entitas anak menentukan apakah transfer telah terjadi antara Tingkat dalam hirarki dengan menilai kembali kategorisasi (berdasarkan masukan tingkat terendah yang signifikan terhadap pengukuran nilai wajar secara keseluruhan) pada akhir setiap tahun pelaporan.

Nilai wajar instrumen keuangan yang diperdagangkan dalam pasar aktif pada tanggal laporan didasarkan pada harga kuotasi atau kuotasi harga pedagang efek yang mengikat (harga penawaran untuk jangka panjang dan harga pemintaan untuk jangka pendek), tanpa adanya pengurangan untuk biaya transaksi. Sekuritas didefinisikan dalam pencatatan ini sebagai "terdaftar" diperjualbelikan dalam pasar aktif. Dimana Perusahaan dan entitas anak memiliki aset dan liabilitas keuangan dengan posisi saling hapus dalam risiko pasar atau risiko kredit pihak ketiga, telah memilih untuk menggunakan pengukuran pengecualian untuk mengukur nilai wajar atas eksposur risiko bersihnya dengan menerapkan harga penawaran atau permintaan ke posisi pembukaan bersih yang sesuai. Untuk seluruh instrumen keuangan lain yang tidak diperdagangkan dalam pasar aktif, nilai wajar ditentukan dengan menggunakan teknik valuasi yang dianggap tepat dan sesuai kondisi. Teknik penilaian termasuk pendeketan pasar (misalnya menggunakan transaksi *arm's length* yang disesuaikan seperlunya dan mengacu pada nilai pasar instrumen lain yang sama secara substansial) dan pendekatan pendapatan (misalnya analisis arus kas diskonto dan opsi model penentuan harga membuat penggunaan data pasar yang tersedia dan mendukung yang memungkinkan).

2. *SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)*

f. Financial assets and liabilities and equity instruments (Continued)

4. Fair value (Continued)

Level 1: Quoted (unadjusted) prices in active markets for identical assets or liabilities.
Level 2: Inputs other than market quotations included within Level 1 that are observable for the asset or liability, either directly (eg, prices) or indirectly (for example, derivatives prices)

Level 3: Inputs for the asset or liability that are not based on observable market data (unobservable inputs)

For assets and liabilities that are recognized in the financial statement on a recurring basis, the Company and subsidiaries determines whether transfers have occurred between Levels in the hierarchy by reassessing categorization (based on the lowest level input that is significant to the fair value measurement as a whole) at the end of each reporting year.

The fair value for financial instruments traded in active markets at the reporting date is based on their quoted price or binding dealer price quotations (bid price for long positions and ask price for short positions), without any deduction for transaction costs. Securities defined in these accounts as "listed" are traded in an active market. Where the Company and subsidiaries has financial assets and financial liabilities with offsetting positions in market risks or counterparty credit risk, it has elected to use the measurement exception to measure the fair value of its net risk exposure by applying the bid or ask price to the net open position as appropriate. For all other financial instruments not traded in an active market, the fair value is determined by using valuation techniques deemed to be appropriate in the circumstances. Valuation techniques include the market approach (i.e., using recent arm's length market transactions adjusted as necessary and reference to the current market value of another instrument that is substantially the same) and the income approach (i.e., discounted cash flow analysis and option pricing models making as much use of available and supportable market data as possible).

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

f. **Aset dan liabilitas keuangan dan instrumen ekuitas** (Lanjutan)

4. Nilai wajar (Lanjutan)

Seluruh aset dan liabilitas yang nilai wajarnya dinilai dan diungkapkan dalam Laporan keuangan konsolidasian dikategorikan dalam hirarki nilai wajar.

Untuk tujuan pengungkapan nilai wajar, Perusahaan dan entitas anak menentukan kelas aset dan liabilitas yang sesuai dengan dasar sifat, karakteristik dan risiko aset atau liabilitas dan level hirarki nilai wajar seperti yang dijelaskan di atas.

5. Pengukuran biaya perolehan diamortisasi

Biaya perolehan diamortisasi dari aset dan liabilitas keuangan adalah jumlah aset atau liabilitas keuangan yang diukur pada saat pengakuan awal dikurangi pembayaran pokok, ditambah atau dikurangi dengan amortisasi kumulatif dengan menggunakan metode suku bunga efektif yang dihitung dari selisih antara nilai awal dan nilai jatuh temponya, dan dikurangi penyisihan kerugian penurunan nilai.

6. Penurunan nilai dari aset keuangan

Dalam PSAK 71, provisi penurunan nilai atas aset keuangan diukur menggunakan model kerugian kredit ekspetasian dan berlaku untuk aset keuangan yang diukur pada biaya perolehan atau nilai wajar melalui penghasilan komprehensif lain.

Terdapat 2 (dua) basis pengukuran atas kerugian kredit ekspektasian, yaitu kerugian kredit ekspektasian 12 bulan atau kerugian kredit sepanjang umurnya. Perusahaan dan entitas anak akan melakukan analisis pengakuan awal menggunakan kerugian kredit ekspektasian 12 bulan dan akan berpindah basis apabila terjadi peningkatan resiko kredit yang signifikan setelah pengakuan awal.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

f. ***Financial assets and liabilities and equity instruments*** *(Continued)*

4. Fair value (Continued)

All assets and liabilities for which fair value is measured or disclosed in the consolidated financial statements are categorized within the fair value hierarchy.

For the purpose of the fair value disclosures, the Company and subsidiaries has determined classes of assets and liabilities on the basis of the nature, characteristics and risks of the asset or liability and the level of the fair value hierarchy as explained above.

5. Amortized cost measurement

The amortized cost of a financial asset or liability is the amount at which the financial asset or liability is measured at initial recognition, minus principal payments, plus or minus the cumulative amortization using the effective interest rate method, calculated from the difference between initial amount and maturity amount, minus any reduction for impairment.

6. Impairment of financial assets

In PSAK 71, impairment loss provision of financial assets measured at expected credit losses model ("ECLs") and applied for financial assets which measured at amortised cost or fair value through other comprehensive lain

There are 2 (two) basis of the measurement of expected credit losses, 12 month expected credit losses or lifetime expected credit losses. The Group will analyse the initial recognition using the 12 month expected credit losses and will move to lifetime expected credit losses if there is significant increase in credit risk after initial recognition.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

f. **Aset dan liabilitas keuangan dan instrumen ekuitas** (Lanjutan)

7. Penghentian pengakuan

Perusahaan dan entitas anak menghentikan pengakuan aset keuangan pada saat hak kontraktual atas arus kas yang berasal dari aset keuangan tersebut kadaluarsa atau Perusahaan dan entitas anak mentransfer seluruh hak untuk menerima arus kas kontraktual dari aset keuangan dalam transaksi di mana Perusahaan dan entitas anak secara substansial telah mentransfer seluruh risiko dan manfaat atas kepemilikan aset keuangan yang ditransfer. Setiap hak atau liabilitas atas aset keuangan yang ditransfer yang timbul atau yang masih dimiliki oleh Perusahaan dan entitas anak diakui sebagai aset atau liabilitas secara terpisah.

Perusahaan dan entitas anak menghentikan pengakuan liabilitas keuangan pada saat liabilitas yang ditetapkan dalam kontrak dilepaskan, dibatalkan atau kadaluarsa.

Dalam transaksi di mana Perusahaan dan entitas anak secara subtansial tidak memiliki atau tidak mentransfer seluruh risiko dan manfaat atas kepemilikan aset keuangan, Perusahaan dan entitas anak menghentikan pengakuan aset tersebut jika Perusahaan dan entitas anak tidak lagi memiliki pengendalian atas aset tersebut. Hak dan liabilitas yang timbul atau yang masih dimiliki dalam transfer tersebut diakui secara terpisah sebagai aset atau liabilitas.

Dalam transfer di mana pengendalian atas aset masih dimiliki, Perusahaan dan entitas anak tetap mengakui aset yang ditransfer tersebut sebesar keterlibatan yang berkelanjutan, dimana tingkat keberlanjutan Perusahaan dan entitas anak dalam aset yang ditransfer adalah sebesar perubahan nilai aset yang ditransfer.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

f. ***Financial assets and liabilities and equity instruments*** *(Continued)*

7. Derecognition

The Company and subsidiaries derecognize financial assets when the contractual rights of the cash flows arising from the financial assets expire or the Company and subsidiaries transfers all rights to receive contractual cash flows of financial assets in a transaction where the Company and subsidiaries has transferred substantially all the risks and rewards of ownership of financial assets. Any rights or obligations on the transferred financial assets that arise or are still owned by the Company and subsidiaries are recognized as assets or liabilities separately.

The Company and subsidiaries derecognize financial liabilities when the obligation specified in the contract is released, canceled or expired.

In transactions in which the Company and subsidiaries neither retains nor transfers substantially all the risks and rewards of ownership of financial assets, the Company and subsidiaries derecognizes the assets if they do not retain control over the assets. The rights and obligations retained in the transfer are recognized separately as assets and liabilities as appropriate.

In transfers in which control over the asset is retained, the Company and subsidiaries continues to recognize the assets to the extent of their continuing involvement, determined by the extent to which they are exposed to changes in the value of the transferred assets.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

f. **Aset dan liabilitas keuangan dan instrumen ekuitas** (Lanjutan)

8. Saling hapus

Aset keuangan dan liabilitas keuangan disalinghapuskan dan nilai bersihnya disajikan dalam laporan posisi keuangan konsolidasian jika, dan hanya jika, saat ini memiliki hak yang dapat dipaksakan secara hukum untuk melakukan saling hapus atas jumlah yang telah diakui tersebut dan Perusahaan dan entitas anak berintensi untuk menyelesaikan secara bersih atau untuk merealisasikan aset dan menyelesaikan liabilitasnya secara simultan. Hal ini tidak umum terjadi dengan perjanjian induk untuk menyelesaikan secara bersih, dan aset dan kewajiban terkait disajikan sebesar nilai bruto dalam laporan posisi keuangan keuangan konsolidasian.

9. Instrumen keuangan derivatif

Derivatif adalah suatu instrumen keuangan atau kontrak lain dengan tiga karakteristik berikut ini:

a) nilainya berubah sebagai akibat dari perubahan variabel yang telah ditentukan (sering disebut dengan variabel yang mendasari/*underlying*), antara lain: suku bunga, harga instrumen keuangan, harga komoditas, nilai tukar mata uang asing, indeks harga atau indeks suku bunga, peringkat kredit atau indeks kredit, atau variabel lainnya. Untuk variabel non-keuangan, variabel tersebut tidak berkaitan dengan pihak-pihak dalam kontrak

b) tidak memerlukan investasi awal bersih atau memerlukan investasi awal bersih dalam jumlah yang lebih kecil dibandingkan dengan jumlah yang diperlukan untuk kontrak serupa lainnya yang diharapkan akan menghasilkan dampak yang serupa sebagai akibat perubahan faktor pasar

c) diselesaikan pada tanggal tertentu di masa mendatang.

Perusahaan dan entitas anak menggunakan instrumen keuangan derivatif, seperti kontrak *forward* mata uang, untuk melindungi nilai risiko mata uang asing yang berasal dari denominasi pinjaman dalam Dolar Amerika Serikat. Instrumen keuangan derivatif tersebut diakui pada nilai wajar pada tanggal dimana kontrak derivatif dibuat dan selanjutnya dinilai pada nilai wajar. Derivatif dicatat sebagai aset keuangan saat nilai wajar positif dan sebagai liabilitas keuangan saat nilai wajar negatif.

2. *SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)*

f. Financial assets and liabilities and equity instruments (Continued)

8. Offsetting

Financial assets and financial liabilities are offset and the net amount reported in the consolidated statement of financial position if and only if there is a currently legal right to offset the recognized amounts and the Company and subsidiaries intends to either settle on a net basis, or to realize the asset and settle the liability simultaneously. This is not generally the case with master netting agreements, and the related assets and liabilities are presented at gross amounts in the consolidated statement of financial position.

9. Derivative financial instruments

A derivative is a financial instrument or other contract with all three of the following characteristics:

a) its value changes in response to the change in a specified interest rate, financial instrument price, commodity price, foreign exchange rate, index of prices or rates, credit rating or credit index, or other variable, provided in the case of a non-financial variable that the variable is not specific to a party to the contract (sometimes called the "underlying")

b) it requires no initial net investment or an initial net investment that is smaller than would be required for other types of contracts that would be expected to have a similar response to changes in market factors

c) it is settled at a future date.

The Company and subsidiaries uses derivative financial instruments, such as forward currency contracts, to hedge its foreign currency risks arising from US dollar (USD)-denominated loans. Such derivative financial instruments are initially recognized at fair value on the date on which a derivative contract is entered into and are subsequently remeasured at fair value. Derivatives are carried as financial assets when the fair value is positive and as financial liabilities when the fair value is negative.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

f. **Aset dan liabilitas keuangan dan instrumen ekuitas** (Lanjutan)

9. Instrumen keuangan derivatif (Lanjutan)

Laba rugi yang berasal dari perubahan nilai wajar derivatif dicatat langsung ke laporan laba rugi dan penghasilan komprehensif lain konsolidasian, kecuali untuk porsi efektif lindung nilai arus kas, yang diakui dalam penghasilan komprehensif lain.

Instrumen derivatif diklasifikasikan sebagai lancar dan tidak lancar berdasarkan penilaian fakta dan keadaan tertentu (seperti dasar arus kas kontraktual). Ketika Perusahaan dan entitas anak mempunyai derivatif sebagai lindung nilai ekonomi dan tidak diterapkan sebagai lindung nilai akuntansi untuk tahun diatas 12 bulan setelah tanggal pelaporan, derivatif diklasifikasikan sebagai tidak lancar.

g. **Transaksi dengan pihak-pihak berelasi**

Suatu pihak dianggap berelasi dengan Perusahaan dan entitas anak jika:

a) langsung atau tidak langsung melalui satu atau lebih perantara, suatu pihak (i) mengendalikan atau dikendalikan oleh, atau berada di bawah pengendalian bersama dengan Perusahaan dan entitas anak; (ii) memiliki kepentingan dalam Perusahaan dan entitas anak yang memberikan pengaruh signifikan atas Perusahaan dan entitas anak; atau (iii) memiliki pengendalian bersama atas Perusahaan dan entitas anak;
b) suatu pihak yang berelasi dengan Perusahaan dan entitas anak;
c) suatu pihak adalah ventura bersama dimana Perusahaan dan entitas anak sebagai *venture*;
d) suatu pihak adalah anggota dari personil manajemen kunci Perusahaan dan entitas anak atau induk;
e) suatu pihak adalah anggota keluarga dekat dengan individu yang diuraikan dalam butir (a) atau (d);
f) suatu pihak adalah entitas yang dikendalikan, dikendalikan bersama atau dipengaruhi signifikan oleh atau untuk dimana hak suara signifikan pada beberapa entitas, langsung maupun tidak langsung, individu seperti diuraikan dalam butir (d) atau (e); atau
g) suatu pihak adalah suatu program imbalan pasca-kerja untuk imbalan kerja dari Perusahaan dan entitas anak atau entitas lain yang terkait dengan Perusahaan dan entitas anak.

2. *SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)*

f. Financial assets and liabilities and equity instruments (Continued)

9. Derivative financial instruments (Continued)

Any gains or losses arising from changes in the fair value of derivatives are taken directly to consolidated statement of profit or loss and other comprehensive income, except for the effective portion of cash flow hedges, which is recognized in other comprehensive income.

Derivative instruments are classified as current or non-current based on an assessment of the facts and circumstances (i.e., the underlying contracted cash flows). When the the Company and subsidiaries will hold a derivative as an economic hedge and does not apply hedge accounting for a year beyond 12 months after the reporting date, the derivative is classified as non-current.

g. Transactions with related parties

A party is considered to be related party to the Company and subsidiaries if:

a) directly or indirectly through one or more intermediaries, the party (i) controls, or is controlled by, or is under common control with the Company and subsidiaries; (ii) has an interest in the Company and subsidiaries that gives significant influence over the Company and subsidiaries; or (iii) has joint control over the Company and subsidiaries;
b) the party is an associated of the Company and subsidiaries;
c) the party is a joint venture in which the Company and subsidiaries is a venturer;
d) the party is a member of the key management personnel of the Company and subsidiaries or its parent;
e) the party is a close member of the family of any individual referred to (a) or (d);
f) the party is an entity that is controlled, jointly controlled or significant influenced by or for which significant voting power in such entity resides with, directly or indirectly, any individual referred to (d) or (e); or
g) the party is a post-employment benefits plan for the benefit or employees of the Company and subsidiaries, or any entity that is a related party of the Company and subsidiaries.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

g. **Transaksi dengan pihak-pihak berelasi** (Lanjutan)

Transaksi ini dilakukan berdasarkan persyaratan yang disetujui oleh kedua belah pihak, dimana persyaratan tersebut mungkin tidak sama dengan transaksi lain yang dilakukan dengan pihak-pihak tidak berelasi.

Seluruh transaksi dan saldo yang material dengan pihak-pihak berelasi telah diungkapkan dalam catatan atas Laporan keuangan konsolidasian.

h. **Kas dan setara kas**

Kas dan setara kas merupakan bagian aset keuangan yang tidak digunakan sebagai jaminan atas pinjaman dan tidak dibatasi penggunaannya.

i. **Piutang**

Piutang usaha dan piutang non-usaha pada awalnya diakui sebesar nilai wajar dan selanjutnya diukur pada biaya perolehan diamortisasi dengan menggunakan metode bunga efektif, apabila dampak pendiskontoan signifikan, dikurangi provisi atas penurunan nilai.

Kolektibilitas piutang usaha dan piutang non-usaha ditinjau secara berkala. Piutang yang diketahui tidak tertagih, dihapuskan dengan secara langsung mengurangi nilai tercatatnya. Akun penyisihan digunakan ketika terdapat bukti yang objektif bahwa Perusahaan dan enitas anak tidak dapat menagih seluruh jumlah piutang sesuai dengan persyaratan awal piutang.

Jumlah kerugian penurunan nilai diakui pada laporan laba rugi konsolidasian dan disajikan dalam "Penyisihan atas penurunan nilai piutang usaha".

j. **Persediaan**

Persediaan diakui sebesar nilai yang lebih rendah antara biaya perolehan dan nilai realisasi bersih *(the lower of cost or net realizable value)*. Biaya perolehan ditentukan dengan menggunakan metode *first-in, first-out (FIFO) method*. Perusahaan dan entitas anak menentukan penyisihan persediaan usang berdasarkan hasil penelaahan terhadap keadaan persediaan pada akhir tahun.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

g. ***Transactions with related parties*** *(Continued)*

The transactions are made based on the terms agreed by the parties, such term may not be the same as those transactions with unrelated parties.

All material transactions and balances with related parties are disclosed in the notes to the consolidated financial statements.

h. ***Cash and cash equivalents***

Cash and cash equivalents are financial assets, which are not being as collateral of loan nor restricted for use.

i. ***Receivables***

Trade and non-trade receivables are recognized initially at fair value and subsequently measured at amortized cost using the effective interest method, if the impact of discounting is significant, less any provision for impairment.

Collectibility of trade and non-trade receivables is reviewed on an ongoing basis. Receivables which are known to be uncollectible are written off by reducing the carrying amount directly. An allowance account is used when there is objective evidence that the Company and subsidiaries will not be able to collect all amounts due according to the original terms of the receivables.

The amount of the impairment loss is recognized in consolidated statement of profit or loss and other comprehensive income within "Allowance for impairment losses of trade receivables".

j. ***Inventories***

Inventories are stated at the lower of cost or net realizable value. Cost is determined based on the first-in, first-out (FIFO) method. The Company and subsidiaries provide a provision for inventory obsolescence based on a review of the condition of inventories at the end of the year.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

k. **Aset tetap**

Aset tetap, kecuali menara telekomunikasi, dicatat dengan menggunakan model biaya yaitu biaya perolehan dikurangi akumulasi penyusutan dan akumulasi penurunan nilai aset, jika ada.

Menara telekomunikasi dicatat dengan menggunakan model revaluasi, yaitu nilai wajar pada tanggal revaluasi dikurangi dengan akumulasi penyusutan dan akumulasi rugi penurunan nilai setelah tanggal revaluasi, jika ada.

Revaluasi pada nilai wajar dilakukan pada setiap tahun pelaporan. Jika jumlah tercatat aset meningkat akibat revaluasi, maka kenaikan tersebut diakui dalam penghasilan komprehensif lain dan terakumulasi dalam ekuitas pada bagian surplus revaluasi. Akan tetapi, kenaikan tersebut diakui dalam laba rugi hingga sebesar jumlah penurunan nilai aset yang sama akibat revaluasi yang pernah diakui sebelumnya dalam laporan laba rugi. Jika jumlah tercatat aset turun akibat revaluasi, maka penurunan tersebut diakui dalam laba rugi. Penurunan nilai tersebut diakui dalam penghasilan komprehensif lain, untuk mengurangi jumlah akumulasi dari surplus revaluasi, sepanjang tidak melebihi saldo surplus revaluasi dari aset tersebut.

Surplus revaluasi aset tetap dapat dialihkan ke saldo laba ketika terjadi penghentian atau pelepasan aset tersebut. Sebagian surplus revaluasi juga dapat dialihkan sejalan dengan penggunaan aset. Dalam hal tersebut, maka surplus revaluasi yang dialihkan ke saldo laba adalah sebesar perbedaan antara jumlah penyusutan berdasarkan nilai revaluasian dan jumlah penyusutan berdasarkan biaya perolehan awalnya. Pengalihan tersebut tidak dilakukan melalui laba rugi.

Penyusutan terhadap aset tetap dihitung dengan metode garis lurus (*straight-line method*), berdasarkan taksiran manfaat ekonomis aset tetap, sebagai berikut:

2. *SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)*

k. *Property and equipment*

Property and equipment, unless telecommunication towers are stated at cost net of accumulated depreciation and accumulated of asset impairment value, if any.

Telecommunication towers are accounted for using the revaluation model, which is the fair value at the date of revaluation less any accumulated depreciation and accumulated impairment losses after the date of revaluation, if any.

A revaluation at fair value is made at each reporting year. If the carrying amount of the asset increases as a result of the revaluation, the increase is recognized in other comprehensive income and accumulates in equity in the revaluation surplus section. However, the increase is recognized in profit and loss up to the same amount of impairment loss due to revaluation previously recognized in profit or loss. If the carrying amount of the asset decreases as a result of the revaluation, the decrease is recognized in profit or loss. The impairment is recognized in other comprehensive income, to reduce the accumulated amount of the revaluation surplus, as long as it does not exceed the revaluation surplus balance of the asset.

The revaluation surplus of property and equipment may be transferred to the retained earnings when there is a termination or disposal of the asset. Some revaluation surpluses may also be transferred in line with asset use. In that case, the revaluation surplus transferred to retained earnings is the difference between the amount of depreciation based on the revaluation amount and the amount of depreciation based on the initial cost. The transfer is not made through profit or loss.

Depreciation of property and equipment has been computed on a straight-line method, based on the estimated useful lives of the related assets, as follows:

	Masa manfaat/ *Useful lives* Tahun/ *Years*	**Tarif penyusutan / *Depreciation rate***	
Menara telekomunikasi	30	3,33%	*Telecommunication towers*
Bangunan	20	5%	*Buildings*
Menara bergerak	10	10%	*Transportable towers*
Perangkat lunak	4	25%	*Software*
Peralatan, perlengkapan kantor dan perangkat elektronik	4	25%	*Tools, office equipment and electronic hardware*
Kendaraan	4	25%	*Vehicles*
Genset	4	25%	*Gensets*

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

k. **Aset tetap** (Lanjutan)

Beban penyusutan diperhitungkan di dalam laporan laba rugi selama tahun buku di mana beban tersebut terjadi. Akumulasi penyusutan untuk aset yang direvaluasi, dieliminasi terhadap jumlah tercatat bruto dan jumlah tercatat neto setelah eliminasi disajikan kembali sebesar jumlah revaluasiannya.

Perbaikan dan perawatan diperhitungkan ke dalam laporan laba rugi selama tahun di mana perbaikan dan perawatan terjadi. Biaya renovasi dan restorasi utama digabungkan ke dalam nilai tercatat aset jika biaya tersebut memiliki kemungkinan untuk memberikan manfaat di masa depan yang jumlahnya melebihi standar kinerja pada penilaian awal aset yang ada yang akan mengalir ke dalam Perusahaan dan entitas anak, dan disusutkan sebesar sisa umur manfaat aset tersebut.

Nilai residu, masa manfaat, dan metode depresiasi, dikaji pada tiap akhir tahun pelaporan, dan disesuaikan secara prospektif, sesuai dengan keadaan.

Ketika terdapat indikasi penurunan nilai, nilai tercatat aset dinilai dan segera dicatat berdasarkan jumlah terpulihkan.

Keuntungan atau kerugian pelepasan aset tetap ditentukan dengan membandingkan penerimaan dengan nilai tercatat dan dicatat ke dalam laba rugi dari operasi.

Aset dalam penyelesaian dinyatakan sebesar biaya perolehan dan disajikan sebagai bagian dari aset tetap. Akumulasi biaya perolehan akan dipindahkan ke masing-masing akun aset tetap yang bersangkutan pada saat aset tersebut selesai dikerjakan dan siap digunakan.

l. **Properti investasi**

Properti investasi adalah tanah atau bangunan atau bagian dari suatu bangunan atau kedua-duanya yang dikuasai oleh Perusahaan dan entitas anak untuk menghasilkan sewa atau untuk kenaikan nilai atau kedua-duanya, dan tidak digunakan maupun dijual dalam kegiatan operasi.

Properti investasi diukur pada nilai wajar. Nilai wajar properti investasi diakui berdasarkan penilaian dari penilai independen yang memenuhi kualifikasi dan telah diakui, serta didukung oleh bukti pasar. Perubahan nilai wajar properti investasi diakui pada laporan laba rugi dan penghasilan komprehensif lain konsolidasian.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

k. ***Property and equipment*** *(Continued)*

Depreciation expenses are taken to profit or loss during the financial year in which they are incurred. The accumulated depreciation for the revalued asset is eliminated against the gross carrying amount and the net carrying amount after elimination is restated for the amount of revaluation.

Repair and maintenance expenses are taken to profit or loss during the financial year in which they are incurred. The cost of major renovations and restorations is included in the carrying amount of the asset when it is probable that future economic benefits in excess of the originally assessed standard of performance of the existing asset will flow to the Company and subsidiaries, and depreciated over the remaining useful life of the asset.

The residual value, useful life and depreciation method are reviewed at the end of each reporting year, and adjusted prospectively, if appropriate.

Where an indication of impairment exists, the carrying amount of the asset is assessed and written down immediately to its recoverable amount.

Gains or losses on disposal are determined by comparing proceeds with the carrying amount and are included in profit or loss from operations.

Assets in progress are stated at cost and presented as part of the property and equipments. The accumulated cost will be reclassified to the appropriate property and equipments account when the installation is substantially completed and the asset is ready for its intended use.

l. ***Investment properties***

Investment property is land or buildings or part of a building or both which is controlled by the Company and subsidiaries to earn rental or for capital appreciation or both, rather than for use or sale in the ordinary course of business.

Investment property shall be measured at fair value. The fair value of investment property is recognized based on an appraisal by a qualified and authorized independent appraiser and supported by the market evidence. Changes to investment property fair value shall be recognized in the consolidated statements of profit or loss and other comprehensive income.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

l. **Properti investasi** (Lanjutan)

Properti investasi dihentikan pengakuannya (dikeluarkan) dari laporan posisi keuangan konsolidasian pada saat pelepasan atau ketika properti investasi tersebut tidak digunakan lagi secara permanen dan tidak memiliki manfaat ekonomis di masa depan yang dapat diharapkan pada saat pelepasannya. Laba atau rugi yang timbul dari penghentian atau pelepasan properti investasi diakui dalam laporan laba rugi dan penghasilan komprehensif konsolidasian dalam tahun terjadinya penghentian atau pelepasan tersebut.

m. **Penurunan nilai aset non-keuangan**

Pada setiap akhir tahun pelaporan, Perusahaan dan entitas anak menilai apakah terdapat indikasi suatu aset mengalami penurunan nilai. Jika terdapat indikasi tersebut atau pada saat pengujian penurunan nilai aset (yaitu aset tak berwujud dengan umur manfaat tidak terbatas, aset tak berwujud yang belum dapat digunakan, atau *goodwill* yang diperoleh dalam suatu kombinasi bisnis) diperlukan, maka Perusahaan dan entitas anak membuat estimasi formal jumlah terpulihkan aset tersebut.

Jumlah terpulihkan yang ditentukan untuk aset individual adalah jumlah yang lebih tinggi antara nilai wajar aset atau unit penghasil kas ("UPK") dikurangi biaya pelepasan dengan nilai pakainya, kecuali aset tersebut tidak menghasilkan arus kas masuk yang sebagian besar independen dari aset atau kelompok aset lain. Jika nilai tercatat aset lebih besar daripada nilai terpulihkannya, maka aset tersebut mengalami penurunan nilai dan nilai tercatat aset diturunkan menjadi sebesar nilai terpulihkannya. Rugi penurunan nilai segera diakui dalam laba rugi.

Dalam menghitung nilai pakai, estimasi arus kas masa depan bersih didiskontokan ke nilai kini dengan menggunakan tingkat diskonto sebelum pajak yang menggambarkan penilaian pasar terkini atas nilai waktu dari uang dan risiko spesifik dari aset. Jika tidak terdapat transaksi tersebut, Perusahaan dan entitas anak menggunakan model penilaian yang sesuai untuk menentukan nilai wajar aset. Perhitungan-perhitungan ini dikuatkan oleh penilaian berganda atau indikasi nilai wajar yang tersedia.

Dalam menentukan nilai wajar dikurangi biaya untuk menjual, digunakan harga penawaran pasar terakhir, jika tersedia. Kerugian penurunan nilai dari operasi yang dilanjutkan, jika ada, diakui pada laporan laba rugi dan penghasilan komprehensif lain konsolidasian sesuai dengan kategori beban yang konsisten dengan fungsi dari aset yang diturunkan nilainya.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

l. ***Investment properties*** *(Continued)*

The investment property shall be eliminated from the consolidated statements of financial position on disposal or when the investment property is permanently withdrawn from use and no future economic benefits are expected when withdrawn. Gains or losses from investment property withdrawals or disposals are recorded in the consolidated statements of profit or loss and other comprehensive income when incurred.

m. ***Impairment of non-financial assets***

At the end of each reporting year, the Company and subsidiaries assesses whether there is an indication that an asset may be impaired. If any such indication exists or impairment testing for an asset (i.e., an intangible asset with an indefinite useful life, an intangible asset not yet available for use, or goodwill acquired in a business combination) is required, the Company and subsidiaries makes an estimate of the asset's recoverable amount.

An individual asset's recoverable amount is determined by the higher between the fair value asset or cash generating unit ("CGU") less costs to disposal and its value in use, unless the asset does not generate cash inflows that are largely independent of those from assets or group of other assets. Where the carrying amount of an asset exceeds its recoverable amount, the asset is considered impaired and is written-down to its recoverable amount. Impairment losses are recognized immediately in profit or loss.

In assessing the value in use, the estimated net future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset. If no such transactions can be identified, the Company and subsidiaries use an appropriate valuation model to determine the fair value of the assets. These calculations are corroborated by multiple valuation or other available fair value indicators.

In determining fair value less costs to sell, recent market transactions are taken into account, if available. Impairment losses of continuing operations, if any, are recognized in the consolidated statement of profit or loss and other comprehensive income under expense categories that are consistent with the functions of the impaired assets.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

m. **Penurunan nilai aset non-keuangan** (Lanjutan)

Penilaian dilakukan pada akhir setiap tahun pelaporan tahunan apakah terdapat indikasi bahwa rugi penurunan nilai yang telah diakui dalam tahun sebelumnya untuk aset selain *goodwill* mungkin tidak ada lagi atau mungkin telah menurun. Jika indikasi dimaksud ditemukan, maka entitas mengestimasi jumlah terpulihkan aset tersebut. Kerugian penurunan nilai yang telah diakui dalam tahun sebelumnya untuk aset selain *goodwill* dibalik hanya jika terdapat perubahan asumsi-asumsi yang digunakan untuk menentukan jumlah terpulihkan aset tersebut sejak rugi penurunan nilai terakhir diakui. Dalam hal ini, jumlah tercatat aset dinaikkan ke jumlah terpulihkannya. Pembalikan tersebut dibatasi sehingga jumlah tercatat aset tidak melebihi jumlah terpulihkannya maupun jumlah tercatat, bersih setelah penyusutan, seandainya tidak ada rugi penurunan nilai yang telah diakui untuk aset tersebut pada tahun sebelumnya. Pembalikan rugi penurunan nilai diakui dalam laporan laba rugi dan penghasilan komprehensif lain konsolidasian. Setelah pembalikan tersebut, penyusutan aset tersebut disesuaikan di tahun mendatang untuk mengalokasikan jumlah tercatat aset yang direvisi, dikurangi nilai sisanya, dengan dasar yang sistematis selama sisa umur manfaatnya.

n. **Sewa**

Pada tanggal permulaan suatu kontrak, Perusahaan dan entitas anak menilai apakah kontrak merupakan, atau mengandung sewa. Suatu kontrak merupakan, atau mengandung sewa jika kontrak tersebut memberikan hak untuk mengendalikan penggunaan aset identifikasian selama suatu jangka waktu untuk dipertukarkan dengan imbalan.

Untuk menilai apakah suatu kontrak memberikan hak untuk mengendalikan suatu aset identifikasian, Perusahaan dan entitas anak menilai apakah:

- Kontrak melibatkan penggunaan suatu aset identifikasian ini dapat ditentukan secara eksplisit atau implisit dan secara fisik dapat dibedakan atau mewakili secara substansial seluruh kapasitas aset yang secara fisik dapat dibedakan. Jika pemasok memiliki hak substitusi substantif, maka aset tersebut tidak teridentifikasi;

- Perusahaan dan entitas anak memiliki hak untuk mendapatkan secara subtansial seluruh manfaat ekonomi dari penggunaan aset identifikasian;

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

m. ***Impairment of non-financial assets*** *(Continued)*

An assessment is made at the end of each reporting year as to whether there is any indication that previously recognized impairment losses recognized for an asset other than goodwill may no longer exist or may have decreased. If such indication exists, the entity estimates the recoverable amount. A previously recognized impairment loss for an asset is reversed only if there has been a change in the assumptions used to determine the asset's recoverable amount since the last impairment loss was recognized. If that is the case, the carrying amount of the asset is increased to its recoverable amount. The reversal is limited so that the carrying amount of the asset does not exceed its recoverable amount, nor exceed the carrying amount that would have been determined, net of depreciation, had no impairment loss been recognized for the asset in prior years. Reversal of an impairment loss is recognized in the consolidated statement of profit or loss and other comprehensive income. After such a reversal, the depreciation charge on the said asset is adjusted in future years to allocate the asset's revised carrying amount, less any residual value, on a systematic basis over its remaining useful life.

n. ***Leases***

At the inception of a contract, the Company and subsidiaries assesses whether the contract is, or contains a lease. A contract is, or contains a lease if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration.

To assess whether a contract conveys the right to control the use of an identified asset, the Company and subsidiaries assesses whether:

- *The contract involves the use of an identified asset - this may be specified explicitly or implicitly and should be physically distinct or represent substantially all of the capacity of a physically distinct asset. If the supplier has the substantive substitution right, then the asset is not identified;*

- *The Company and subsidiaries has the right to obtain substantially all the economic benefits from use of the asset throughout the period of use;*

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

n. **Sewa** (Lanjutan)

- Perusahaan dan entitas anak memiliki hak untuk mengarahkan penggunaan aset identifikasian. Perusahaan dan entitas anak memiliki hak ini ketika hak pengambilan keputusan yang paling relevan untuk mengubah bagaimana dan untuk tujuan apa aset tersebut digunakan. Dalam kondisi tertentu di mana semua keputusan tentang bagaimana dan untuk tujuan apa aset digunakan telah ditentukan sebelumnya, Perusahaan dan entitas anak memiliki hak untuk mengarahkan penggunaan aset tersebut jika:

  - Perusahaan memiliki hak untuk mengoperasikan aset; dan
  - Perusahaan telah mendesain aset dengan cara menetapkan sebelumnya bagaimana dan untuk tujuan apa aset akan digunakan selama periode penggunaan.

Pada tanggal insepsi atau pada saat penilaian kembali suatu kontrak yang mengandung suatu komponen sewa, Perusahaan dan entitas anak mengalokasikan imbalan dalam kontrak ke masing-masing komponen sewa berdasarkan harga tersendiri relatif dari komponen sewa.

Pada pengakuan awal, Perusahaan dan entitas anak mencatat aset hak-guna dan liabilitas sewa.

Aset hak-guna diukur pada biaya perolehan, dimana meliputi jumlah pengukuran awal liabilitas sewa yang disesuaikan dengan pembayaran sewa yang dilakukan pada atau sebelum tanggal permulaan, ditambah dengan biaya langsung awal yang dikeluarkan dan estimasi biaya yang akan dikeluarkan untuk membongkar dan memindahkan aset pendasar atau untuk merestorasi aset pendasar sesuai kondisi yang disyaratkan dan ketentuan sewa, dikurangi dengan insentif sewa yang diterima.

Aset hak-guna disusutkan dengan menggunakan metode garis-lurus dari tanggal permulaan hingga tanggal yang lebih awal antara akhir masa manfaat aset hak-guna atau akhir masa sewa.

Liabilitas sewa awalnya diukur pada nilai kini atas pembayaran sewa yang belum dibayar pada tanggal permulaan, didiskontokan menggunakan suku bunga implisit dalam sewa atau, jika suku bunga tersebut tidak dapat ditentukan, digunakan suku bunga pinjaman inkremental Perusahaan dan entitas anak.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

n. ***Leases*** *(Continued)*

- *The Company and subsidiaries have the right to direct the use of the identified asset. The Company and subsidiaries have this right when it has the decisionmaking rights that are most relevant to changing how and for what purpose the asset is used. In certain circumstances where all the decisions about how and for what purpose the asset is used are predetermined, the Company and subsidiaries has the right to direct the use of the asset if either:*

  - *The Company has the right to operate the asset; and*
  - *The Company has designed the asset in a way that predetermined how and for what purpose it will be used.*

At inception or on re-assessment of a contract that contains a lease component, the Company and subsidiaries allocates consideration in the contract to each lease component on the basis of their relative stand-alone prices.

At initial recognition, the Company and subsidiaries recorded the right-of-use asset and lease liability.

The right-of-use asset is initially measured at cost, which comprises the initial amount of the lease liability adjusted for any lease payment made at or before the commencement date, plus any initial direct cost incurred and an estimate of costs to dismantle and remove the underlying asset or to restore the underlying asset to the condition required by the terms and conditions of the lease, less any lease incentives received.

The right-of-use asset is depreciated using the straight-line method from the commencement date to the earlier of the end of the useful life of the right-of-use asset or the end of the lease term.

The lease liability is initially measured at the present value of the lease payments that are not yet paid at the commencement date, discounted using the interest rate implicit in the lease or, if that rate cannot be readily determined, the Company and subsidiaries 's incremental borrowing rate.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

n. **Sewa** (Lanjutan)

Pembayaran sewa yang termasuk dalam pengukuran liabilitas sewa meliputi:

- Pembayaran tetap, termasuk pembayaran tetap secara-substansi;
- Pembayaran sewa variabel yang bergantung pada suatu indeks atau suku bunga, yang pada awalnya diukur dengan menggunakan indeks atau suku bunga pada tanggal permulaan;
- Jumlah yang diperkirakan akan dibayarkan dalam jaminan nilai residual;
- Harga eksekusi opsi beli dimana Perusahaan dan entitas anak cukup pasti untuk mengeksekusi opsi tersebut, pembayaran sewa dalam periode perpanjangan opsional jika Perusahaan dan entitas anak cukup pasti untuk mengeksekusi opsi perpanjangan; dan
- Penalti untuk penghentian dini dari sewa kecuali jika Perusahaan dan entitas anak cukup pasti untuk tidak mengakhiri lebih dini.

Liabilitas sewa diukur kembali ketika ada perubahan pembayaran sewa masa depan yang timbul dari perubahan indeks atau suku bunga, jika ada perubahan estimasi Perusahaan dan entitas anak atas jumlah yang diperkirakan akan dibayar dalam jaminan nilai residual, atau jika Perusahaan dan entitas anak mengubah penilaiannya apakah akan mengeksekusi opsi beli, perpanjangan atau penghentian.

Ketika liabilitas sewa diukur kembali dengan cara ini, penyesuaian terkait dilakukan terhadap jumlah tercatat aset hak-guna, atau dicatat dalam laba rugi jika jumlah tercatat aset hak-guna telah berkurang menjadi nol.

Sewa jangka pendek dan sewa aset bernilai rendah

Perusahaan dan entitas anak memilih untuk tidak mengakui aset hak guna dan liabilitas sewa untuk sewa jangka pendek yang memiliki masa sewa maksimal 12 bulan dan sewa atas aset bernilai rendah. Perusahaan dan entitas anak mengakui pembayaran sewa terkait dengan sewa ini sebagai beban dengan dasar garis-lurus selama masa sewa.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

n. ***Leases*** *(Continued)*

Lease payments included in the measurement of the lease liability comprise the following:

- *Fixed payments, including in-substance fixed payments;*
- *Variable lease payments that depend on an index or a rate, initially measured using the index or rate as at the commencement date;*
- *Amounts expected to be payable under a residual value guarantee;*
- *The exercise price under a purchase option that the Company and subsidiaries is reasonably certain to exercise, lease payments in an optional renewal period if the Company and subsidiaries is reasonably certain to exercise an extension option; and*
- *Penalties for early termination of a lease unless the Company and subsidiaries is reasonably certain not to terminate early.*

Lease liability remeasured when there is a change in future lease payments arising from a change in an index or rate, if there is a change in the Company and subsidiaries 's estimate of the amount expected to be payable under a residual value guarantee, or if the Company and subsidiaries changes its assessment of whether it will exercise a purchase, extension or termination option.

When the lease liability is remeasured in this way, a corresponding adjustment is made to the carrying amount of the rightof-use assets, or is recorded in profit or loss if the carrying amount of the right-of-use asset has been reduced to zero.

Short-term leases and leases of low-value assets

The Company and subsidiaries have elected not to recognize right-of use assets and lease liabilities for short-term leases that have a maximum lease term of 12 months and leases of low-value assets. The Company and subsidiaries recognize the lease payments associated with these leases as an expense on a straight-line basis over the lease term.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

n. **Sewa** (Lanjutan)

Sewa aset tetap

Perusahaan dan entitas anak melakukan sewa atas aset tetap tertentu yang diklasifikasikan sebagai aset sewa pembiayaan dalam aset tetap.

Jumlah sewa pembiayaan yang awalnya diakui sebagai aset tetap, diukur mana yang lebih rendah antara nilai wajar aset dan nilai kini utang pembayaran sewa minimum selama masa sewa. Komitmen sewa disajikan sebagai liabilitas. Pembayaran sewa dianalisis antara modal dan bunga. Unsur bunga sewa diperhitungkan dan dibebankan di dalam laba rugi selama periode sewa sehingga mencerminkan proporsi tetap liabilitas sewa.

Aset sewa pembiayaan dalam aset tetap disusutkan atas dasar penggunaan selama taksiran umur operasi aset tetap tersebut.

Aset sewa pembiayaan disusutkan dengan metode yang sama dan berdasarkan masa manfaat sebagaimana diestimasikan untuk aset tetap perolehan langsung. Akan tetapi, jika tidak terdapat kepastian yang memadai bahwa Perusahaan dan entitas anak akan memperoleh kepemilikan pada akhir masa sewa, aset sewa pembiayaan disusutkan penuh selama jangka waktu yang lebih pendek antara masa sewa dan umur manfaatnya.

Perjanjian sewa yang tidak memenuhi kriteria di atas, dicatat sebagai sewa operasi dimana pembayarannya diakui sebagai beban dengan dasar garis lurus selama masa sewa.

o. **Perpajakan**

Beban pajak penghasilan

Beban pajak terdiri dari pajak kini dan pajak tangguhan. Pajak diakui dalam laporan laba rugi, kecuali jika berkaitan dengan item yang diakui dalam penghasilan komprehensif lain atau secara langsung dalam ekuitas. Dalam kasus ini, pajak diakui dalam penghasilan komprehensif lain atau langsung dalam ekuitas.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

n. ***Leases*** *(Continued)*

Leases of property, plant and equipment

The Company and subsidiaries leases certain of property, plant and equipment that classified as finance lease assets under property, plant and equipment.

The amount of finance lease that initially recognized as a property, plant and equipment is the lower of the fair value of the leased asset and the present value of the minimum lease payments payable over the term of the lease. The corresponding lease commitment is shown as a liability. Lease payments are analyzed between capital and interest. The interest element is charged to profit or loss over the period of the lease and is calculated so that it represents a constant proportion of the lease liability.

Finance lease assets under property, plant and equipment are depreciated using utilisation basis over their estimated operating life.

Leased assets are depreciated using the same method and based on the useful lives as estimated for directly acquired property and equipment. However, if there is no reasonable certainty that the Company and subsidiaries will obtain ownership by the end of the lease term, the leased assets are fully depreciated over the shorter of the lease terms and their economic useful lives.

Lease arrangements that do not meet the above criteria are accounted for as operating leases for which payments are charged as an expense on the straight-line basis over the lease year.

o. ***Taxation***

Income tax expense

The tax expense comprises current and deferred tax. Tax is recognized in profit or loss, except to the extent that it relates to items recognized in other comprehensive income or directly in equity. In this case, the tax is also recognized in other comprehensive income or directly in equity, respectively.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

o. **Perpajakan** (Lanjutan)

Beban pajak penghasilan (Lanjutan)

i. **Pajak kini**

Beban pajak penghasilan kini dihitung dengan dasar hukum pajak yang berlaku pada tanggal pelaporan. Aset atau liabilitas pajak penghasilan kini terdiri dari kewajiban kepada atau klaim dari otoritas pajak yang berhubungan dengan tahun pelaporan kini atau sebelumnya, yang belum dibayar pada akhir tahun tanggal pelaporan. Pajak penghasilan diperhitungkan berdasarkan tarif pajak dan hukum pajak yang berlaku pada tahun fiskal tersebut. Pada 31 Maret 2020, Pemerintah Indonesia menerbitkan Peraturan Pemerintah Pengganti Undang-Undang No. 1 Tahun 2020 (Perppu No.1/2020) tentang Kebijakan Keuangan Negara dan Stabilitas Sistem Keuangan Untuk Penanganan Pandemi Corona Virus Disease 2019 (COVID-19) Dan/Atau Dalam Rangka Menghadapi Ancaman Yang Membahayakan Perekonomian Nasional Dan/Atau Stabilitas Sistem Keuangan. Perppu ini mengatur penyesuaian tarif Pajak Penghasilan Wajib Pajak badan dalam negeri dan bentuk usaha tetap menjadi 22% yang berlaku pada Tahun Pajak 2020 dan Tahun Pajak 2021 serta tarif 20% yang berlaku pada Tahun Pajak 2022. Seluruh perubahan pada aset atau liabilitas pajak kini diakui sebagai komponen biaya pajak penghasilan dalam laporan laba rugi.

ii. **Pajak tangguhan**

Aset dan liabilitas pajak tangguhan diakui ketika jumlah tercatat dari aset atau liabilitas dalam laporan posisi keuangan konsolidasian berbeda dari dasar perpajakannya, kecuali jika perbedaan itu terjadi karena:

- Pengakuan awal *goodwill*
- Pengakuan awal aset atau liabilitas pada saat transaksi yang bukan merupakan kombinasi bisnis dan pada saat transaksi terjadi tidak mempengaruhi akuntansi atau laba kena pajak, dan
- Investasi pada entitas anak dan pengendalian bersama entitas dimana Perusahaan dan entitas anak mampu mengendalikan waktu pembalikan perbedaan dan kemungkinan besar bahwa perbedaan tersebut tidak akan dibalik pada masa yang akan datang.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

o. ***Taxation*** *(Continued)*

Income tax expense *(Continued)*

i. ***Current tax***

The current Income tax charge is calculated on the basis of the tax laws enacted or substantively enacted at the reporting date. Current income tax assets and/or liabilities comprise those obligations to, or claims from, tax authorities relating to the current or prior reporting year, that are unpaid at the end of each reporting year date. They are calculated according to the tax rates and tax laws applicable to the fiscal years to which they relate, based on the taxable profit for the year. On 31 March 2020, the Government of Indonesia issued Government Regulation in Lieu of Law No. 1 Year 2020 (Perppu No.1/2020) on State Financial Policy and Stability of Financial Systems for the Management of Corona Virus Disease 2019 (Covid-19) and/or Encounter the Threat to National Economy and/or Stability of Financial Systems. Perppu No.1/2020 regulates the adjustment of tax rates for Income Tax of domestic corporate and permanent establishment in the form of a rates reduction to 22% applicable for Fiscal Year 2020 and Fiscal Year 2021 and 20% applicable for Fiscal Year 2022. All changes to current tax assets or liabilities are recognized as a component of income tax expense in profit or loss.

ii. ***Deferred tax***

Deferred tax assets and liabilities are recognised where the carrying amount of an asset or liability in the consolidated statement of financial position differs from its tax base, except for differences arising on:

- *The initial recognition of goodwill*
- *The initial recognition of an asset or liability in a transaction which is not a business combination and at the time of the transaction affects neither accounting or taxable profit, and*

- *Investments in subsidiaries and jointly controlled entities where the Company and subsidiaries is able to control the timing of the reversal of the difference and it is probable that the difference will not reverse in the foreseeable future.*

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

o. **Perpajakan** (Lanjutan)

Beban pajak penghasilan (Lanjutan)

ii. **Pajak tangguhan (**Lanjutan)

Pengakuan dari aset pajak tangguhan terbatas pada saat dimana terdapat kemungkinan besar bahwa laba kena pajak akan tersedia terhadap perbedaan yang dapat digunakan.

Jumlah aset atau liabilitas ditentukan dengan menggunakan tarif pajak pada saat tanggal pelaporan dan di harapkan akan digunakan ketika liabilitas pajak tangguhan/(aset) telah diselesaikan/(dipulihkan).

Aset dan liabilitas pajak tangguhan di saling hapus ketika Perusahaan dan entitas anak memiliki hak hukum untuk saling hapus aset dan liabilitas pajak kini yang berhubungan dengan pungutan oleh otoritas pajak yang sama atas:

- Perusahaan dan entitas anak yang dikenakan pajak adalah sama, atau
- Kelompok entitas yang berbeda yang bertujuan untuk menyelesaikan aset pajak kini secara neto atau untuk merealisasikan aset dan menyelesaikan liabilitas, pada tahun masa depan dimana jumlah aset atau liabilitas pajak tangguhan signifikan diharapkan untuk di selesaikan atau di pulihkan.

iii. **Pajak penghasilan final**

Pada 6 September 2017, Pemerintah Indonesia menerbitkan Peraturan Pemerintah (PP) No. 34 (PP34) tentang Pajak Penghasilan atas Penghasilan dari Persewaan Tanah dan/atau Bangunan. Menurut PP34 ini, untuk sewa menara telekomunikasi yang tahun sewanya dimulai sejak berlakunya PP34 ini pada 2 Januari 2018, maka penghasilan atas sewa menara telekomunikasi tersebut akan dikenakan pajak penghasilan dengan tarif final 10%. Sedangkan penghasilan atas sewa menara telekomunikasi yang tahun sewanya dimulai sebelum berlakunya PP34 tersebut, tetap dikenakan pajak penghasilan dengan tarif non-final.

Pajak Pertambahan Nilai

Pendapatan, beban dan aset diakui bersih dari jumlah PPN, kecuali apabila PPN timbul pada saat pembelian aset atau jasa yang tidak dapat dipulihkan dari otoritas perpajakan, dalam hal ini PPN diakui sebagai bagian dari biaya perolehan aset atau sebagai bagian dari pos biaya, sebagaimana yang berlaku.

2. *SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)*

o. ***Taxation*** *(Continued)*

Income tax expense *(Continued)*

ii. ***Deferred tax*** *(Continued)*

Recognition of deferred tax assets is restricted to those instances where it is probable that taxable profit will be available against which the difference can be utilised.

The amount of the asset or liability is determined using tax rates that have been enacted or substantively enacted by the reporting date and are expected to apply when the deferred tax liabilities/(assets) are settled/(recovered).

Deferred tax assets and liabilities are offset when the Company and subsidiaries has a legally enforceable right to offset current tax assets and liabilities and the deferred tax assets and liabilities relate to taxes levied by the same tax authority on either:

- *The same taxable of the Company and subsidiaries, or*
- *Different Company and subsidiaries entities which intend either to settle current tax assets and liabilities on a net basis, or to realise the assets and settle the liabilities simultaneously, in each future year in which significant amounts of deferred tax assets or liabilities are expected to be settled or recovered.*

iii. ***Final tax income***

On 6 September 2017, the Government of Indonesia issued the Government Regulation (GR) No. 34 (GR34) regarding Income Tax on Income from Land and/or Building Rental. According to the GR34, for lease of telecommunication towers whose lease year commences from the inception of this PP34 on 2 January 2018, the rental telecommunication tower's income shall be subject to the final income tax at rate of 10%. While the rental telecommunication tower income, which is the rental year commencing prior to the enactment of GR34, remains subject to the non final income tax, which is the rental year commencing prior to the enactment of GR34, remains subject to the non final income tax.

Value-Added Tax

Revenue, expenses and assets are recognized net of the amount of VAT, except where the VAT incurred on a purchase of assets or services are not recoverable from the taxation authority, in which case the VAT is recognized as part of the cost of acquisition of the asset or as part of the expense item as applicable.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

o. **Perpajakan** (Lanjutan)

Hal-hal perpajakan lainnya

Penyesuaian atas liabilitas pajak dicatat pada saat Surat Ketetapan Pajak diterima atau pada saat keberatan yang diajukan ditetapkan.

p. **Cadangan imbalan pasca-kerja**

Program manfaat pasti

Perusahaan dan entitas anak mendanai program imbalan pasca-kerja sesuai dengan Undang-Undang Ketenagakerjaan No. 13/2003 tanggal 25 Maret 2003 ("Undang-Undang").

Liabilitas atau aset imbalan kerja bersih adalah agregat dari nilai kini liabilitas imbalan pasti pada akhir tahun pelaporan dikurangi dengan nilai wajar aset program (jika ada), disesuaikan dengan dampak yang membatasi aset imbalan pasti bersih terhadap batas atas aset. Batas atas aset adalah nilai sekarang dari manfaat ekonomis yang tersedia dalam bentuk pengembalian dana dari program atau pengurangan iuran masa mendatang tersebut.

Beban tersebut berdasarkan perhitungan aktuaria independen dengan menggunakan metode *"Projected Unit Credit"*.

Biaya imbalan pasti terdiri dari:
- Biaya jasa
- Bunga neto atas liabilitas atau aset imbalan pasti neto
- Pengukuran kembali liabilitas atau aset imbalan pasti neto

Biaya jasa meliputi biaya jasa kini, biaya jasa lalu dan keuntungan atau kerugian dari dan pembayaran yang tidak rutin diakui sebagai beban dalam laba rugi. Biaya jasa lalu diakui pada tanggal yang lebih awal antara ketika amendemen atau kurtailmen program terjadi, dan ketika Perusahaan dan entitas anak mengakui biaya restrukturisasi terkait atau biaya pesangon.

Bunga bersih atas liabilitas atau aset imbalan pasti adalah perubahan selama tahun berjalan pada bunga bersih atas liabilitas atau aset imbalan pasti yang muncul dari waktu ke waktu yang ditentukan dengan mengalikan tingkat diskonto berdasarkan obligasi pemerintah dengan liabilitas atau aset imbalan pasti bersih. Bunga bersih atas liabilitas atau aset imbalan pasti diakui sebagai beban atau pendapatan dalam laba rugi.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

o. ***Taxation*** *(Continued)*

Other taxation matters

Amendments to taxation obligations are recorded when a Tax Assessment Letter is received or, if appealed against, when the results of the appeal are determined.

p. ***Provision for post-employment benefits***

Defined benefit plan

The Company and subsidiaries set up fund for post-employment benefit program. in accordance with Labor Law No. 13/2003 dated 25 March 2003 (the "Law").

The net pension liability or asset is the aggregate of the present value of the defined benefit obligation at the end of the reporting year reduced by the fair value of plan assets (if any), adjusted for any effect of limiting a net defined benefit asset to the asset ceiling. The asset ceiling is the present value of any economic benefits available in the form of refunds from the plan or reductions in future contributions to the plan.

The provision is estimated based on actuarial calculations prepared by an independent firm of actuaries using the "Projected Unit of Credit" method.

Net pension cost comprises the following:
- *Service cost*
- *Net interest on the net defined benefit liability or asset*
- *Remeasurements of net defined benefit liability or asset*

Service costs which include current service costs, past service costs and gains or losses on nonroutine settlements are recognized as expense in profit or loss. Past service costs are recognized at the earlier of the date when the plan amendment or cuartailment occurs and when the Company and subsidiaries recognises related restructuring cost or termination benefits.

Net interest on the net defined benefit liability or asset is the change during the year in the net defined benefit liability or asset that arises from the passage of time which is determined by applying the discount rate based on government bonds to the net defined benefit liability or asset. Net interest on the net defined benefit liability or asset is recognized as expense or income in profit or loss.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

p. **Cadangan imbalan pasca-kerja** (Lanjutan)

Pengukuran kembali terdiri dari keuntungan dan kerugian aktuaria, imbal hasil aset program dan setiap perubahan dampak batas atas aset, tidak termasuk jumlah yang dimasukan dalam bunga neto atas liabilitas atau aset imbalan pasti. Pengukuran kembali atas liabilitas (aset) imbalan pasti neto diakui dalam penghasilan komprehensif lain pada tahun terjadinya. Pengukuran kembali tidak direklasifikasi ke laba rugi pada tahun berikutnya.

Imbalan jangka panjang lainnya

Perusahaan dan entitas anak juga memberikan manfaat penghargaan jangka panjang lainnya dalam bentuk cuti panjang dan tunjangan cuti panjang.

Beban tersebut berdasarkan perhitungan aktuaria independen dengan menggunakan metode *"Projected-Unit-Credit"*. Beban jasa masa kini termasuk beban jasa lalu dan keuntungan atau kerugian aktuarial dibebankan langsung ke laporan laba rugi tahun berjalan.

q. **Modal saham**

Modal saham diukur pada nilai nominal untuk seluruh saham yang ditempatkan. Pada saat Perusahaan menempatkan lebih dari satu jenis saham, akun terpisah dikelola untuk tiap jenis saham dan jumlah saham yang ditempatkan.

r. **Transaksi restrukturisasi entitas sepengendali**

Transaksi restrukturisasi entitas sepengendali berupa pengalihan aset, liabilitas, saham atau instrumen kepemilikan lainnya yang dilakukan dalam rangka reorganisasi entitas-entitas yang berada dalam suatu Perusahaan dan entitas anak yang sama, bukan merupakan perubahan pemilikan dalam arti substansi ekonomi, sehingga transaksi demikian tidak dapat menimbulkan laba atau rugi bagi seluruh kelompok perusahaan ataupun bagi entitas individual dalam kelompok perusahaan tersebut.

Karena transaksi restrukturisasi antara entitas sepengendali tidak mengakibatkan perubahan substansi ekonomi pemilikan atas aset, liabilitas, saham, atau instrumen kepemilikan lainnya yang dipertukarkan, maka aset maupun liabilitas yang pemilikannya dialihkan (dalam bentuk hukumnya) harus dicatat sesuai dengan nilai tercatat seperti penggabungan usaha berdasarkan metode penyatuan kepemilikan *(pooling-of-interest)*.

Unsur-unsur laporan keuangan dari perusahaan yang direstrukturisasi untuk tahun terjadinya restrukturisasi tersebut dan untuk tahun perbandingan yang disajikan, harus disajikan sedemikian rupa seolah-olah Perusahaan tersebut telah bergabung sejak permulaan tahun yang disajikan tersebut.

2. *SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)*

*p. **Provision for post-employment benefits** (Continued)*

Remeasurements comprising actuarial gains and losses, return on plan assets and any change in the effect of the asset ceiling excluding net interest on defined benefit liability are recognized in other comprehensive income in the year in which they arise. Remeasurements are not reclassified to profit or loss in subsequent years.

Other long-term benefits

The Company and subsidiaries also provide other long-term rewards in the form of long leave and long leave allowances.

The provision is estimated based on actuarial calculations prepared by an independent firm of actuaries using the "Projected Unit of Credit" method. Current service costs including past service cost and actuarial gain or loss are charged directly to statement of profit or loss of the current year.

*q. **Share capital***

Share capital is measured at par value for all shares issued. When the Company issues more than one class of shares, a separate account is maintained for each class of shares and the number of shares issued.

*r. **Restructuring transactions of entities under common control***

Restructuring transactions of entities under common control represent transfer of assets, liabilities, shares or other ownership instruments to reorganize entities within the same Company and subsidiaries, therefore resulting in no changes of ownership in terms of economic substance, and should not result in any gains or losses for the whole Company and subsidiaries companies or for the individual entity in the Company and subsidiaries.

Since restructuring transactions of entities under common control do not result in changes in economic substance of ownership in transferred assets, shares, liabilities or other ownership instruments, the transferred assets or liabilities (in legal form) should be recorded at book value in a manner similar to business combination transactions using the pooling-of-interest method.

The financial statements items of the restructured companies for the year in which the restructuring occurs and for any comparative years should be presented as if the Companies had been combined from the beginning of the earliest year presented.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

r. **Transaksi restrukturisasi entitas sepengendali** (Lanjutan)

Sebelum 1 Januari 2013, selisih antara harga pengalihan dengan nilai tercatat setiap transaksi restrukturisasi antara entitas sepengendali dibukukan dalam akun "Selisih nilai transaksi restrukturisasi entitas sepengendali". Saldo akun tersebut selanjutnya disajikan sebagai unsur ekuitas.

Efektif 1 Januari 2013, selisih antara harga pengalihan dengan nilai tercatat setiap transaksi restrukturisasi antara entitas sepengendali dibukukan dalam akun "Tambahan modal disetor".

s. **Tambahan modal disetor - bersih**

Tambahan modal disetor – bersih merupakan selisih antara harga penawaran dari hasil penawaran umum perdana saham Perusahaan dengan nilai nominal saham, setelah dikurangi dengan biaya-biaya yang terjadi sehubungan dengan penawaran umum perdana saham tersebut.

t. **Saham treasuri**

Ketika Perusahaan membeli modal saham ekuitas (saham treasuri), imbalan yang dibayar, termasuk biaya tambahan yang secara langsung dapat diatribusikan (dikurangi pajak penghasilan) dikurangkan dari ekuitas yang diatribusikan kepada pemilik ekuitas sampai saham tersebut ditarik atau diterbitkan kembali. Apabila saham treasuri ditarik kembali, selisih antara harga perolehan dengan nilai nominal dialokasikan antara tambahan modal disetor dan saldo laba.

u. **Dividen**

Dividen diakui pada saat dividen secara legal menjadi terutang. Dalam dividen terhadap pemegang saham ekuitas, dividen menjadi terutang pada saat diumumkan oleh Direksi. Dalam dividen final, dividen menjadi terutang pada saat dividen diumumkan oleh para pemegang saham pada saat Rapat Umum Pemegang Saham.

v. **Pengakuan pendapatan dan beban**

Pendapatan diakui ketika kemungkinan besar manfaat ekonomi masa depan akan mengalir ke Perusahaan dan entitas anak dan manfaat ini dapat diukur secara handal. Pendapatan diukur dengan nilai wajar imbalan yang diterima, dikurangi diskon dan Pajak Pertambahan Nilai (PPN).

Pendapatan sewa menara diakui selama masa sewa. Pendapatan sewa menara diterima di muka disajikan sebagai akun "Pendapatan yang diterima di muka". Pendapatan sewa menara yang belum ditagih disajikan sebagai akun "Pendapatan yang masih harus diterima" di laporan posisi keuangan konsolidasian. Beban diakui berdasarkan metode akrual *(accrual method)*.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

r. ***Restructuring transactions of entities under common control*** *(Continued)*

Before 1 January 2013, the difference between transfer price and book value for each restructuring transaction of entities under common control is recorded in an account entitled "Differences arising from restructuring transactions of entities under common control". The account balance is presented as a component of the equity.

Effective 1 January 2013, the difference between transfer price and book value for each restructuring transaction of entities under common control is recorded in an account entitled "Additional paid-in capital".

s. ***Additional paid-in capital - net***

Additional paid-in capital – net represents the difference between the offering price of the shares of the Company at the initial public offering with the par value of such shares, net of shares issuance costs.

t. ***Treasury stocks***

Where the Company purchases its share capital (treasury shares), the consideration paid, including any directly attributable incremental costs (net of income taxes) is deducted from equity attributable to the equity holders until the shares are retired or reissued. When the treasury stock is retired, the excess of acquisition cost over par value shall be allocated between the related additional paid-in capital and retained earnings.

u. ***Dividends***

Dividends are recognised when they become legally payable. In the case of dividends to equity shareholders, this is when declared by the directors. In the case of final dividends, this is when approved by the shareholders at the General Meeting of Shareholders.

v. ***Revenue and expenses recognition***

Revenue is recognized when it is likely that future economic benefits will flow to the Company and subsidiaries and these benefits can be measured reliably. Revenue is measured at the fair value of the consideration received, net of discounts and Value Added Tax (VAT).

Tower rental revenue is recognized over the lease year. Tower rental revenue received in advance is presented as "Unearned income". Tower rental revenue that has not been billed yet is presented as "Accrued revenue" in the consolidated statements of financial position. Expenses are recognized based on accrual method.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

w. **Laba (rugi) per saham dasar yang dapat diatribusikan kepada pemegang saham biasa entitas induk**

Laba (rugi) per saham dasar dihitung dengan membagi laba (rugi) bersih pada tahun berjalan yang dapat diatribusikan kepada pemegang saham biasa Perusahaan dengan jumlah rata-rata tertimbang saham beredar dalam tahun berjalan dan telah dikurangi dengan saham treasuri.

Jika jumlah saham biasa atau instrument berpotensi saham biasa yang beredar meningkat sebagai akibat dari kapitalisasi, penerbitan saham bonus atau pemecahan saham, atau menurun sebagai akibat dari penggabungan saham, maka penghitungan laba per saham dasar dan dilusian untuk seluruh periode yang disajikan disesuaikan secara restrospektif.

Pendapatan, beban, aset, hasil, dan liabilitas segmen mencakup unsur-unsur yang dapat diatribusikan secara langsung pada segmen yang dapat dialokasikan menurut dasar yang memadai kepada segmen. Unsur-unsur tersebut ditetapkan sebelum saldo dan transaksi Perusahaan dieliminasi sebagai bagian dari proses konsolidasi.

x. **Pelaporan segmen**

Suatu segmen adalah suatu unsur yang dapat dibedakan dari Perusahaan yang beroperasi baik di dalam menghasilkan produk atau jasa tertentu (segmen bisnis), atau di dalam menghasilkan produk dan jasa di antara lingkungan ekonomi tertentu (segmen geografis), yang merupakan subjek manfaat dan risiko yang berbeda dari segmen-segmen lainnya. Segmen operasi dilaporkan secara konsisten dengan pelaporan intern yang diberikan kepada pengambil keputusan pimpinan operasi. Pengambil keputusan pimpinan operasi, yang bertanggungjawab di dalam mengalokasikan sumber daya dan menilai kinerja segmen operasi, telah diidentifikasi sebagai komite pengendali yang membuat keputusan strategis.

Pendapatan, beban, aset, hasil, dan liabilitas segmen mencakup unsur-unsur yang dapat diatribusikan secara langsung pada segmen yang dapat dialokasikan menurut dasar yang memadai kepada segmen. Unsur-unsur tersebut ditetapkan sebelum saldo dan transaksi Perusahaan dieliminasi sebagai bagian dari proses konsolidasi.

Segmen Perusahaan dibagi menjadi dua segmen operasi. Segmen primer ditentukan berdasarkan sifat produk. Segmen sekunder ditentukan berdasarkan penyebaran aset.

2. *SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)*

*w. **Basic earnings (loss) per share attributable to the common equity holders of the parent company***

Basic earnings (loss) per share are calculated by dividing net profit (loss) for the current year attributable to the common equity holders of the Company by the weighted average number of outstanding shares during the current year and has been reduced by treasury stock.

If the number of ordinary shares or potential ordinary shares outstanding increases as a result of capitalization, issuance of bonus shares or stock splits, or decreases as a result of a merger of shares, the calculation of basic and diluted earnings per share for all periods presented is adjusted retrospectively.

Segment revenue, expenses, assets, results and liabilities include items directly attributable to a segment as well as those that can be allocated on a reasonable basis to that segment. They are determined before the intra-Group's balances and the Group's transactions are eliminated as part of the consolidation process.

*x. **Segment reporting***

A segment is a distinguishable component from the Company that is engaged either in providing certain products and service (business segment), or in providing products and service within a particular economic environment (geographical segment), which is subjected to risks and rewards that are different from those of other segments. Operating segments are reported in a manner consistent with the internal reporting provided to the chief operating decision-maker. The chief operating decision-maker, who is responsible for allocating resources and assessing performance of the operating segments, has been identified as the steering committee that makes strategic decisions.

Segment revenue, expenses, assets, results and liabilities include items directly attributable to a segment as well as those that can be allocated on a reasonable basis to that segment. They are determined before the intra-Group's balances and the Group's transactions are eliminated as part of the consolidation process.

The Company's segment organized into two operating segments. The primary segment determined based on nature of the product. The secondary segment determined based on deployment of assets.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

y. **Provisi dan kontinjensi**

Provisi diakui ketika Perusahaan dan entitas anak memiliki kewajiban (legal maupun konstruktif) sebagai hasil peristiwa lalu; yaitu kemungkinan besar arus keluar sumber daya ekonomi diperlukan untuk menyelesaikan kewajiban dan suatu estimasi terhadap jumlah dapat dilakukan. Apabila dampak nilai waktu uang adalah material, maka provisi didiskontokan dengan menggunakan tarif sebelum pajak, untuk mencerminkan risiko spesifik liabilitas. Ketika pendiskontoan digunakan, kenaikan provisi terkait dengan berlalunya waktu diakui sebagai beban keuangan.

Kewajiban kontinjensi tidak diakui dalam Laporan keuangan konsolidasian. Kewajiban tersebut telah diungkapkan dalam catatan atas laporan keuangan konsolidasian kecuali kemungkinan arus keluar sumber daya ekonomi sangat kecil.

Aset kontinjensi tidak diakui dalam Laporan keuangan konsolidasian tetapi diungkapkan dalam catatan atas Laporan keuangan konsolidasian ketika arus masuk manfaat ekonomi cukup besar.

z. **Peristiwa setelah periode pelaporan**

Peristiwa setelah periode pelaporan yang memberikan bukti kondisi yang ada pada akhir periode pelaporan *(adjusting events)* tercermin dalam Laporan keuangan konsolidasian. Peristiwa setelah periode pelaporan yang tidak berdampak pada laporan keuangan diungkapkan dalam catatan atas Laporan keuangan konsolidasian apabila jumlahnya material.

3. **PERTIMBANGAN, ESTIMASI DAN ASUMSI AKUNTANSI SIGNIFIKAN**

Penyusunan Laporan keuangan konsolidasian Perusahaan dan entitas anak mengharuskan manajemen untuk membuat pertimbangan, estimasi dan asumsi yang mempengaruhi jumlah yang dilaporkan dari pendapatan, beban, aset dan liabilitas, dan pengungkapan atas liabilitas kontijensi, pada akhir tahun pelaporan. Ketidakpastian mengenai asumsi dan estimasi tersebut dapat mengakibatkan penyesuaian material terhadap nilai tercatat aset dan liabilitas dalam tahun pelaporan berikutnya.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

y. ***Provision and contingencies***

Provisions are recognized when the Company and subsidiaries has a present obligation (legal or constructive) as a result of past event; it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate can be made of the amount of the obligation. If the effect of the time value of money is material, provisions are determined by discounting the expected future cash flows at a pre-tax rate, that reflects current market assessment of the time value of money and where appropriate, the risks specific to the liability. Where disounting is used, the increased due to the passage of time is recognized as interest expense.

Contingent liabilities are not recognized in the consolidated financial statements. They are disclosed in the notes to consolidated financial statements unless the possibility of an outflow of resources embodying economic benefits is remote.

Contingent assets are not recognized in the consolidated financial statements but are disclosed in the notes to consolidated financial statements when an inflow of economic benefits is probable.

z. ***Events after the reporting period***

Events after the reporting period that provide evidence of conditions that existed at the end of the reporting period (adjusting events) are reflected in the consolidated financial statements. Events after the reporting period that are not adjusting events are disclosed in the notes to consolidated financial statements when material.

3. ***SIGNIFICANT ACCOUNTING JUDGMENTS, ESTIMATES AND ASSUMPTIONS***

The preparation of consolidated financial statements of the Company and subsidiaries requires management to make judgments, estimates and assumptions that affect the reported amounts of revenues, expenses, assets and liabilities, and the disclosure of contingent liabilities at the end of the reporting year. Uncertainty about these assumptions and estimates could result in outcomes that require a material adjustment to the carrying amount of the asset and liability affected in future years.

3. **PERTIMBANGAN, ESTIMASI DAN ASUMSI AKUNTANSI SIGNIFIKAN (**Lanjutan)

Pertimbangan

Klasifikasi Aset dan Liabilitas Keuangan

Perusahaan dan entitas anak menetapkan klasifikasi atas aset dan liabilitas tertentu sebagai aset keuangan dan liabilitas keuangan dengan pertimbangan bila definisi yang ditetapkan PSAK 71 terpenuhi. Dengan demikian, aset keuangan dan liabilitas keuangan diakui sesuai dengan kebijakan akuntansi Perusahaan dan entitas anak seperti yang dijelaskan pada Catatan 2f.

Estimasi dan Asumsi

Penyisihan Kerugian Kredit Ekspektasian

Perusahaan dan entitas anak mengevaluasi akun tertentu jika terdapat informasi bahwa pelanggan yang bersangkutan tidak dapat memenuhi liabilitas keuangannya.

Dalam hal tersebut, Perusahaan dan entitas anak mempertimbangkan, berdasarkan fakta dan situasi yang tersedia, termasuk namun tidak terbatas pada, jangka waktu hubungan dengan pelanggan dan status kredit dari pelanggan berdasarkan catatan kredit dari pihak ketiga dan faktor pasar yang telah diketahui, untuk mencatat provisi spesifik atas jumlah piutang pelanggan guna mengurangi jumlah piutang yang diharapkan dapat diterima oleh Perusahaan dan entitas anak. Provisi spesifik ini dievaluasi kembali dan disesuaikan jika tambahan informasi yang diterima mempengaruhi jumlah penyisihan untuk piutang usaha.

Penyusutan Aset Tetap

Biaya perolehan aset tetap disusutkan dengan menggunakan metode garis lurus berdasarkan taksiran masa manfaat ekonomisnya. Manajemen mengestimasi masa manfaat ekonomis aset tetap antara 4-30 tahun. Ini adalah umur yang secara umum diharapkan dalam industri di mana Perusahaan dan entitas anak menjalankan bisnisnya. Perubahan tingkat pemakaian dan perkembangan teknologi dapat mempengaruhi masa manfaat ekonomis dan nilai sisa aset, dan karenanya beban penyusutan masa depan mungkin direvisi.

Penurunan Nilai *Goodwill*

Perusahaan dan entitas anak disyaratkan untuk melakukan pengujian, secara tahunan, apakah nilai *goodwill* telah mengalami penurunan nilai. Jumlah terpulihkan ditentukan berdasarkan pada perhitungan nilai yang dapat digunakan. Penggunaan metode ini mensyaratkan estimasi atas arus kas masa depan dan penentuan tingkat diskonto untuk menghitung nilai kini arus kas. Informasi lebih lanjut temasuk nilai tercatat terdapat dalam Catatan 38.

*3. **SIGNIFICANT ACCOUNTING JUDGMENTS, ESTIMATES AND ASSUMPTIONS** (Continued)*

Judgments

Classification of Financial assets and Financial Liabilities

The Company and subsidiaries determine the classifications of certain assets and liabilities as financial assets and financial liabilities by judging if they meet the definitions set forth in PSAK 71. Accordingly, the financial assets and financial liabilities are accounted for in accordance with the Company and subsidiaries accounting policies described in Note 2f.

Estimates and Assumptions

Allowance for Expected Credit Losses

The Company and subsidiaries evaluate specific accounts where they have information that certain customers are unable to meet their financial obligations.

In these cases, the Company and subsidiaries use judgment, based on the best available facts and circumstances, including but not limited to, the length of their relationship with the customer and the customer's current credit status based on third party credit reports and known market factors, to record specific provisions for customers against amounts due to reduce the receivable amounts that the Company and subsidiaries expect to collect. These specific provisions are re-evaluated and adjusted as additional information received affects the amounts of allowance for impairment of trade receivables.

Depreciation of Property and Equipment

The costs of property and equipment are depreciated on a straight-line method over their estimated useful lives. Management estimates the useful lives of these property and equipment to be within 4-30 years. These are common life expectancies applied in the industries where the Company and subsidiaries conduct their businesses. Changes in the expected level of usage and technological development could impact the economic useful lives and the residual values of these assets, and therefore future depreciation charges could be revised.

Impairment of Goodwill

The Company and subsidiaries is required to test, on an annual basis, whether goodwill has suffered any impairment. The recoverable amount is determined based on value in use calculations. The use of this method requires the estimation of future cash flows and the determination of a discount rate in order to calculate the present value of the cash flows. More information including carrying values is included in Note 38.

3. **PERTIMBANGAN, ESTIMASI DAN ASUMSI AKUNTANSI SIGNIFIKAN (**Lanjutan)

Estimasi dan Asumsi (Lanjutan)

Imbalan Pasca-Kerja

Biaya, aset dan liabilitas skema imbalan pasti yang dilakukan oleh Perusahaan dan entitas anak ditentukan dengan menggunakan metode yang bergantung pada estimasi dan asumsi aktuarial. Rincian dari asumsi utama terdapat dalam Catatan 35. Perusahaan dan entitas anak menjalankan masukan dari aktuaris independen terkait dengan kesesuaian asumsi. Perubahan pada asumsi yang digunakan mungkin memiliki efek yang signifikan pada laporan laba rugi dan penghasilan komprehensif lain konsolidasian dan laporan posisi keuangan konsolidasian.

Pajak Penghasilan

Pertimbangan signifikan dilakukan dalam menentukan provisi atas pajak penghasilan badan. Terdapat transaksi dan perhitungan tertentu yang penentuan pajak akhirnya adalah tidak pasti dalam kegiatan usaha normal. Perusahaan dan entitas anak mengakui liabilitas atas pajak penghasilan badan berdasarkan estimasi apakah akan terdapat tambahan pajak penghasilan badan.

Proses hukum

Perusahaan dan entitas anak meninjau perkembangan kasus hukum yang masih berjalan dalam proses hukum dan pada setiap tanggal pelaporan, guna untuk menilai kebutuhan provisi dan pengungkapan dalam laporan keuangannya. Di antara faktor-faktor yang dipertimbangkan dalam membuat keputusan provisi litigasi adalah sifat litigasi, klaim atau penilaian, proses hukum dan tingkat potensi kerusakan dijurisdiksi di mana litigasi, klaim atau penilaian tersebut berada, perkembangan dari kasus (termasuk perkembangan setelah tanggal pelaporan keuangan namun sebelum laporan tersebut dikeluarkan), pendapat atau pandangan penasihat hukum, pengalaman dalam kasus serupa dan keputusan dari manajemen Perusahaan dan entitas anak tentang bagaimana Perusahaan dan entitas anak akan merespon terhadap litigasi, klaim atau penilaian.

Pengukuran nilai wajar

Sehubungan dengan penerapan PSAK 16 (Revisi 2014) "Aset Tetap" dan PSAK 13 (Revisi 2014) "Properti Investasi", Perusahaan dan entitas anak telah memilih model revaluasi dan nilai wajar untuk pengukuran setelah pengakuan awal menara telekomunikasi, tanah dan bangunan. Hirarki nilai wajar aset tetap pada akhir tahun pelaporan merupakan kategori dalam level 3 pengukuran berulang nilai wajar. Untuk menentukan nilai wajar, penilai independen menggunakan kombinasi dua pendekatan sebagai metode penilaian: pendekatan pendapatan, yang mendiskontokan arus kas masa depan, dan pendekatan biaya, yang didasarkan pada biaya penggantian saat ini. Untuk penjelasan lebih detail lihat Catatan 13 dan 14 atas laporan keuangan konsolidasian.

3. ***SIGNIFICANT ACCOUNTING JUDGMENTS, ESTIMATES AND ASSUMPTIONS*** *(Continued)*

Estimates and Assumptions *(Continued)*

Post-Employment Benefits

The costs, assets and liabilities of the defined benefit schemes operating by the Company and subsidiaries are determined using methods relying on actuarial estimates and assumptions. Details of the key assumptions are set out in Note 35. The Company and subsidiaries takes advice from independent actuaries relating to the appropriateness of the assumptions. Changes in the assumptions used may have a significant effect on the consolidated statement of profit or loss and other comprehensive income and the consolidated statement of financial position.

Income Taxes

Significant judgment is involved in determining the provision for corporate income tax. There are certain transactions and computation for which the ultimate tax determination is uncertain during the ordinary course of business. The Company and subsidiaries recognizes liabilities for expected corporate income tax issues based on estimates of whether additional corporate income tax will be due.

Legal proceeding

The Company and subsidiaries reviews outstanding legal cases following developments in the legal proceedings and at each reporting date, in order to assess the need for provisions and disclosures in its financial statements. Among the factors considered in making decisions on provisions are the nature of litigation, claim or assessment, the legal process and potential level of damages in the jurisdiction in which the litigation, claim or assessment has been brought, the progress of the case (including the progress after the date of the financial statements but before those statements are issued), the opinions or views of legal advisers, experience on similar cases and any decision of the management of the Company and subsidiaries as to how it will respond to the litigation, claim or assessment.

Fair value measurement

Regarding the implementation of PSAK No. 16 (Revised 2014) "Property and Equipment" and PSAK 13 (revised 2014) "Investment Property", the Company and subsidairies has chosen the revaluation model for the measurement after initial recognition of telecommunication towers, land and building. The fair value hierarchy of property and equipment at the end of reporting year is categorised as a level 3 recurring fair value measurement. To determine the fair value, the independent appraiser utilizes a combination of two approaches as the appraisal method: the income approach, which discounts future cash flows, and the cost approach, which is based on current replacement cost. For more details, see Notes 13 and 14 to our consolidated financial statements.

4. KAS DAN SETARA KAS / *4. CASH AND CASH EQUIVALENTS*

	2020	2019	2018	
Kas	656	666	746	***Cash on hand***
Bank				***Cash in banks***
Rupiah				***Rupiah***
PT Bank UOB Indonesia	560.223	189.955	17.647	*PT Bank UOB Indonesia*
PT Bank BNP Paribas Indonesia	5.041	3.002	5.004	*PT Bank BNP Paribas Indonesia*
PT Bank DBS Indonesia	2.795	6.524	1.192	*PT Bank DBS Indonesia*
PT Bank Mandiri (Persero) Tbk	2.382	32.320	5.199	*PT Bank Mandiri (Persero) Tbk*
PT Bank QNB Indonesia	1.377	-	-	*PT Bank QNB Indonesia*
PT Bank Central Asia Tbk	115	1.497	737	*PT Bank Central Asia Tbk*
PT Bank Permata Tbk	30	26	218	*PT Bank Permata Tbk*
PT Bank Danamon Indonesia Tbk	8	6	80	*PT Bank Danamon Indonesia Tbk*
The Hongkong and Shanghai Banking Corporation Ltd	4	6	8	*The Hongkong and Shanghai Banking Corporation Ltd*
PT Bank Negara Indonesia (Persero) Tbk	4	-	-	*PT Bank Negara Indonesia (Persero) Tbk*
PT Bank OCBC NISP Tbk	3	4	16	*PT Bank OCBC NISP Tbk*
MUFG Bank Ltd.	2	3	4	*MUFG Bank Ltd.*
PT Bank CIMB Niaga Tbk	1	7.003	6	*PT Bank CIMB Niaga Tbk*
PT Bank ANZ Indonesia	1	5.003	5	*PT Bank ANZ Indonesia*
PT Bank INA Perdana Tbk	-	-	193	*PT Bank INA Perdana Tbk*
Deutsche Bank AG	-	23	79	*Deutsche Bank AG*
	571.986	245.372	30.388	
Dolar AS				***US Dollar***
PT Bank UOB Indonesia	316.043	223.235	149.977	*PT Bank UOB Indonesia*
PT Bank Mandiri (Persero) Tbk	1.037	1.060	413	*PT Bank Mandiri (Persero) Tbk*
PT Bank Permata Tbk	738	29	419	*PT Bank Permata Tbk*
JP Morgan Chase & Co	388	2.070	-	*JP Morgan Chase & Co*
PT Bank Danamon Indonesia Tbk	77	26	1.320	*PT Bank Danamon Indonesia Tbk*
PT Bank ANZ Indonesia	37	40	49	*PT Bank ANZ Indonesia*
PT Bank Central Asia Tbk	32	52.390	35.153	*PT Bank Central Asia Tbk*
The Hongkong and Shanghai Banking Corporation Ltd	32	255	820	*The Hongkong and Shanghai Banking Corporation Ltd*
MUFG Bank Ltd.	26	28	30	*MUFG Bank Ltd.*
PT Bank Mega Tbk	24	-	-	*PT Bank Mega Tbk*
PT Bank DBS Indonesia	21	28	36	*PT Bank DBS Indonesia*
PT Bank CIMB Niaga Tbk	19	24	30	*PT Bank CIMB Niaga Tbk*
PT Bank OCBC NISP Tbk	10	19	905	*PT Bank OCBC NISP Tbk*
PT Bank BNP Paribas Indonesia	4	-	-	*PT Bank BNP Paribas Indonesia*
PT Bank QNB Indonesia Tbk	3	-	-	*PT Bank QNB Indonesia Tbk*
	318.491	279.204	189.152	
Sub-jumlah bank	890.477	524.576	219.540	*Sub-total cash in banks*
Deposito berjangka				***Time deposit***
PT Bank UOB Indonesia	56.208	-	-	*PT Bank UOB Indonesia*
PT Bank Mandiri (Persero) Tbk	-	-	300	*PT Bank Mandiri (Persero) Tbk*
Jumlah	**947.341**	**525.242**	**220.586**	***Total***

Pada tanggal 31 Desember 2020 dan 2018, bunga deposito yang diperoleh masing-masing berkisar antara 4,00% sampai 5,80% dan 5,50% per tahun.

As of 31 December 2020 and 2018, time deposits earn an annual interest are ranging from 4.00% to 5.80% and 5,50% per year, respectively.

Seluruh saldo kas dan setara kas adalah kepada pihak ketiga.

All cash and cash equivalents are to third parties.

5. PIUTANG USAHA - PIHAK KETIGA / *5. TRADE RECEIVABLES – THIRD PARTIES*

Rincian piutang usaha berdasarkan mata uang adalah sebagai berikut:

The details of trade receivables per currency are as follows:

	2020	2019	2018	
Pihak ketiga				***Third parties***
Rupiah	555.061	393.674	362.890	*Rupiah*
Dolar AS	159.891	72.873	20.413	*US Dollar*
Jumlah	714.952	466.547	383.303	***Total***
Dikurangi:				*Less:*
Penyisihan kerugian kredit ekspektasian	(4.230)	-	-	*Allowance for expected credit losses*
Jumlah - bersih	**710.722**	**466.547**	**383.303**	***Total - net***

Rincian piutang usaha berdasarkan jenis pendapatan adalah sebagai berikut:

The details of trade receivables based on type of revenues are as follows:

	2020	2019	2018	
Sewa menara				***Tower rental***
PT Indosat Tbk	245.180	120.233	50.155	*PT Indosat Tbk*
PT Telekomunikasi Selular	133.988	44.006	6.235	*PT Telekomunikasi Selular*
PT Hutchison 3 Indonesia	127.036	134.052	144.087	*PT Hutchison 3 Indonesia*
PT Smartfren Telecom Tbk	107.274	58.799	59.722	*PT Smartfren Telecom Tbk*
PT XL Axiata Tbk	74.264	69.193	96.411	*PT XL Axiata Tbk*
PT Smart Telecom	8.814	9.704	-	*PT Smart Telecom*
PT First Media Tbk	-	15.312	16.007	*PT First Media Tbk*
Lainnya	15.983	9.793	6.629	*Others*
	712.539	461.092	379.246	
Sewa bangunan	2.413	5.455	4.057	*Building rental*
Jumlah	714.952	466.547	383.303	***Total***
Dikurangi:				*Less:*
Penyisihan kerugian kredit ekspektasian	(4.230)	-	-	*Allowance for expected credit losses*
Jumlah - bersih	**710.722**	**466.547**	**383.303**	***Total - net***

Perusahaan menerapkan PSAK 71 dengan pendekatan yang disederhanakan untuk mengukur penyisihan kerugian kredit ekspektasian (PKKE) menggunakan PKKE sepanjang umurnya untuk piutang usaha dan aset kontrak. Untuk mengukur PKKE secara kolektif, piutang usaha dan aset kontrak dikelompokkan berdasarkan risiko kredit dan umur yang sama. Aset kontrak memiliki karakteristik risiko yang sama dengan piutang usaha karena jenis kontrak yang sama.

The Company applies the PSAK 71 simplified approach to measuring Allowance for expected credit losses (AECL) using a lifetime AECL for trade receivables and contract assets. To measure AECL on a collective basis, trade receivables and contract assets are grouped based on similar credit risk and aging. The contract assets have similar risk characteristics to the trade receivables as the same types of contracts.

5. **PIUTANG USAHA - PIHAK KETIGA** (Lanjutan)

Berdasarkan basis tersebut, berikut ini penyisihan kerugian ditentukan untuk piutang usaha:

5. ***TRADE RECEIVABLES - THIRD PARTIES (****Continued)*

On that basis, the loss allowance was determined as follows for trade receivables:

31 Desember 2020/ *31 December 2020*	**Belum jatuh tempo/ *current***	**Jatuh tempo/ *Overdue***				**Jumlah/ *Total***
		1-30 hari/ *days*	**31-60 hari/ *days***	**61-90 hari/ *days***	**lebih dari/ *over* 90 hari/ *days***	
Jumlah tercatat/ *Carry amount*	640.851	52.265	6.717	670	14.449	714.952
Kerugian kredit ekspektasian/ *Expected credit loss*	3.792	309	40	4	85	4.230

Mutasi penyisihan kerugian kredit ekspektasian adalah sebagai berikut:

Changes in the allowance for expected credit losses are as follows:

	2020	**2019**	**2018**	
Saldo Awal	-	-	-	*Beginning balance*
Penambahan				*Additional*
Penyisihan kerugian kredit ekspektasian	(4.230)	-	-	*Allowance for expected credit losses*
Saldo Akhir	**(4.230)**	**-**	**-**	***Ending balance***

Umur piutang usaha sejak tanggal faktur adalah sebagai berikut:

Aging of trade receivables from the date of invoice is as follows:

	2020	**2019**	**2018**	
Belum jatuh tempo	640.851	437.271	254.136	*Current*
Jatuh tempo				*Overdue*
1 - 30 hari	52.265	7.383	47.997	*1 - 30 days*
31 - 60 hari	6.717	4.330	56.966	*31 - 60 days*
61 - 90 hari	670	153	3.544	*61 - 90 days*
Lebih dari 90 hari	14.449	17.410	20.660	*Over 90 days*
Jumlah	714.952	466.547	383.303	***Total***
Dikurangi:				*Less:*
Penyisihan kerugian kredit ekspektasian	(4.230)	-	-	*Allowance for expected credit losses*
Jumlah - bersih	**710.722**	**466.547**	**383.303**	***Total - net***

Berdasarkan penelaahan atas saldo piutang usaha pada akhir tahun, manajemen menentukan penyisihan kerugian kredit ekspektasian (PKKE) untuk tahun yang berakhir pada 31 Desember 2020, 2019 dan 2018 masing-masing sebesar Rp 4.230, nihil dan nihil.

Based on the review of the trade receivable accounts at the end of the year, the management determine allowance for expected credit losses (AECL) for the year ended 31 December 2020, 2019 and 2018 are Rp 4,230, nil and nil, respectively.

6. PIUTANG LAIN-LAIN / *6. OTHER RECEIVABLES*

	2020	2019	2018	
Pihak ketiga				***Third parties***
PT Hamparan Cipta Sejati	221.425	221.425	-	*PT Hamparan Cipta Sejati*
Operator selular - Tagihan listrik	13.785	14.291	24.379	*Cellular operator - Electricity bills*
Bukti potong pajak penghasilan pasal 23 dan final	11.326	27.938	17.891	*Withholding tax slip for income tax article 23 and final*
Penjualan menara telekomunikasi	10.360	10.360	10.360	*Sale of telecommunication tower*
Karyawan	9.806	28.015	20.665	*Employees*
Asuransi	5.022	1.592	945	*Insurance*
Lainnya	8.272	2.157	2.207	*Others*
	279.996	305.778	76.447	
Pihak berelasi	-	-	1.213	***Related parties***
Jumlah	279.996	305.778	77.660	***Total***
Dikurangi:				*Less:*
Penyisihan kerugian kredit ekspektasian	(17.111)	-	-	*Allowance for expected credit losses*
Jumlah - bersih	**262.885**	**305.778**	**77.660**	***Total - net***

Perusahaan menerapkan PSAK 71 dengan pendekatan yang disederhanakan untuk mengukur penyisihan kerugian kredit ekspektasian (PKKE) menggunakan PKKE sepanjang umurnya untuk piutang lain-lain dan aset kontrak. Untuk mengukur PKKE secara kolektif, piutang lain-lain dan aset kontrak dikelompokkan berdasarkan risiko kredit dan umur yang sama. Aset kontrak memiliki karakteristik risiko yang sama dengan piutang lain-lain karena jenis kontrak yang sama.

The Company applies the PSAK 71 simplified approach to measuring Allowance for expected credit losses (AECL) using a lifetime AECL for other receivables and contract assets. To measure AECL on a collective basis, other receivables and contract assets are grouped based on similar credit risk and aging. The contract assets have similar risk characteristics to the other receivables as the same types of contracts.

Berdasarkan basis tersebut, berikut ini penyisihan kerugian ditentukan untuk piutang lain-lain:

On that basis, the loss allowance was determined as follows for other receivables:

	Belum jatuh tempo/ *current*	Jatuh tempo/ *Overdue*				
31 Desember 2020 / 31 December 2020		**1-30 hari/ *days***	**31-60 hari/ *days***	**61-90 hari/ *days***	**lebih dari/ *over* 90 hari/ *days***	**Jumlah/ *Total***
Jumlah tercatat/ *Carry amount*	232.072	968	1.684	1.137	44.135	279.996
Kerugian kredit ekspektasian/ *Expected credit loss*	15.633	30	52	35	1.361	17.111

Mutasi penyisihan kerugian kredit ekspektasian adalah sebagai berikut:

Changes in the allowance for expected credit losses are as follows:

	2020	2019	2018	
Saldo Awal	-	-	-	*Beginning balance*
Penambahan Penyisihan kerugian kredit ekspektasian	(17.111)	-	-	*Additional allowance for expected credit losses*
Saldo Akhir	**(17.111)**	**-**	**-**	***Ending balance***

6. **PIUTANG LAIN-LAIN** (Lanjutan)

Umur piutang lain-lain sejak tanggal faktur adalah sebagai berikut:

6. ***OTHER RECEIVABLES*** *(Continued)*

Aging of other receivables from the date of invoice is as follows:

	2020	2019	2018	
Belum jatuh tempo	232.072	229.068	21.179	*Current*
Jatuh tempo				*Overdue*
1 - 30 hari	968	9.507	28.231	*1 - 30 days*
31 - 60 hari	1.684	21.566	12.166	*31 - 60 days*
61 - 90 hari	1.137	9.923	15.567	*61 - 90 days*
Lebih dari 90 hari	44.135	35.714	517	*Over 90 days*
Jumlah	279.996	305.778	77.660	***Total***
Dikurangi:				*Less:*
Penyisihan kerugian kredit ekspektasian	(17.111)	-	-	*Allowance for expected credit losses*
Jumlah - bersih	**262.885**	**305.778**	**77.660**	***Total - net***

Piutang kepada PT Hamparan Cipta Sejati (HCS) merupakan piutang yang berasal dari pengalihan surat sanggup bayar (Catatan 7). Berdasarkan Perjanjian Pinjaman tanggal 1 Oktober 2019, antara entitas anak (yang menjadi pemilik surat sanggup bayar) dan HCS, piutang ini digunakan oleh HCS untuk kegiatan usahanya, dijamin oleh aset berupa tanah yang dimiliki oleh HCS, dan tidak dikenakan bunga pinjaman. Piutang ini akan jatuh tempo pada tanggal 31 Oktober 2020 dan sudah diperpanjang sampai dengan tanggal 30 Juni 2021. Piutang ini telah dilunasi pada tanggal 29 April 2021 (Catatan 46.h).

Receivables from PT Hamparan Cipta Sejati (HCS) represent receivables were originally derived from the transfer of promissory notes (Note 7). Based on Loan Agreement dated 1 October 2019, between the subsidiaries (who owned the promissory notes) and HCS, these receivables were used by HCS for its business operation, secured by bank of lands owned by HCS, and bears no interest. These receivables will mature in 31 October 2020 and has been extended until 30 June 2021. This receivables has been fully paid on 29 April 2021 (Note 46.h).

Berdasarkan penelahaan atas saldo piutang lain-lain pada akhir tahun, manajemen menentukan penyisihan kerugian kredit ekspektasian (PKKE) untuk tahun yang berakhir pada 31 Desember 2020, 2019 dan 2018 masing-masing sebesar Rp 17.111, nihil dan nihil.

Based on the review of the other receivable accounts at the end of the year, the management determine allowance for expected credit losses (AECL) for the years ended 31 December 2020, 2019 and 2018 are Rp 17,111, nil and nil, respectively.

7. **SURAT SANGGUP BAYAR**

Pada bulan Desember 2018, Perusahaan dan PT Internux telah menyepakati untuk mengubah piutang usaha PT Internux menjadi Surat Sanggup Bayar senilai Rp 221.425. Surat Sanggup Bayar tersebut tidak memiliki jangka waktu dan dapat dialihkan kepada pihak lain.

Surat sanggup bayar ini merupakan konversi piutang usaha dan pelaksanaannya terikat dengan Perjanjian Perdamaian tanggal 30 Oktober 2018. Dalam Perjanjian Perdamaian tersebut, jangka waktu pelunasan piutang kepada Perusahaan maksimal adalah 360 bulan sejak tanggal Perjanjian Perdamaian, tidak terdapat bunga pinjaman dan jaminan.

Pada 21 Oktober 2019, Perusahaan dan entitas anak telah mengalihkan Surat Sanggup Bayar tersebut kepada pihak ketiga (Catatan 6).

7. ***PROMISSORY NOTES***

In December 2018, the Company and PT Internux have agreed to convert PT Internux's trade receivables into the Promissory Notes amounted to Rp 221,425. The Promissory Notes has no time year and can be transferred to another party.

This promissory note is the conversion of trade receivables and the implementation is bound by the Peace Agreement dated 30 October 2018. In the Peace Agreement, the maximum period of payment of receivables to the Company is 360 months from the date of the Peace Agreement, there are no loan and guarantee interest.

As of 21 October 2019, the Company and subsidiaries have transferred the Promissory Notes to a third party (Note 6).

8. INVESTASI

Akun ini merupakan surat berharga tersedia untuk dijual dalam bentuk obligasi wajib konversi.

Pada tanggal 9 Desember 2014, Pengadilan Niaga pada Pengadilan Negeri Jakarta Pusat telah memutuskan PT Bakrie Telecom Tbk dalam Penundaan Kewajiban Pembayaran Utang ("PKPU") Sementara berdasarkan perkara PKPU No. 59/Pdt.Sus-PKPU/2014/PN.Niaga.Jkt.Pusat. Pada tanggal 9 Desember 2014, Pengadilan Niaga pada Pengadilan Negeri Jakarta Pusat telah memberikan putusan pengadilan untuk mengesahkan Perjanjian Perdamaian tanggal 9 Desember 2014 yang dibuat antara PT Bakrie Telecom Tbk dengan para kreditur terkait, termasuk dengan beberapa entitas anak (PT Solu Sindo Kreasi Pratama, PT Tower Bersama, PT Bali Telekom, PT Batavia Towerindo, PT Telenet Internusa, PT Prima Media Selaras, PT United Towerindo, PT Mitrayasa Sarana Informasi) ("Perjanjian Perdamaian"), dimana utang sewa PT Bakrie Telecom Tbk kepada entitas anak tersebut akan diselesaikan melalui mekanisme tunai bertahap dan pelaksanaan obligasi wajib konversi.

Perubahan nilai wajar untuk tahun yang berakhir pada 31 Desember 2020, 2019 dan 2018 masing-masing sebesar nihil. Manajemen berpendapat bahwa nilai surat berharga pada tanggal laporan posisi keuangan konsolidasian telah mencerminkan nilai wajarnya dan melakukan hapus buku pada Maret 2020.

Saldo pada tanggal 31 Desember 2020, 2019 dan 2018 masing-masing sebesar nihil, Rp 1.508 dan Rp 1.508.

8. INVESTMENT

This account represents mandatory convertible bonds and classified as securities - available for sale.

On 9 December 2014, the Commercial Court of the District Court of Central Jakarta had granted PT Bakrie Telecom Tbk a Temporary Suspension of Payment (the "SOP") based on SOP case No. 59/Pdt.Sus-PKPU/2014/PN.Niaga.Jkt.Pusat. On 9 December 2014, the Commercial Court of the District Court of Central Jakarta has given a court order to legalize the Settlement Agreement dated 9 December 2014, made by PT Bakrie Telecom Tbk and the respective creditors, including to some subsidiaries (PT Solu Sindo Kreasi Pratama, PT Tower Bersama, PT Bali Telekom, PT Batavia Towerindo, PT Telenet Internusa, PT Prima Media Selaras, PT United Towerindo, PT Mitrayasa Sarana Informasi) (the "Settlement Agreement"), which the lease debt of PT Bakrie Telecom Tbk to the respective subsidiaries will be settled through cash installments and the exercise of mandatory convertible bonds.

Change in fair value for the year ended 31 December 2020, 2019 and 2018 amounted to nil, respectively. The management believes that the value of such securities on the consolidated statements of financial position has reflected it's fair value and determine write-off in March 2020.

The outstanding balance as of 31 December 2020, 2019 and 2018 was amounted to nil, Rp 1,508 and Rp 1,508, respectively.

9. PENDAPATAN YANG MASIH HARUS DITERIMA / *9. ACCRUED REVENUE*

	2020	2019	2018	
Pihak ketiga				***Third parties***
PT Telekomunikasi Selular	408.245	389.652	417.160	*PT Telekomunikasi Selular*
PT Indosat Tbk	31.151	29.668	21.145	*PT Indosat Tbk*
PT Smartfren Telecom Tbk	19.459	17.453	17.610	*PT Smartfren Telecom Tbk*
PT Hutchison 3 Indonesia	17.969	36.480	1.539	*PT Hutchison 3 Indonesia*
PT XL Axiata Tbk	11.408	36.556	82.405	*PT XL Axiata Tbk*
PT Smart Telecom	2.065	1.296	1.261	*PT Smart Telecom*
PT First Media Tbk	-	4.192	4.192	*PT First Media Tbk*
Lainnya (masing-masing di bawah Rp 1 miliar)	3.362	7.035	1.296	*Others (each below Rp 1 billion)*
Jumlah	493.659	522.332	546.608	***Total***
Dikurangi:				*Less :*
Penyisihan kerugian kredit ekspektasian	(2.469)	-	-	*Allowance for expected credit losses*
Jumlah - bersih	**491.190**	**522.332**	**546.608**	***Total - net***

9. **PENDAPATAN YANG MASIH HARUS DITERIMA** (Lanjutan)

Akun ini merupakan pendapatan sewa menara telekomunikasi yang belum ditagih, karena proses pengujian fisik menara dan verifikasi dokumen yang belum selesai pada tanggal laporan posisi keuangan konsolidasian.

Mutasi penyisihan kerugian kredit ekspektasian adalah sebagai berikut:

9. ***ACCRUED REVENUE*** *(Continued)*

This account represents unbilled rental income of telecommunication towers due to the customer's site visit and verification of documents not being completed as of the consolidated statements of financial position date.

Changes in the allowance for expected credit losses are as follows:

	2020	2019	2019	
Saldo Awal	-	-	-	*Beginning balance*
Penambahan Penyisihan kerugian kredit ekspektasian	(2.469)	-	-	*Aditional allowance for expected credit losses*
Saldo Akhir	**(2.469)**	**-**	**-**	*Ending balance*

Berdasarkan penelahaan atas saldo pendapatan yang masih harus diterima pada akhir tahun, manajemen menentukan penyisihan kerugian kredit ekspektasian (PKKE) untuk tahun yang berakhir pada 31 Desember 2020, 2019 dan 2018 masing-masing sebesar Rp 2.469, nihil dan nihil.

Based on the review of the status of the accrued revenue accounts at the end of the year, the management determine allowance for expected credit losses (AECL) for the years ended 31 December 2020, 2019 and 2018 are Rp 2,469, nil and nil, respectively.

10. **PERSEDIAAN DAN PERLENGKAPAN**

10. ***INVENTORIES AND SUPPLIES***

	2020	2019	2018	
Material menara	105.991	11.722	18.603	*Tower material*
Suku cadang	12.321	5.986	4.120	*Spareparts*
Jumlah	**118.312**	**17.708**	**22.723**	***Total***

Pada tanggal 31 Desember 2020, 2019 dan 2018, tidak ada persediaan dan perlengkapan yang dijaminkan.

As of 31 December 2020, 2019 and 2018, there are no inventories and supplies are pledged as collateral.

Berdasarkan hasil penelaahan pada setiap akhir tahun, manajemen berpendapat tidak perlu membentuk penyisihan penurunan nilai atas akun persediaan. Kecuali material menara, seluruh persediaan dan perlengkapan akan diakui sebagai beban pada saat penggunaan.

Based on a review at the end of the year, the management determines that no impairment provision is necessary provided. Except for tower material, all inventories and supplies will be recognized as expenses at the time of use.

Persediaan yang diakui sebagai beban untuk tahun yang berakhir pada 31 Desember 2020, 2019 dan 2018 masing-masing adalah sebesar Rp 8.796, Rp 6.985 dan Rp 5.042.

Inventories which recognized as expenses the year ended 31 December 2020, 2019 and 2018 are amounted to Rp 8,796, Rp 6,985 and Rp 5,042, respectively.

11. UANG MUKA DAN BEBAN DIBAYAR DI MUKA / *11. ADVANCE PAYMENTS AND PREPAID EXPENSES*

	2020	2019	2018	
Pembelian menara	398.968	-	-	*Purchase of towers*
Perizinan	39.692	26.601	28.602	*Licenses*
Retribusi	20.036	16.257	10.427	*Retribution*
Asuransi	15.234	13.408	14.443	*Insurance*
Sewa kantor	4.725	4.756	3.586	*Office rental*
Operasional	4.108	38.527	58.693	*Operational*
Lainnya	51.841	71.408	39.052	*Others*
Jumlah	**534.604**	**170.957**	**154.803**	***Total***

Pembelian menara merupakan uang muka pembelian 3.000 menara milik PT Inti Bangun Sejahtera Tbk (IBST) dengan nilai Rp 3.975.000 oleh PT Tower Bersama, entitas anak. Pembelian aset IBST tersebut telah selesai dilaksanakan pada awal kuartal kedua 2021 (lihat catatan 46.g).

Purchase of towers represents an advance for the purchase of 3,000 towers owned by PT Inti Bangun Sejahtera Tbk (IBST) amounted to Rp 3,975,000 by PT Tower Bersama, a subsidiary. The purchase of those IBST's towers have been completed at the beginning of the second quarter of 2021 (see note 46.g).

Pos lainnya terutama merupakan biaya pengiriman material menara sebesar 47% (2019: 48%, 2018: 51%) ke berbagai daerah yang masih dalam proses rekonsiliasi untuk dialokasi ke masing-masing site terkait, dan pembayaran bunga surat utang yang belum jatuh tempo sebesar 25% (2019: 21%, 2018: 0%) namun telah disetorkan ke lembaga kustodian.

Other items mainly represent the cost of sending tower materials of 47% (2019: 48%, 2018: 51%) to various regions that are still in the process of reconciliation to be allocated to each of the related sites, and interest payments for debt securities that have not yet matured by 25% (2019: 21%, 2018: 0%) but had been deposited to the custodian.

12. SEWA LAHAN JANGKA PANJANG / *12. LONG-TERM LANDLEASE*

Akun ini merupakan sewa lahan untuk menara telekomunikasi, dimana jangka waktu umumnya sesuai dengan masa kontrak sewa dengan pelanggan (sekitar 10-11 tahun), dengan rincian sebagai berikut:

This account represents land leases for telecommunication towers, generally with a term equal to the length of the contract term with customers (mostly 10-11 years), with details as follows:

	2020	2019	2018	
Jumlah sewa lahan	-	1.910.130	1.858.516	*Total land lease*
Dikurangi:				*Less:*
Bagian masa kontrak dalam satu tahun	-	297.534	279.643	*Length of contracts' portion within one year*
Bagian masa kontrak lebih dari satu tahun	-	1.612.596	1.578.873	*Length of contracts' portion more than one year*

13. ASET TETAP / *13. PROPERTY AND EQUIPMENT*

31 Desember 2020	Saldo awal/ *Beginning balance*	Penambahan/ *Additions*	Pengurangan/ *Deductions*	Reklasifikasi/ *Reclassification*	Akumulasi penyusutan dan penyesuaian nilai wajar/ *Accumulated depreciation and fair value adjustment*	Reklasifikasi ke properti investasi/ *Reclassified to investment property*	Surplus revaluasi/ *Revaluation surplus*	Saldo akhir/ *Ending balance*	*31 December 2020*
Model Revaluasi									***Revaluation Model***
Menara telekomunikasi	22.952.811	-	-	1.708.970	(406.836)	-	3.405.454	27.660.399	*Telecommunication towers*
Akumulasi penyusutan									*Accumulated depreciation*
Menara telekomunikasi	-	406.836	-	-	(406.836)	-	-	-	*Telecommunication towers*
Model Biaya									***Cost Model***
Aset tetap dalam									*Property and*
penyelesaian	1.237.995	1.119.525	-	(1.708.970)	-	-	-	648.550	*equipment in progress*
Biaya Perolehan									***Cost***
Pemilikan Langsung									***Direct ownership***
Tanah	45.507	-	-	-	-	-	-	45.507	*Land*
Bangunan	335.981	20.647	-	-	-	-	-	356.628	*Building*
Peralatan,									*Tools,*
perlengkapan kantor									*office equipment and*
dan perangkat elektronik	113.144	3.841	(84.006)	3.688	-	-	-	36.667	*electronic hardware*
Perangkat lunak	3.688	-	-	(3.688)	-	-	-	-	*Software*
Kendaraan	33.117	8.140	(6.020)	-	-	-	-	35.237	*Vehicles*
Genset	30.623	-	-	-	-	-	-	30.623	*Genset*
Menara bergerak	166.035	227	-	-	-	-	-	166.262	*Transportable towers*
Sewa Pembiayaan									***Finance Lease***
Kendaraan	28.753	-	-	(28.753)	-	-	-	-	*Vehicles*
	756.848	32.855	(90.026)	(28.753)	-	-	-	670.924	
Akumulasi Penyusutan									***Accumulated Depreciation***
Pemilikan Langsung									***Direct Ownership***
Bangunan	69.875	18.898	-	-	-	-	-	88.773	*Building*
Peralatan,									*Tools,*
perlengkapan kantor									*office equipment and*
dan perangkat elektronik	94.984	5.004	(84.006)	3.688	-	-	-	19.670	*electronic hardware*
Perangkat lunak	3.034	654	-	(3.688)	-	-	-	-	*Software*
Kendaraan	19.905	5.054	(3.957)	-	-	-	-	21.002	*Vehicles*
Genset	30.476	28	-	-	-	-	-	30.504	*Genset*
Menara bergerak	65.273	16.289	-	-	-	-	-	81.562	*Transportable towers*
Sewa Pembiayaan									***Finance Lease***
Kendaraan	14.813	-	-	(14.813)	-	-	-	-	*Vehicles*
	298.360	45.927	(87.963)	(14.813)	-	-	-	241.511	
Nilai Tercatat	23.411.299							28.089.812	***Carrying Value***
Jumlah	**24.649.294**							**28.738.362**	***Total***

13. **ASET TETAP** (Lanjutan) / *13. **PROPERTY AND EQUIPMENT** (Continued)*

31 Desember 2019	Saldo awal/ *Beginning balance*	Penambahan/ *Additions*	Pengurangan/ *Deductions*	Reklasifikasi/ *Reclassification*	Akumulasi penyusutan dan penyesuaian nilai wajar/ *Accumulated depreciation and fair value adjustment*	Reklasifikasi ke properti investasi/ *Reclassified to investment property*	Surplus revaluasi/ *Revaluation surplus*	Saldo akhir/ *Ending balance*	*31 December 2019*
Model Revaluasi									***Revaluation Model***
Menara telekomunikasi	20.397.393	-	-	1.232.111	(277.413)	-	1.600.720	22.952.811	*Telecommunication towers*
Akumulasi penyusutan									*Accumulated depreciation*
Menara telekomunikasi	-	277.413	-	-	(277.413)	-	-	-	*Telecommunication towers*
Model Biaya									***Cost Model***
Aset tetap dalam									*Property and*
penyelesaian	997.542	1.472.627	-	(1.232.111)	-	(63)	-	1.237.995	*equipment in progress*
Biaya Perolehan									***Cost***
Pemilikan Langsung									***Direct Ownership***
Tanah	29.360	-	-	16.147	-	-	-	45.507	*Land*
Bangunan	350.555	1.573	-	(16.147)	-	-	-	335.981	*Building*
Peralatan,									*Tools,*
perlengkapan kantor									*office equipment and*
dan perangkat elektronik	105.879	7.265	-	-	-	-	-	113.144	*electronic hardware*
Perangkat lunak	3.688	-	-	-	-	-	-	3.688	*Software*
Kendaraan	27.332	6.563	(778)	-	-	-	-	33.117	*Vehicles*
Genset	30.501	122	-	-	-	-	-	30.623	*Genset*
Menara bergerak	165.949	86	-	-	-	-	-	166.035	*Transportable towers*
Sewa Pembiayaan									***Finance lease***
Kendaraan	20.743	8.310	(300)	-	-	-	-	28.753	*Vehicles*
	734.007	23.919	(1.078)	-	-	-	-	756.848	
Akumulasi Penyusutan									***Accumulated Depreciation***
Pemilikan Langsung									***Direct Ownership***
Bangunan	52.441	17.434	-	-	-	-	-	69.875	*Building*
Peralatan,									*Tools,*
perlengkapan kantor									*office equipment and*
dan perangkat elektronik	90.204	4.780	-	-	-	-	-	94.984	*electronic hardware*
Perangkat lunak	2.003	1.031	-	-	-	-	-	3.034	*Software*
Kendaraan	16.818	3.865	(778)	-	-	-	-	19.905	*Vehicles*
Genset	30.428	48	-	-	-	-	-	30.476	*Genset*
Menara bergerak	48.416	16.857	-	-	-	-	-	65.273	*Transportable towers*
Sewa Pembiayaan									***Finance Lease***
Kendaraan	10.024	4.997	(208)	-	-	-	-	14.813	*Vehicles*
	250.334	49.012	(986)	-	-	-	-	298.360	
Nilai Tercatat	20.881.066							23.411.299	***Carrying Value***
Jumlah	**21.878.608**							**24.649.294**	***Total***

13. **ASET TETAP** (Lanjutan) / *13. **PROPERTY AND EQUIPMENT** (Continued)*

31 Desember 2018	Saldo awal/ *Beginning balance*	Penambahan/ *Additions*	Pengurangan/ *Deductions*	Reklasifikasi/ *Reclassification*	Akumulasi penyusutan dan penyesuaian nilai wajar/ *Accumulated depreciation and fair value adjustment*	Surplus revaluasi/ *Revaluation Surplus*	Reklasifikasi ke properti investasi/ *Reclassified to investment property*	Saldo akhir/ *Ending balance*	*31 December 2018*
Model Revaluasi									***Revaluation Model***
Menara telekomunikasi	18.899.510	-	-	1.115.509	(214.588)	83.074	-	20.397.393	*Telecommunication towers*
Akumulasi penyusutan									*Accumulated depreciation*
Menara telekomunikasi	-	214.588	-	-	(214.588)	-	-	-	*Telecommunication towers*
Model Biaya									***Cost Model***
Aset tetap dalam									*Property and*
penyelesaian	468.670	1.610.043	-	(1.115.509)	-	-	(63)	997.542	*equipment in progress*
Biaya Perolehan									***Cost***
Pemilikan langsung									***Direct Ownership***
Tanah	23.687	5.423	-	250	-	-	-	29.360	*Land*
Bangunan	334.587	16.218	-	(250)	-	-	-	350.555	*Building*
Peralatan,									*Tools,*
perlengkapan kantor									*office equipment and*
dan perangkat elektronik	96.026	6.251	-	-	-	-	-	105.879	*electronic hardware*
Perangkat lunak	3.688	-	-	-	-	-	-	3.688	*Software*
Kendaraan	16.862	11.570	(1.200)	-	-	-	-	27.332	*Vehicles*
Genset	30.501	-	-	-	-	-	-	30.501	*Genset*
Menara bergerak	111.718	54.231	-	-	-	-	-	165.949	*Transportable towers*
Sewa pembiayaan									***Finance lease***
Kendaraan	15.301	6.710	(1.268)	-	-	-	-	20.743	*Vehicles*
	632.370	100.403	(2.468)	-	-	-	-	734.007	
Model Biaya									***Cost Model***
Akumulasi penyusutan									***Accumulated Depreciation***
Pemilikan langsung									***Direct Ownership***
Bangunan	35.059	17.382	-	-	-	-	-	52.441	*Building*
Peralatan,									*Tools,*
perlengkapan kantor									*office equipment and*
dan perangkat elektronik	80.602	7.329	-	-	-	-	-	90.204	*electronic hardware*
Perangkat lunak	1.879	124	-	-	-	-	-	2.003	*Software*
Kendaraan	13.987	3.931	(1.200)	-	-	-	-	16.818	*Vehicles*
Genset	30.351	77	-	-	-	-	-	30.428	*Genset*
Menara bergerak	32.445	15.971	-	-	-	-	-	48.416	*Transportable towers*
Sewa pembiayaan									***Finance lease***
Kendaraan	7.494	3.798	(1.268)	-	-	-	-	10.024	*Vehicles*
	201.817	48.612	(2.468)	-	-	-	-	250.334	
Nilai tercatat	19.330.063							20.881.066	***Carrying value***
Jumlah	**19.798.733**							**21.878.608**	***Total***

13. **ASET TETAP** (Lanjutan)

Pada 1 Januari 2020, aset tetap – sewa pembiayaan kendaraan direklasifikasi ke aset hak guna sebagai dampak dari penerapan PSAK 73.

Aset tetap dalam penyelesaian merupakan pembangunan infrastruktur menara telekomunikasi, dengan rincian sebagai berikut:

*13. **PROPERTY AND EQUIPMENT** (Continued)*

On January 1, 2020, fixed assets - vehicle finance leases were reclassified to rights of use assets as changes of the application of PSAK 73.

Property and equipment in progress represent the telecommunications towers infrastructures development, detail as follows:

	2020	2019	2018	
Persentase penyelesaian > 50%				*Percentage of completion > 50%*
Menara telekomunikasi	209.063	476.539	594.612	*Telecommunications towers*
In building system	44.996	6.440	13.659	*In building system*
Persentase penyelesaian < 50%				*Percentage of completion < 50%*
Menara telekomunikasi	326.997	745.355	380.166	*Telecommunications towers*
In building system	67.494	9.661	9.105	*In building system*
Jumlah	**648.550**	**1.237.995**	**997.542**	***Total***

Estimasi penyelesaian aset tetap dalam penyelesaian adalah sekitar 1 bulan sampai 2 tahun sejak tanggal pelaporan. Tidak terdapat hambatan untuk menyelesaikan aset tetap dalam penyelesaian.

The estimation date to complete the property and equipment in progress is between 1 month to 2 years since the reporting date. There are no obstacles to settling property and equipment in progress.

Tidak terdapat kapitalisasi biaya pinjaman untuk aset karena tidak memenuhi kriteria aset kualifikasian.

There is no capitalization of borrowing costs for assets because It does not meet the criteria for qualifying assets.

Untuk tahun yang berakhir pada 31 Desember 2020, 2019 dan 2018, beban penyusutan dialokasikan pada beban pokok pendapatan dan beban usaha masing-masing sebesar Rp 423.125 (2019: Rp 294.270, 2018: Rp 230.559) dan Rp 29.638 (2019: Rp 32.155, 2018: 32.641) (Catatan 33 dan 34).

For the years ended 31 December 2020, 2019 and 2018, depreciation charged to cost of revenue and operating expenses amounted to Rp 423,125 (2019: Rp 294,270, 2018: Rp 230.559) and Rp 29,638 (2019: Rp 32,155, 2018: Rp 32,641), respectively (Notes 33 and 34).

Keuntungan pelepasan aset tetap untuk tahun yang berakhir 31 Desember 2020, 2019 dan 2018 adalah sebagai berikut:

Loss on disposal of property and equipments for the year ended 31 December 2020, 2019 and 2018 are as follows:

	2020	2019	2018	
Nilai perolehan	6.020	1.078	2.468	*Cost*
Akumulasi penyusutan	(3.957)	(986)	(2.468)	*Accumulated depreciation*
Nilai Tercatat	2.063	92	-	*Carrying value*
Harga Jual	3.800	-	-	*Selling price*
Keuntungan (kerugian) pelepasan	**1.737**	**(92)**	**-**	***Gain (loss) on disposal***

Pada tanggal 31 Desember 2019 dan 2018, aset tetap-sewa pembiayaan berupa kendaraan telah dijadikan jaminan atas liabilitas sewa pembiayaan (Catatan 24).

As of 31 December 2019 and 2018, leased vehicles are collateralized for finance lease liabilities (Note 24).

13. **ASET TETAP** (Lanjutan)

Pada 31 Desember 2020, 2019 dan 2018, seluruh aset tetap telah diasuransikan kepada PT Lippo General Insurance Tbk, PT Asuransi Umum Mega, PT Asuransi Candi Utama dan PT Asuransi Mitra Pelindung Mustika terhadap kebakaran, pencurian dan risiko kerugian lainnya kepada pihak ketiga berdasarkan suatu paket polis tertentu dengan nilai pertanggungan masing-masing sebesar Rp 10.118.837, Rp 9.469.207 dan Rp 10.177.247. Manajemen berpendapat bahwa nilai pertanggungan tersebut cukup untuk menutupi kemungkinan kerugian atas risiko yang dipertanggungkan.

Perusahaan dan entitas anak tidak memiliki aset yang tidak digunakan sementara, dan tidak ada aset yang dihentikan dari penggunaan aktif dan diklasifikasi sebagai tersedia untuk dijual.

Aset yang sudah habis disusutkan dan masih digunakan adalah kendaraan dengan nilai perolehan sebesar Rp 3.529, Rp 3.477 dan Rp 3.477 pada 31 Desember 2020, 2019 dan 2018.

Berdasarkan evaluasi yang dilakukan manajemen, tidak terdapat kejadian atau perubahan atas keadaan yang menunjukan adanya penurunan nilai aset tetap pada tanggal 31 Desember 2020, 2019 dan 2018.

Pengukuran nilai wajar

Sehubungan dengan penerapan PSAK 16 (Revisi 2014) "Aset Tetap", Perusahaan dan entitas anak telah memilih model revaluasi untuk pengukuran setelah pengakuan awal menara telekomunikasi. Nilai wajar pada tanggal 31 Desember 2020 ditentukan berdasarkan penilaian dari penilai independen KJPP Martokoesoemo, Pakpahan & Rekan dalam laporannya pada tanggal 17 Maret 2021, dan telah sesuai dengan peraturan No. VIII.C.4 mengenai pedoman penilaian dan penyajian laporan penilaian aset di pasar modal.

Hirarki nilai wajar aset tetap pada akhir tahun pelaporan merupakan kategori dalam level 3 pengukuran berulang nilai wajar. Tidak terdapat transfer antara level selama tahun berjalan.

Dalam menentukan nilai wajar, Penilai Independen menggunakan metode penilaian dengan mengkombinasikan dua pendekatan, yaitu pendekatan pendapatan yang mendiskontokan penerimaan kas dimasa depan, dan pendekatan biaya yang menggunakan biaya penggantian pada saat ini.

Pada 31 Desember 2020, 2019 dan 2018 asumsi utama yang digunakan oleh penilai independen adalah sebagai berikut:
a. Inflasi per tahun sebesar 3,12% (2019: 3,35%, 2018: 3,51%)
b. Tingkat bunga diskonto per tahun sebesar 11,25% (2019: 11,30%, 2018: 11,19%)

*13. **PROPERTY AND EQUIPMENT** (Continued)*

As of 31 December 2020, 2019 and 2018, all property and equipment have been insured to PT Lippo General Insurance Tbk, PT Asuransi Umum Mega, PT Asuransi Candi Utama and PT Asuransi Mitra Pelindung Mustika against fire, theft and other losses to third parties under a blanket policy with sum insured of Rp 10,118,837, Rp 9,469,207 and Rp 10,177,247, respectively. Management believes that the sum insured is adequate to cover possible losses from such risks.

The Company and subsidiaries has no assets not in use temporarily, and no assets are discontinued from active use and clasified as available for sale.

Depreciated and still used assets are vehicles at cost of Rp 3,529, Rp 3,477 and Rp 3,477 as of 31 December 2020, 2019 and 2018, respectively.

Based on evaluation of Management, there were no events or changes in circumstances to indicate any impairment of property and equipment as of 31 December 2020, 2019 and 2018.

Fair value measurement

Regarding the implementation of PSAK 16 (Revised 2014) "Property and Equipment", the Company and subsidiaries has chosen the revaluation model for the measurement after initial recognition of telecommunication towers. The fair value as of 31 December 2020 is determined based on the appraisal of KJPP Martokoesoemo, Pakpahan & Rekan in their report dated 17 March 2021, and incorporates the regulation No. VIII.C.4 regarding the guidelines of appraisal and presentation of asset appraisal report to capitals market.

The fair value hierarchy of property and equipment at the end of reporting year is categorised as a level 3 recurring fair value measurement. There are no transfers between levels during the year.

To determine the fair value, the Independent Appraiser utilizes a combination of two approaches as the appraisal method: the income approach, which discounts future cash flows, and the cost approach, which is based on current replacement cost.

As of 31 December 2020, 2019 and 2018 independent appraiser used the following key assumptions:
a. Inflation per year of 3.12% (2019: 3.35%, 2018: 3.51%)
b. Discount rate per year of 11.25% (2019: 11.30%, 2018: 11.19%)

13. **ASET TETAP** (Lanjutan)

Hubungan antara input tidak dapat diobservasi untuk nilai wajar aset tetap adalah lebih tinggi tingkat diskonto digunakan, semakin rendah nilai wajar dan semakin tinggi tingkat pertumbuhan sewa aset tetap digunakan, semakin tinggi nilai wajar.

Tidak terdapat perubahan teknik penilaian pengukuran nilai wajar level 3 pada tahun kini. Pengukuran nilai wajar didasarkan pada item di atas yang tertinggi dan penggunaan terbaik, yang tidak berbeda dari penggunaan yang sebenarnya.

Jika menara telekomunikasi diukur menggunakan model biaya, maka nilai tercatat menara telekomunikasi pada 31 Desember 2020, 2019 dan 2018 masing-masing adalah sebesar Rp 19.129.809, Rp 17.399.070 dan Rp 17.007.809.

*13. **PROPERTY AND EQUIPMENT** (Continued)*

Relationship between unobservable inputs to fair value of property and equipment is the higher the discount rate used, the lower the fair value and the higher the rental income of property and equipment growth rate used, the higher the fair value.

There were no changes to the valuation techniques of level 3 fair value measurements in the year. The fair value measurement is based on the above items highest and best use, which does not differ from their actual use.

If at 31 December 2020, 2019 and 2018, the telecommunication towers were measured using cost model, their carrying value were amounting to Rp 19,129,809, Rp 17,399,070 and Rp 17,007,809, respectively.

14. **PROPERTI INVESTASI**

Rincian properti investasi adalah sebagai berikut:

*14. **INVESTMENT PROPERTIES***

The details of investment properties are as follows:

31 Desember 2020	**Saldo awal/ *Beginning balance***	**Penambahan/ *Additions***	**Saldo akhir/ *Ending balance***	***31 December 2020***
Tanah	75.393	39.363	114.756	*Land*
Bangunan	140.500	47.693	188.193	*Building*
	215.893	87.056	302.949	
Akumulasi kenaikan nilai wajar	50.293	34.778	85.071	*Accumulated increase of fair value*
Jumlah	**266.186**		**388.020**	***Total***

31 Desember 2019	**Saldo awal/ *Beginning balance***	**Penambahan/ *Additions***	**Saldo akhir/ *Ending balance***	***31 December 2019***
Tanah	70.242	5.151	75.393	*Land*
Bangunan	140.500	-	140.500	*Building*
	210.742	5.151	215.893	
Akumulasi kenaikan (penurunan) nilai wajar	(29.134)	79.427	50.293	*Accumulated increase (decrease) of fair value*
Jumlah	**181.608**		**266.186**	***Total***

31 Desember 2018	**Saldo awal/ *Beginning balance***	**Penambahan/ *Additions***	**Saldo akhir/ *Ending balance***	***31 December 2018***
Tanah	65.051	5.128	70.242	*Land*
Bangunan	140.500	-	140.500	*Building*
	205.551	5.128	210.742	
Akumulasi kenaikan (penurunan) nilai wajar	(36.862)	7.728	(29.134)	*Accumulated increase (decrease) of fair value*
Jumlah	**168.689**		**181.608**	***Total***

14. **PROPERTI INVESTASI** (Lanjutan)

Sehubungan dengan penerapan PSAK 13 (Revisi 2014) "Properti Investasi", Perusahaan dan entitas anak telah memilih model nilai wajar untuk pengukuran setelah pengakuan awal. Nilai wajar properti investasi per 31 Desember 2020 ditentukan berdasarkan penilaian dari penilai independen KJPP Martokoesoemo, Pakpahan & Rekan dalam laporannya pada tanggal 17 Maret 2021, dan telah sesuai dengan peraturan No. VIII.C.4 mengenai pedoman penilaian dan penyajian laporan penilaian properti di pasar modal.

Hirarki nilai wajar properti investasi pada akhir tahun pelaporan merupakan kategori dalam level 3 pengukuran berulang nilai wajar. Tidak terdapat transfer antara level selama tahun berjalan.

Dalam menentukan nilai wajar, Penilai Independen menggunakan Pendekatan Pasar yaitu pendekatan penilaian yang menggunakan data transaksi atau penawaran atas properti yang sebanding dan sejenis dengan obyek penilaian yang didasarkan pada suatu proses perbandingan dan penyesuaian.

Pendekatan ini digunakan apabila dipasaran umum secara fisik didapat data untuk properti yang hampir sama dan tipikal dengan properti yang dinilai.

Pengukuran nilai wajar

Tidak terdapat perubahan teknik penilaian pengukuran nilai wajar level 3 pada tahun kini. Pengukuran nilai wajar didasarkan pada item di atas yang tertinggi dan penggunaan terbaik, yang tidak berbeda dari penggunaan yang sebenarnya.

Jumlah pendapatan sewa atas properti investasi untuk tahun yang berakhir pada 31 Desember 2020, 2019 dan 2018 masing-masing sebesar Rp 8.228, Rp 3.764 dan Rp 2.797, diakui pada pendapatan (Catatan 32).

Tidak terdapat beban operasi langsung yang diakui dalam laporan keuangan. Penyewa membayar beban operasi langsung, seperti biaya listrik, pemeliharaan dan perawatan kepada pihak ketiga.

*14. **INVESTMENT PROPERTIES** (Continued)*

Regarding the implementation of PSAK 13 (Revised 2014) "Investment Property", the Company and subsidiaries has chosen the fair value model for the measurement after initial recognition. The fair value of investment property as of 31 December 2020 is determined based on the appraisal of KJPP Martokoesoemo, Pakpahan & Rekan in their report dated 17 March 2021, and incorporates the regulation No. VIII.C.4 regarding the guidelines of appraisal and presentation of property appraisal report to capitals market.

The fair value hierarchy of investment properties at the end of reporting year is categorised as a level 3 recurring fair value measurement. There are no transfers between levels during the year.

To determine the fair value, the Independent Appraiser utilizes a market approach valuation approach that uses transaction or offer data on comparable and similar property to valuation objects based on a process of comparison and adjustment.

This approach is used if the physical market generally gets data for properties that are almost identical and typical of the property being valued.

Fair value measurement

There were no changes to the valuation techniques of level 3 fair value measurements in the year. The fair value measurement is based on the above items highest and best use, which does not differ from their actual use.

Total rent revenue arising from investment properties for the years ended 31 December 2020, 2019 and 2018 amounting to Rp 8,228, Rp 3,764 and Rp 2.797, respectively, recognized in revenue (Note 32).

There are no direct operating expenses recognized in the financial statements. Tenants pay direct operating expenses, such as electricity, maintenance and maintenance costs to third parties.

15. ASET HAK GUNA / *15. RIGHT OF USE ASSETS*

Sesuai dengan PSAK 73 mengenai "Sewa", akun ini merupakan sewa lahan untuk menara telekomunikasi dan sewa kantor, mencakup biaya sewa dibayar dimuka untuk jangka waktu yang sesuai dengan masa kontrak sewa ditambah dengan estimasi liabilitas sewa untuk mencakup jangka waktu kolokasi, dengan rincian sebagai berikut:

Based on PSAK 73 "Leases", this account represents land leases for telecommunication towers and office leases consists of prepaid land lease with a period matching to the contract term plus the estimation of land lease extension to cover the collocation period, with details as follows:

	Penerapan awal PSAK 73 1 Januari 2020/ *Initial application of PSAK 73 1 January 2020*	Penambahan/ *Addition*	Saldo per 31 Desember 2020/ *Balance as of 31 December 2020*	
Biaya perolehan				***Acquisition costs***
Sewa lahan	3.466.973	687.265	4.154.238	*Land leases*
Sewa kantor	7.446	-	7.446	*Office leases*
Sewa kendaraan	28.753	5.439	34.192	*Vehicle leases*
Jumlah biaya perolehan	3.503.172	692.704	4.195.876	***Total acquisition costs***
Akumulasi penyusutan				***Accumulated depreciation***
Sewa lahan	(1.248.923)	(310.171)	(1.559.094)	*Land leases*
Sewa kantor	-	(827)	(827)	*Office leases*
Sewa kendaraan	(14.813)	(6.260)	(21.073)	*Vehicle leases*
Jumlah akumulasi penyusutan	(1.263.736)	(317.258)	(1.580.994)	***Total acumulated depreciation***
Nilai tercatat	**2.239.436**		**2.614.882**	***Carrying amount***

Apabila terdapat kontrak kolokasi dengan jangka waktu lebih panjang dari kontrak sewa lahan, maka estimasi nilai perpanjangan sewa lahan untuk mencakup jangka waktu kolokasi akan disajikan sebagai Liabilitas Sewa (lihat Catatan 27).

If collocation period longer than existing land lease contract, the estimation of land lease extension to cover the collocation period will be presented as Leases Liability (see Note 27).

Untuk tahun yang berakhir pada 31 Desember 2020, 2019 dan 2018, beban penyusutan dialokasikan pada beban pokok pendapatan dan beban usaha masing-masing sebesar Rp 310.171 (2019 dan 2018: nihil) dan Rp 7.087 (2019 dan 2018: nihil) (Catatan 33 dan 34).

For the years ended 31 December 2020, 2019 and 2018, depreciation charged to cost of revenue and operating expenses amounted to Rp 310,171 (2019 and 2018: nil) and Rp 7,087 (2019 and 2018: nil), respectively (Note 33 and 34).

Pada tanggal 31 Desember 2020, aset tetap-sewa pembiayaan berupa kendaraan telah dijadikan jaminan atas liabilitas sewa pembiayaan (Catatan 27.b).

As of 31 December 2020, leased vehicles are collateralized for finance lease liabilities (Note 27.b).

16. UANG JAMINAN / *16. REFUNDABLE DEPOSITS*

	2020	2019	2018	
Sewa	506	524	614	*Rental*
Listrik	-	497	497	*Electricity*
Lainnya	1.202	1.260	956	*Others*
Jumlah	**1.708**	**2.281**	**2.067**	***Total***

17. ASET KEUANGAN DERIVATIF / *17. DERIVATIVE FINANCIAL ASSETS*

	2020	2019	2018	
Aset keuangan derivatif				***Derivative financial assets***
Derivatif yang ditetapkan sebagai instrumen lindung nilai				*Derivatives designated as hedging instruments*
Swap valuta asing - lindung nilai arus kas	1.084.975	1.312.140	2.605.591	*Cross currency swaps - cash flow hedges*

Arus kas *swap* valuta asing

Risiko nilai tukar valuta asing muncul ketika operasi individu Perusahaan dan entitas anak memasuki transaksi yang terbagi dalam mata uang selain mata uang fungsionalnya. Ketika risiko terhadap Perusahaan dan entitas anak di pertimbangkan menjadi signifikan, treasuri Perusahaan dan entitas anak akan mencocokan kontrak berjangka valuta asing dengan bank yang mempunyai nama baik.

Jumlah pokok nosional dari sisa kontrak berjalan berjangka valuta asing pada tanggal dan 31 Desember 2020, 2019 dan 2018 masing-masing sebesar US$ 1.619.500.000, US$ 1.443.000.000 dan US$ 1.385.000.000. Nilai wajar pada masing-masing tanggal diatas adalah sebesar Rp 1.084.975, Rp 1.312.140 dan Rp 2.605.591

Pada tanggal 31 Desember 2020, 2019 dan 2018 premi lindung nilai sehubungan dengan *swap* valuta asing berkisar antara 3,15% sampai dengan 4,86%, (2019: 2,10% sampai dengan 4,66%) dan (2018: 2,10% sampai dengan 4,66%).

Cash flow currency swaps

Foreign exchange risk arises when individual operations of the Company and subsidiaries enter into transactions denominated in a currency other than their functional currency. Where the risk to the Company and subsidiaries is considered to be significant, treasury of the Company and subsidiaries will enter into a matching forward foreign exchange contract with a reputable bank.

The notional principal amounts of outstanding forward foreign exchange contracts at 31 December 2020, 2019 and 2018 were US$ 1,619,500,000, US$ 1,443,000,000 and US$ 1,385,000,000, respectively. Their fair value at these respective dates is Rp 1,084,975, Rp 1,312,140 and Rp 2,605,591, respectively.

As of 31 December 2020, 2019 and 2018 hedge premiums related to foreign currency swaps ranged from 3.15% to 4.86%, (2019: 2.10% to 4.66%) and (2018: 2.10% to 4.66%).

Tahun/ *Year*	Jumlah kontrak lindung nilai/ *Number of hedging contracts*	Jumlah Nosional/ *Notional amount* (US$ nilai penuh/ *US$ full amount)*	Jatuh tempo/ *Due date*	Beban lindung nilai/ *Hedging cost*	Pihak yang memiliki nilai kontrak lindung nilai lebih dari 10%/ *Parties who earn contracts more than 10%*	
					Pihak dalam kontrak / Counterparties	*%*
31 Desember / 31 December 2020	96	1.619.500.000	24 Januari 2021 sampai dengan 24 Januari 2025/ *24 January 2021 to 24 January 2025*	842.739	BNP Paribas, Oversea-Chinese Banking Corporation Limited, The Hongkong And Shanghai Banking Corporation Limited, Credit Agricole Corporate And Investment Bank	47,9%
31 Desember / *31 December* 2019	119	1.443.000.000	16 Januari 2020 sampai dengan 24 Januari 2025/ *16 January 2020 to 24 January 2025*	765.439	BNP Paribas, Morgan Stanley, Nomura International plc, Oversea-Chinese Banking Corporation Limited, The Hongkong And Shanghai Banking Corporation Limited	65,3%
31 Desember / *31 December* 2018	131	1.385.000.000	1 Februari 2019 sampai dengan 30 Juni 2022/ *1 February 2019 to 30 June 2022*	851.426	BNP Paribas, Morgan Stanley, Nomura International plc, Oversea-Chinese Banking Corporation Limited, The Hongkong And Shanghai Banking Corporation Limited	64,2%

18. ASET TIDAK LANCAR LAINNYA / *18. OTHER NON-CURRENT ASSETS*

Pada 31 Desember 2020, 2019 dan 2018 akun ini terutama merupakan perangkat lunak dan lisensi sebesar 93% (2019: 74%, 2018: 51%).

At 31 December 2020, 2019 and 2018 this account mainly are software and license of 93% (2019: 74%, 2018: 51%).

19. UTANG USAHA - PIHAK KETIGA / *19. TRADE PAYABLES - THIRD PARTIES*

	2020	2019	2018	
Pihak ketiga				***Third parties***
Rupiah				***Rupiah***
PT Inti Bangun Sejahtera Tbk (Catatan 46.g)	397.499	-	-	*PT Inti Bangun Sejahtera Tbk (Note 46.g)*
PT Wahana Infrastruktur Nusantara	17.796	15.993	6.093	*PT Wahana Infrastruktur Nusantara*
PT Kustodian Sentral Efek Indonesia	12.920	12.920	12.920	*PT Kustodian Sentral Efek Indonesia*
PT Omadi Investindo	3.256	3.612	3.612	*PT Omadi Investindo*
PT Bach Multi Global	3.016	1.947	2.277	*PT Bach Multi Global*
PT Jaya Engineering Technology	2.719	-	-	*PT Jaya Engineering Technology*
PT Mandiri Infra Tripakarti	2.546	-	-	*PT Mandiri Infra Tripakarti*
PT Berkat Bersama Teknik	2.518	1.316	1.495	*PT Berkat Bersama Teknik*
PT Tunas Cahaya Mandiri Widyatama	2.253	2.639	1.092	*PT Tunas Cahaya Mandiri Widyatama*
PT Nayaka Pratama	2.046	2.060	1.983	*PT Nayaka Pratama*
PT Dwi Pari Abadi	1.721	1.509	-	*PT Dwi Pari Abadi*
PT Prasetia Dwidharma	1.625	1.210	1.247	*PT Prasetia Dwidharma*
PT Cipta Jaya Sejahtera Abadi	1.564	-	-	*PT Cipta Jaya Sejahtera Abadi*
PT Raka Mitra Bersama	1.341	-	-	*PT Raka Mitra Bersama*
PT Karya Lintas Sejahtera	1.187	2.002	1.337	*PT Karya Lintas Sejahtera*
PT Dwi Pari Selaras	1.009	-	-	*PT Dwi Pari Selaras*
PT Maxima Arta	-	1.480	-	*PT Maxima Arta*
PT Pamengkang Jagat	-	1.345	-	*PT Pamengkang Jagat*
PT Indo Premier Sekuritas	-	-	9.886	*PT Indo Premier Sekuritas*
CV Lintas Reka Cipta	-	-	3.377	*CV Lintas Reka Cipta*
PT Tower Capital Indonesia	-	-	1.561	*PT Tower Capital Indonesia*
Lainnya				*Others*
(masing-masing di bawah Rp 1 miliar)	34.308	30.024	21.815	*(each below Rp 1 billion)*
Sub-jumlah	489.324	78.057	68.695	*Sub-total*
US Dolar				***US Dollar***
Asia Pasific Intertrading Pte Ltd. (saldo pada tanggal 31 Desember 2020, 2019 dan 2018 masing-masing adalah sebesar US$ 5.790.543, US$ 8.851.147 dan US$ 10.577.767)	81.676	123.040	153.177	*Asia Pasific Intertrading Pte Ltd. (as of 31 December 2020, 2019 and 2018 the outstanding balance are US$ 5,790,543, US$ 8,851,147 and US$ 10,577,767, respectively)*
Milton Schaub Corporation Pte Ltd. (saldo pada tanggal 31 Desember 2020, 2019 and 2018 masing-masing adalah sebesar nihil, US$ 3.344.682 dan nihil)	-	46.494	-	*Milton Schaub Corporation Pte Ltd. (as of 31 December 2020, 2019 and 2018 the outstanding balance are nil, US$ 3,344,682 and nil, respectively)*
Global Tradinglinks Ltd. (saldo pada tanggal 31 Desember 2020, 2019 dan 2018 masing-masing sebesar nihil, nihil, dan US$ 679.451)	-	-	9.839	*Global Tradinglinks Ltd. (as of 31 December 2020, 2019 and 2018 the outstanding balance are nil, nil and US$ 679,451, respectively)*
Sub-jumlah	81.676	169.534	163.016	*Sub-total*
Jumlah	**571.000**	**247.591**	**231.711**	***Total***

20. UTANG LAIN-LAIN / *20. OTHER PAYABLES*

	2020	2019	2018	
Asuransi	3.485	2.343	2.517	*Insurance*
Lainnya	17.572	38.596	101.511	*Others*
Jumlah	**21.057**	**40.939**	**104.028**	***Total***

21. PERPAJAKAN / *21. TAXATION*

a. Pajak Dibayar di Muka / *a. Prepaid Taxes*

	2020	2019	2018	
Pajak Penghasilan Pasal 4 (2)	-	-	133	*Income Tax Article 4 (2)*
Pajak Penghasilan Pasal 23	-	163	11.649	*Income Tax Article 23*
Pajak Penghasilan Pasal 28	94.339	6.460	14.423	*Income Tax Article 28*
Pajak Pertambahan Nilai - Masukan	68.001	62.511	93.001	*Value-Added Tax - Input*
Jumlah	**162.340**	**69.134**	**119.206**	***Total***

b. Utang Pajak / *b. Taxes Payable*

	2020	2019	2018	
Pajak Penghasilan Pasal 4 (2)	5.485	5.110	5.191	*Income Tax Article 4 (2)*
Pajak Penghasilan Pasal 21	2.728	2.793	2.855	*Income Tax Article 21*
Pajak Penghasilan Pasal 23	11.910	5.575	10.162	*Income Tax Article 23*
Pajak Penghasilan Pasal 25	6.436	15.923	10.698	*Income Tax Article 25*
Pajak Penghasilan Pasal 26	1.531	2.629	1.176	*Income Tax Article 26*
Pajak Penghasilan Pasal 29	24.001	11.978	16.972	*Income Tax Article 29*
Pajak Pertambahan Nilai - Keluaran	4.431	63	13.011	*Value-Added Tax - Output*
Jumlah	**56.522**	**44.071**	**60.065**	***Total***

21. **PERPAJAKAN** (Lanjutan)

c. **Perhitungan Pajak Penghasilan**

Penghasilan kena pajak yang dihitung Perusahaan menjadi dasar Surat Pemberitahuan (SPT) yang disampaikan kepada otoritas perpajakan pada setiap tahun.

Rekonsiliasi antara laba sebelum pajak penghasilan menurut laporan laba rugi dan penghasilan komprehensif lain konsolidasian dengan taksiran laba kena pajak untuk tahun yang berakhir pada 31 Desember 2020, 2019 dan 2018, adalah sebagai berikut:

*21. **TAXATION** (Continued)*

*c. **Income Tax Calculation***

Taxable income which calculated by the Company uses as basis for Surat Pemberitahuan (SPT) that reported to Director General of Taxes yearly.

Reconciliation between profit before income tax as shown in the consolidated statements of profit or loss and other comprehensive income with estimated taxable profit for the years ended 31 December 2020, 2019 and 2018, are as follows:

	2020	2019	2018	
Pendapatan yang dikenakan pajak penghasilan yang bersifat final	1.557.230	813.942	173.102	*Revenue subject to final income tax*
Pendapatan yang dikenakan pajak penghasilan yang tidak bersifat final	3.770.459	3.884.800	4.145.035	*Revenue subject to non final income tax*
Pendapatan konsolidasian	5.327.689	4.698.742	4.318.137	*Consolidated income*
Pajak Penghasilan				***Income Tax***
Pajak penghasilan yang bersifat final	155.723	81.394	17.310	*Subject to final income tax*
Pajak penghasilan yang tidak bersifat final	254.752	261.448	187.395	*Subject to non final income tax*
Beban pajak penghasilan menurut laporan laba rugi dan penghasilan komprehensif lain - taksiran	410.475	342.842	204.705	*Income tax expense as per consolidated statements of profit or loss and other comprehensive income - estimated*
Pajak Non Final				***Non Final Tax***
Laba sebelum pajak penghasilan, menurut laporan laba rugi komprehensif konsolidasian	1.509.454	1.222.595	1.034.285	*Profit before income tax, as per consolidated statements of comprehensive income*
Bagian laba entitas anak sebelum pajak penghasilan - bersih	(442.199)	(400.593)	(351.516)	*Profit of subsidiairies before income taxes - net*
Laba Perusahaan sebelum pajak penghasilan	1.067.255	822.002	682.769	***The Company's profit before income tax***
Koreksi fiskal:				***Fiscal corrections:***
Beda temporer	647	68	96	***Temporary differences***
Beda tetap:				***Permanent differences:***
Beban yang terkait dengan pendapatan yang dikenakan pajak penghasilan yang bersifat final	7.022	10.912	14.358	*Expenses related to revenue subject to final income tax*
Bagian laba dari entitas anak	(1.099.152)	(945.268)	(740.632)	*Gain from subsidiaries*
Lainnya - Bersih	142.892	122.544	52.250	*Others - Net*
Jumlah koreksi fiskal	(948.591)	(811.744)	(673.928)	***Total fiscal correction***
Taksiran laba kena pajak	118.664	10.258	8.841	***Estimated tax income***

21. **PERPAJAKAN** (Lanjutan) / *21. **TAXATION** (Continued)*

c. **Perhitungan Pajak Penghasilan** (Lanjutan) / *c. **Income Tax Calculation** (Continued)*

Taksiran beban pajak penghasilan dan utang pajak penghasilan untuk tahun yang berakhir 31 Desember 2020, 2019 dan 2018 adalah sebagai berikut:

Estimated income tax expenses and income tax payable for the years ended 31 December 2020, 2019 and 2018, are as follows:

	2020	2019	2018	
Taksiran laba kena pajak				***Estimated taxable income***
Perusahaan	118.664	10.258	8.841	*The Company*
Entitas anak - Bersih	1.038.400	1.020.878	1.029.278	*Subsidiaries - Net*
Taksiran beban pajak penghasilan				***Estimated income tax expenses***
Perusahaan	26.106	2.565	2.210	*The Company*
Entitas anak	228.646	258.883	185.185	*Subsidiaries*
Taksiran beban pajak penghasilan menurut laporan laba rugi komprehensif konsolidasian	254.752	261.448	187.395	***Estimated income tax expenses as per consolidated statements of comprehensive income***
Dikurangi:				***Less:***
Pajak Penghasilan Pasal 23	(138.470)	(73.645)	(74.911)	*Income Tax Article 23*
Pajak Penghasilan Pasal 25	(92.281)	(175.825)	(95.512)	*Income Tax Article 25*
Jumlah	(230.751)	(249.470)	(170.423)	***Total***
Taksiran utang pajak penghasilan				***Estimated income tax payable***
Pajak Penghasilan Pasal 29	24.001	11.978	16.972	*Income Tax Article 29*
Taksiran klaim pajak penghasilan	(94.339)	(6.460)	(2.832)	***Estimated claims for income tax refund***

d. **Pajak tangguhan** / *d. **Deferred tax***

Aset pajak tangguhan / *Deferred tax assets*

Aset (liabilitas) pajak tangguhan yang timbul dari perbedaan temporer antara pendapatan dan beban, yang diakui secara komersial dan perpajakan, adalah sebagai berikut:

Deferred tax assets (liabilities) occuring from temporary differences of revenues and expenses recognition between the commercial and tax base are as follows:

31 Desember 2020	**Saldo awal/ *Beginning balance***	**Dikreditkan (dibebankan) ke laba rugi/ *Credited (charged) to profit or loss***	**Dikreditkan ke penghasilan komprehensif lain/ *Credited to other comprehensive income***	**Saldo akhir/ *Ending balance***	***31 December 2020***
Rugi fiskal	240.925	(195.930)	-	44.995	*Tax loss*
Cadangan imbalan pasca-kerja	9.885	2.014	15	11.914	*Provision for post-employment benefits*
Penyusutan aset tetap	(1.219)	5.036	-	3.817	*Depreciation of property and equipment*
Jumlah - bersih	249.591	(188.880)	15	60.726	***Total - net***

21. **PERPAJAKAN** (Lanjutan) / *21. **TAXATION** (Continued)*

d. **Pajak tangguhan** (Lanjutan) / *d. **Deferred tax** (Continued)*

Aset pajak tangguhan (Lanjutan) / *Deferred tax assets (Continued)*

31 Desember 2019 / *31 December 2019*	Saldo awal/ *Beginning balance*	*Penyesuaian/ Adjustment*	Dikreditkan (dibebankan) ke laba rugi/ *Credited (charged) to profit or loss*	Saldo akhir/ *Ending balance*	
Rugi fiskal	340.833	-	(99.908)	240.925	*Tax loss*
Cadangan imbalan pasca-kerja	6.630	(86)	3.341	9.885	*Provision for post-employment benefits*
Penyusutan aset tetap	(2.760)	-	1.541	(1.219)	*Depreciation of property and equipment*
Jumlah - bersih	344.703	(86)	(95.026)	249.591	***Total - net***

31 Desember 2018 / *31 December 2018*	Saldo awal/ *Beginning balance*	Dampak akuisisi / *Effect of Acquisition*	Dikreditkan (dibebankan) ke laba rugi/ *Credited charged) to profit or loss*	Dikreditkan ke penghasilan komprehensif lain/ *Credited to other comprehensive income*	Saldo akhir/ *Ending balance*	
Rugi fiskal	468.571	-	(127.738)	-	340.833	*Tax loss*
Cadangan imbalan pasca-kerja	2.046	925	3.789	(130)	6.630	*Provision for post-employment benefits*
Penyusutan aset tetap	239	-	(2.999)	-	(2.760)	*Depreciation of property and equipment*
Jumlah - bersih	470.856	925	(126.948)	(130)	344.703	***Total - net***

Liabilitas pajak tangguhan / *Deferred tax liabilities*

31 Desember 2020 / *31 December 2020*	Saldo awal/ *Beginning balance*	Dikreditkan (dibebankan) ke laba rugi/ *Credited to (charged to) profit or loss*	Dikreditkan ke penghasilan komprehensif lain/ *Credited to other comprehensive income*	*Reklasifikasi/ Reclasification*	Saldo akhir/ *Ending balance*	
Cadangan imbalan pasca-kerja	12.685	(12.685)	-	-	-	*Provision for post-employment benefits*
Pencadangan kerugian penurunan nilai piutang	6.490	(6.490)	-	-	-	*Allowance for impairment losses of trade receivables*
Penyusutan aset tetap	(3.908)	3.908	-	-	-	*Depreciation of property and equipment*
Pajak atas pendapatan bunga	-	-	(165)	(11.246)	(11.411)	*Interest income withholding tax*
Rugi fiskal	(27.267)	16.021	-	11.246	-	*Tax loss*
Jumlah	(12.000)	754	(165)	-	(11.411)	***Total***

21. **PERPAJAKAN** (Lanjutan) / *21. **TAXATION** (Continued)*

d. **Pajak tangguhan** (Lanjutan) / *d. **Deferred tax** (Continued)*

Liabilitas pajak tangguhan (Lanjutan) / *Deferred tax liabilities (Continued)*

31 Desember 2019	Saldo awal/ *Beginning balance*	Dikreditkan ke penghasilan komprehensif lain/ *Credited to other comprehensive income*	Saldo akhir/ *Ending balance*	*31 December 2019*
Cadangan imbalan pasca-kerja	12.685	-	12.685	*Provision for post-employment benefits*
Pencadangan kerugian penurunan nilai piutang	6.490	-	6.490	*Allowance for impairment losses of trade receivables*
Penyusutan aset tetap	(4.417)	509	(3.908)	*Depreciation of property and equipment*
Rugi fiskal	(27.267)	-	(27.267)	*Tax loss*
Jumlah	(12.509)	509	(12.000)	***Total***

31 Desember 2018	Saldo awal/ *Beginning balance*	Dikreditkan ke penghasilan komprehensif lain/ *Credited to other comprehensive income*	Saldo akhir/ *Ending balance*	*31 December 2018*
Cadangan imbalan pasca-kerja	12.685	-	12.685	*rovision for post-employment benefits*
Pencadangan kerugian penurunan nilai piutang	6.490	-	6.490	*Allowance for impairment losses of trade receivables*
Penyusutan aset tetap	(3.745)	(672)	(4.417)	*property and equipment*
Rugi fiskal	(27.267)	-	(27.267)	*Tax loss*
Jumlah	(11.837)	(672)	(12.509)	***Total***

e. **Taksiran klaim pajak penghasilan** / *e. **Estimated claims for income tax refund***

Akun ini merupakan taksiran jumlah lebih bayar pajak penghasilan. Jumlah tersebut mungkin berbeda dari jumlah lebih bayar pajak penghasilan yang dilaporkan dalam Surat Pemberitahuan (SPT) Tahunan.

This account represents estimated claims for income tax refund. Such amounts might be different with the amounts reported in the Annual Income Tax Return.

22. PENDAPATAN YANG DITERIMA DI MUKA / *22. UNEARNED INCOME*

	2020	2019	2018	
Pihak ketiga				***Third parties***
PT XL Axiata Tbk	455.997	399.255	269.695	*PT XL Axiata Tbk*
PT Hutchison 3 Indonesia	278.857	210.520	171.020	*PT Hutchison 3 Indonesia*
PT Indosat Tbk	178.050	175.462	175.022	*PT Indosat Tbk*
PT Telekomunikasi Selular	105.903	32.525	29.846	*PT Telekomunikasi Selular*
PT Smartfren Telecom Tbk	30.848	25.051	18.799	*PT Smartfren Telecom Tbk*
PT Smart Telecom	8.071	8.822	749	*PT Smart Telecom*
PT Sampoerna Telecom	1.945	1.945	1.847	*PT Sampoerna Telecom*
Lainnya	2.323	7.302	1.565	*Others*
Jumlah	**1.061.994**	**860.882**	**668.543**	***Total***

Sesuai perjanjian sewa, entitas anak telah menerima pembayaran di muka dari pelanggan untuk jangka waktu 1 (satu) bulan, 3 (tiga) bulan dan 1 (satu) tahun.

Based on the rental agreements, the subsidiaries have received payments in advance for year of 1 (one) month, 3 (three) months and 1 (one) year.

23. BEBAN MASIH HARUS DIBAYAR / *23. ACCRUED EXPENSES*

	2020	2019	2018	
Estimasi biaya pembangunan menara telekomunikasi	578.160	686.335	893.694	*Estimated construction cost of telecommunication towers*
Beban bunga :				*Interest expenses :*
Surat utang (Catatan 26)	304.627	195.552	199.286	*Notes (Note 26)*
Pinjaman jangka panjang (Catatan 25)	60.842	67.850	81.250	*Long-term loans (Note 25)*
Karyawan	106.979	98.478	77.086	*Employees*
Perbaikan dan pemeliharaan menara	44.315	51.923	42.669	*Towers repair and maintenance*
Keamanan	5.930	5.675	5.492	*Security*
Jasa konsultan	5.640	5.844	3.341	*Consultant fees*
Listrik	3.422	6.505	7.730	*Electricity*
Lainnya	46.875	50.423	155.480	*Others*
Jumlah	**1.156.790**	**1.168.585**	**1.466.028**	***Total***

Estimasi biaya pembangunan menara telekomunikasi merupakan estimasi beban masih harus dikeluarkan atas menara telekomunikasi yang telah selesai pembangunannya namun belum ditagihkan seluruh biayanya oleh kontraktor.

Estimated construction cost of telecommunication towers represents the estimated costs to be incurred by the Company in relation to work performed on the telecommunication towers which have been completed but not yet invoiced by contractors.

24. PINJAMAN JANGKA PANJANG - SEWA PEMBIAYAAN / *24. LONG-TERM LOANS - FINANCE LEASES*

	2019	2018	
PT Mitra Pinasthika Mustika Finance	15.362	10.540	*PT Mitra Pinasthika Mustika Finance*
PT Toyota Astra Financial Services	2.831	3.954	*PT Toyota Astra Financial Services*
PT BCA Finance	698	3.469	*PT BCA Finance*
Jumlah	**18.891**	**17.963**	***Total***
Bagian yang jatuh tempo dalam satu tahun	**(4.644)**	**(5.095)**	***Current portion less than one year***
Bagian yang jatuh tempo lebih dari satu tahun	**14.247**	**12.868**	***due more than one year***

Pembayaran sewa pembiayaan minimum di masa mendatang, serta nilai kini atas pembayaran minimum sewa pembiayaan pada tanggal 31 Desember 2019 dan 2018 adalah sebagai berikut:

Future minimum lease payments under finance leases together with the present value of the minimum lease payments as at 31 December 2019 and 2018 were as follows:

	2019	2018	
Jatuh tempo dalam satu tahun	7.495	7.385	*Due less than one year*
Jatuh tempo lebih dari satu tahun	18.276	16.221	*Due more than one year*
	25.771	23.606	
Dikurangi:			*Less:*
Beban bunga yang belum jatuh tempo	(6.880)	(5.643)	*Future financing charges*
Nilai kini pembayaran minimun utang sewa pembiayaan	18.891	17.963	*Present value of minimum finance lease payable*
Jatuh tempo dalam satu tahun	4.644	5.095	*Due less than one year*
Jatuh tempo lebih dari satu tahun	14.247	12.868	*Due more than one year*
Nilai kini pembayaran minimun utang sewa pembiayaan	**18.891**	**17.963**	***Present value of minimum finance lease payable***

Pada tanggal 31 Desember 2019 dan 2018, sewa pembiayaan ini dikenakan bunga berkisar antara 5,50% sampai dengan 15,22% per tahun dan akan jatuh tempo antara tahun 2020 sampai dengan tahun 2024.

As of 31 December 2019 and 2018, this finance lease bears interest ranging from 5.50% to 15.22% per annum and will be due between 2020 to 2024.

Pada 1 Januari 2020, Perusahaan telah menerapkan PSAK 73 yang berdampak pada penyajian sewa pembiayaan yang disajikan dalam liabilitas sewa pada 31 Desember 2020.

On 1 January 2020, the Company adopted PSAK 73 which impacted the presentation of the finance leases presented in the lease liabilities on 31 December 2020.

Sewa pembiayaan ini dijamin dengan aset kendaraan yang menjadi obyek pembiayaan.

The finance lease is secured by the respective vehicle assets.

25. PINJAMAN JANGKA PANJANG - PIHAK KETIGA

Akun ini merupakan pinjaman dari pihak ketiga sebagai berikut:

25. LONG-TERM LOANS - THIRD PARTIES

This account represents loans from third parties as follows:

	2020	2019	2018	
Pinjaman sindikasi				***Syndicated loans***
a. Fasilitas US$1 miliar (saldo pada 31 Desember 2020, 2019 dan 2018 masing-masing sebesar (US$ 366,9 juta, US$ 522,275 juta dan US$ 925,275 juta)	5.175.125	7.260.145	13.398.907	*a. US$1 billion facility (balance as of 31 December 2020, 2019 and 2018 amounted to US$ 366.9 million, US$ 522.275 million and US$ 925.275 million, respectively)*
b. Fasilitas US$ 200 juta (saldo pada 31 Desember 2020, 2019 dan 2018 masing-masing sebesar US$ 74 juta, US$ 195,725 juta dan US$ 109,725 juta)	1.043.770	2.720.773	1.588.928	*b. US$ 200 million facility (balance as of 31 December 2020, 2019 and 2018 amounted to US$ 74 million, US$ 195.725 million and US$ 109.725 million, respectively)*
c. Fasilitas US$ 375 juta (saldo pada 31 Desember 2020, 2019 dan 2018 masing-masing sebesar US$ 292,1 juta, US$ 375 juta dan nihil)	4.120.070	5.212.875	-	*c. US$ 375 million facility (balance as of 31 December 2020, 2019 and 2018 amounted to US$ 292.1 million, US$ 375 million and nil, respectively)*
Pinjaman non-sindikasi				***Non-syndicated loans***
PT Bank UOB Indonesia	24.800	75.850	6.250	*PT Bank UOB Indonesia*
PT Bank QNB Indonesia Tbk	36.500	-	-	*PT Bank QNB Indonesia Tbk*
PT Bank Mandiri (Persero) Tbk	-	-	34.402	*PT Bank Mandiri (Persero) Tbk*
PT Bank Ina Perdana Tbk	-	-	41.024	*PT Bank Ina Perdana Tbk*
Jumlah	10.400.265	15.269.643	15.069.511	***Total***
Dikurangi:				*Less:*
Biaya pinjaman (Catatan 2f)	(121.418)	(153.735)	(115.387)	*Unamortized borrowing cost (Note 2f)*
Jumlah - bersih	10.278.847	15.115.908	14.954.124	***Total - net***
Saldo yang jatuh tempo dalam satu tahun	**(3.857.445)**	**-**	**(3.265.184)**	***Balance due less than one year***
Saldo yang jatuh tempo lebih dari satu tahun	**6.421.402**	**15.115.908**	**11.688.940**	***Balance due more than one year***

Pinjaman Sindikasi

a. **Fasilitas Pinjaman US$ 1 miliar**

Pada tanggal 21 November 2014, entitas anak tertentu telah menandatangani perjanjian fasilitas pinjaman ("Perjanjian Fasilitas Pinjaman") sebesar US$ 1.000.000.000 untuk melunasi program pinjaman US$ 2.000.000.000 pada saat itu dan untuk menyediakan tambahan dana untuk modal kerja.

Pada tanggal 21 April 2017, Perusahaan dan entitas anak, telah merevisi dan menyajikan kembali Perjanjian Fasilitas Pinjaman yang diubah melalui surat perubahan dan pengesampingan tanggal 6 November 2015 dan 17 Maret 2017.

Syndication Loans

a. US$ 1 billion Credit Facilities

On 21 November 2014, certain subsidiaries of have entered into a US$ 1,000,000,000 credit facility agreement (the "Credit Facilities Agreement") to refinance the existing US$ 2,000,000,000 debt program and to provide additional funding for working capital.

On 21 April 2017, the Company and its subsidiaries have revised and restated the Loan Facility Agreement which was amended through a letter of amendment and waiver on 6 November 2015 and 17 March 2017.

25. **PINJAMAN JANGKA PANJANG – PIHAK KETIGA** (Lanjutan)

Pinjaman Sindikasi (Lanjutan)

a. **Fasilitas Pinjaman US$ 1 miliar** (Lanjutan)

Pada tanggal 16 Maret 2020, entitas anak melakukan penyesuaian nilai fasilitas pinjaman sindikasi US$ 1 miliar. Amandemen nilai fasilitas tersebut adalah untuk fasilitas pinjaman *revolving* Seri B dari sebesar US$ 300 juta menjadi US$ 100 juta.

Pinjaman ini tidak memiliki jaminan, dan entitas anak yang menjadi peserta fasilitas pinjaman ini memberikan jaminan bersama (*cross guarantee*) atas Perjanjian Fasilitas Pinjaman.

Dalam Perjanjian Fasilitas Pinjaman tersebut, entitas anak diharuskan untuk memenuhi beberapa kondisi, diantaranya:
a. *Net senior debt* dari entitas anak/ EBITDA yang disesuaikan dan dianualisasi maksimum sebesar 5 kali;
b. *Top tier revenue ratio* minimum sebesar 50,00%.

Fasilitas pinjaman ini terdiri dari 4 fasilitas yaitu:

1. **Fasilitas A sebesar US$ 400 juta**

Fasilitas ini dikenakan marjin bunga sebesar 2,10% per tahun di atas LIBOR untuk kreditur dalam negeri, dan 2,00% per tahun untuk kreditur luar negeri.

Fasilitas ini akan jatuh tempo pada bulan Januari 2020.

Fasilitas ini telah dilunasi seluruhnya pada tanggal 12 Juli 2019.

Saldo pada tanggal 31 Desember 2020, 2019 dan 2018 masing-masing sebesar nihil, nihil dan US$ 400 juta.

Kreditor yang berpartisipasi pada fasilitas ini adalah:

- Oversea-Chinese Banking Corporation Limited
- DBS Bank Ltd
- The Hongkong and Shanghai Banking Corporation Limited
- Credit Agricole Corporate and Investment Bank
- CIMB Bank Berhad
- Sumitomo Mitsui Banking Corporation
- CTBC Bank Co, Ltd
- MUFG Bank, Ltd., Jakarta Branch
- PT Bank HSBC Indonesia
- PT Bank ANZ Indonesia
- PT Bank BNP Paribas Indonesia
- PT Bank UOB Indonesia

25. LONG-TERM LOANS - THIRD PARTIES (Continued)

***Syndication Loans** (Continued)*

*a. **US$ 1 billion Credit Facilities** (Continued)*

On 16 March 2020, the subsidiary amended the limit of syndicated loan facility of US$ 1 billion. The amendment is for the Series B revolving loan facility from US$ 300 million to become US$ 100 million.

These loans are unsecured, and the subsidiaries who participated in the Credit Facilities provide a cross guarantee to the Lenders under the Credit Facilities Agreement.

Under the Credit Facilities Agreement, the subsidiaries are required to adhere to the following conditions, among others, as follows:
a. Net senior debt of subsidiaries/ annualized adjusted EBITDA ratio shall not exceed 5 times;
b. Minimum top tier revenue ratio of 50.00%.

There are 4 facilities under this credit facilities:

*1. **Facility A US$ 400 million Term Loan Facility***

This facility bears interest margin of 2.10% above LIBOR per annum for onshore lenders and 2.00% per annum for offshore lenders.

This Facility will mature in January 2020.

This Facility has been fully paid on dated 12 July 2019.

The outstanding balance as of 31 December 2020, 2019 and 2018 was amounted to nil, nil and US$ 400 million, respectively.

The lenders who participated in this facility are:

- *Oversea-Chinese Banking Corporation Ltd*
- *DBS Bank Ltd*
- *The Hongkong and Shanghai Banking Corporation Limited*
- *Credit Agricole Corporate and Investment Bank*
- *CIMB Bank Berhad*
- *Sumitomo Mitsui Banking Corporation*
- *CTBC Bank Co, Ltd*
- *MUFG Bank, Ltd., Jakarta Branch*
- *PT Bank HSBC Indonesia*
- *PT Bank ANZ Indonesia*
- *PT Bank BNP Paribas Indonesia*
- *PT Bank UOB Indonesia*

25. **PINJAMAN JANGKA PANJANG – PIHAK KETIGA** (Lanjutan)

Pinjaman Sindikasi (Lanjutan)

a. Fasilitas Pinjaman US$ 1 miliar (Lanjutan)

2. **Fasilitas Pinjaman *Revolving* Seri B sebesar US$ 100 juta**

Fasilitas ini dikenakan marjin bunga sebesar 1,85% per tahun di atas LIBOR untuk kreditur dalam negeri, dan 1,75% per tahun untuk kreditur luar negeri.

Fasilitas ini akan jatuh tempo pada bulan Juni 2022.

Saldo pada tanggal 31 Desember 2020, 2019 dan 2018 masing-masing sebesar US$ 91,9 juta, US$ 247,275 juta dan US$ 250,275 juta.

Kreditor yang berpartisipasi pada fasilitas ini adalah:

- Oversea-Chinese Banking Corporation Limited
- United Oversea Bank Ltd
- DBS Bank Ltd
- The Hongkong and Shanghai Banking Corporation Limited
- Credit Agricole Corporate and Investment Bank
- CIMB Bank Berhad
- Sumitomo Mitsui Banking Corporation
- MUFG Bank, Ltd., Jakarta Branch
- PT Bank HSBC Indonesia
- PT Bank ANZ Indonesia
- PT Bank BNP Paribas Indonesia
- PT Bank UOB Indonesia

3. **Fasilitas Pinjaman *Revolving* Seri C sebesar US$ 300 juta**

Fasilitas ini dikenakan marjin bunga sebesar 1,60% per tahun di atas LIBOR untuk kreditur dalam negeri dan 1,50% untuk kreditur luar negeri.

Fasilitas ini jatuh tempo pada bulan November 2015 dan telah dilunasi seluruhnya pada tanggal 16 November 2015.

4. **Fasilitas D sebesar US$ 275 juta**

Fasilitas ini dikenakan marjin bunga sebesar 2,10% per tahun di atas LIBOR untuk kreditur dalam negeri dan 2,00% untuk kreditur luar negeri.

Fasilitas ini akan jatuh tempo pada bulan Juni 2021.

Entitas anak telah menarik seluruh fasilitas pinjaman ini.

Saldo pada tanggal 31 Desember 2020, 2019 dan 2018 masing-masing sebesar US$ 275 juta.

25. ***LONG-TERM LOANS - THIRD PARTIES*** *(Continued)*

Syndication Loan *(Continued)*

a. US$ 1 billion Credit Facilities *(Continued)*

2. ***Facility B of US$ 100 million Revolving Loan Facility***

This facility bears interest margin of 1.85% above LIBOR per annum for onshore lenders and 1.75% per annum for offshore lenders.

This Facility will mature in June 2022.

The outstanding balance as of 31 December 2020, 2019 and 2018 was amounted to US$ 91.9 million, US$ 247.275 million and US$ 250.275 million, respectively.

The lenders who participated in this facility are:

- *Oversea-Chinese Banking Corporation Ltd*
- *United Oversea Bank Ltd*
- *DBS Bank Ltd*
- *The Hongkong and Shanghai Banking Corporation Limited*
- *Credit Agricole Corporate and Investment Bank*
- *CIMB Bank Berhad*
- *Sumitomo Mitsui Banking Corporation*
- *MUFG Bank, Ltd., Jakarta Branch*
- *PT Bank HSBC Indonesia*
- *PT Bank ANZ Indonesia*
- *PT Bank BNP Paribas Indonesia*
- *PT Bank UOB Indonesia*

3. ***Facility C of US$ 300 million Revolving Loan Facility***

This facility bears interest margin of 1.60% above LIBOR per annum for onshore lenders and 1.50% for offshore lenders.

This Facility matures in November 2015 and was fully repaid on 16 November 2015.

4. ***Facility D US$ 275 million Term Loan Facility***

This facility bears interest margin of 2.10% above LIBOR per annum for onshore lenders and 2.00% for offshore lenders.

This Facility will mature in June 2021.

The subsidiaries had fully drawn this loan facility.

The outstanding balance as of 31 December 2020, 2019 and 2018 was amounted to US$ 275 million, respectively.

25. **PINJAMAN JANGKA PANJANG – PIHAK KETIGA** (Lanjutan)

Pinjaman Sindikasi (Lanjutan)

a. Fasilitas Pinjaman US$ 1 miliar (Lanjutan)

4. **Fasilitas D sebesar US$ 275 juta** (Lanjutan)

Kreditor yang berpartisipasi pada fasilitas ini adalah:

- Oversea-Chinese Banking Corporation Limited
- United Oversea Bank Ltd
- DBS Bank Ltd
- CIMB Bank Berhad
- Sumitomo Mitsui Banking Corporation
- CTBC Bank Co, Ltd
- MUFG Bank, Ltd., Jakarta Branch
- PT Bank HSBC Indonesia
- PT Bank ANZ Indonesia
- PT Bank BNP Paribas Indonesia

b. Fasilitas Pinjaman *Revolving* sebesar US$ 200 juta

Pada tanggal 30 Maret 2017, entitas anak tertentu telah menandatangani perjanjian fasilitas pinjaman *revolving* ("Perjanjian RLF") sebesar US$ 200.000.000 untuk menyediakan tambahan dana untuk modal kerja.

Pinjaman ini tidak memiliki jaminan, dan entitas anak yang menjadi peserta RLF ini memberikan jaminan bersama (*cross guarantee*) atas Perjanjian RLF.

Dalam Perjanjian Fasilitas Pinjaman tersebut, entitas anak diharuskan untuk memenuhi beberapa kondisi, diantaranya:
a. *Net senior debt* dari entitas anak/ EBITDA yang disesuaikan dan dianualisasi maksimum sebesar 5 kali;
b. *Top tier revenue ratio* minimum sebesar 50,00%

Kreditor yang berpartisipasi pada fasilitas ini adalah:
- Oversea-Chinese Banking Corporation Limited
- DBS Bank Ltd
- CIMB Bank Berhad
- PT Bank UOB Indonesia
- MUFG Bank, Ltd
- PT Bank CIMB Niaga Tbk
- PT Bank HSBC Indonesia
- PT Bank ANZ Indonesia
- PT Bank BNP Paribas Indonesia
- PT Bank DBS Indonesia

Fasilitas ini dikenakan marjin bunga sebesar 2,00% per tahun di atas LIBOR untuk kreditur dalam negeri, dan 1,75% per tahun untuk kreditur luar negeri.

Fasilitas ini akan jatuh tempo pada bulan Juni 2022.

Saldo pada tanggal 31 Desember 2020, 2019 dan 2018 masing-masing sebesar US$ 74 juta, US$ 195,725 juta dan US$ 109,725 juta.

25. LONG-TERM LOANS - THIRD PARTIES (Continued)

***Syndication Loan** (Continued)*

***a. US$ 1 billion Credit Facilities** (Continued)*

4. Facility D US$ 275 million Term Loan Facility (Continued)

The lenders who participated in this facility are:

- *Oversea-Chinese Banking Corporation Ltd*
- *United Oversea Bank Ltd*
- *DBS Bank Ltd*
- *CIMB Bank Berhad*
- *Sumitomo Mitsui Banking Corporation*
- *CTBC Bank Co, Ltd*
- *MUFG Bank, Ltd., Jakarta Branch*
- *PT Bank HSBC Indonesia*
- *PT Bank ANZ Indonesia*
- *PT Bank BNP Paribas Indonesia*

b. US$ 200 million Revolving Loan Facility

On 30 March 2017, certain subsidiaries have entered into a US$ 200,000,000 revolving loan facility agreement (the "RLF Agreement") to provide additional funding for working capital.

These loans are unsecured, and the subsidiaries who participated in the RLF provide a cross guarantee to the Lenders under the RLF Agreement.

Under the RLF Agreement, the subsidiaries are required to adhere to the following covenants, among others, as follows:
a. Net senior debt of subsidiaries/ annualized adjusted EBITDA ratio shall not exceed 5 times;
b. Minimum top tier revenue ratio of 50.00%.

The lenders who participated in this facility are:
- *Oversea-Chinese Banking Corporation Limited*
- *DBS Bank Ltd*
- *CIMB Bank Berhad*
- *PT Bank UOB Indonesia*
- *MUFG Bank, Ltd*
- *PT Bank CIMB Niaga Tbk*
- *PT Bank HSBC Indonesia*
- *PT Bank ANZ Indonesia*
- *PT Bank BNP Paribas Indonesia*
- *PT Bank DBS Indonesia*

This facility bears interest margin of 2.00% above LIBOR per annum for onshore lenders, and 1.75% per annum for offshore lenders.

This Facility will mature in June 2022.

The outstanding balance as of 31 December 2020, 2019 and 2018 amounted to US$ 74 million, US$ 195.725 million and US$ 109.725 million, respectively.

25. **PINJAMAN JANGKA PANJANG – PIHAK KETIGA** (Lanjutan)

Pinjaman Sindikasi (Lanjutan)

c. **Fasilitas Pinjaman *Revolving* sebesar US$ 375 juta**

Pada tanggal 28 Juni 2019, entitas anak tertentu telah menandatangani perjanjian fasilitas pinjaman *revolving* ("Perjanjian RLF") sebesar US$ 375.000.000 untuk melunasi Fasilitas A (lihat huruf a.1).

Pinjaman ini tidak memiliki jaminan, dan entitas anak yang menjadi peserta RLF ini memberikan jaminan bersama (*cross guarantee*) atas Perjanjian RLF.

Dalam Perjanjian Fasilitas Pinjaman tersebut, entitas anak diharuskan untuk memenuhi beberapa kondisi, diantaranya:

a. *Net senior debt* dari entitas anak/ EBITDA yang disesuaikan dan dianualisasi maksimum sebesar 5 kali;
b. *Top tier revenue ratio* minimum sebesar 50,00%.

Kreditor yang berpartisipasi pada fasilitas ini adalah:
- Australia and New Zealand Banking Group Limited
- CIMB Bank Berhad
- Credit Agricole Corporate and Investment Bank
- DBS Bank, Ltd
- Mizuho Bank, Ltd
- Oversea-Chinese Banking Corporation Limited
- PT Bank BNP Paribas Indonesia
- PT Bank CIMB Niaga Tbk
- PT Bank DBS Indonesia
- PT Bank HSBC Indonesia
- PT Bank OCBC NISP Tbk
- The Hongkong and Shanghai Banking Corporation
- United Overseas Bank Limited

Fasilitas ini dikenakan marjin bunga sebesar 1,85% per tahun di atas LIBOR untuk kreditur dalam negeri, dan 1,75% per tahun untuk kreditur luar negeri.

Fasilitas ini akan jatuh tempo pada bulan Januari 2025.

Saldo pada tanggal 31 Desember 2020, 2019 dan 2018 masing-masing US$ 292,1 juta, US$ 375 juta dan nihil.

*25. **LONG-TERM LOANS - THIRD PARTIES** (Continued)*

***Syndication Loan** (Continued)*

*c. **US$ 375 million Revolving Loan Facility***

On 28 June 2019, certain subsidiaries have entered into a US$ 375,000,000 revolving loan facility agreement (the "RLF Agreement") to repay Facility A (see letter a.1).

These loans are unsecured, and the subsidiaries who participated in the RLF provide a cross guarantee to the Lenders under the RLF Agreement.

Under the RLF Agreement, the subsidiaries are required to adhere to the following covenants, among others, as follows:

a. Net senior debt of subsidiaries/ annualized adjusted EBITDA ratio shall not exceed 5 times;
b. Minimum top tier revenue ratio of 50.00%.

The lenders who participated in this facility are:
- *Australia and New Zealand Banking Group Limited*
- *CIMB Bank Berhad*
- *Credit Agricole Corporate and Investment Bank*
- *DBS Bank, Ltd*
- *Mizuho Bank, Ltd*
- *Oversea-Chinese Banking Corporation Limited*
- *PT Bank BNP Paribas Indonesia*
- *PT Bank CIMB Niaga Tbk*
- *PT Bank DBS Indonesia*
- *PT Bank HSBC Indonesia*
- *PT Bank OCBC NISP Tbk*
- *The Hongkong and Shanghai Banking Corporation*
- *United Overseas Bank Limited*

This facility bears interest margin of 1.85% above LIBOR per annum for onshore lenders, and 1.75% per annum for offshore lenders.

This Facility will mature in January 2025.

The outstanding balance as of 31 December 2020, 2019 and 2018 amounted US$ 292.1 million, US$ 375 million and nil, respectively)

25. **PINJAMAN JANGKA PANJANG – PIHAK KETIGA** (Lanjutan)

Pinjaman Non-Sindikasi

PT Bank Mandiri (Persero) Tbk

Pada tanggal 22 November 2017, berdasarkan akta Perjanjian Kredit Investasi No.CRO.JTH/0441/KI/2017 yang dibuat di hadapan Julius Purnawan, S.H., M.Si., Notaris di Jakarta, PT Gihon Telekomunikasi Indonesia Tbk, entitas anak, menandatangani perjanjian fasilitas pinjaman (Kredit Investasi) dengan PT Bank Mandiri (Persero) Tbk yang akan digunakan untuk tambahan dana modal kerja pembangunan menara telekomunikasi dengan rincian sebagai berikut:

Kredit Investasi IX

Fasilitas kredit	: Rp 57.000
Jangka waktu	: November 2024
Bunga	: 11,25%
Provisi	: 0,25% dari jumlah fasilitas
Commitment fee	: 0,25%

Pinjaman ini dijamin dengan aset-aset sebagai berikut:

a) Tagihan yang akan diterima dari hasil penerimaan sewa menara telekomunikasi yang dibiayai oleh Fasilitas KI baru (KI-XI);
b) Tanah & bangunan rukan SHMASRS, No. 01032 atas nama Rudolf Parningotan Nainggolan telah diikat HT III dengan total pengikatan sebesar Rp 2.748 dan akan ditingkatkan dengan HT IV sebesar Rp 2.660;
c) Tanah & bangunan gudang SHGB No. 01315-01317/ Setu atas nama PT Gihon Telekomunikasi Indonesia, entitas anak telah diikat HT III dengan total pengikatan sebesar Rp 4.375 dan akan ditingkatkan dengan HT IV sebesar Rp 1.990;
d) Tanah dan bangunan SHGB No. 01333/ Setu, SHGB No. 01337/ Setu, SHGB No.01338/ Setu atas nama PT Gihon Telekomunikasi Indonesia, entitas anak telah diikat HT III dengan total pengikatan sebesar Rp 4.434 dan akan ditingkatkan dengan HT IV sebesar Rp 3.880;
e) 1 unit rumah tinggal di Kemang Kolonie "The Residence" SHM No.5770/ Bangka atas nama Rudolf Parningotan Nainggolan telah diikat HT II dengan total pengikatan sebesar Rp 2.800 dan akan ditingkatkan dengan HT III sebesar Rp 2.350;
f) 1 unit tanah bangunan di Perumahan Taman Proven Blok A9, No.12. Ds. Lekong Wetan, Serpong SHM No.00947 atas nama Hotma Linda Ebigail Sirait telah diikat HT I sebesar Rp 1.400 dan akan ditingkatkan dengan HT II sebesar Rp 1.000;
g) Jaminan pribadi dari Rudolf Parningotan Nainggolan dan Hotma Linda Ebigail Sirait.

Berdasarkan Perjanjian tersebut PT Gihon Telekomunikasi Indonesia Tbk, entitas anak, telah mendapatkan persetujuan dari PT Bank Mandiri (Persero) Tbk untuk melakukan hal-hal, antara lain untuk:

*25. **LONG-TERM LOANS - THIRD PARTIES** (Continued)*

Non-Syndication Loans

PT Bank Mandiri (Persero) Tbk

At 22 November 2017, based on Investment Credit Agreement No. CRO.JTH/0441/KI/2017 made in the presence of Julius Purnawan, S.H., M.Si., Notary in Jakarta, PT Gihon Telekomunikasi Indonesia Tbk, the subsidiary entered loan facility agreement (Investment Credit) with PT Bank Mandiri (Persero) Tbk which will be used for additional working capital of telecommunication towers construction with detail are as follows:

Investment Credit IX

Credit facility	*: Rp 57,000*
Year	*: November 2024*
Interest	*: 11.25%*
Provision	*: 0.25% of total facility*
Commitment fee	*: 0.25%*

These loans are secured with some assets are as follows:

a) Claims to be received from the proceeds of telecommunication tower leases that financed by IC Facility (KI-XI);
b) Land & building of SHMASRS, No. 01032 on behalf of Rudolf Parningotan Nainggolan has been bound HT III with total binding of Rp 2,748 and will be increased with HT IV amounted to Rp 2,660;
c) Land & building warehouse with SHGB No. 01315 01317/Setu on behalf of PT Gihon Telekomunikasi Indonesia, subsidiary has been bound HT III with total binding of Rp 4,375 and will be increased with HT IV amounted to Rp 1,990;
d) Land & building with SHGB No. 01333/Setu, SHGB No. 01337/Setu, SHGB No. 01338/Setu on behalf of PT Gihon Telekomunikasi Indonesia, subsidiary has been bound HT III with total binding of Rp 4,434 and will be increased with HT IV amounted to Rp 3,880;
e) 1 unit of residence in Kemang Kolonie "The Residence" with SHM No. 5770/Bangka on behalf of Rudolf Parningotan Nainggolan has been bound HT II with total binding of Rp 2,800 and will be increased with HT III amounted to Rp 2,350;
f) 1 unit of land and building in Perumahan Taman Proven Blok A9, No.12. Ds. Lekong Wetan, Serpong with SHM No. 00947 on behalf of Mrs. Hotma Linda Ebigail Sirait has been bound HT I of Rp 1,400 and will be increased with HT II amounted to Rp 1,000;
g) Personal Guarantee from Rudolf Parningotan Nainggolan and Hotma Linda Ebigail Sirait.

Based on this Agreement PT Gihon Telekomunikasi Indonesia Tbk, the subsidiary has obtained approval from PT Bank Mandiri (Persero) Tbk to perform the following matters, among others:

25. **PINJAMAN JANGKA PANJANG – PIHAK KETIGA** (Lanjutan)

Pinjaman Non-Sindikasi (Lanjutan)

Kredit Investasi IX (Lanjutan)

PT Bank Mandiri (Persero) Tbk (Lanjutan)

a) Membagikan dividen,
b) Mengubah porsi bagian saham publik,
c) Merubah susunan pengurus, perubahan organisasi, merger dan akuisisi, apabila entitas anak telah melaksanakan Penawaran Umum Perdana Saham.

Atas fasilitas Kredit Investasi IX, PT Gihon Telekomunikasi Indonesia Tbk, entitas anak, dikenakan bunga fluktuatif sesuai dengan ketentuan PT Bank Mandiri (Persero) Tbk.

Fasilitas ini telah dilunasi seluruhnya pada tanggal 4 Januari 2019.

Saldo pada 31 Desember 2020, 2019 dan 2018 masing-masing sebesar nihil, nihil dan Rp 34.402.

PT Bank UOB Indonesia

Pada tanggal 31 Oktober 2018, PT Gihon Telekomunikasi Indonesia Tbk, entitas anak telah mendatangani perjanjian fasilitas pinjaman ("Perjanjian Fasilitas Pinjaman *Revolving*") yang bersifat *uncommitted* sebesar Rp 50.000 untuk menyediakan tambahan dana modal kerja.

Pada tanggal 4 Januari 2019 PT Gihon Telekomunikasi Indonesia Tbk, entitas anak telah merevisi dan menyajikan kembali perjanjian fasilitas pinjaman tersebut menjadi fasilitas pinjaman *revolving* yang bersifat *uncommitted* Rp 50.000 dan bersifat *commited* Rp 100.000.

Pinjaman ini tidak memiliki jaminan tetapi PT Gihon Telekomunikasi Indonesia Tbk, entitas anak, harus menyerahkan perjanjian pemegang saham yang di tandatangani oleh perusahaan dan pemegang saham lainnya dan memastikan laporan keuangan PT Gihon Telekomunikasi Indonesia Tbk, entitas anak, telah dikonsolidasi ke dalam laporan keuangan Perusahaan.

Dalam fasilitas pinjaman ini, PT Gihon Telekomunikasi Indonesia Tbk, entitas anak diharuskan memenuhi beberapa kondisi, diataranya:

a) *Debt to EBITDA* yang disesuaikan dan di anualisasi maksimum sebesar 3,75 kali.
b) *Top tier revenue* minimum 50,00%.

Fasilitas pinjaman ini terdiri dari 2 fasilitas yaitu:

a) **Fasilitas Pinjaman *Revolving* Seri I sebesar Rp 50.000**

Fasilitas ini bersitat *Uncommited*, dan dikenakan marjin bunga sebesar 1,75% per tahun diatas JIBOR untuk rasio *Debt/EBITDA* kurang dari 3 kali dan 2,25% per tahun diatas JIBOR untuk rasio *Debt/EBITDA* lebih dari 3 kali.

25. ***LONG-TERM LOANS - THIRD PARTIES*** *(Continued)*

Non-Syndication Loans *(Continued)*

Investment Credit IX *(Continued)*

PT Bank Mandiri (Persero) Tbk *(Continued)*

a) Distribute dividends,
b) Changing the share of public portion,
c) Changing the organizational structure, organizational change, merger and acquisition, if the Company has conducted the Initial Public Offering.

Regarding to Investment Credit facilities IX, PT Gihon Telekomunikasi Indonesia, the subsidiary is subject to fluctuating interest in accordance with the policy of PT Bank Mandiri (Persero) Tbk.

This Facility has been fully paid on dated 4 January 2019.

The outstanding balance as of 31 December 2020, 2019 and 2018 amounted to nil, nil and Rp 34,402, respectively.

PT Bank UOB Indonesia

On 31 October 2018, PT Gihon Telekomunikasi Indonesia Tbk, the subsidiary has entered into a Rp 50,000 credit facility agreement ("the Revolving Credit Facilities Agreement") to provide additional funding for working capital.

As of 4 January 2019, PT Gihon Telekomunikasi Indonesia Tbk, the subsidiary has revised and and restated the loan facility agreement to become revolving loan facility that uncommitted Rp 50,000 and commited Rp 100,000.

This loan is unsecured but PT Gihon Telekomunikasi Indonesia Tbk, the subsidiary had to submit shareholders agreement signed by the Company and other shareholders and ensure that PT Gihon Telekomunikasi Indonesia Tbk, the subsidiary, financial statements have been consolidated into the Company's financial statements.

Under the credit facility agreement, PT Gihon Telekomunikasi Indonesia Tbk, the subsidiary are required to adhere to the following conditions, among others, as follows:

a) Debt to EBITDA adjusted and annualized a maximum of 3.75 times.
b) Minimum top tier revenue ratio of 50,00%.

There are 2 facilities under this credit facilities:

a) ***Facility Series I of Rp 50,000 Revolving Loan Facility***

The Uncommited facility bears interest margin of 1.75% per annum above JIBOR for Debt/EBITDA ratio less than 3 times and 2.25% per annum above JIBOR for Debt/EBITDA ratio more than 3 times.

25. **PINJAMAN JANGKA PANJANG – PIHAK KETIGA** (Lanjutan)

Pinjaman Non-Sindikasi (Lanjutan)

PT Bank UOB Indonesia (Lanjutan)

a) **Fasilitas Pinjaman *Revolving* Seri I sebesar Rp 50.000** (Lanjutan)

Fasilitas ini akan jatuh tempo pada tanggal 31 Oktober 2021.

Pada 31 Desember 2020, 2019 dan 2018, saldo Fasilitas Pinjaman *Revolving* Seri I masing-masing sebesar nihil, nihil dan Rp 6.250.

b) **Fasilitas Pinjaman *Revolving* Seri II sebesar Rp 100.000**

Fasilitas ini bersitat *Commited* dan dikenakan marjin bunga sebesar 2,50% per tahun diatas JIBOR untuk rasio *Debt/EBITDA* kurang dari 3 kali dan 3,00% per tahun diatas JIBOR untuk rasio Debt/EBITDA lebih dari 3 kali.

Fasilitas ini akan jatuh tempo pada bulan Januari 2021.

Pada 31 Desember 2020, 2019 dan 2018, saldo Fasilitas Pinjaman *Revolving* II masing-masing sebesar Rp 24.800, Rp 75.850 dan nihil.

PT Gihon Telekomunikasi Indonesia Tbk, entitas anak telah memenuhi semua persyaratan yang ditetapkan oleh kreditor atas seluruh pinjaman Kredit Investasi yang diberikan.

Pada tanggal 9 November 2020, PT Permata Karya Perdana, entitas anak telah mendatangani perjanjian fasilitas pinjaman ("Perjanjian Fasilitas Pinjaman *Revolving*") yang bersifat *uncommitted* sebesar Rp 200.000 untuk menyediakan tambahan dana modal kerja.

Pinjaman ini tidak memiliki jaminan tetapi PT Permata Karya Perdana, entitas anak, harus menyerahkan perjanjian pemegang saham yang di tandatangani oleh perusahaan dan pemegang saham lainnya dan laporan keuangan Perusahaan.

Dalam fasilitas pinjaman ini, PT Permata Karya Perdana, entitas anak diharuskan memenuhi beberapa kondisi, diataranya:

a) *Debt to EBITDA* yang disesuaikan dan di anualisasi maksimum sebesar 4 kali.
b) *Top tier revenue* minimum 30,00%.

Fasilitas ini bersitat *Commited* dan dikenakan marjin bunga sebesar 2% per tahun diatas JIBOR.

Fasilitas ini akan jatuh tempo pada bulan November 2021.

Pada 31 Desember 2020, 2019 dan 2018 saldo Fasilitas Pinjaman *Revolving* adalah nihil.

25. ***LONG-TERM LOANS - THIRD PARTIES*** *(Continued)*

Non-Syndication Loans *(Continued)*

PT Bank UOB Indonesia *(Continued)*

a) ***Facility Series I of Rp 50,000 Revolving Loan Facility*** *(Continued)*

This facility will mature on 31 October 2021.

As of 31 December 2020, 2019 and 2018, the balance of Revolving Loan Facility Series I are amounted to nil, nil and Rp 6,250, respectively.

b) ***Facility II of Rp 100,000 Revolving Loan Facility***

The Commited facility bears interest margin of 2.50% per annum above JIBOR for Debt/EBITDA ratio less than 3 times and 3.00% per annum above JIBOR for Debt/EBITDA ratio more than 3 times.

This facility will mature in January 2021.

As of 31 December 2020, 2019 and 2018, the balance of Revolving Loan Facility II are amounted to Rp 24,800, Rp 75,850 and nil, respectively.

PT Gihon Telekomunikasi Indonesia Tbk, the subsidiary has complied with all the requirements assigned by the creditors on all the Investment Credits given.

On 9 November 2020, PT Permata Karya Perdana, the subsidiary has entered into a Rp 200,000 credit facility agreement ("the Revolving Credit Facilities Agreement") to provide additional funding for working capital.

This loan is unsecured but PT Permata Karya Perdana, the subsidiary had to submit shareholders agreement signed by the Company and other shareholders and financial statements of the Company.

Under the credit facility agreement, PT Permata Karya Perdana, the subsidiary are required to adhere to the following conditions, among others, as follows:

a) Debt to EBITDA adjusted and annualized a maximum of 4 times.
b) Minimum top tier revenue ratio of 30,00%.

The Commited facility bears interest margin of 2% per annum above JIBOR.

This facility will mature in November 2021.

As of 31 December 2020, 2019 and 2018 the balance of Revolving Loan Facility are nil.

25. **PINJAMAN JANGKA PANJANG – PIHAK KETIGA** (Lanjutan)

Pinjaman Non-Sindikasi (Lanjutan)

PT Bank QNB Indonesia Tbk

Pada tanggal 22 Desember 2020, PT Gihon Telekomunikasi Indonesia Tbk, entitas anak telah mendatangani perjanjian fasilitas pinjaman yang bersifat *committed* sebesar Rp 50.000 untuk menyediakan tambahan dana modal kerja.

Pinjaman ini tidak memiliki jaminan.

Dalam fasilitas pinjaman ini, PT Gihon Telekomunikasi Indonesia Tbk, entitas anak diharuskan memenuhi beberapa kondisi, diataranya:

a) *Debt to equity* maksimum sebesar 2 kali.
b) *Debt service coverage* minimum sebesar 2 kali.
c) *Top tier revenue* minimum 50,00%

Fasilitas ini bersifat *Commited* dan dikenakan marjin bunga sebesar 2,75% per tahun diatas JIBOR.

Fasilitas ini akan jatuh tempo pada bulan Desember 2025.

Pada 31 Desember 2020, 2019 dan 2018 saldo Fasilitas Pinjaman *Revolving* QNB masing-masing sebesar Rp 36.500, nihil dan nihil.

PT Bank Ina Perdana Tbk

Pada tanggal 31 Agustus 2017, PT Visi Telekomunikasi Infrastuktur Tbk, entitas anak menandatangani perjanjian fasilitas pinjaman (Kredit Investasi) dengan PT Bank Ina Perdana Tbk dengan rincian sebagai berikut:

Fasilitas kredit	: Rp 50.000
Jangka waktu	: 31 Agustus 2022
Bunga	: 13,00%

Pinjaman tersebut dijamin dengan piutang usaha sebesar Rp 1.711 dan 42 menara telekomunikasi yang dimiliki Entitas Anak.

Pada 31 Desember 2020, 2019 dan 2018 jumlah fasilitas yang telah digunakan masing-masing sebesar nihil, nihil dan Rp 41.024.

*25. **LONG-TERM LOANS - THIRD PARTIES** (Continued)*

***Non-Syndication Loans** (Continued)*

PT Bank QNB Indonesia Tbk

As of 22 December 2020, PT Gihon Telekomunikasi Indonesia Tbk, the subsidiary has entered into a Rp 50,000 credit facility agreement to provide additional funding for working capital.

This loan is unsecured.

Under the credit facility agreement, PT Gihon Telekomunikasi Indonesia Tbk, the subsidiary are required to adhere to the following conditions, among others, as follows:

a) Debt to equity a maximum of 2 times.
b) Debt to service coverage a minimum of 2 times.
c) Top tier revenue a minimum 50.00%

The Commited facility bears interest margin of 2.75% per annum above JIBOR.

This facility will mature in December 2025.

As of 31 December 2020, 2019 and 2018 the balance of the QNB Revolving Loan Facility amounted to Rp 36,500, nil, and nil, respectively.

PT Bank Ina Perdana Tbk

At 31 August 2017, PT Visi Telekomunikasi Infrastruktur Tbk, the subsidiary entered loan facility agreement (Investment Credit) with PT Bank Ina Perdana Tbk with detail are as follows:

Credit facility	*: Rp 50,000*
Year	*: 31 August 2022*
Interest	*: 13.00%*

The loan is collateralized by trade receivables amounting to Rp 1,711 and 42 telecommunication towers owned by subsidiary.

As of 31 December 2020, 2019 and 2018 total facility have been utilized is amounted to nil, nil and Rp 41,024, respectively.

25. **PINJAMAN JANGKA PANJANG – PIHAK KETIGA** (Lanjutan)

Rincian fasilitas pinjaman jangka panjang – pihak ketiga yang belum dicairkan pada 31 Desember 2020, 2019 dan 2018 adalah sebagai berikut:

25. ***LONG-TERM LOANS - THIRD PARTIES*** *(Continued)*

Undrawn facility long term loans – third parties as of 31 December 2020, 2019 and 2018 is as follows:

	2020			2019			2018			
	Jumlah Fasilitas/ *Total facility*	Fasilitas yang telah dicairkan/ *Drawn facility*	Fasilitas yang belum dicairkan/ *Undrawn facility*	Jumlah Fasilitas/ *Total facility*	Fasilitas yang telah dicairkan/ *Drawn facility*	Fasilitas yang belum dicairkan/ *Undrawn facility*	Jumlah Fasilitas/ *Total facility*	Fasilitas yang telah dicairkan/ *Drawn facility*	Fasilitas yang belum dicairkan/ *Undrawn facility*	
Dolar AS - nilai penuh										*US Dollar - full amount*
Pinjaman sindikasi										*Syndication loans*
Fasilitas US$1 miliar										*US$1 billion facility*
Fasilitas A	-	-	-	400.000.000	-	400.000.000	400.000.000	-	400.000.000	*Facility A*
Fasilitas B	100.000.000	91.900.000	8.100.000	300.000.000	247.275.000	52.725.000	300.000.000	250.275.000	49.725.000	*Facility B*
Fasilitas D	275.000.000	275.000.000	-	275.000.000	275.000.000	-	275.000.000	275.000.000	-	*Facility D*
Fasilitas US$ 200 juta	200.000.000	74.000.000	126.000.000	200.000.000	195.725.000	4.275.000	200.000.000	109.725.000	90.275.000	*US$ 200 million facility*
Fasilitas US$ 375 juta	375.000.000	292.100.000	82.900.000	375.000.000	375.000.000	-	-	-	-	*US$ 375 million facility*
Jumlah	950.000.000	733.000.000	217.000.000	1.550.000.000	1.093.000.000	457.000.000	1.175.000.000	635.000.000	540.000.000	*Total*
Rupiah										*Rupiah*
Pinjaman non-sindikasi										*Non-syndication loans*
PT Bank UOB Indonesia										*PT Bank UOB Indonesia*
Uncommited	250.000	-	250.000	50.000	-	50.000	-	-	-	*Uncommited*
Commited	100.000	24.800	75.200	-	-	-	-	-	-	*Commited*
PT Bank QNB Indonesia Tbk										*PT Bank QNB Indonesia Tbk*
Commited	50.000	36.500	13.500	100.000	75.850	24.150	100.000	75.850	24.150	*Commited*
PT Bank Mandiri (Persero) Tbk	-	-	-	-	-	-	57.000	22.598	34.402	*PT Bank Mandiri (Persero) Tbk*
PT Bank Ina Perdana Tbk	-	-	-	-	-	-	50.000	8.976	41.024	*PT Bank Ina Perdana Tbk*
Jumlah	400.000	61.300	338.700	150.000	75.850	74.150	207.000	107.424	99.576	*Total*

25. **PINJAMAN JANGKA PANJANG - PIHAK KETIGA** (Lanjutan)

Jika bagian pinjaman dalam valuta asing yang telah dilindung nilai diukur dengan menggunakan kurs lindung nilainya, maka saldo pinjaman jangka panjang pada 31 Desember 2020, 2019 dan 2018 setelah dikurangi biaya pinjaman yang belum diamortisasi adalah sebagai berikut:

25. ***LONG-TERM LOANS - THIRD PARTIES*** *(Continued)*

If the hedged portion of foreign currency loans are valued using their hedged rate, the outstanding balance of long-term loans as of 31 December 2020, 2019 and 2018 net of unamortized borrowing cost are as follows:

	2020		2019		2018		
	Saldo pinjaman / *The balance of loans*		Saldo pinjaman / *The balance of loans*		Saldo pinjaman / *The balance of loans*		
	Kurs laporan posisi keuangan / *Rate of consolidated statements of financial position date*	Kurs lindung nilai / *Hedging rate*	Kurs laporan posisi keuangan / *Rate of consolidated statements of financial position date*	Kurs lindung nilai / *Hedging rate*	Kurs laporan posisi keuangan / *Rate of consolidated statements of financial position date*	Kurs lindung nilai / *Hedging rate*	
Pinjaman sindikasi	10.338.965	9.905.205	15.193.793	14.397.704	14.987.835	13.181.570	*Syndication loans*
Pinjaman non-sindikasi	61.300	61.300	75.850	75.850	81.676	81.676	*Non-syndication loans*
Dikurangi:							***Less:***
Biaya pinjaman yang belum diamortisasi (Catatan 2f)	(121.418)	(121.418)	(153.735)	(153.735)	(115.387)	(115.387)	*Unamortized borrowing costs (Note 2f)*
Jumlah - Bersih	10.278.847	9.845.087	15.115.908	14.319.819	14.954.124	13.147.859	***Total - Net***

26. SURAT UTANG / *26. NOTES*

	2020	2019	2018		
Surat utang terdiri dari:					***Notes consist of:***
US Dolar					***US Dollar***
a. *5,25% Senior Unsecured Note* (saldo pada 31 Desember 2020, 2019 dan 2018 masing-masing sebesar US$ 350 juta)	4.936.750	4.865.350	5.068.350	*a.*	*5.25% Senior Unsecured Notes (balance as of 31 December 2020, 2019 and 2018 amounted to US$ 350 million, respectively)*
b. *4,25% Senior Unsecured Note* (saldo pada 31 Desember 2020, 2019 dan 2018 masing-masing sebesar US$ 350 juta, nihil dan nihil)	4.936.750	-	-	*b.*	*4.25% Senior Unsecured Notes (balance as of 31 December 2020, 2019 and 2018 amounted to US$ 350 million, nil and nil, respectively)*
Jumlah	9.873.500	4.865.350	5.068.350		***Total***
Rupiah					***Rupiah***
a. Obligasi Berkelanjutan II Tahap I	230.000	230.000	230.000	*a.*	*Continuous Bonds II Phase I*
b. Obligasi Berkelanjutan II Tahap II	-	700.000	700.000	*b.*	*Continuous Bonds II Phase II*
c. Obligasi Berkelanjutan II Tahap III	-	700.000	700.000	*c.*	*Continuous Bonds II Phase III*
d. Obligasi Berkelanjutan III Tahap I	608.000	608.000	608.000	*d.*	*Continuous Bonds III Phase I*
e. Obligasi Berkelanjutan III Tahap II	-	-	628.000	*e.*	*Continuous Bonds III Phase II*
f. Obligasi Berkelanjutan III Tahap III	-	750.000	-	*f.*	*Continuous Bonds III Phase III*
g. Obligasi Berkelanjutan III Tahap IV	1.500.000	-	-	*g.*	*Continuous Bonds III Phase IV*
h. Obligasi Berkelanjutan IV Tahap I	700.000	-	-	*h.*	*Continuous Bonds IV Phase I*
i. Obligasi Berkelanjutan IV Tahap II	750.000	-	-	*i.*	*Continuous Bonds IV Phase II*
Jumlah	13.661.500	7.853.350	7.934.350		***Total***
Dikurangi:					***Less:***
Biaya pinjaman yang belum diamortisasi (Catatan 2f)	(93.018)	(28.143)	(45.325)		*Unamortized borrowing cost (Note 2f)*
Saldo yang jatuh tempo dalam satu tahun	**(6.900.451)**	**(2.146.911)**	**(624.283)**		***Balance due less than one year***
Saldo yang jatuh tempo lebih dari satu tahun	**6.668.031**	**5.678.296**	**7.264.742**		***Balance due more than one year***

a. **5,25% *Senior Unsecured Note* sebesar US$ 350 juta**

Pada tanggal 10 Februari 2015, TBG Global Pte Ltd (TBGG), entitas anak, menerbitkan 5,25% *Senior Unsecured Notes* ("Surat Utang") dengan nilai agregat sebesar US$ 350.000.000. Surat Utang ini dikenakan bunga sebesar 5,25% per tahun yang jatuh tempo pada tanggal 10 Februari dan 10 Agustus setiap tahun, dimulai pada tanggal 10 Agustus 2015. Surat Utang ini akan jatuh tempo pada tanggal 10 Februari 2022. Surat Utang ini dijamin oleh Perusahaan dan tidak dapat dibeli kembali sebelum 4 (empat) tahun.

Dana dari penerbitan Surat Utang tersebut digunakan untuk membiayai kembali (a) pinjaman sebesar US$ 300 juta berdasarkan Perjanjian Fasilitas Pinjaman *Revolving* (lihat Catatan 25), (b) sebagian pinjaman *revolving* seri C berdasarkan Perjanjian Fasilitas Pinjaman, dan (c) sisanya digunakan untuk mendukung kebutuhan lainnya.

a. ***5.25% Senior Unsecured Notes amounted to US$ 350 million***

On 10 February 2015, TBG Global Pte Ltd. (TBGG), a subsidiary, issued 5.25% Senior Unsecured Notes ("Notes") with an aggregate value of US$ 350,000,000. These notes bear interest at 5.25% per annum and pay interest on 10 February and 10 August each year, commencing on 10 August 2015. The Notes will mature on 10 February 2022. The Notes are guaranteed by the Company and have a 4 (four) years non-call provision.

The proceeds from the issuance of the Notes were used to refinance (a) all outstanding loan amounting to US$ 300 million under Revolving Loan Facility Agreement (see Note 25), (b) part of outstanding loan facility C of revolving loan facility under the Credit Facility Agreement, and (c) the remaining amount to be used for general corporate purposes.

26. **SURAT UTANG** (Lanjutan)

a. **5,25% *Senior Unsecured Note* sebesar US$ 350 juta** (Lanjutan)

Sesuai pembatasan-pembatasan yang mengatur tentang Surat Utang, Perusahaan dan entitas anak yang dibatasi, memiliki keterbatasan untuk melakukan tindakan-tindakan, antara lain, sebagai berikut:

1. Menambah pinjaman baru dan menerbitkan saham preferen, kecuali:

   Rasio Utang/Arus Kas Teranualisasi tidak lebih dari 6,25 kali.

2. Melakukan pembayaran yang dibatasi, seperti:

   a) menyatakan atau membayar dividen atau melakukan suatu pembayaran atau pembagian untuk kepentingan Penjamin Induk Perusahaan atau setiap Hak Kepemilikan Atas Ekuitas Entitas Anak Yang Dibatasi atau kepada para pemilik langsung atau tidak langsung dari Penjamin Induk Perusahaan atau setiap Hak Kepemilikan Atas Ekuitas dari Entitas Anak Yang Dibatasi;
   b) membeli, menebus atau dengan cara lain mendapatkan atau membebaskan untuk nilai setiap Hak Kepemilikan Atas Ekuitas dari Penjamin Induk Perusahaan atau setiap induk langsung atau tidak langsung dari Penjamin Induk Perusahaan;
   c) melakukan pembayaran atas atau sehubungan dengan, melakukan penebusan dengan tidak dapat dicabut kembali, atau membeli, menebus, melakukan penjaminan efek atau dengan cara lain mendapatkan atau membebaskan untuk nilai dari setiap utang dari TBGG sebagai penerbit atau setiap Surat Utang Penjamin yang secara kontraktual disubordinasikan kepada Surat Utang atau setiap Jaminan Surat Utang (tidak termasuk pinjaman antar Perusahaan dan utang antar Perusahaan), kecuali suatu pembayaran bunga atau pokok pada tanggal jatuh tempo; dan
   d) membuat setiap investasi yang dibatasi.

Perusahaan dapat melakukan Pembayaran Yang Dibatasi tersebut di atas, jika:

1. Tidak ada wanprestasi atau peristiwa wanprestasi telah terjadi dan berlanjut atau akan terjadi; dan
2. Rasio Arus Kas Teranualisasi tidak lebih dari 6,25 kali.

Transaksi ini telah memenuhi peraturan No. IX.E.2 tentang transaksi material, dan Perusahaan telah melaporkan penerbitan Surat Utang tersebut kepada Otoritas Jasa Keuangan (OJK) pada tanggal 12 Februari 2015. Surat Utang ini didaftarkan pada pasar modal Singapura.

5,25% Senior Unsecured Note sebesar US$ 350 juta telah dilunasi seluruhnya pada tanggal 22 Februari 2021.

26. NOTES (Continued)

*a. **5.25% Senior Unsecured Notes amounted to US$ 350 million** (Continued)*

Under the covenants governing the Notes, the Company and its restricted subsidiaries are restricted from performing certain actions such as:

1. Incurrence of indebtedness and issuance of preferred stock, unless:

   Debt to Annualized Cash Flow Ratio would have been no greater than 6.25 times.

2. Making restricted payments, such as:

   a) declare and pay dividend or make any other payment or distribution on account of Parent Guarantor or any of its Restricted Subsidiaries Equity Interests or to the direct or indirect holders of Parent Guarantor or any of its Restricted Subsidiaries Equity Interests;

   b) purchase, redeem or otherwise acquire or retire for value any Equity Interest of Parent Guarantor or any direct or indirect parent of Parent Guarantor;

   c) make any payment on or with respect to, irrevocably call for redemption, or purchase, redeem, defease or otherwise acquire or retire for value any indebtedness of the Issuer or any Note Guarantor that is contractually subordinated to the Notes or to any Note Guarantee (excluding intercompany loans and Indebtedness), except for payment of interest and principal at maturity; and

   d) make any restricted investment.

The company can make Restricted Payments described above, if:

1. No Default or Event of Default has occurred and is continuing or would occur; and
2. Debt to Annualized Cash Flow Ratio would have been no greater than 6.25 times.

This transaction has fulfilled the regulation No. IX.E.2 regarding material transactions, and the Company has reported the issuance of the Notes to the Indonesia Financial Service Authority (OJK) on 12 February 2015. The Notes are listed on the Singapore Exchange.

5.25% Senior Unsecured Notes amounted to US$ 350 million has been fully paid on 22 February 2021.

26. **SURAT UTANG** (Lanjutan)

b. **4,25% *Senior Unsecured Note* sebesar US$ 350 juta**

Pada tanggal 21 Januari 2020, Perusahaan, menerbitkan 4,25% *Senior Unsecured Notes* ("Surat Utang") dengan nilai agregat sebesar US$ 350.000.000. Surat Utang ini dikenakan bunga sebesar 4,25% per tahun yang jatuh tempo pada tanggal 21 Januari dan 21 Juli setiap tahun, dimulai pada tanggal 21 Juli 2020. Surat Utang ini akan jatuh tempo pada tanggal 21 Januari 2025. Surat Utang ini tidak dapat dibeli kembali sebelum 3 (tiga) tahun.

Dana dari penerbitan Surat Utang tersebut digunakan untuk membiayai kembali seluruh saldo pinjaman Perjanjian Fasilitas Pinjaman *Revolving* seri B dan sebagian Pinjaman *Revolving* US$ 200 juta.

Sesuai pembatasan-pembatasan yang mengatur tentang Surat Utang, Perusahaan dan entitas anak yang dibatasi, memiliki keterbatasan untuk melakukan tindakan-tindakan, antara lain, sebagai berikut:

1. Menambah pinjaman baru dan menerbitkan saham preferen, kecuali:

   Rasio Utang/Arus Kas Teranualisasi tidak lebih dari 6,25 kali.

2. Melakukan pembayaran yang dibatasi, seperti:

   a) menyatakan atau membayar dividen atau melakukan suatu pembayaran atau pembagian untuk kepentingan penerbit atau setiap Hak Kepemilikan Atas Ekuitas Entitas Anak Yang Dibatasi atau kepada para pemilik langsung atau tidak langsung dari penerbit atau setiap Hak Kepemilikan Atas Ekuitas dari Entitas Anak Yang Dibatasi;
   b) membeli, menebus atau dengan cara lain mendapatkan atau membebaskan untuk nilai setiap Hak Kepemilikan Atas Ekuitas dari penerbit atau setiap induk langsung atau tidak langsung dari penerbit;
   c) melakukan pembayaran atas atau sehubungan dengan, melakukan penebusan dengan tidak dapat dicabut kembali, atau membeli, menebus, melakukan penjaminan efek atau dengan cara lain mendapatkan atau membebaskan untuk nilai dari setiap utang dari penerbit atau setiap anak perusahaan yang secara kontraktual disubordinasikan kepada anak perusahaan atau setiap Jaminan Surat Utang (tidak termasuk pinjaman antar Perusahaan dan utang antar Perusahaan), kecuali suatu pembayaran bunga atau pokok pada tanggal jatuh tempo; dan
   d) membuat setiap investasi yang dibatasi.

26. ***NOTES** (Continued)*

b. ***4.25% Senior Unsecured Notes amounted to US$ 350 million***

On 21 January 2020, the Company, issued 4.25% Senior Unsecured Notes ("Notes") with an aggregate value of US$ 350,000,000. These notes bear interest at 4.25% per annum and pay interest on 21 January and 21 July each year, commencing on 21 July 2020. The Notes will mature on 21 January 2025. These Notes have 3 (three) years non call provision.

The proceeds from the issuance of the Notes were used to refinance all outstanding loan of Facility B of the Revolving Loan Facility and part of outstanding loan facility US$ 200 million of Revolving loan facility.

Under the covenants governing the Notes, the Company and its restricted subsidiaries are restricted from performing certain actions such as:

1. Incurrence of indebtedness and issuance of preferred stock, unless:

   Debt to Annualized Cash Flow Ratio would have been no greater than 6.25 times.

2. Making restricted payments, such as:

   a) declare and pay dividend or make any other payment or distribution on account of issuer or any of its Restricted Subsidiaries Equity Interests or to the direct or indirect holders of issuer or any of its Restricted Subsidiaries Equity Interests;

   b) purchase, redeem or otherwise acquire or retire for value any Equity Interest of issuer or any direct or indirect parent of issuer;

   c) make any payment on or with respect to, irrevocably call for redemption, or purchase, redeem, defease or otherwise acquire or retire for value any indebtedness of the Issuer or any subsidiaries that is contractually subordinated to the Notes or to any subsidiaries (excluding intercompany loans and Indebtedness), except for payment of interest and principal at maturity; and

   d) make any restricted investment.

26. **SURAT UTANG** (Lanjutan)

b. **4,25% *Senior Unsecured Note* sebesar US$ 350 juta (**Lanjutan**)**

Perusahaan dapat melakukan Pembayaran Yang Dibatasi tersebut di atas, jika:

1. Tidak ada wanprestasi atau peristiwa wanprestasi telah terjadi dan berlanjut atau akan terjadi; dan
2. Rasio Arus Kas Teranualisasi tidak lebih dari 6,25 kali.

Transaksi ini telah memenuhi peraturan No. IX.E.2 tentang transaksi material, dan Perusahaan telah melaporkan penerbitan Surat Utang tersebut kepada Otoritas Jasa Keuangan (OJK) (dahulu Bapepam-LK) pada tanggal 23 Januari 2020. Surat Utang ini didaftarkan pada pasar modal Singapura.

Jika bagian utang yang telah dilindung nilai diukur dengan menggunakan kurs lindung nilainya, maka saldo surat utang jangka panjang pada 31 Desember 2020, 2019 dan 2018 setelah dikurangi biaya pinjaman yang belum diamortisasi adalah sebagai berikut:

*26. **NOTES** (Continued)*

*b. **4.25% Senior Unsecured Notes amounted to US$ 350 million (**Continued**)***

The company can make Restricted Payments described above, if:

1. *No Default or Event of Default has occurred and is continuing or would occur; and*
2. *Debt to Annualized Cash Flow Ratio would have been no greater than 6.25 times.*

This transaction has fulfilled the regulation No. IX.E.2 regarding material transactions, and the Company has reported the issuance of the Notes to the Indonesia Financial Service Authority (OJK) (formerly Bapepam-LK) on 23 January 2020. The Notes are listed on the Singapore Exchange.

If the hedged portion of the long-term notes are valued using their hedge rate, the outstanding balance of the Long-term notes as of 31 December 2020, 2019 and 2018 net of unamortized borrowing costs are as follow:

	2020		2019		2018		
	Saldo pinjaman / *The balance of loans*		Saldo pinjaman / *The balance of loans*		Saldo pinjaman / *The balance of loans*		
	Kurs laporan posisi keuangan / *Rate of consolidated statements of financial position date*	Kurs lindung nilai / *Hedging rate*	Kurs laporan posisi keuangan / *Rate of consolidated statements of financial position date*	Kurs lindung nilai / *Hedging rate*	Kurs laporan posisi keuangan / *Rate of consolidated statements of financial position date*	Kurs lindung nilai / *Hedging rate*	
Surat utang	13.661.500	12.940.051	7.853.350	7.293.000	7.934.350	7.171.000	*Notes*
Dikurangi:							***Less:***
Biaya pinjaman yang belum diamortisasi (Catatan 2f)	(93.018)	(93.018)	(28.143)	(28.143)	(45.325)	(45.325)	*Unamortized borrowing costs (Note 2f)*
Jumlah - Bersih	13.568.482	12.847.033	7.825.207	7.264.857	7.889.025	7.125.675	***Total - Net***

26. **SURAT UTANG** (Lanjutan)

a. **Obligasi Berkelanjutan II Tahap I**

Pada tanggal 1 Juli 2016, Perusahaan menerbitkan Obligasi Berkelanjutan II Tower Bersama Infrastructure Tahap I Tahun 2016 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan II Tahap I") sebesar 9,25% per tahun. Nominal Obligasi Berkelanjutan II Tahap I ini adalah sebesar Rp 230.000.

Hasil bersih yang diperoleh dari penerbitan Obligasi Berkelanjutan II Tahap I telah digunakan seluruhnya untuk pembayaran kewajiban keuangan entitas anak.

Bunga Obligasi Berkelanjutan II Tahap I akan dibayarkan setiap kuartal sesuai dengan tanggal pembayaran bunga. Pembayaran pertama dari bunga adalah pada tanggal 1 Oktober 2016. Tanggal pembayaran bunga terakhir, yang juga merupakan tanggal jatuh tempo Obligasi Berkelanjutan II Tahap I, adalah pada tanggal 1 Juli 2021.

Obligasi Berkelanjutan II Tahap I ini tidak dijamin oleh suatu jaminan tertentu, namun dijamin dengan seluruh kekayaan Perusahaan, baik barang bergerak maupun tidak bergerak, dan yang telah ada maupun yang akan ada di kemudian hari.

Penerbitan Obligasi Berkelanjutan II Tahap I ini dilakukan sesuai dengan Akta Adendum II dan Pernyataan Kembali Perjanjian Perwaliamanatan Obligasi Berkelanjutan II Tower Bersama Infrastructure Tahap I Tahun 2016 No. 42 tanggal 17 Juni 2016 yang dibuat di hadapan Notaris Jose Dima Satria, S.H. M.Kn. Bertindak sebagai wali amanat adalah PT Bank Rakyat Indonesia (Persero) Tbk ("Wali Amanat").

Sesuai persyaratan yang disepakati dalam penerbitan Obligasi Berkelanjutan II Tahap I ini, maka Perusahaan tanpa persetujuan tertulis dari Wali Amanat tidak diperkenankan untuk melakukan tindakan-tindakan, antara lain: melakukan penggabungan atau pengambilalihan usaha, merubah bidang usaha utama, mengurangi modal dasar dan modal disetor, menjual, mengalihkan atau melepaskan seluruh atau sebagian aset, memberikan opsi, waran, dan memberikan pinjaman kepada pihak ketiga, kecuali kepada entitas anak Perusahaan, di luar kegiatan usaha Perusahaan dan entitas anak.

Perusahaan juga disyaratkan untuk mempertahankan perbandingan antara jumlah pinjaman konsolidasian proforma dengan EBITDA proforma dari kuartal terakhir dikalikan 4 (empat) tidak melebihi 6,25 kali.

Pada 31 Desember 2020, 2019 dan 2018, Perusahaan telah memenuhi semua kondisi yang disyaratkan dalam perjanjian perwaliamanatan tersebut.

Pada 23 November 2020, Fitch Indonesia, lembaga pemeringkat efek independen, telah memberikan peringkat "AA+" (*Double A Plus*) untuk Obligasi Berkelanjutan II Tahap I ini.

*26. **NOTES** (Continued)*

*a. **Continuous Bonds II Phase I***

On 1 July 2016, the Company issued Continuous Bonds II Tower Bersama Infrastructure Phase I Year 2016 with Fixed Interest Rate ("Continuous Bonds II Phase I") amounted to 9.25% per year. The Continuous Bonds II Phase I have a total principal amount of Rp 230,000.

The net proceeds from the issuance of the Continuous Bonds II Phase I were used entirely for payments of financial liabilities of subsidiaries.

Interest for the Continuous Bonds II Phase I are payable on a quarterly basis on the interest payment dates. The first interest payment of Bonds was on 1 October 2016. The last interest payment dates, which are also the respective maturity dates of the Continuous Bonds II Phase I, will be on 1 July 2021.

The Continuous Bonds II Phase I is not secured by specific collateral, however it is guaranteed by all assets of the Company, for existing and future fixed or moveable assets.

The issuance of Continuous Bonds II Phase I was covered in the Deed of Second Amendment and Restatement of Trusteeship Agreement of Continuous Bonds II Tower Bersama Infrastructure Phase I Year 2016 No. 42 dated 17 June 2016, of a Notary Jose Dima Satria, S.H., M.Kn. The bond trustee is PT Bank Rakyat Indonesia (Persero) Tbk (the "Trustee").

Under the covenants governing the Continuous Bonds II Phase I, the Company, without the written consent of the Trustee, shall not, among others: merge or acquire, change the scope of main activities, reduce the authorized and paid-up capital, sale, transfer or dispose all or part of asset by the Company's subsidiaries, sale, transfer, or giving options, warrants, and grant loans to third parties, except to the Company's subsidiaries, outside the Company's and Subsidiaries business activities.

In addition, the Company is required to maintain the comparative of total proforma consolidation loans with proforma EBITDA from last quarter multiplied by 4 (four) of no more than 6.25 times.

As of 31 December 2020, 2019 and 2018, the Company has complied with the restrictions set out in these trusteeship agreements.

On 23 November 2020, Fitch Indonesia, an independent credit rating agency, rated the Continuous Bonds II Phase I "AA+" (Double A Plus).

26. **SURAT UTANG** (Lanjutan)

b. **Obligasi Berkelanjutan II Tahap II**

Pada tanggal 21 April 2017, Perusahaan menerbitkan Obligasi Berkelanjutan II Tower Bersama Infrastructure Tahap II Tahun 2017 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan II Tahap II") sebesar 8,75% per tahun. Nominal Obligasi Berkelanjutan II Tahap II ini adalah sebesar Rp 700.000.

Hasil bersih yang diperoleh dari penerbitan Obligasi Berkelanjutan II Tahap II telah digunakan seluruhnya untuk pembayaran kewajiban keuangan entitas anak.

Bunga Obligasi Berkelanjutan II Tahap II akan dibayarkan setiap kuartal sesuai dengan tanggal pembayaran bunga. Pembayaran pertama dari bunga adalah pada tanggal 21 Juli 2017. Tanggal pembayaran bunga terakhir, yang juga merupakan tanggal jatuh tempo Obligasi Berkelanjutan II Tahap II, adalah pada tanggal 21 April 2020.

Obligasi Berkelanjutan II Tahap II ini tidak dijamin oleh suatu jaminan tertentu, namun dijamin dengan seluruh kekayaan Perusahaan, baik barang bergerak maupun tidak bergerak, dan yang telah ada maupun yang akan ada di kemudian hari.

Penerbitan Obligasi Berkelanjutan II Tahap II ini dilakukan sesuai Perjanjian Perwaliamanatan Obligasi Berkelanjutan II Tower Bersama Infrastructure Tahap II Tahun 2017 No. 110 tanggal 30 Maret 2017 yang dibuat di hadapan Notaris Jose Dima Satria, S.H. M.Kn. Bertindak sebagai wali amanat adalah PT Bank Rakyat Indonesia (Persero) Tbk ("Wali Amanat").

Sesuai persyaratan yang disepakati dalam penerbitan Obligasi Berkelanjutan II Tahap II ini, maka Perusahaan tanpa persetujuan tertulis dari Wali Amanat tidak diperkenankan untuk melakukan tindakan-tindakan, antara lain: melakukan penggabungan atau pengambilalihan usaha, merubah bidang usaha utama, mengurangi modal dasar dan modal disetor, menjual, mengalihkan atau melepaskan seluruh atau sebagian aset, memberikan opsi, waran, dan memberikan pinjaman kepada pihak ketiga, kecuali kepada entitas anak Perusahaan, di luar kegiatan usaha Perusahaan dan entitas anak.

Perusahaan juga disyaratkan untuk mempertahankan perbandingan antara jumlah pinjaman konsolidasian proforma dengan EBITDA proforma dari kuartal terakhir dikalikan 4 (empat) tidak melebihi 6,25 kali.

Pada 31 Desember 2019 dan 2018, Perusahaan telah memenuhi semua kondisi yang disyaratkan dalam perjanjian perwaliamanatan tersebut.

Pada 24 Januari 2020, Fitch Indonesia, lembaga pemeringkat efek independen, telah memberikan peringkat "AA-" (*Double A Minus*) untuk Obligasi Berkelanjutan II Tahap II ini.

Obligasi berkelanjutan II Tahap II ini telah dilunasi seluruhnya pada tanggal 21 April 2020.

*26. **NOTES** (Continued)*

*b. **Continuous Bonds II Phase II***

On 21 April 2017, the Company issued Continuous Bonds II Tower Bersama Infrastructure Phase II Year 2017 with Fixed Interest Rate ("Continuous Bonds II Phase II") amounted to 8.75% per year. The Continuous Bonds II Phase II have a total principal amount of Rp 700,000.

The net proceeds from the issuance of the Continuous Bonds II Phase II were used entirely for payments of financial liabilities of subsidiaries.

Interest for the Continuous Bonds II Phase II are payable on a quarterly basis on the interest payment dates. The first interest payment of Bonds was on 21 July 2017. The last interest payment dates, which are also the respective maturity dates of the Continuous Bonds II Phase II, will be on 21 April 2020.

The Continuous Bonds II Phase II is not secured by specific collateral, however it is guaranteed by all assets of the Company, for existing and future fixed or moveable assets.

The issuance of Continuous Bonds II Phase II was covered Trusteeship Agreement of Continuous Bonds II Tower Bersama Infrastructure Phase II Year 2017 No. 110 dated 30 March 2017, of a Notary Jose Dima Satria, S.H., M.Kn. The bond trustee is PT Bank Rakyat Indonesia (Persero) Tbk (the "Trustee").

Under the covenants governing the Continuous Bonds II Phase II, the Company, without the written consent of the Trustee, shall not, among others: merge or acquire, change the scope of main activities, reduce the authorized and paid-up capital, sale, transfer or dispose all or part of asset by the Company's subsidiaries, sale, transfer, or giving options, warrants, and grant loans to third parties, except to the Company's subsidiaries, outside the Company's and Subsidiaries business activities.

In addition, the Company is required to maintain the comparative of total proforma consolidation loans with proforma EBITDA from last quarter multiplied by 4 (four) of no more than 6.25 times.

As of 31 December 2019 and 2018, the Company has complied with the restrictions set out in these trusteeship agreements.

On 24 January 2020, Fitch Indonesia, an independent credit rating agency, rated the Continuous Bonds II Phase II "AA-" (Double A Minus).

This Continuous Bonds II Phase II has been fully paid on 21 April 2020.

26. **SURAT UTANG** (Lanjutan)

c. **Obligasi Berkelanjutan II Tahap III**

Pada tanggal 19 September 2017, Perusahaan menerbitkan Obligasi Berkelanjutan II Tower Bersama Infrastructure Tahap III Tahun 2017 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan II Tahap III") sebesar 8,40% per tahun. Nominal Obligasi Berkelanjutan II Tahap III ini adalah sebesar Rp 700.000.

Hasil bersih yang diperoleh dari penerbitan Obligasi Berkelanjutan II Tahap III telah digunakan seluruhnya untuk pembayaran kewajiban keuangan entitas anak.

Bunga Obligasi Berkelanjutan II Tahap III akan dibayarkan setiap kuartal sesuai dengan tanggal pembayaran bunga. Pembayaran pertama dari bunga adalah pada tanggal 19 Desember 2017. Tanggal pembayaran bunga terakhir, yang juga merupakan tanggal jatuh tempo Obligasi Berkelanjutan II Tahap III, adalah pada tanggal 19 September 2020.

Obligasi Berkelanjutan II Tahap III ini tidak dijamin oleh suatu jaminan tertentu, namun dijamin dengan seluruh kekayaan Perusahaan, baik barang bergerak maupun tidak bergerak, dan yang telah ada maupun yang akan ada di kemudian hari.

Penerbitan Obligasi Berkelanjutan II Tahap III ini dilakukan sesuai Perjanjian Perwaliamanatan Obligasi Berkelanjutan II Tower Bersama Infrastructure Tahap III Tahun 2017 No. 87 tanggal 29 Agustus 2017 yang dibuat di hadapan Notaris Jose Dima Satria, S.H. M.Kn. Bertindak sebagai wali amanat adalah PT Bank Rakyat Indonesia (Persero) Tbk ("Wali Amanat").

Sesuai persyaratan yang disepakati dalam penerbitan Obligasi Berkelanjutan II Tahap III ini, maka Perusahaan tanpa persetujuan tertulis dari Wali Amanat tidak diperkenankan untuk melakukan tindakan-tindakan, antara lain: melakukan penggabungan atau pengambilalihan usaha, merubah bidang usaha utama, mengurangi modal dasar dan modal disetor, menjual, mengalihkan atau melepaskan seluruh atau sebagian aset, memberikan opsi, waran, dan memberikan pinjaman kepada pihak ketiga, kecuali kepada entitas anak Perusahaan, di luar kegiatan usaha Perusahaan dan entitas anak.

Perusahaan juga disyaratkan untuk mempertahankan perbandingan antara jumlah pinjaman konsolidasian proforma dengan EBITDA proforma dari kuartal terakhir dikalikan 4 (empat) tidak melebihi 6,25 kali.

Pada 31 Desember 2019 dan 2018, Perusahaan telah memenuhi semua kondisi yang disyaratkan dalam perjanjian perwaliamanatan tersebut.

Pada 24 Januari 2020, Fitch Indonesia, lembaga pemeringkat efek independen, telah memberikan peringkat "AA-" *(Double A Minus)* untuk Obligasi Berkelanjutan II Tahap III ini.

Obligasi berkelanjutan II Tahap III ini telah dilunasi seluruhnya pada tanggal 19 September 2020.

*26. **NOTES** (Continued)*

*c. **Continuous Bonds II Phase III***

On 19 September 2017, the Company issued Continuous Bonds II Tower Bersama Infrastructure Phase III Year 2017 with Fixed Interest Rate ("Continuous Bonds II Phase III") amounted to 8.40% per year. The Continuous Bonds II Phase III have a total principal amount of Rp 700,000.

The net proceeds from the issuance of the Continuous Bonds II Phase III were used entirely for payments of financial liabilities of subsidiaries.

Interest for the Continuous Bonds II Phase III are payable on a quarterly basis on the interest payment dates. The first interest payment of Bonds was on 19 December 2017. The last interest payment dates, which are also the respective maturity dates of the Continuous Bonds II Phase III, will be on 19 September 2020.

The Continuous Bonds II Phase III is not secured by specific collateral, however it is guaranteed by all assets of the Company, for existing and future fixed or moveable assets.

The issuance of Continuous Bonds II Phase III was covered Trusteeship Agreement of Continuous Bonds II Tower Bersama Infrastructure Phase III Year 2017 No. 87 dated 29 August 2017, of a Notary Jose Dima Satria, S.H., M.Kn. The bond trustee is PT Bank Rakyat Indonesia (Persero) Tbk (the "Trustee").

Under the covenants governing the Continuous Bonds II Phase III, the Company, without the written consent of the Trustee, shall not, among others: merge or acquire, change the scope of main activities, reduce the authorized and paid up capital, sale, transfer or dispose all or part of asset by the Company's subsidiaries, sale, transfer, or giving options, warrants, and grant loans to third parties, except to the Company's subsidiaries, outside the Company's and Subsidiaries business activities.

In addition, the Company is required to maintain the comparative of total proforma consolidation loans with proforma EBITDA from last quarter multiplied by 4 (four) of no more than 6.25 times.

As of 31 December 2019 and 2018, the Company has complied with the restrictions set out in these trusteeship agreements.

On 24 January 2020, Fitch Indonesia, an independent credit rating agency, rated the Continuous Bonds II Phase III "AA-" (Double A Minus).

This Continuous Bonds II Phase III has been fully paid on 19 September 2020.

26. **SURAT UTANG** (Lanjutan)

d. **Obligasi Berkelanjutan III Tahap I**

Pada tanggal 5 Juli 2018, Perusahaan menerbitkan Obligasi Berkelanjutan III Tower Bersama Infrastructure Tahap I Tahun 2018 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan III Tahap I") sebesar 8,5% per tahun. Nominal Obligasi Berkelanjutan III Tahap I ini adalah sebesar Rp 608.000. Obligasi ini dicatatkan pada bursa efek Indonesia pada tanggal 6 Juli 2018.

Hasil bersih yang diperoleh dari penerbitan Obligasi Berkelanjutan III Tahap I telah digunakan seluruhnya untuk pembayaran kewajiban keuangan entitas anak.

Bunga Obligasi Berkelanjutan III Tahap I akan dibayarkan setiap kuartal sesuai dengan tanggal pembayaran bunga. Pembayaran pertama dari bunga adalah pada tanggal 5 Oktober 2018. Tanggal pembayaran bunga terakhir, yang juga merupakan tanggal jatuh tempo Obligasi Berkelanjutan III Tahap I, adalah pada tanggal 5 Juli 2021.

Penerbitan Obligasi Berkelanjutan III Tahap I ini dilakukan sesuai Akta Addendum III dan pernyataan kembali Perjanjian Perwaliamanatan Obligasi Berkelanjutan III Tower Bersama Infrastructure Tahap I Tahun 2018 No. 27 tanggal 8 Juni 2018 yang dibuat di hadapan Notaris Jose Dima Satria, S.H. M.Kn. Bertindak sebagai wali amanat adalah PT Bank Rakyat Indonesia (Persero) Tbk ("Wali Amanat").

Sesuai persyaratan yang disepakati dalam penerbitan Obligasi Berkelanjutan III Tahap I ini, maka Perusahaan tanpa persetujuan tertulis dari Wali Amanat tidak diperkenankan untuk melakukan tindakan-tindakan, antara lain: melakukan penggabungan atau pengambilalihan usaha, merubah bidang usaha utama, mengurangi modal dasar dan modal disetor, menjual, mengalihkan atau melepaskan seluruh atau sebagian aset, memberikan opsi, waran, dan memberikan pinjaman kepada pihak ketiga, kecuali kepada entitas anak Perusahaan, di luar kegiatan usaha Perusahaan dan entitas anak.

Perusahaan juga disyaratkan untuk mempertahankan perbandingan antara jumlah pinjaman konsolidasian proforma dengan EBITDA proforma dari kuartal terakhir dikalikan 4 (empat) tidak melebihi 6,25 kali.

Pada 31 Desember 2020, 2019 dan 2018, Perusahaan telah memenuhi semua kondisi yang disyaratkan dalam perjanjian perwaliamanatan tersebut.

Pada 23 November 2020, Fitch Indonesia, lembaga pemeringkat efek independen, telah memberikan peringkat "AA+" (*Double A Plus*) untuk Obligasi Berkelanjutan III Tahap I ini.

*26. **NOTES** (Continued)*

*d. **Continuous Bonds III Phase I***

On 5 July 2018, the Company issued Continuous Bonds III Tower Bersama Infrastructure Phase I Year 2018 with Fixed Interest Rate ("Continuous Bonds III Phase I") amounted to 8.5% per year. The Continuous Bonds III Phase I have a total principal amount of Rp 608,000. These bonds are listed on the Indonesian stock exchange on 6 July 2018.

The net proceeds from the issuance of the Continuous Bonds III Phase I were used entirely for payments of financial liabilities of subsidiaries.

Interest for the Continuous Bonds III Phase I are payable on a quarterly basis on the interest payment dates. The first interest payment of Bonds was on 5 October 2018. The last interest payment dates, which are also the respective maturity dates of the Continuous Bonds III Phase I, will be on 5 July 2021.

The issuance of Continuous Bonds III Phase I was covered in the Deed of Third Amendment and Restatement of Trusteeship Agreement of Continuous Bonds III Tower Bersama Infrastructure Phase I Year 2018 No. 27 dated 8 June 2018, of a Notary Jose Dima Satria, S.H., M.Kn. The bond trustee is PT Bank Rakyat Indonesia (Persero) Tbk (the "Trustee").

Under the covenants governing the Continuous Bonds III Phase I, the Company, without the written consent of he Trustee, shall not, among others: merge or acquire, change the scope of main activities, reduce the authorized and paid up capital, sale, transfer or dispose all or part of asset by the Company's subsidiaries, sale, transfer, or giving options, warrants, and grant loans to third parties, except to the Company's subsidiaries, outside the Company's and Subsidiaries business activities.

In addition, the Company is required to maintain the comparative of total proforma consolidation loans with proforma EBITDA from last quarter multiplied by 4 (four) of no more than 6.25 times.

As of 31 December 2020, 2019 and 2018, the Company has complied with the restrictions set out in these trusteeship agreements.

On 23 November 2020, Fitch Indonesia, an independent credit rating agency, rated the Continuous Bonds III Phase I "AA+" (Double A Plus).

26. **SURAT UTANG** (Lanjutan)

e. **Obligasi Berkelanjutan III Tahap II**

Pada tanggal 18 Oktober 2018, Perusahaan menerbitkan Obligasi Berkelanjutan III Tower Bersama Infrastructure Tahap II Tahun 2018 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan III Tahap II") sebesar 8,5% per tahun. Nominal Obligasi Berkelanjutan III Tahap II ini adalah sebesar Rp 628.000. Obligasi ini dicatatkan pada bursa efek Indonesia pada tanggal 19 Oktober 2018.

Hasil bersih yang diperoleh dari penerbitan Obligasi Berkelanjutan III Tahap II telah digunakan seluruhnya untuk pembayaran kewajiban keuangan entitas anak.

Bunga Obligasi Berkelanjutan III Tahap II akan dibayarkan setiap kuartal sesuai dengan tanggal pembayaran bunga. Pembayaran pertama dari bunga adalah pada tanggal 18 Januari 2019. Tanggal pembayaran bunga terakhir, yang juga merupakan tanggal jatuh tempo Obligasi Berkelanjutan III Tahap II, adalah pada tanggal 28 Oktober 2019.

Penerbitan Obligasi Berkelanjutan III Tahap II ini dilakukan sesuai Akta Perjanjian Perwaliamanatan Obligasi Berkelanjutan III Tower Bersama Infrastructure Tahap II Tahun 2018 No. 27 tanggal 1 Oktober 2018 yang dibuat di hadapan Notaris Jose Dima Satria, S.H. M.Kn. Bertindak sebagai wali amanat adalah PT Bank Rakyat Indonesia (Persero) Tbk ("Wali Amanat").

Sesuai persyaratan yang disepakati dalam penerbitan Obligasi Berkelanjutan III Tahap II ini, maka Perusahaan tanpa persetujuan tertulis dari Wali Amanat tidak diperkenankan untuk melakukan tindakantindakan, antara lain: melakukan penggabungan atau pengambilalihan usaha, merubah bidang usaha utama, mengurangi modal dasar dan modal disetor, menjual, mengalihkan atau melepaskan seluruh atau sebagian aset, memberikan opsi, waran, dan memberikan pinjaman kepada pihak ketiga, kecuali kepada entitas anak Perusahaan, di luar kegiatan usaha Perusahaan dan entitas anak.

Perusahaan juga disyaratkan untuk mempertahankan perbandingan antara jumlah pinjaman konsolidasian proforma dengan EBITDA proforma dari kuartal terakhir dikalikan 4 (empat) tidak melebihi 6,25 kali.

Pada 31 Desember 2019 dan 2018, Perusahaan telah memenuhi semua kondisi yang disyaratkan dalam perjanjian perwaliamanatan tersebut.

Pada 24 Januari 2020, Fitch Indonesia, lembaga pemeringkat efek independen, telah memberikan peringkat "AA-" (Double A Minus) untuk Obligasi Berkelanjutan III Tahap II ini.

Obligasi berkelanjutan III Tahan II ini telah dilunasi seluruhnya pada tanggal 28 Oktober 2019.

*26. **NOTES** (Continued)*

*e. **Continuous Bonds III Phase II***

On 18 October 2018, the Company issued Continous Bonds III phase II Year 2018 with a Fixed Interest Rate ("Continous Bonds III Phase II") of 8.5% per annum. The Continous Bonds III Phase II has a total principal of Rp 628,000. These bonds are listed on the Indonesia stock exchange on 19 October 2018.

The net proceeds obtained from the issuance of Continous Bonds III Phase II have been used entirely for the payment of financial liabilities of subsidiaries.

Interest for Continous Bonds III Phase II will be paid on a quarterly basis on the interest payment date. The first payment of interest is on 18 January 2019. The date of the last interest payment, which is also the due date of the Continous Bond III Phase II, is on 28 October 2019.

The issuance of Continuous Bonds III Phase II was covered in the Deed of Trusteeship Agreement of Continuous Bonds III Tower Bersama Infrastructure Phase II Year 2018 No. 27 dated 1 October 2018, of a Notary Jose Dima Satria, S.H., M.Kn. The bond trustee is PT Bank Rakyat Indonesia (Persero) Tbk (the "Trustee").

Under the covenants governing the Continuous Bonds III Phase II, the Company, without the written consent of he Trustee, shall not, among others: merge or acquire, change the scope of main activities, reduce the authorized and paid up capital, sale, transfer or dispose all or part of asset by the Company's subsidiaries, sale, transfer, or giving options, warrants, and grant loans to third parties, except to the Company's subsidiaries, outside the Company's and Subsidiaries business activities.

In addition, the Company is required to maintain the comparative of total proforma consolidation loans with proforma EBITDA from last quarter multiplied by 4 (four) of no more than 6.25 times

*As of 31 December 2019 and 2018, the Company has complied with
the restrictions set out in these trusteeship agreements.*

On 24 January 2020, Fitch Indonesia, an independent credit rating agency, rated the Continuous Bonds III Phase II "AA-" (Double A Minus).

This Continuous Bonds III Phase II has been fully paid on dated 28 October 2019.

26. **SURAT UTANG** (Lanjutan)

f. **Obligasi Berkelanjutan III Tahap III**

Pada tanggal 24 Mei 2019, Perusahaan menerbitkan Obligasi Berkelanjutan III Tower Bersama Infrastructure Tahap III Tahun 2019 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan III Tahap III") sebesar 8,0% per tahun. Nominal Obligasi Berkelanjutan III Tahap III ini adalah sebesar Rp 750.000. Obligasi ini dicatatkan pada Bursa Efek Indonesia pada tanggal 27 Mei 2019.

Hasil bersih yang diperoleh dari penerbitan Obligasi Berkelanjutan III Tahap III telah digunakan seluruhnya untuk pembayaran kewajiban keuangan entitas anak.

Bunga Obligasi Berkelanjutan III Tahap III akan dibayarkan setiap kuartal sesuai dengan tanggal pembayaran bunga. Pembayaran pertama dari bunga adalah pada tanggal 24 Agustus 2019. Tanggal pembayaran bunga terakhir, yang juga merupakan tanggal jatuh tempo Obligasi Berkelanjutan III Tahap III, adalah pada tanggal 4 Juni 2020.

Penerbitan Obligasi Berkelanjutan III Tahap III ini dilakukan sesuai Akta Perjanjian Perwaliamanatan Obligasi Berkelanjutan III Tower Bersama Infrastructure Tahap III Tahun 2019 No. 66 tanggal 8 Mei 2019 yang dibuat di hadapan Notaris Jose Dima Satria, S.H. M.Kn. Bertindak sebagai wali amanat adalah PT Bank Rakyat Indonesia (Persero) Tbk ("Wali Amanat").

Sesuai persyaratan yang disepakati dalam penerbitan Obligasi Berkelanjutan III Tahap III ini, maka Perusahaan tanpa persetujuan tertulis dari Wali Amanat tidak diperkenankan untuk melakukan tindakan-tindakan, antara lain: melakukan penggabungan atau pengambilalihan usaha, merubah bidang usaha utama, mengurangi modal dasar dan modal disetor, menjual, mengalihkan atau melepaskan seluruh atau sebagian aset, memberikan opsi, waran, dan memberikan pinjaman kepada pihak ketiga, kecuali kepada entitas anak Perusahaan, di luar kegiatan usaha Perusahaan dan entitas anak.

Perusahaan juga disyaratkan untuk mempertahankan perbandingan antara jumlah pinjaman konsolidasian proforma dengan EBITDA proforma dari kuartal terakhir dikalikan 4 (empat) tidak melebihi 6,25 kali.

Pada 31 Desember 2019 dan 2018, Perusahaan telah memenuhi semua kondisi yang disyaratkan dalam perjanjian perwaliamanatan tersebut.

Pada 24 Januari 2020, Fitch Indonesia, lembaga pemeringkat efek independen, telah memberikan peringkat "AA-" (*Double A Minus*) untuk Obligasi Berkelanjutan III Tahap III ini.

Obligasi berkelanjutan III Tahap III ini telah dilunasi seluruhnya pada tanggal 4 Juni 2020.

*26. **NOTES** (Continued)*

*f. **Continuous Bonds III Phase III***

On 24 May 2019, the Company issued Continous Bonds III phase III Year 2019 with a Fixed Interest Rate ("Continous Bonds III Phase III") of 8.0% per annum. The Continous Bonds III Phase III has a total principal of Rp 750,000. These bonds are listed on the Indonesia stock exchange on 27 May 2019.

The net proceeds obtained from the issuance of Continous Bonds III Phase III have been used entirely for the payment of financial liabilities of subsidiaries.

Interest for Continous Bonds III Phase III will be paid on a quarterly basis on the interest payment date. The first payment of interest is on 24 August 2019. The date of the last interest payment, which is also the due date of the Continous Bond III Phase III, is on 4 June 2020.

The issuance of Continuous Bonds III Phase III was covered in the Deed of Trusteeship Agreement of Continuous Bonds III Tower Bersama Infrastructure Phase III Year 2019 No. 66 dated 8 May 2019, of a Notary Jose Dima Satria, S.H., M.Kn. The bond trustee is PT Bank Rakyat Indonesia (Persero) Tbk (the "Trustee").

Under the covenants governing the Continuous Bonds III Phase III, the Company, without the written consent of he Trustee, shall not, among others: merge or acquire, change the scope of main activities, reduce the authorized and paid up capital, sale, transfer or dispose all or part of asset by the Company's subsidiaries, sale, transfer, or giving options, warrants, and grant loans to third parties, except to the Company's subsidiaries, outside the Company's and Subsidiaries business activities.

In addition, the Company is required to maintain the comparative of total proforma consolidation loans with proforma EBITDA from last quarter multiplied by 4 (four) of no more than 6.25 times.

As of 31 December 2019 and 2018, the Company has complied with the restrictions set out in these trusteeship agreements.

On 24 January 2020, Fitch Indonesia, an independent credit rating agency, rated the Continuous Bonds III Phase III "AA-" (Double A Minus).

This Continuous Bonds III Phase III has been fully paid on 4 June 2020.

26. **SURAT UTANG** (Lanjutan)

g. **Obligasi Berkelanjutan III Tahap IV**

Pada tanggal 24 Maret 2020, Perusahaan menerbitkan Obligasi Berkelanjutan III Tower Bersama Tahap IV Tahun 2020 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan III Tahap IV"). Nominal Obligasi Berkelanjutan III Tahap IV ini adalah sebesar Rp 1.500.000. Obligasi ini dicatatkan pada Bursa Efek Indonesia pada tanggal 26 Maret 2020.

Hasil bersih yang diperoleh dari penerbitan Obligasi Berkelanjutan III Tahap IV telah digunakan seluruhnya untuk pembayaran kewajiban keuangan entitas anak.

Obligasi Berkelanjutan III Tahap IV ini diterbitkan dalam 2 (dua) seri sebagai berikut:

1. Obligasi seri A dengan nilai nominal sebesar Rp 633.000 dengan tingkat bunga tetap sebesar 6,25% per tahun. Jangka waktu obligasi seri A adalah 370 (tiga ratus tujuh puluh) Hari Kalender.
2. Obligasi seri B dengan nilai nominal sebesar Rp 867.000 dengan tingkat bunga tetap sebesar 7,75% per tahun, berjangka waktu 3 (tiga) tahun.

Bunga Obligasi dibayarkan setiap triwulan, dimana Bunga Obligasi pertama akan dibayarkan pada tanggal 24 Juni 2020, sedangkan Bunga Obligasi terakhir sekaligus dengan pelunasan Obligasi akan dibayarkan pada tanggal 4 April 2021 untuk Obligasi Seri A dan tanggal 24 Maret 2023 untuk Obligasi Seri B.

Penerbitan Obligasi Berkelanjutan III Tahap IV ini dilakukan sesuai Akta Perjanjian Perwaliamanatan Obligasi Berkelanjutan III Tower Bersama Infrastructure Tahap IV Tahun 2020 No. 9 tanggal 5 Maret 2020 yang dibuat di hadapan Notaris Jose Dima Satria, S.H. M.Kn. Bertindak sebagai wali amanat adalah PT Bank Rakyat Indonesia (Persero) Tbk ("Wali Amanat").

Sesuai persyaratan yang disepakati dalam penerbitan Obligasi Berkelanjutan III Tahap IV ini, maka Perusahaan tanpa persetujuan tertulis dari Wali Amanat tidak diperkenankan untuk melakukan tindakan-tindakan, antara lain: melakukan penggabungan atau pengambilalihan usaha, merubah bidang usaha utama, mengurangi modal dasar dan modal disetor, menjual, mengalihkan atau melepaskan seluruh atau sebagian aset, memberikan opsi, waran, dan memberikan pinjaman kepada pihak ketiga, kecuali kepada entitas anak Perusahaan, di luar kegiatan usaha Perusahaan dan entitas anak.

Perusahaan juga disyaratkan untuk mempertahankan perbandingan antara jumlah pinjaman konsolidasian proforma dengan EBITDA proforma dari kuartal terakhir dikalikan 4 (empat) tidak melebihi 6,25 kali.

Pada 31 Desember 2020, Perusahaan telah memenuhi semua kondisi yang disyaratkan dalam perjanjian perwaliamanatan tersebut.

*26. **NOTES** (Continued)*

*g. **Continuous Bonds III Phase IV***

On 24 March 2020, the Company issued Continous Bonds III phase IV Year 2020 with a Fixed Interest Rate ("Continuous Bonds III Phase IV"). The Continuous Bonds III Phase IV has a total principal of Rp 1,500,000. These bonds are listed on the Indonesia stock exchange on 26 March 2020.

The net proceeds obtained from the issuance of Continous Bonds III Phase IV have been used entirely for the payment of financial liabilities of subsidiaries.

These Continuous Bonds III Phase IV were issued in series consisting of:

1. *Series A Bonds with nominal value of Rp 633,000 at a fixed interest rate of 6.25% per year. The term of the Series A Bonds is 370 (three hundred and seventy) Calendar Days.*
2. *Series B Bonds with nominal value of Rp 867,000 at a fixed interest rate of 7.75% per year. The term of the Series B Bonds is 3 (three) years.*

Interest for Continous Bonds III Phase IV will be paid on a quarterly basis on the interest payment date. The first payment of interest is on 24 June 2020. The date of the last interest payment, which is also the due date of the Continous Bond III Phase IV, is on 4 April 2021 for Series A and 24 March 2023 for Series B.

The issuance of Continuous Bonds III Phase IV was covered in the Deed of Trusteeship Agreement of Continuous Bonds III Tower Bersama Infrastructure Phase IV Year 2020 No. 9 dated 5 March 2020, of a Notary Jose Dima Satria, S.H., M.Kn. The bond trustee is PT Bank Rakyat Indonesia (Persero) Tbk (the "Trustee").

Under the covenants governing the Continuous Bonds III Phase IV, the Company, without the written consent of the Trustee, shall not, among others: merge or acquire, change the scope of main activities, reduce the authorized and paid up capital, sale, transfer or dispose all or part of asset by the Company's subsidiaries, sale, transfer, or giving options, warrants, and grant loans to third parties, except to the Company's subsidiaries, outside the Company's and Subsidiaries business activities.

In addition, the Company is required to maintain the comparative of total proforma consolidation loans with proforma EBITDA from last quarter multiplied by 4 (four) of no more than 6.25 times.

As of 30 December 2020, the Company has complied with the restrictions set out in these trusteeship agreements.

26. **SURAT UTANG** (Lanjutan)

g. **Obligasi Berkelanjutan III Tahap IV** (Lanjutan)

Pada 23 November 2020, Fitch Indonesia, lembaga pemeringkat efek independen, telah memberikan peringkat "AA+" (*Double A Plus*) untuk Obligasi Berkelanjutan III Tahap IV ini.

h. **Obligasi Berkelanjutan IV Tahap I**

Pada tanggal 8 September 2020, Perusahaan menerbitkan Obligasi Berkelanjutan IV Tower Bersama Infrastructure Tahap I Tahun 2020 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan IV Tahap I"). Nominal Obligasi Berkelanjutan IV Tahap I ini adalah sebesar Rp 700.000. Obligasi ini dicatatkan pada Bursa Efek Indonesia pada tanggal 9 September 2020.

Hasil bersih yang diperoleh dari penerbitan Obligasi Berkelanjutan IV Tahap I telah digunakan seluruhnya untuk melunasi sebagian utang pokok Obligasi Berkelanjutan II Tahap III (Catatan 26.c).

Obligasi Berkelanjutan IV Tahap I ini diterbitkan dalam 2 (dua) seri sebagai berikut:

1. Obligasi seri A dengan nilai nominal sebesar Rp 231.000 dengan tingkat bunga tetap sebesar 6,30% per tahun. Jangka waktu obligasi seri A adalah 370 (tiga ratus tujuh puluh) Hari Kalender.
2. Obligasi seri B dengan nilai nominal sebesar Rp 469.000 dengan tingkat bunga tetap sebesar 8,00% per tahun, berjangka waktu 3 (tiga) tahun.

Bunga Obligasi dibayarkan setiap triwulan, dimana Bunga Obligasi pertama akan dibayarkan pada tanggal 8 Desember 2020, sedangkan Bunga Obligasi terakhir sekaligus dengan pelunasan Obligasi akan dibayarkan pada tanggal 18 September 2021 untuk Obligasi Seri A dan tanggal 8 September 2023 untuk Obligasi seri B.

Penerbitan Obligasi Berkelanjutan IV Tahap I ini dilakukan sesuai Akta Perjanjian Perwaliamanatan Obligasi Berkelanjutan IV Tower Bersama Infrastructure Tahap I Tahun 2020 No. 129 tanggal 27 Agustus 2020 yang dibuat di hadapan Notaris Jose Dima Satria, S.H. M.Kn. Bertindak sebagai wali amanat adalah PT Bank Rakyat Indonesia (Persero) Tbk ("Wali Amanat").

Sesuai persyaratan yang disepakati dalam penerbitan Obligasi Berkelanjutan IV Tahap I ini, maka Perusahaan tanpa persetujuan tertulis dari Wali Amanat tidak diperkenankan untuk melakukan tindakan-tindakan, antara lain: melakukan penggabungan atau pengambilalihan usaha, merubah bidang usaha utama, mengurangi modal dasar dan modal disetor, menjual, mengalihkan atau melepaskan seluruh atau sebagian aset, memberikan opsi, waran, dan memberikan pinjaman kepada pihak ketiga, kecuali kepada entitas anak Perusahaan, di luar kegiatan usaha Perusahaan dan entitas anak.

*26. **NOTES** (Continued)*

*g. **Continuous Bonds III Phase IV** (Continued)*

On 23 November 2020, Fitch Indonesia, an independent credit rating agency, rated the Continuous Bonds III Phase IV "AA+" (Double A Plus).

*h. **Continuous Bonds IV Phase I***

On 8 September 2020, the Company issued Continuous Bonds IV phase I Year 2020 with a Fixed Interest Rate ("Continuous Bonds IV Phase I"). The Continuous Bonds IV Phase I has a total principal of Rp 700,000. These bonds are listed on the Indonesia stock exchange on 9 September 2020.

The net proceeds from the issuance of the Continuous Bonds IV Phase I were used entirely for payments of the Continuous Bonds II Phase III (Note 26.c).

These Continuous Bonds IV Phase I were issued in 2 (two) series consisting of:

1. *Series A Bonds with nominal value of Rp 231,000 at a fixed interest rate of 6.30% per year. The term of the Series A Bonds is 370 (three hundred and seventy) Calendar Days.*
2. *Series B Bonds with nominal value of Rp 469,000 at a fixed interest rate of 8.00% per year. The term of the Series B Bonds is 3 (three) years.*

Interest for Continuous Bonds IV Phase I will be paid on a quarterly basis on the interest payment date. The first payment of interest is on 8 December 2020. The date of the last interest payment, which is also the due date of Continuous Bond IV phase I, is on 18 September 2021 for series A and 8 September 2023 for series B.

The issuance of Continuous Bonds IV Phase I was covered in the Deed of Trusteeship Agreement of Continuous Bonds IV Tower Bersama Infrastructure Phase I Year 2020 No. 129 dated 27 August 2020, of a Notary Jose Dima Satria, S.H., M.Kn. The bond trustee is PT Bank Rakyat Indonesia (Persero) Tbk (the "Trustee").

Under the covenants governing the Continuous Bonds IV Phase I, the Company, without the written consent of the Trustee, shall not, among others: merge or acquire, change the scope of main activities, reduce the authorized and paid up capital, sale, transfer or dispose all or part of asset by the Company's subsidiaries, sale, transfer, or giving options, warrants, and grant loans to third parties, except to the Company's subsidiaries, outside the Company's and Subsidiaries business activities.

26. **SURAT UTANG** (Lanjutan)

h. **Obligasi Berkelanjutan IV Tahap I** (Lanjutan)

Perusahaan juga disyaratkan untuk mempertahankan perbandingan antara jumlah pinjaman konsolidasian proforma dengan EBITDA proforma dari kuartal terakhir dikalikan 4 (empat) tidak melebihi 6,25 kali.

Pada 31 Desember 2020, Perusahaan telah memenuhi semua kondisi yang disyaratkan dalam perjanjian perwaliamanatan tersebut.

Pada 23 November 2020, Fitch Indonesia, lembaga pemeringkat efek independen, telah memberikan peringkat "AA+" (*Double A Plus*) untuk Obligasi Berkelanjutan IV Tahap I ini.

i. **Obligasi Berkelanjutan IV Tahap II**

Pada tanggal 2 Desember 2020, Perusahaan menerbitkan Obligasi Berkelanjutan IV Tower Bersama Infrastructure Tahap II Tahun 2020 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan IV Tahap II"). Nominal Obligasi Berkelanjutan IV Tahap II ini adalah sebesar Rp 750.000. Obligasi ini dicatatkan pada Bursa Efek Indonesia pada tanggal 3 Desember 2020.

Hasil bersih yang diperoleh dari penerbitan Obligasi Berkelanjutan IV Tahap II telah digunakan seluruhnya untuk pembayaran kewajiban keuangan entitas anak.

Obligasi Berkelanjutan IV Tahap II ini diterbitkan dalam 2 (dua) seri sebagai berikut:

1. Obligasi seri A dengan nilai nominal sebesar Rp 295.000 dengan tingkat bunga tetap sebesar 5,75% per tahun. Jangka waktu obligasi seri A adalah 370 (tiga ratus tujuh puluh) Hari Kalender.
2. Obligasi seri B dengan nilai nominal sebesar Rp 455.000 dengan tingkat bunga tetap sebesar 7,25% per tahun, berjangka waktu 3 (tiga) tahun.

Bunga Obligasi dibayarkan setiap triwulan, dimana Bunga Obligasi pertama akan dibayarkan pada tanggal 2 Maret 2021, sedangkan Bunga Obligasi terakhir sekaligus dengan pelunasan Obligasi akan dibayarkan pada tanggal 12 Desember 2021 untuk Obligasi Seri A dan tanggal 2 Desember 2023 untuk Obligasi seri B.

Penerbitan Obligasi Berkelanjutan IV Tahap II ini dilakukan sesuai Akta Perjanjian Perwaliamanatan Obligasi Berkelanjutan IV Tower Bersama Infrastructure Tahap II Tahun 2020 No. 115 tanggal 24 November 2020 yang dibuat di hadapan Notaris Jose Dima Satria, S.H. M.Kn. Bertindak sebagai wali amanat adalah PT Bank Rakyat Indonesia (Persero) Tbk ("Wali Amanat").

*26. **NOTES** (Continued)*

*h. **Continuous Bonds IV Phase I** (Continued)*

In addition, the Company is required to maintain the comparative of total proforma consolidation loans with proforma EBITDA from last quarter multiplied by 4 (four) of no more than 6.25 times.

As of 31 December 2020, the Company has complied with the restrictions set out in these trusteeship agreements.

On 23 November 2020, Fitch Indonesia, an independent credit rating agency, rated the Continuous Bonds IV Phase I "AA+" (Double A Plus).

*i. **Continuous Bonds IV Phase II***

On 2 December 2020, the Company issued Continuous Bonds IV phase II Year 2020 with a Fixed Interest Rate ("Continuous Bonds IV Phase II"). The Continuous Bonds IV Phase II has a total principal of Rp 750,000. These bonds are listed on the Indonesia stock exchange on 3 December 2020.

The net proceeds from the issuance of the Continuous Bonds IV Phase II were used entirely for payments of financial liabilities of subsidiaries.

These Continuous Bonds IV Phase II were issued in 2 (two) series consisting of:

1. *Series A Bonds with nominal value of Rp 295,000 at a fixed interest rate of 5.75% per year. The term of the Series A Bonds is 370 (three hundred and seventy) Calendar Days.*
2. *Series B Bonds with nominal value of Rp 455,000 at a fixed interest rate of 7.25% per year. The term of the Series B Bonds is 3 (three) years.*

Interest for Continuous Bonds IV Phase II will be paid on a quarterly basis on the interest payment date. The first payment of interest is on 2 March 2021. The date of the last interest payment, which is also the due date of Continuous Bond IV phase II, is on 12 December 2021 for series A and 2 December 2023 for series B.

The issuance of Continuous Bonds IV Phase II was covered in the Deed of Trusteeship Agreement of Continuous Bonds IV Tower Bersama Infrastructure Phase II Year 2020 No. 115 dated 24 November 2020, of a Notary Jose Dima Satria, S.H., M.Kn. The bond trustee is PT Bank Rakyat Indonesia (Persero) Tbk (the "Trustee").

26. **SURAT UTANG** (Lanjutan)

i. **Obligasi Berkelanjutan IV Tahap II** (Lanjutan)

Sesuai persyaratan yang disepakati dalam penerbitan Obligasi Berkelanjutan IV Tahap II ini, maka Perusahaan tanpa persetujuan tertulis dari Wali Amanat tidak diperkenankan untuk melakukan tindakan-tindakan, antara lain: melakukan penggabungan atau pengambilalihan usaha, merubah bidang usaha utama, mengurangi modal dasar dan modal disetor, menjual, mengalihkan atau melepaskan seluruh atau sebagian aset, memberikan opsi, waran, dan memberikan pinjaman kepada pihak ketiga, kecuali kepada entitas anak Perusahaan, di luar kegiatan usaha Perusahaan dan entitas anak.

Perusahaan juga disyaratkan untuk mempertahankan perbandingan antara jumlah pinjaman konsolidasian proforma dengan EBITDA proforma dari kuartal terakhir dikalikan 4 (empat) tidak melebihi 6,25 kali.

Pada 31 Desember 2020, Perusahaan telah memenuhi semua kondisi yang disyaratkan dalam perjanjian perwaliamanatan tersebut.

Pada 23 November 2020, Fitch Indonesia, Lembaga pemeringkat efek independen, telah memberikan peringkat "AA+" (Double A Plus) untuk Obligasi Berkelanjutan IV Tahap II ini.

Pada 31 Desember 2020, 2019 dan 2018, beban bunga masih harus dibayar untuk Surat Utang adalah sebesar Rp 304.627, Rp 195.552 dan Rp 199.286 dan disajikan sebagai bagian dari akun "Beban Masih Harus Dibayar" pada laporan posisi keuangan konsolidasian (Catatan 23). Beban bunga disajikan sebagai bagian dari akun "Beban Keuangan" pada laporan laba rugi dan penghasilan komprehensif lain konsolidasian.

*26. **NOTES** (Continued)*

*i. **Continuous Bonds IV Phase II** (Continued)*

Under the covenants governing the Continuous Bonds IV Phase II, the Company, without the written consent of the Trustee, shall not, among others: merge or acquire, change the scope of main activities, reduce the authorized and paid up capital, sale, transfer or dispose all or part of asset by the Company's subsidiaries, sale, transfer, or giving options, warrants, and grant loans to third parties, except to the Company's subsidiaries, outside the Company's and Subsidiaries business activities.

In addition, the Company is required to maintain the comparative of total proforma consolidation loans with proforma EBITDA from last quarter multiplied by 4 (four) of no more than 6.25 times.

As of 31 December 2020, the Company has complied with the restrictions set out in these trusteeship agreements.

On 23 November 2020, Fitch Indonesia, an independent credit rating agency, rated the Continuous Bonds IV Phase II "AA+" (Double A Plus).

As of 31 December 2020, 2019 and 2018, the accrued interest for Notes amounts to Rp 304,627, Rp 195,552 and Rp 199,286 and is presented as part of "Accrued Expenses" in the consolidated statement of financial position (Note 23). The related interest expense is presented as part of "Financial Expenses" in the consolidated statements of profit or loss and other comprehensive income.

27. **LIABILITAS SEWA** / *27. **LEASE LIABILITIES***

Akun ini terdiri dari: / *This account consists of:*

	2020		
a. Aset hak guna	450.430	*a.*	*Right of use asset*
b. Kendaraan	16.082	*b.*	*Vehicles*
Jumlah	466.512		***Total***
Bagian yang jatuh tempo dalam satu tahun	**152.617**		***Current portion less than one year***
Bagian yang jatuh tempo lebih dari satu tahun	**313.895**		***Due more than one year***

27. **LIABILITAS SEWA** (Continued)

a. Aset hak guna

Sesuai dengan penerapan PSAK 73 "Sewa", Perusahaan dan entitas anak mulai melakukan penerapan awal dan mengakui liabilitas sewa aset hak guna dari estimasi nilai perpanjangan sewa lahan untuk mencakup jangka waktu kolokasi, dengan rincian sebagai berikut:

27. ***LEASE LIABILITIES*** *(Continued)*

a. Rights of use assets

Based on PSAK 73 "Leases", the Company and subsidiaries start to apply initial application and recognized the estimation of land lease extension to cover the collocation period as right of use assets lease liabilities, with details as follows:

	2020	
Penerapan awal, 1 Januari 2020	318.453	*Initial application, 1 January 2020*
Ditambah:		*Add:*
Penambahan sewa lahan	60.572	*Additional landlease*
Beban keuangan	93.604	*Financial expenses*
Dikurangi:		*Less:*
Pembayaran sewa lahan	(22.199)	*Payment of landlease*
Jumlah	450.430	*Total*
Bagian yang jatuh tempo dalam satu tahun	147.976	***Current portion less than one year***
Bagian yang jatuh tempo lebih dari satu tahun	302.454	***Due more than one year***

b. Kendaraan

b. Vehicles

	2020	
PT Mitra Pinasthika Mustika Finance	14.310	*PT Mitra Pinasthika Mustika Finance*
PT Toyota Astra Financial Services	1.772	*PT Toyota Astra Financial Services*
Jumlah	16.082	*Total*
Bagian yang jatuh tempo dalam satu tahun	4.641	***Current portion less than one year***
Bagian yang jatuh tempo lebih dari satu tahun	11.441	***Due more than one year***

Pembayaran sewa minimum di masa mendatang, serta nilai kini atas pembayaran sewa minimum pada tanggal 31 Desember 2020 adalah sebagai berikut:

Future minimum lease payments under finance leases together with the present value of the minimum lease payments as at 31 December 2020 were as follows:

	2020	
Jatuh tempo dalam satu tahun	6.954	*Due less than one year*
Jatuh tempo lebih dari satu tahun	14.147	*Due more than one year*
	21.101	
Dikurangi:		*Less:*
Beban bunga yang belum jatuh tempo	(5.019)	*Future financing charges*
Nilai kini pembayaran minimun utang sewa pembiayaan	16.082	*Present value of minimum finance lease payable*
Bagian yang jatuh tempo dalam satu tahun	4.641	*Current portion less than one year*
Bagian yang jatuh tempo lebih dari satu tahun	11.441	*Due more than one year*
Nilai kini pembayaran minimun utang sewa pembiayaan	16.082	*Present value of minimum finance lease payable*

27. **LIABILITAS SEWA** (Continued)

b. Kendaraan (Lanjutan)

Pada tanggal 31 Desember 2020, sewa pembiayaan ini dikenakan bunga berkisar antara 5,50% sampai dengan 15,22% per tahun dan akan jatuh tempo antara tahun 2021 sampai dengan tahun 2025.

Sewa pembiayaan ini dijamin dengan aset kendaraan yang menjadi obyek pembiayaan.

*27. **LEASE LIABILITIES** (Continued)*

b. Vehicles (Continued)

As of 31 December 2020, this finance lease bears interest ranging from 5.50% to 15.22% per annum and will be due between 2021 to 2025.

The finance lease is secured by the respective vehicle assets.

28. **MODAL SAHAM**

Pada tanggal 31 Desember 2020, 2019 dan 2018, susunan pemegang saham dan kepemilikannya adalah sebagai berikut:

*28. **SHARE CAPITAL***

As of 31 December 2020, 2019 and 2018, the structure of shareholders and their respective shareholdings are as follows:

	31 Desember 2020/ *31 December 2020*			
Pemegang saham	**% Hak suara/ *% Voting rights***	**Lembar saham (nilai penuh)/ *No. of shares (full amount)***	**Jumlah/ *Amount* (Rp)**	***Shareholders***
PT Wahana Anugerah Sejahtera	35,85	7.755.471.093	155.109	*PT Wahana Anugerah Sejahtera*
PT Provident Capital Indonesia	26,73	5.782.760.530	115.655	*PT Provident Capital Indonesia*
Winato Kartono	0,63	136.719.815	2.734	*Winato Kartono*
Edwin Soeryadjaya	0,33	71.481.830	1.430	*Edwin Soeryadjaya*
Hardi Wijaya Liong	0,32	68.359.905	1.367	*Hardi Wijaya Liong*
Budianto Purwahjo	0,02	5.025.000	101	*Budianto Purwahjo*
Herman Setya Budi	0,02	4.625.000	93	*Herman Setya Budi*
Helmy Yusman Santoso	0,01	3.125.000	63	*Helmy Yusman Santoso*
Gusandi Sjamsudin	0,01	1.950.000	39	*Gusandi Sjamsudin*
Masyarakat	36,08	7.801.535.772	156.031	*Public*
Jumlah	100,00	21.631.053.945	432.621	***Total***
Saham treasuri		1.025.945.500	20.519	*Treasury stock*
Jumlah Saham yang memiliki hak suara		22.656.999.445	453.140	***Number of voting right stock***

	31 Desember 2019/ *31 December 2019*			
Pemegang saham	**% Hak suara/ *% Voting rights***	**Lembar saham (nilai penuh)/ *No. of shares (full amount)***	**Jumlah/ *Amount* (Rp)**	***Shareholders***
PT Wahana Anugerah Sejahtera	30,54	6.605.591.595	132.112	*PT Wahana Anugerah Sejahtera*
PT Provident Capital Indonesia	24,95	5.397.590.530	107.952	*PT Provident Capital Indonesia*
Winato Kartono	0,63	136.719.815	2.734	*Winato Kartono*
Edwin Soeryadjaya	0,33	71.481.830	1.430	*Edwin Soeryadjaya*
Hardi Wijaya Liong	0,32	68.359.905	1.367	*Hardi Wijaya Liong*
Budianto Purwahjo	0,02	5.025.000	101	*Budianto Purwahjo*
Herman Setya Budi	0,02	3.625.000	72	*Herman Setya Budi*
Helmy Yusman Santoso	0,01	3.125.000	62	*Helmy Yusman Santoso*
Gusandi Sjamsudin	0,01	1.950.000	39	*Gusandi Sjamsudin*
Masyarakat	43,17	9.337.585.270	186.752	*Public*
Jumlah	100,00	21.631.053.945	432.621	***Total***
Saham treasuri		1.025.945.500	20.519	*Treasury stock*
Jumlah Saham yang memiliki hak suara		22.656.999.445	453.140	***Number of voting right stock***

28. **MODAL SAHAM** (Lanjutan) / *28. **SHARE CAPITAL** (Continued)*

Pemegang saham	31 Desember 2018/ *31 December 2018*			
	% Hak suara/ *% Voting rights*	Lembar saham (nilai penuh)/ *No. of shares (full amount)*	Jumlah/ *Amount* (Rp)	*Shareholders*
PT Wahana Anugerah Sejahtera	30,73	1.333.897.198	133.390	*PT Wahana Anugerah Sejahtera*
PT Provident Capital Indonesia	26,64	1.156.552.106	115.655	*PT Provident Capital Indonesia*
Winato Kartono	0,63	27.343.963	2.734	*Winato Kartono*
Edwin Soeryadjaya	0,33	14.296.366	1.430	*Edwin Soeryadjaya*
Hardi Wijaya Liong	0,31	13.671.981	1.367	*Hardi Wijaya Liong*
Budianto Purwahjo	0,02	1.005.000	101	*Budianto Purwahjo*
Herman Setya Budi	0,02	725.000	72	*Herman Setya Budi*
Helmy Yusman Santoso	0,01	625.000	62	*Helmy Yusman Santoso*
Gusandi Sjamsudin	0,01	390.000	39	*Gusandi Sjamsudin*
Masyarakat	40,30	1.792.434.875	179.244	*Public*
Jumlah	100,00	4.340.941.489	434.094	***Total***
Saham treasuri		190.458.400	19.046	*Treasury stock*
Jumlah Saham yang memiliki hak suara		4.531.399.889	453.140	***Number of voting right stock***

Pemecahan nilai saham

Pada 30 Oktober 2019, Perusahaan mengadakan Rapat Umum Pemegang Saham Luar Biasa (RUPSLB) untuk memperoleh persetujuan pemecahan nilai nominal saham dari Rp 100 (nilai penuh) per saham menjadi Rp 20 (nilai penuh) per saham. Pemecahan nilai nominal tersebut telah dinyatakan dalam akta Notaris No. 166 tanggal 30 Oktober 2019, dibuat di hadapan Jose Dima Satria, S.H., M.Kn., Notaris di Jakarta, mengenai perubahan Pasal 3, maksud dan tujuan serta kegiatan usaha, mengubah ketentuan Pasal 4 ayat 1 dan ayat 2 Anggaran Dasar Perusahaan tentang modal dasar ditempatkan dan disetor. Perubahan anggaran dasar tersebut telah diterima dan dicatat di dalam *database* sistem Administrasi Badan Hukum Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia sebagaimana tercantum dalam Surat Keputusan No. AHU-0089482.AH.01.02.Tahun 2019 tanggal 31 Oktober 2019 dan Surat Keputusan Penerimaan Pemberitahuan Perubahan Data Perusahaan sesuai Akta No. 166 AHU-AH.01.03-0354029 tanggal 31 Oktober 2019.

Pada 31 Desember 2020, 2019 dan 2018, Komisaris dan Direksi Perusahaan yang memiliki langsung saham Perusahaan masing-masing adalah sebanyak 291.286.550 saham, 290.286.550 saham dan 58.057.310 saham, jumlah tersebut masing-masing mencerminkan hak suara sebesar 1,35%, 1,34% dan 1,30% dari jumlah saham beredar.

Stock split per share

On 30 October 2019, the Company held the Extraordinary General Meeting of Shareholders (EGMS) to obtain approval of stock split from nominal Rp 100 (full amount) per share to Rp 20 (full amount) per share. Stock split has been stated in notarial Deed No. 166 dated 30 October 2019, made in the presence of Jose Dima Satria, S.H, M.Kn., a Notary in Jakarta, regarding to amend Article 3, the purpose and objectives and strength of the business, and the provisions of Article 4 paragraph 1 and paragraph 2 of the Company's Articles of Association concerning capital basis placed and paid. These amendments have been accepted and registered into the database of Administrative System for Legal Entities of the Ministry of Law and Human Rights of the Republic of Indonesia as stated in his Decree No. AHU-0089482.AH.01.02.Tahun 2019 dated 31 October 2019, and Decree of Receiving Notification of the Company's Data Amendments as stipulated in Deed No. 166 AHU-AH.01.03-0354029 dated 31 October 2019.

As of 31 December 2020, 2019 and 2018, there are Commissioners and Directors who directly owned 291,286,550 shares, 290,286,550 shares and 58.057.310 shares of the Company, respectively. Those shares represent 1.35%, 1.34% and 1,30% voting rights of total outstanding shares, respectively.

29. SAHAM TREASURI

a. Pada tanggal 27 April 2018, Perusahaan mengadakan Rapat Umum Pemegang Saham Tahunan (RUPST). RUPST ini memberikan persetujuan kepada Perusahaan untuk membeli kembali sebesar maksimum 4,5% saham beredarnya atau sebanyak 204.000.000 saham melalui Bursa Efek Indonesia.

Sesuai peraturan OJK, pembelian kembali saham tersebut harus dilakukan melalui bursa saham dan persetujuan tersebut berlaku selama 18 (delapan belas) bulan. Maksimum dana yang akan digunakan untuk membeli kembali saham tersebut adalah sebesar Rp 1,2 trilyun (nilai penuh) termasuk biaya transaksi, perantara pedagang efek dan biaya terkait lainnya.

Sesuai surat Perusahaan No. 534/TBG-TBI 001/FIN/05/IX/2019 tangal 4 September 2019, Perusahaan telah menyampaikan kepada OJK bahwa Perusahaan menghentikan pelaksanaan pembelian kembali saham.

Dengan demikian, pelaksanaan pembelian kembali saham tersebut dinyatakan telah selesai dilaksanakan seluruhnya dan selanjutnya pengalihan saham hasil pembelian kembali tersebut akan dilakukan sesuai peraturan yang berlaku, khususnya Peraturan Otoritas Jasa Keuangan No. 30/POJK.04/2017 tentang Pembelian Kembali Saham Yang Dikeluarkan Oleh Perusahaan Terbuka.

Sejak tanggal RUPST sampai dengan 4 September 2019, Perusahaan telah membeli kembali saham beredarnya dari bursa saham sebanyak 110.944.200 saham dengan biaya perolehan sebesar Rp 513.160. Setelah *stock split* di bulan November 2019, jumlah saham tersebut menjadi 554.721.000 saham, yang mencerminkan 2,45% dari seluruh saham beredar Perusahaan.

b. Pada tanggal 24 Oktober 2016, Perusahaan mengadakan Rapat Umum Pemegang Saham Luar Biasa (RUPSLB). RUPSLB ini memberikan persetujuan kepada Perusahaan untuk membeli kembali sebesar maksimum 5% saham beredarnya atau sebanyak 236.000.000 saham melalui Bursa Efek Indonesia.

Sesuai peraturan OJK, pembelian kembali saham tersebut harus dilakukan melalui bursa saham dan persetujuan tersebut berlaku selama 18 (delapan belas) bulan. Maksimum dana yang akan digunakan untuk membeli kembali saham tersebut adalah sebesar Rp 1,5 trilyun (nilai penuh) termasuk biaya transaksi, perantara pedagang efek dan biaya terkait lainnya.

Sejak tanggal RUPSLB sampai dengan 25 April 2018, Perusahaan telah membeli kembali saham beredarnya dari bursa saham sebanyak 85.810.400 saham dengan biaya perolehan sebesar Rp 463.847. Setelah stock split di bulan November 2019, jumlah saham tersebut menjadi 429.052.000 saham, yang mencerminkan 1,89% dari seluruh saham beredar Perusahaan.

29. TREASURY STOCK

a. On 27 April 2018, the Company held the Annual General Meeting of Shareholders (AGMS). The AGMS approved plans to buyback a maximum of 4.5% of the issued shares or 204,000,000 shares of the Company on the Indonesia Stock Exchange.

According to the OJK's regulation, these shares will be boughtback through the stock exchange and the approval is valid for 18 (eighteen) months. The maximum fund to be used for the share buyback is amounting to Rp 1.2 trillion (full amount), including transaction, brokerage and other costs to be incurred.

According to the Company's letter No. 534/TBG-TBI-001/FIN/05/IX/2019 dated 4 September 2019, the Company has informed OJK that the Company has stopped the buyback of its outstanding shares.

Accordingly, the shares repurchase has been completed, and those shares will be transferred in accordance with the applicable regulations, particularly to OJK's regulation No. 30 / POJK.04 / 2017 concerning Buyback of Shares Issued by a Public Company.

From the AGMS until 4 September 2019, the Company has bought back 110,944,200 of its outstanding shares from the stock exchange as a cost of Rp 513,160. Post the stock-split in November 2019, the number of shares is now 554,721,000 shares, representing 2.45% of the Company's outstanding shares.

b. On 24 October 2016, the Company held the Extraordinary General Meeting of Shareholders (EGMS). The EGMS approved plans to buyback a maximum of 5% of the issued shares or 236,000,000 shares of the Company on the Indonesia Stock Exchange.

According to the OJK's regulation, these shares will be boughtback through the stock exchange and the approval is valid for 18 (eighteen) months. The maximum fund to be used for the share buyback is amounting to Rp 1.5 trillion (full amount), including transaction, brokerage and other costs to be incurred.

Since the EGMS up to 25 April 2018, the Company had boughtback 85,810,400 of its outstanding shares from the stock exchange at a cost of Rp 463,847. Post the stock-split in November 2019, the number of shares is now 429,052,000 shares, representing 1.89% of the Company's outstanding shares.

29. **SAHAM TREASURI** (Lanjutan)

c. Pada tanggal 27 Mei 2015, Perusahaan mengadakan Rapat Umum Pemegang Saham Tahunan (RUPST). RUPST ini memberikan persetujuan kepada Perusahaan untuk membeli kembali sebesar maksimum 5% saham beredarnya atau sebanyak 236.000.000 saham melalui Bursa Efek Indonesia.

Sesuai peraturan OJK, pembelian kembali saham tersebut harus dilakukan melalui bursa saham dan persetujuan tersebut berlaku selama 18 (delapan belas) bulan. Maksimum dana yang akan digunakan untuk membeli kembali saham tersebut adalah sebesar Rp 2,2 trilyun (nilai penuh) termasuk biaya transaksi, perantara pedagang efek dan biaya terkait lainnya.

Sejak tanggal RUPST sampai dengan tanggal 24 Oktober 2016, Perusahaan telah membeli kembali saham beredarnya dari bursa saham sebanyak 194.855.500 saham dengan biaya perolehan sebesar Rp 1.195.828. 186.421.000 dari jumlah 194.855.500 saham treasuri ini telah ditarik kembali pada saat pengurangan modal pada 28 Desember 2016. Setelah *stock split* di bulan November 2019, jumlah saham tersebut menjadi 42.172.500 saham, yang mencerminkan 0,04% dari seluruh saham beredar Perusahaan.

d. Pada tanggal 24 Juli 2013, Perusahaan mengadakan Rapat Umum Pemegang Saham Luar Biasa (RUPSLB). RUPSLB ini memberikan persetujuan kepada Perusahaan untuk membeli kembali sebesar maksimum 5% saham beredarnya atau sebanyak 239.800.000 saham melalui Bursa Efek Indonesia.

Sesuai peraturan OJK, pembelian kembali saham tersebut harus dilakukan melalui bursa saham dan persetujuan tersebut berlaku selama 18 (delapan belas) bulan. Maksimum dana yang akan digunakan untuk membeli kembali saham tersebut adalah sebesar Rp 1,44 trilyun (nilai penuh) termasuk biaya transaksi, perantara pedagang efek dan biaya terkait lainnya.

Sejak tanggal RUPSLB sampai dengan bulan Maret 2014, Perusahaan telah membeli kembali saham beredarnya dari bursa saham sebanyak 78.705.310 saham dengan biaya perolehan sebesar Rp 459.254. Jumlah saham tersebut mencerminkan 1,64% dari seluruh saham beredar Perusahaan. Saham treasuri ini termasuk dalam saham treasuri yang ditarik kembali melalui pengurangan modal pada tanggal 28 Desember 2016.

Sesuai surat Perusahaan No. 0478/TBG-TBI-001/FAL/05/IV/2014 tangal 28 April 2014, Perusahaan telah menyampaikan kepada OJK untuk menghentikan pelaksanaan pembelian kembali saham.

*29. **TREASURY STOCK** (Continued)*

c. On 27 May 2015, the Company held the Annual General Meeting of Shareholders (AGMS). The AGMS approved plans to buyback a maximum of 5% of the issued shares or 236,000,000 shares of the Company on the Indonesia Stock Exchange.

According to the OJK's regulation, these shares will be boughtback through the stock exchange and the approval is valid for 18 (eighteen) months. The maximum fund to be used for the share buyback is amounting to Rp 2.2 trillion (full amount), including transaction, brokerage and other costs to be incurred.

Since the AGMS up to 24 October 2016, the Company has bought back circulated shares from the stock exchange totaling 194,855,500 shares with a acquisition cost of Rp 1,195,828. 186,421,000 of the total 194,855,500 treasury shares were withdrawn at the time of capital reduction on 28 December 2016. After the stock split in November 2019, the number of shares became 42,172,500 shares, representing 0.04% of all outstanding shares the Company.

d. On 24 July 2013, the Company held the Extraordinary General Meeting of Shareholders (EGMS). The EGMS approved plans to repurchase a maximum of 5% of the issued shares or 239,800,000 shares of the Company on the Indonesia Stock Exchange.

According to the OJK's regulation, these shares will be repurchased through the stock exchange and the approval is valid for 18 (eighteen) months. The maximum fund to be used for the shares repurchase is amounting to Rp 1.44 trillion (full amount), including transaction, brokerage and other costs to be incurred.

Since the EGMS up to March 2014, the Company had repurchased its 78,705,310 outstanding shares from the stock exchange at cost of Rp 459,254. Those number of shares represents 1.64% of the Company's outstanding shares. There shares were included in the Compnay's treasury shares and have subsequently been cancelled on 28 December 2016.

According to the Company's letter No. 0478/TBG-TBI-001/FAL/05/IV/2014 dated 28 April 2014, the Company has advised to OJK to suspend the execution of repurchase of its outstanding shares.

29. **SAHAM TREASURI** (Lanjutan)

Dengan demikian, pelaksanaan pembelian kembali saham tersebut dinyatakan telah selesai dan selanjutnya pengalihan saham hasil pembelian kembali tersebut akan dilakukan sesuai peraturan yang berlaku, khususnya peraturan OJK No. XI.B2 lampiran keputusan No. Kep-105/BL/2010 tanggal 13 April 2010.

Berdasarkan pengesahan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dalam surat keputusan No. AHU-0022051.AH.01.02. Tahun 2016 tanggal 22 November 2016 tentang Persetujuan Perubahan Anggaran Dasar Perseroan Terbatas, Perusahaan memutuskan untuk melakukan pengurangan modal dengan cara menghentikan peredaran 265.126.310 saham treasuri dan merubah Pasal 4 Anggaran Dasar Perusahaan terkait dengan modal ditempatkan dan disetor sehingga menjadi sebanyak 4.531.399.889 saham dengan nilai nominal saham Rp 100 (nilai penuh) per saham. Setelah perubahan modal tersebut, maka jumlah modal disetor Perusahaan menjadi sebesar Rp 453.140.

Dengan demikian, jumlah saham beredar yang telah dibeli kembali oleh Perusahaan pada tanggal 31 Desember 2020, 2019 dan 2018 masing-masing sebanyak 1.025.945.500 saham, 1.025.945.500 saham dan 190.458.400 saham atau 4,53%, 4,53% dan 4,20% dari seluruh jumlah saham beredar dengan biaya perolehan masing-masing sebesar Rp 1.028.268, Rp 1.028.268, dan Rp 985.379.

*29. **TREASURY STOCK** (Continued)*

Accordingly, the shares repurchase has been completed, and those shares will be transferred in accordance with the applicable regulations, particularly to OJK's regulation No. XI.B2 attachment to the decision No. Kep-105/BL/2010 dated 13 April 2010.

Based on approval from the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. AHU-0022051.AH.01.02. Tahun 2016 dated 22 November 2016 regarding Approval of Changing in the Company's Article of Association, the Company has decided to reduce its capital by retiring the circulation of 265,126,310 treasury stocks, and to amend Article 4 of the Company's Articles of Association related to the issued and paid for becoming of 4,531,399,889 shares at a nominal value of Rp 100 (full amount) per share. Subsequently, the Company's fully paid in capital is now becoming to Rp 453,140.

Accordingly, the numbers of outstanding shares that have been boughtback by the Company as of 31 December 2020, 2019 and 2018 amounted to 1,025,945,500 shares, 1,025,945,500 shares and 190,458,400 shares, respectively or 4.53%, 4.53% and 4.20% of the total number of shares outstanding at a cost of Rp 1,028,268, Rp 1,028,268 and Rp 985,379, respectively.

30. **TAMBAHAN MODAL DISETOR - BERSIH**

Akun ini terdiri dari:

*30. **ADDITIONAL PAID-IN CAPITAL - NET***

This account consists of:

	2020	2019	2018	
Agio saham:				***Premium of paid-in capital:***
Penawaran Umum Perdana	1.060.888	1.060.888	1.060.888	*Initial Public Offering*
PT Indosat Tbk	733.101	733.101	733.101	*PT Indosat Tbk*
PT Saratoga Infrastruktur	185.244	185.244	185.244	*PT Saratoga Infrastruktur*
Biaya emisi efek ekuitas:				***Share issuance costs:***
Penawaran Umum Perdana	(62.275)	(62.275)	(62.275)	*Initial Public Offering*
Selisih transaksi dengan pihak non-pengendali	(1.870.286)	(1.870.286)	(1.850.931)	***Difference arising from transaction with non-controlling interest***
Selisih nilai transaksi restrukturisasi entitas sepengendali (Catatan 2r)	(140.620)	(140.620)	(140.620)	***Difference arising from restructuring transaction of entities under common control*** *(Note 2r)*
Penarikan kembali saham dari saham treasuri (Catatan 29)	(426.552)	(426.552)	(426.552)	***Shares retired from treasury stock*** *(Note 29)*
Selisih aset pengampunan pajak	-	1.485	1.485	***Difference of tax amnesty assets***
Jumlah - Bersih	**(520.500)**	**(519.015)**	**(499.660)**	***Total - Net***

30. **TAMBAHAN MODAL DISETOR – BERSIH** (Lanjutan)

30. ***ADDITIONAL PAID-IN CAPITAL – NET*** *(Continued)*

Selisih transaksi dengan pihak non-pengendali

Difference in arising from transactions with non-controlling parties

Akun ini terdiri dari beberapa transaksi pembelian kembali saham sebagai berikut:

This account consists of several share buyback transactions as follows:

Perusahaan	2020	2019	2018		*the Company*
a. PT Solu Sindo Kreasi Pratama	(1.850.931)	(1.850.931)	(1.850.931)	*a.*	*PT Solu Sindo Kreasi Pratama*
b. PT Jaringan Pintar Indonesia	(98)	(98)	-	*b.*	*PT Jaringan Pintar Indonesia*
c. PT Gihon Telekomunikasi Indonesia Tbk	(1.091)	(1.091)	-	*c.*	*PT Gihon Telekomunikasi Indonesia Tbk*
d. PT Visi Telekomunikasi Infrastruktur Tbk	(18.166)	(18.166)	-	*d.*	*PT Visi Telekomunikasi Infrastruktur Tbk*
Jumlah	**(1.870.286)**	**(1.870.286)**	**(1.850.931)**		***Total***

a. Pada berbagai tanggal selama tahun 2014 sampai dengan tahun 2018 (terakhir dilakukan pada tanggal 9 Agustus 2018), berdasarkan Perjanjian Pengikatan Jual beli Kembali Saham SKP, pemegang saham non-pengendali SKP menyetujui untuk mengalihkan 587.345 saham miliknya kepada SKP dengan harga sebesar Rp 2.113.880.

Jumlah saham tersebut merepresentasikan 32,66% dari seluruh saham beredar SKP. Dengan demikian, SKP menjadi memiliki sahamnya sendiri sebanyak 587.345 saham atau 32,66% dari seluruh saham yang beredar. Setelah transaksi pembelian saham tersebut, selanjutnya SKP menghentikan peredaran saham yang dibelinya kembali tersebut.

Selanjutnya, SKP telah melaporkan penghentian peredaran saham tersebut dan perubahan susunan pemegang saham kepada Menteri Hukum dan Hak Asasi Manusia. Perubahan anggaran dasar tersebut telah disetujui oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dalam Surat Keputusan No. AHU-21014.AH.01.02.Tahun 2013 tanggal 19 April 2013, No. AHU-57070.AH.01.02.Tahun 2013 tanggal 8 November 2013, No. AHU-05606.AH.01.02.Tahun 2014 tanggal 10 Februari 2014, No. AHU- 04548.40.20.2014 tanggal 16 Mei 2014, No. AHU-0000371.AH.01.02.Tahun 2015 tanggal 12 Januari 2015, No. AHU-0938197.AH.01.02.Tahun 2015 tanggal 26 Juni 2015, No. AHU-0949402.AH.01.02.Tahun 2015 tanggal 15 Februari 2016 dan NO. AHU-0021798.AH.01.02.Tahun 2018 tanggal 14 Oktober 2018.

Setelah pelaksanaan pembelian kembali saham, kepemilikan efektif MSI atas SKP pada 31 Desember 2020, 2019 dan 2018 berubah menjadi 99,71%.

a. On a number of dates in and between 2014 and 2018 (the last on 9 August 2018), based on the SKP Shares Purchase Agreement, the non-controlling shareholders of SKP agreed to transfer their 587,345 shares to SKP at a price of Rp 2,113,880.

The number of shares represents 32.66% of total shares outstanding of SKP. Accordingly, SKP now has as many as 587.345 shares of its own or 32.66% of the total shares outstanding. After the transaction of share repurchase, SKP terminated all the shares purchased as the outstanding shares.

Subsequently, SKP has reported the terminated all the shares purchased and changes in shareholding structure to the Ministry of Law and Human Rights. The changes of articles of association have been approved by the Minister of Law and Human Rights through its Decree Letter No. AHU-21014.AH.01.02.Tahun 2013 dated 19 April 2013, No. AHU-57070.AH.01.02.Tahun 2013 dated 8 November 2013, No. AHU-05606.AH.01.02.Tahun 2014 dated 10 February 2014, No. AHU-04548.40.20.2014 dated 16 May 2014, No. AHU-0000371.AH.01.02.Tahun 2015 dated 12 January 2015, No. AHU-0938197.AH.01.02.Tahun 2015 dated 26 June 2015, No. AHU-0949402.AH.01.02.Tahun 2015 dated 15 February 2016, and NO. AHU-0021798.AH.01.02.Tahun 2018 dated 14 October 2018.

Subsequent to the share repurchase execution, the effective ownership of MSI over SKP as of 31 December 2020, 2019 and 2018 has changed to 99.71%, respectively.

30. **TAMBAHAN MODAL DISETOR – BERSIH** (Lanjutan)

30. ***ADDITIONAL PAID-IN CAPITAL – NET*** *(Continued)*

Selisih transaksi dengan pihak non-pengendali

Difference in arising from transactions with non-controlling parties

Rincian dari perhitungan akun tersebut adalah sebagai berikut:

Details of the calculation of these accounts are as follows:

	2020	2019	2018	
Nilai tercatat investasi MSI pada SKP pada saat pelaksanaan pembelian kembali saham	2.563.512	2.563.512	2.563.512	*MSI investment at SKP on the date of treasury stock executed*
Nilai tercatat investasi MSI pada SKP setelah pelaksanaan pembelian kembali saham dengan kepemilikan efektif 99,71% masing-masing pada 30 September 2020 dan 31 Desember 2019	712.483	712.483	712.483	*MSI investment at SKP after the date treasury stock executed with ownership effective 99.71% as of 30 September 2020 and 31 December 2019, respectively*
Penurunan bagian investasi yang dicatat MSI sebagai selisih perubahan ekuitas entitas anak	(1.850.931)	(1.850.931)	(1.850.931)	*Decrease of investment obtained by MSI and recorded as the change of the shareholders' equity in subsidiary*
Kepemilikan Perusahaan di MSI	100,00%	100,00%	100,00%	*The ownership of the Company in MSI*
Selisih transaksi dengan pihak non-pengendali yang dicatat Perusahaan	(1.850.931)	(1.850.931)	(1.850.931)	***Difference arising from transactions with with non-controlling parties as recorded by the Company***

b. Pada bulan September 2018, PT Tower Bersama (TB) entitas anak, melakukan pembelian saham PT Jaringan Pintar Indonesia (JPI) sebanyak 374 saham dari PT Moga Capital, pihak berelasi. Setelah pelaksanaan pembelian kembali saham, kepemilikan efektif TB atas JPI pada 30 September 2018 berubah menjadi 100%.

Pada bulan November 2018, PT Tower Bersama (TB) entitas anak, mengalihkan saham PT Jaringan Pintar Indonesia (JPI) sebanyak 207 saham kepada pihak non-pengendali. Setelah pengalihan kembali saham, kepemilikan efektif TB atas JPI pada 30 November 2018 berubah menjadi 83,44 %. Selisih transaksi dengan pihak non-pengendali yang dicatat Perusahaan adalah sebesar Rp 98.

b. In September 2018, PT Tower Bersama (TB) subsidiary, purchased 374 shares of PT Jaringan Pintar Indonesia (JPI) from PT Moga Capital, a related party. After the stock repurchase, effective ownership of TB on JPI at 30 September 2018 changed to 100%.

In November 2018, PT Tower Bersama (TB) entitas anak, transfer 207 shares PT Jaringan Pintar Indonesia (JPI) to non-controlling shareholders. After the transfer of shares execution, the effective ownership of TB to JPI on 30 November 2018 has changed to 83.44%. Difference in arising from transaction with non-controlling parties as recorded by the Company is Rp 98.

c. Pada tanggal 25 Januari 2019, Perusahaan melakukan pembelian saham PT Gihon Telekomunikasi Indonesia Tbk ("GHON") sebanyak 1.695.700 saham dari pemegang saham GHON lainnya. Setelah pembelian saham tersebut kepemilikan efektif Perusahaan atas GHON pada 31 Januari 2019 berubah menjadi 50,43%. Selisih transaksi dengan pihak non-pengendali yang dicatat Perusahaan adalah sebesar Rp 1.091.

c. On 25 January 2019, the Company acquired 1,695,700 shares from other GHON shareholder of PT Gihon Telekomunikasi Indonesia Tbk ("GHON"). After the acquired of shares execution, the effective ownership of 31 January 2019 has changed to 50.43%. Difference in arising from transaction with non-controlling parties as recorded by the Company is Rp 1,091.

30. **TAMBAHAN MODAL DISETOR – BERSIH (**Lanjutan**)**

Selisih transaksi dengan pihak non-pengendali (Lanjutan**)**

d. Pada tanggal 14 Maret 2019, Perusahaan melakukan pembelian saham PT Visi Telekomunikasi Infrastruktur Tbk ("GOLD") sebanyak 15.798.850 saham dari pemegang saham GOLD lainnya. Setelah pembelian saham tersebut kepemilikan efektif Perusahaan atas GOLD pada 30 Juni 2019 berubah menjadi 56,02%. Selisih transaksi dengan pihak non-pengendali yang dicatat Perusahaan adalah sebesar Rp 4.062.

Pada tanggal 10 Juli 2019, Perusahaan melakukan pembelian saham PT Visi Telekomunikasi Infrastruktur Tbk ("GOLD") sebanyak 476.330.959 saham untuk tujuan Pelaksanaan HMETD milik Perusahaan terkait dengan penambahan modal dengan memberikan HMETD ("*Right Issue*") GOLD. Setelah pembelian saham tersebut kepemilikan efektif Perusahaan atas GOLD pada 31 Juli 2019 berubah menjadi 51,09%. Selisih transaksi dengan pihak non pengendali yang dicatat Perusahaan adalah sebesar Rp 14.104.

Tidak terdapat selisih transaksi dengan pihak non-pengendali yang direalisasi ke laba rugi atas pelepasan investasi untuk tahun yang berakhir pada 31 Desember 2020, 2019 dan 2018.

Selisih Nilai Transaksi Restrukturisasi Entitas Sepengendali

- Pada tanggal 7 Januari 2009, PT Tower Bersama (TB), entitas anak, melakukan pembelian saham PT Prima Media Selaras sebanyak 15.000 saham dari PT Prime Asia Capital, pihak hubungan berelasi. Selisih antara nilai perolehan dan nilai wajar aset bersih yang diperoleh sebesar Rp 2.008 disajikan sebagai "Selisih Nilai Transaksi Restrukturisasi Entitas Sepengendali" sebagai bagian dari ekuitas (catatan 2s).

- Pada bulan Januari 2013, TBG Global Pte Ltd (TBGG), entitas anak, memperoleh 100% kepemilikan saham Tower Bersama Singapore Pte Ltd, dari Perusahaan. Selisih antara nilai perolehan dan nilai wajar aset bersih yang diperoleh sebesar Rp 386 disajikan sebagai "Selisih Nilai Transaksi Restrukturisasi Entitas Sepengendali" sebagai bagian dari ekuitas (Catatan 2s).

- Pada tanggal 21 Desember 2018, Perusahaan melakukan pembelian saham PT Gihon Telekomunikasi Indonesia Tbk ("GHON") sebanyak 166.760.000 saham dari pemegang saham GHON lainnya. Selisih antara nilai perolehan dan nilai wajar aset bersih yang diperoleh sebesar Rp 138.226 disajikan sebagai "Selisih Nilai Transaksi Restrukturisasi Entitas Sepengendali" sebagai bagian dari ekuitas.

30. ADDITIONAL PAID-IN CAPITAL – NET (Continued)

Difference in arising from transactions with non-controlling parties (Continued)

d. *On 14 March 2019, the Company acquired 15,798,850 shares from other GOLD shareholder of PT Visi Telekomunikasi Infrastruktur Tbk ("GOLD"). After the acquired of shares execution, the effective ownership of 30 June 2019 has changed to 56.02%. Difference in arising from transaction with non-controlling parties as recorded by the Company is Rp 4,062.*

On 10 July 2019, the Company acquired 476,330,959 shares from other GOLD shareholder of PT Visi Telekomunikasi Infrastruktur Tbk ("GOLD") for the purpose of exercise the Company's rights related to the Rights issues GOLD. After the acquired of shares execution, the effective ownership of 31 July 2019 has changed to 51.09%. Difference in arising from transaction with non-controlling parties as recorded by the Company is Rp 14,104.

There are no difference arising from transactions with non-controlling parties derived from disposal of investment which realized to profit or loss for the years ended 31 December 2020, 2019 and 2018.

Difference Arising From Restructuring Transactions of Entities Under Common Control

- *On 7 January 2009, PT Tower Bersama (TB), a subsidiary, purchased 15,000 shares of PT Prima Media Selaras from PT Prime Asia Capital, a related party. The difference between the acquisition value and the fair value of the net assets acquired amounting to Rp 2,008 is presented as "Difference Arising from Restructuring Transactions of Entities Under Common Control" as part of equity (note 2s).*

- *On January 2013, TBG Global Pte Ltd (TBGG), a subsidiary, acquired 100% ownership Tower Bersama Singapore Pte Ltd., from the Company. The difference between the acquisition cost and the fair value of net assets acquired amounted to Rp 386 is presented as the "Difference Arising from Restructuring Transactions of Entities Under Common Control" as part of the equity (Note 2s).*

- *On 21 December 2018, the Company acquired 166,760,000 shares from other GHON shareholder of PT Gihon Telekomunikasi Indonesia Tbk ("GHON"). The difference between the cost and the fair value of net assets acquired amounting to Rp 138,226 is presented as "Difference Arising from Restructuring Transactions of Entities Under Common Control" as part of equity.*

31. PENGHASILAN KOMPREHENSIF LAIN

Akun ini merupakan selisih transaksi perubahan ekuitas entitas anak dan penghasilan komprehensif lain dengan rincian sebagai berikut:

31. OTHER COMPREHENSIVE INCOME

This account represents differences arising from change in subsidiaries equity and other comprehensive income with details as follows:

	2020	2019	2018	
Surplus revaluasi	7.768.171	4.570.827	3.089.803	*Revaluation surplus*
Keuntungan aktuaria yang diakui dalam penghasilan komprehensif lain	5.845	11.349	(1.001)	*Actuarial gain recognized in other comprehensive income*
Cadangan lindung nilai arus kas	(110.819)	(43.811)	33.907	*Cash flows hedging reserves*
Selisih translasi atas mata uang asing	(62.309)	(61.761)	(61.777)	*Difference translation of foreign currency*
Jumlah	**7.600.888**	**4.476.604**	**3.060.932**	***Total***

a. Cadangan lindung nilai arus kas

Perusahaan dan entitas anak melakukan kontrak lindung nilai dalam rangka mengantisipasi risiko fluktuasi tingkat bunga dan nilai tukar mata uang asing atas pinjaman bank dalam mata uang asing. Nilai wajar aset keuangan derivatif pada tanggal 31 Desember 2020, 2019 dan 2018 masing-masing adalah sebesar Rp 1.084.975, Rp 1.312.140 dan Rp 2.605.591.

Instrumen derivatif ini telah memenuhi kriteria akuntansi lindung nilai berdasarkan PSAK 55 (Revisi 2014). Oleh karena itu, nilai wajar bersih dari aset keuangan derivatif pada tanggal 31 Desember 2020, 2019 dan 2018 sesudah memperhitungkan perubahan kurs pinjaman yang dilindung nilai sebesar Rp (112.124), Rp (50.184) dan Rp 48.502 diakui sebagai bagian efektif atas laba (rugi) instrumen lindung nilai pada entitas anak dan dicatat pada akun "Cadangan Lindung Nilai Arus Kas" dan "Selisih Transaksi Perubahan Ekuitas Entitas Anak" pada Ekuitas Perusahaan masing-masing sebesar Rp (110.819), Rp (43.811) dan Rp 33.907.

Rincian dari masing-masing komponen tersebut diatas adalah sebagai berikut:

a. Cash flows hedging reserves

The Company and subsidiaries entered into hedging contracts in order to mitigate the fluctuations in interest rates and exchange rates from bank loans in foreign currency. Fair value of derivatives financial assets as of 31 December 2020, 2019 and 2018 amounted to Rp 1,084,975, Rp 1,312,140 and Rp 2.605.591, respectively.

These derivative instruments qualified the criteria of hedge accounting based on PSAK 55 (Revised 2014). Therefore, the net fair value of derivative financial assets as of 31 December 2020 and 2019 after considering the foreign exchange translation of related hedged loans of Rp (112,124), Rp (50,184) and Rp 48,502, are recognized as effective portion of gains (losses) on hedging instruments at the subsidiaries level and presented as "Cash Flows Hedging Reserves" and "Difference Arising from Changes in Subsidiaries Equity" in the Company shareholders' equity section of Rp (110,819), Rp (43,811) and Rp 33,907, respectively.

Details of each component above are as follows:

31 Desember 2020/ *31 December 2020*	**Cadangan lindung nilai arus kas / *Cash flows hedging reserves***	**Persentase kepemilikan / *Percentage of ownership***	**Cadangan lindung nilai arus kas dicatat Perusahaan / *Cash flows hedging reserves recorded by the Company***
Perusahaan / *The Company*	(116.402)		(116.402)
Entitas anak / *Subsidiaries* :			
PT Tower Bersama	(81.793)	98,00%	(80.157)
PT Solusi Menara Indonesia	(41.721)	70,03%	(29.217)
Entitas yang berada dibawah pengendalian bersama antara Perusahaan dan entitas anak sebagai berikut / *Entity controlled directly or indirectly between the Company and the following subsidiaries* :			
PT Metric Solusi Integrasi	114.923	100,00%	114.923
PT Tower Bersama	35	98,00%	34
Jumlah / *Total*	**(124.958)**		**(110.819)**

31. **PENGHASILAN KOMPREHENSIF LAIN** (Lanjutan) / *31. **OTHER COMPREHENSIVE INCOME** (Continued)*

a. **Cadangan lindung nilai arus kas** (Lanjutan) / *a. **Cash flows hedging reserves** (Continued)*

31 Desember 2019/ *31 December 2019*	**Cadangan lindung nilai arus kas / *Cash flows hedging reserves***	**Persentase kepemilikan / *Percentage of ownership***	**Cadangan lindung nilai arus kas dicatat Perusahaan / *Cash flows hedging reserves recorded by the Company***
Perusahaan / *The Company*	(103.008)		(103.008)
Entitas anak / *Subsidiaries* :			
PT Tower Bersama	(38.683)	98,00%	(37.909)
PT Solusi Menara Indonesia	(18.549)	70,03%	(12.990)
Entitas yang berada dibawah pengendalian bersama antara Perusahaan dan entitas anak sebagai berikut / *Entity controlled directly or indirectly between the Company and the following subsidiaries* :			
PT Metric Solusi Integrasi	113.146	100,00%	113.146
PT Tower Bersama	(1.906)	98,00%	(1.867)
PT Tower One	(1.184)	99,90%	(1.183)
Jumlah / *Total*	**(50.184)**		**(43.811)**

31 Desember 2018/ 31 December 2018	**Cadangan lindung nilai arus kas / *Cash flows hedging reserves***	**Persentase kepemilikan / *Percentage of ownership***	**Cadangan lindung nilai arus kas dicatat Perusahaan / *Cash flows hedging reserves recorded by the Company***
Perusahaan / *The Company*	(188.329)		(188.329)
Entitas anak / *Subsidiaries* :			
PT Tower Bersama	100.027	98,00%	98.026
PT Solusi Menara Indonesia	42.861	70,03%	30.016
Entitas yang berada dibawah pengendalian bersama antara Perusahaan dan entitas anak sebagai berikut / *Entity controlled directly or indirectly between the Company and the following subsidiaries* :			
PT Metric Solusi Integrasi	110.812	100,00%	110.812
PT Tower Bersama	(12.297)	98,00%	(12.051)
PT Tower One	(4.572)	99,90%	(4.567)
Jumlah / *Total*	**48.502**		**33.907**

b. **Selisih translasi atas mata uang asing**

Transaksi ini merupakan selisih translasi atas mata uang asing TBG Global Pte Ltd., entitas anak (lihat Catatan 1c dan 2e).

*b. **Difference translation of foreign currency***

This transaction represents difference translation of foreign currency of TBG Global Pte Ltd., a subsidiary (see Notes 1c and 2e).

32. PENDAPATAN / *REVENUE*

Rincian pelanggan pihak ketiga untuk tahun yang berakhir pada 31 Desember 2020, 2019 dan 2018 adalah sebagai berikut:

Details of third-party customers for the years ended 31 December 2020, 2019 and 2018 are as follows:

	Pendapatan/ *Revenue*			Persentase dari pendapatan / *Percentage of total revenue*			
	2020	2019	2018	2020	2019	2018	
PT Telekomunikasi Selular	2.082.756	2.010.213	1.936.976	39,09%	42,78%	44,86%	*PT Telekomunikasi Selular*
PT Indosat Tbk	1.145.724	1.013.971	960.851	21,51%	21,58%	22,25%	*PT Indosat Tbk*
PT XL Axiata Tbk	898.641	844.416	679.808	16,87%	17,97%	15,74%	*PT XL Axiata Tbk*
PT Hutchison 3 Indonesia	785.540	526.683	387.916	14,74%	11,21%	8,98%	*PT Hutchison 3 Indonesia*
PT Smartfren Telecom Tbk	377.148	264.802	238.928	7,08%	5,64%	5,53%	*PT Smartfren Telecom Tbk*
PT Internux	-	-	99.311	0,00%	0,00%	2,30%	*PT Internux*
Lainnya	37.880	38.657	14.347	0.71%	0.82%	0.33%	*Others*
Jumlah	**5.327.689**	**4.698.742**	**4.318.137**	**100,00%**	**100,00%**	**100,00%**	***Total***

Seluruh penghasilan merupakan penghasilan sewa dari menara telekomunikasi dan properti investasi.

The revenues are earned from rental of telecommunication towers and investment properties.

33. BEBAN POKOK PENDAPATAN / *COST OF REVENUE*

Rincian beban pokok pendapatan untuk tahun yang berakhir pada 31 Desember 2020, 2019 dan 2018 adalah sebagai berikut:

Details of cost of revenue for the years ended 31 December 2020, 2019 and 2018 are as follows:

	2020	2019	2018	
Penyusutan menara (Catatan 13)	406.836	277.413	214.588	*Depreciation of tower (Note 13)*
Penyusutan aset hak guna (Catatan 15)	310.171	-	-	*Depreciation of right of use assets (Note 15)*
Perbaikan dan pemeliharaan	210.928	176.484	154.240	*Repairs and maintenance*
Keamanan	45.430	43.931	41.292	*Security*
Amortisasi perizinan	31.104	21.206	24.175	*Amortization of licences*
Listrik	28.008	26.296	14.785	*Electricity*
Asuransi	25.884	25.662	25.073	*Insurance*
Penyusutan menara bergerak (Catatan 13)	16.289	16.857	15.971	*Depreciation of transportable towers (Note 13)*
Amortisasi sewa lahan	-	294.071	279.933	*Amortization of land leases*
Lainnya	18.415	21.534	14.025	*Others*
Jumlah	**1.093.065**	**903.454**	**784.082**	***Total***

Tidak terdapat pihak penjual/ pemasok yang memiliki nilai transaksi atau nilai pembelian yang melebihi 10% dari pendapatan.

There is no subcontractor/ supplier that has a transaction value exceeding 10% of the revenue.

34. BEBAN USAHA / *OPERATING EXPENSES*

Rincian beban usaha untuk tahun yang berakhir pada 31 Desember 2020, 2019 dan 2018 adalah sebagai berikut:

Details of operating expenses for the years ended 31 December 2020, 2019 and 2018 are as follows:

	2020	2019	2018	
Gaji dan tunjangan	265.685	261.345	220.922	*Salaries, wages and allowance*
Penyusutan (Catatan 13)	29.638	32.155	32.641	*Depreciation (Note 13)*
Beban manfaat karyawan (Catatan 35)	23.293	14.262	15.157	*Employee benefits expense (Note 35)*
Beban kantor	20.508	21.227	20.312	*Office expenses*
Jasa profesional	16.812	25.840	19.201	*Professional fees*
Donasi dan tanggung jawab sosial	16.271	5.829	6.815	*Donation and social responsibility*
Sewa kantor	11.033	13.123	10.627	*Office rent*
Sponsor dan representasi	8.271	17.266	21.557	*Sponsorship and representation*
Penyusutan aset hak guna (Catatan 15)	7.087	-	-	*Depreciation of right of use assets (Note 15)*
Transportasi	6.712	7.651	6.759	*Transportation*
Perjalanan dinas	3.555	9.695	10.046	*Travel duty*
Telekomunikasi	577	698	927	*Telecommunication*
Lainnya	9.181	17.343	16.499	*Others*
Jumlah	**418.623**	**426.434**	**381.463**	***Total***

Donasi dan tanggung jawab sosial merupakan kontribusi Perusahaan untuk membantu masyarakat dan Pemerintah dalam menghadapi kondisi pandemi virus Covid-19, penanggulangan bencana, serta meningkatkan kegiatan sosial dan ekonomi masyarakat di wilayah operasional Perusahaan.

Donations and social responsibility are the Company's contributions to support the community and the Government in dealing with the conditions of the Covid-19 virus pandemic, disaster management, and increasing social and economic activities for the community in the Company's operational areas.

35. CADANGAN IMBALAN PASCA-KERJA / *PROVISION FOR POST-EMPLOYMENT BENEFITS*

Perusahaan dan entitas anak menyiapkan pencadangan imbalan untuk karyawannya sesuai dengan Undang-Undang Ketenagakerjaan No. 13/2003.

The Company and subsidiaries provide benefits for its employees in accordance with Labor Law No. 13/2003. The Company and subsidiaries sets up fund for this program.

Perhitungan cadangan imbalan pasca-kerja pada 31 Desember 2020 adalah berdasarkan perhitungan yang dilakukan oleh PT Padma Radya Aktuaria dan PT Dian Artha Tama, aktuaris independen, sesuai laporannya tanggal 29 Januari dan 15 Februari 2021.

The calculation of provision for post-employment benefits as of 31 December 2020 are based on calculations performed independent actuary PT Padma Radya Aktuaria and PT Dian Artha Tama according to its report dated 29 January and 15 February 2021.

Asumsi signifikan yang digunakan:

Major assumptions are used as follows:

Tingkat diskonto per tahun	:	6,8% (2019: 7,80%, 2018: 8,50%)	:	*Discount rate per annum*
Tingkat kenaikan gaji per tahun	:	8,8% (2019, 2018: 10%)	:	*Wages and salaries increase per annum*
Tingkat kematian	:	100% TMI4 (2019, 2018: 100% TMI3)	:	*Mortality rate*
Tingkat cacat	:	5% TMI4 (2019, 2018: 5% TMI3)	:	*Morbidity rate*
Tingkat pengunduran diri	:	8% per tahun sampai dengan usia 30 tahun, kemudian menurun secara linear hingga 0% pada usia 55 tahun/ *8% p.a. until age 30, then decrease linearly into 0% at age 55*	:	*Resignation rate*
Usia pensiun normal	:	Staff: 55 tahun/*years* Direktur/*Director:* 60 tahun/*years*	:	*Normal retirement age*
Metode	:	*Projected Unit Credit*	:	*Method*

35. **CADANGAN IMBALAN PASCA-KERJA** (Lanjutan) / *35. PROVISION FOR POST-EMPLOYMENT BENEFITS (Continued)*

Rekonsiliasi untuk mutasi cadangan imbalan pasca-kerja adalah sebagai berikut:

Reconciliation of mutation of provision for post-employment benefits are as follows:

	2020	2019	2018	
Saldo awal tahun	14.352	30.186	34.398	***Balance at the beginning of the year***
Biaya jasa kini	17.605	13.583	15.960	*Current service cost*
Biaya jasa lalu	5.562	-	-	*Past service cost*
Kerugian atas penyelesaian	-	(504)	-	*Loss on settlement*
Beban bunga bersih	1.206	8.283	1.769	*Net interest expense*
Keuntungan aktuaria	(1.080)	(7.100)	(2.571)	*Actuarial gain*
Diakui pada laba rugi (Catatan 34)	23.293	14.262	15.158	*Charged to profit or loss (Note 34)*
Pengukuran kembali atas imbal hasil atas aset program	-	-	(547)	*Remeasurements on return on plan asset*
Keuntungan aktuaria	4.889	(12.236)	(5.212)	*Actuarial gain*
Diakui pada penghasilan komprehensif lain	4.889	(12.236)	(5.759)	*Charged to other comprehensive income*
Penyesuaian atas mutasi karyawan	-	-	522	*Adjustment due to transfer of employee*
Iuran perusahaan ke aset program	(12.919)	(18.364)	(15.008)	*Employer contribution to plan assets*
Pembayaran imbalan (di luar aset program)	(2.911)	(1.707)	(210)	*Benefits paid (not plan assets)*
Dicatat sebagai aset	(1.854)	2.211	1.085	*Recognized as asset*
Saldo akhir tahun	**24.850**	**14.352**	**30.186**	***Balance at the end of the year***

Program imbalan pasca-kerja

Perusahaan dan entitas anak tertentu juga melalukan pendanaan untuk program ini. Dana tersebut dikelola dalam kontrak asuransi dengan PT Asuransi Allianz Life Indonesia.

Pembayaran berikut merupakan kontribusi yang diharapkan atas nilai kini dari kewajiban imbalan di tahun-tahun mendatang:

Post-employment benefit program

The Company and certain subsidiaries set-up fund for this program. The fund is managed in insurance contract with PT Asuransi Allianz Life Indonesia.

The following payments are expected contributions to present value of benefit obligation in future years:

	2020	2019	2018	
Kurang dari 1 tahun	3.192	129	2.545	*Less than 1 year*
Antara tahun ke-1 sampai tahun ke-2	6.111	6.873	9.454	*Between Year 1 - Year 2*
Antara tahun ke-2 sampai tahun ke-5	91.452	19.853	25.992	*Between Year 2 - Year 5*
Antara tahun ke-5 sampai tahun ke-10	384.827	65.152	98.938	*Between Year 5 - Year 10*
Setelah tahun ke-10	1.085.433	81.013	621.008	*Over Year 10*

Analisis sensitivitas pada asumsi-asumsi aktuarial utama

Sensitivity analysis on significant actuarial assumptions

Asumsi aktuaria/ *Actuarial assumption*	Perubahan/ *Change*	Saldo akhir PVDBO/ *PVDBO ending*	
		Kenaikan/ *Increase*	Penurunan/ *Decrease*
Tingkat diskonto / *Discount rate*	(+/- 1%)	111.955	133.628
Tingkat kenaikan gaji / *Salary increase rate*	(+/- 1%)	133.709	111.693

35. CADANGAN IMBALAN PASCA-KERJA (Lanjutan) / *PROVISION FOR POST-EMPLOYMENT BENEFITS (Continued)*

Program imbalan jangka panjang lainnya / ***Other long-term employee benefit program***

Perusahaan dan entitas anak tertentu memberikan imbalan jangka panjang lainnya dalam bentuk cuti besar selama 22 hari kerja dan tunjangan cuti besar sejumlah satu bulan gaji pokok kepada karyawan staf permanen yang mempunyai masa kerja 5 tahun dan kelipatannya.

The Company and certain subsidiaries provide other long-term employee benefit in form of long leave amounting to 22 workdays and long leaves allowance amounting to one month basic salary for permanent staff employee with 5 years of service and its multiplication.

36. BEBAN KEUANGAN - LAINNYA / *FINANCIAL EXPENSES - OTHERS*

Rincian beban keuangan - lainnya untuk tahun yang berakhir pada 31 Desember 2020, 2019 dan 2018 adalah sebagai berikut:

Details of financial expenses - others for the years ended 31 December 2020, 2019 and 2018 are as follows:

	2020	2019	2018	
Beban bunga liabilitas sewa aset hak guna (Catatan 27)	93.604	-	-	*Interest expenses of right of use assets lease liabilities (Note 27)*
Amortisasi biaya pinjaman jangka panjang - pihak ketiga (Catatan 25)	61.787	46.196	53.396	*Amortization of cost of long term loan - third parties (Note 25)*
Amortisasi biaya surat utang (Catatan 26)	35.954	30.565	14.628	*Amortization of cost of notes (Note 26)*
Jumlah	**191.345**	**76.761**	**68.024**	***Total***

37. DISTRIBUSI SALDO LABA / *DISTRIBUTION OF RETAINED EARNINGS*

Tahun buku 2019 / ***Year 2019***

Pada tanggal 18 Mei 2020, Perusahaan menyelenggarakan Rapat Umum Pemegang Saham Tahunan (RUPST) yang hasilnya antara lain menyetujui dan mengesahkan laporan keuangan Perusahaan untuk Tahun Buku 2019 dengan pencapaian laba bersih yang dapat diatribusikan kepada pemegang saham biasa entitas induk (laba bersih) sebesar Rp 819.454.

On 18 May 2020, the Company held the Annual General Shareholders Meeting (AGMS). The result of the AGMS, among others, was to approve and endorse the financial statements for the year 2019 with achievement of net income attributable to common shareholders of the Parent Company (net income) amounting to Rp 819,454.

Dari laba bersih tersebut, sebesar Rp 605.670 atau 73,90% dari laba bersih tahun 2019 ditetapkan sebagai dividen tunai tahun buku 2019, pembayaran dividen final tersebut dilaksanakan dengan memperhitungkan saham treasuri pada tanggal pengumuman penerimaan dividen (*recording date*) 3 Juni 2020 sehingga pembayaran dividen per saham adalah sebesar Rp 28 (dua puluh delapan Rupiah). Perusahaan telah membayar dividen tersebut pada tanggal 19 Juni 2020.

From the net income, amounting to Rp 605,670 or 73.90% of the net income in 2019 is determined as cash dividend for the financial year 2019, the final dividend payment is carried out by calculating treasury shares on the date of announcement of dividend receipt (recording date) 3 June 2020 so that dividend payments per share is Rp 28 (twenty eigth Rupiah). The company has paid the dividend on 19 June 2020.

Kemudian sebesar Rp 500 dari laba bersih tahun 2019 dijadikan sebagai cadangan wajib untuk memenuhi ketentuan Pasal 70 Undang-Undang Peseroan Terbatas No. 40 Tahun 2007.

In addition, Rp 500 of net income of year 2019 was provided for statutory reserves to fulfill the article 70 of the Limited Liability Company Law No. 40 of 2007.

37. **DISTRIBUSI SALDO LABA** (Lanjutan)

Tahun buku 2018

Pada tanggal 21 Mei 2019, Perusahaan menyelenggarakan Rapat Umum Pemegang Saham Tahunan (RUPST) yang hasilnya antara lain menyetujui dan mengesahkan laporan keuangan Perusahaan untuk Tahun Buku 2018 dengan pencapaian laba bersih yang dapat diatribusikan kepada pemegang saham biasa entitas induk (laba bersih) sebesar Rp 680.581.

Dari laba bersih tersebut, sebesar Rp 600.000 atau 88,16% dari laba bersih tahun 2018 ditetapkan sebagai dividen tunai tahun buku 2018, pembayaran dividen final tersebut dilaksanakan dengan memperhitungkan saham treasuri pada tanggal pengumuman penerimaan dividen (*recording date*) 10 Juni 2019 sehingga pembayaran dividen per saham adalah sebesar Rp 138,689497 (seratus tiga puluh delapan Rupiah koma enam delapan sembilan empat sembilan tujuh). Perusahaan telah membayar dividen tersebut pada tanggal 21 Juni 2019.

Kemudian sebesar Rp 500 dari laba bersih tahun 2018 dijadikan sebagai cadangan wajib untuk memenuhi ketentuan Pasal 70 Undang-Undang Peseroan Terbatas No. 40 Tahun 2007.

Tahun buku 2017

Pada tanggal 27 April 2018, Perusahaan menyelenggarakan Rapat Umum Pemegang Saham Tahunan (RUPST) yang hasilnya antara lain menyetujui dan mengesahkan laporan keuangan Perusahaan untuk Tahun Buku 2017 dengan pencapaian laba bersih yang dapat diatribusikan kepada pemegang saham biasa entitas induk (laba bersih) sebesar Rp 2.316.368.

Dari laba bersih tersebut, sebesar Rp 750.000 atau 32,4% dari laba bersih tahun 2017 ditetapkan sebagai dividen tunai tahun buku 2017, pembayaran dividen final tersebut dilaksanakan dengan memperhitungkan saham treasuri pada tanggal pengumuman penerimaan dividen (recording date) 11 Mei 2018 sehingga pembayaran dividen per saham adalah sebesar Rp 169,107958 (seratus enam puluh sembilan Rupiah koma satu nol tujuh sembilan lima delapan). Perusahaan telah membayar dividen tersebut pada tanggal 24 Mei 2018.

Kemudian sebesar Rp 1.000 dari laba bersih tahun 2017 dijadikan sebagai cadangan wajib untuk memenuhi ketentuan Pasal 70 Undang-Undang Peseroan Terbatas No. 40 Tahun 2007.

*37. **DISTRIBUTION OF RETAINED EARNINGS** (Continued)*

Year 2018

On 21 May 2019, the Company held the Annual General Shareholders Meeting (AGMS). The result of the AGMS, among others, was to approve and endorse the financial statements for the year 2018 with achievement of net income attributable to common shareholders of the Parent Company (net income) amounting to Rp 680,581.

From the net income, amounting to Rp 600,000 or 88.16% of the net income in 2018 is determined as cash dividend for the financial year 2018, the final dividend payment is carried out by calculating treasury shares on the date of announcement of dividend receipt (recording date) 10 June 2019 so that dividend payments per share is Rp 138.689497 (one hundred thirty eigth Rupiah point six eight nine four nine seven). The company has paid the dividend on 21 June 2019.

In addition, Rp 500 of net income of year 2018 was provided for statutory reserves to fulfill the article 70 of the Limited Liability Company Law No. 40 of 2007.

Year 2017

On 27 April 2018, the Company held the Annual General Shareholders Meeting (AGMS). The result of the AGMS, among others, was to approve and endorse the financial statements for the year 2017 with achievement of net income attributable to common shareholders of the Parent Company (net income) amounting to Rp 2,316,368.

From the net income, amounting to Rp 750,000 or 32.4% of the net income in 2017 is determined as cash dividend for the financial year 2017, the final dividend payment is carried out by calculating treasury shares on the date of announcement of dividend receipt (recording date) 11 May 2018 so that dividend payments per share is Rp 169.107958 (one hundred sixty nine Rupiah point one zero seven nine five eight). The company has paid the dividend on 24 May 2018.

In addition, Rp 1,000 of net income of year 2017 was provided for statutory reserves to fulfill the article 70 of the Limited Liability Company Law No. 40 of 2007.

38. *GOODWILL* DAN PEMBELIAN DENGAN DISKON

a. *Goodwill*

Sehubungan dengan penerapan PSAK 48 (Revisi 2009) "Penurunan Nilai Aset", Perusahaan dan entitas anak melakukan uji penurunan nilai wajar atas *goodwill*.

Nilai wajar *goodwill* pada 31 Desember 2020 ditentukan berdasarkan penilaian dari penilai independen KJPP Yufrizal, Deny Kamal dan Rekan dalam laporannya pada tanggal 30 Maret 2021, dan telah sesuai dengan peraturan No. VIII.C.5 mengenai pedoman penilaian dan penyajian laporan penilaian aset tak berwujud.

Dalam menentukan nilai wajar, Penilai Independen menggunakan metode penilaian dengan mengkombinasikan dua pendekatan, yaitu pendekatan pendapatan yang mendiskontokan penerimaan kas di masa depan dan pendekatan aset.

Asumsi utama yang digunakan oleh Penilai Independen adalah sebagai berikut:
a) Sewa menara yang akan jatuh tempo akan diperpanjang kembali selama tahun sewa yang sama;
b) Kenaikan harga sewa menara pada saat jatuh tempo adalah sebesar 5,00%;
c) Tingkat inflasi sebesar 3,00% per tahun;
d) Tingkat diskonto sebesar 10,14%.

Hal ini telah sesuai dengan peraturan No. VIII.C.5 mengenai pedoman penilaian dan penyajian laporan penilaian aset tak berwujud di pasar modal.

Pada bulan September 2018, Perusahaan memperoleh 19,80% kepemilikan saham di PT Gihon Telekomunikasi Indonesia Tbk (GHON). *Goodwill* yang timbul atas transaksi ini adalah sebesar Rp 31.444. Untuk tahun yang berakhir pada 31 Desember 2020, berdasarkan perhitungan penilai independen, tidak terdapat penurunan nilai *goodwill*. Nilai tercatat goodwill pada 31 December 2020, 2019 dan 2018 masing-masing sebesar Rp 31.444.

Pada bulan Oktober 2016, PT Tower Bersama memperoleh 70% kepemilikan saham di PT Jaringan Pintar Indonesia. *Goodwill* yang timbul atas transaksi ini adalah sebesar Rp 607. Nilai tercatat *goodwill* pada 31 Desember 2020, 2019 dan 2018 masing-masing sebesar nihil.

38. GOODWILL AND GAIN FROM BARGAIN PURCHASE

a. Goodwill

Regarding the implementation of PSAK 48 (Revised 2009) "Impairment of Assets", the Company and subsidiaries have done an impairment test of goodwill.

The fair value of goodwill as of 31 December 2020 was determined based on a valuation from KJPP Yufrizal, Deny Kamal and Partners in their report dated 30 March 2021, respectively, and was in accordance No. VIII.C.5 guidelines regarding assessment and presentation of intangible asset valuation.

To determine the fair value, the Independent Appraiser utilizes a combination of two approaches as the appraisal method, the income approach which discounts future cash flows, and the assets approach.

The Independent Appraiser uses the following key assumptions:
a) Rent of towers will be renewed for the same rental year;
b) Price of renewed rent of towers increases by 5.00%;
c) Inflation is 3.00% per year;
d) Discount rate is amounted to 10.14%.

It incorporates the regulation of No. VIII.C.5 regarding the guidelines of appraisal and presentation of intangible assets valuation report to capitals market.

In September 2018, The Company acquired 19.80% shares ownership in PT Gihon Telekomunikasi Indonesia Tbk (GHON). Goodwill arising from the transaction was Rp 31,444. For the year ended 31 December 2020, based on the independent appraiser's calculation, there was no an impairment of goodwill. The carrying amount of goodwill as of 31 December 2020, 2019 and 2018 was and Rp 31,444, respectively.

In October 2016, PT Tower Bersama acquired 70% shares ownership in PT Jaringan Pintar Indonesia. Goodwill arising from this transaction was Rp 607. The carrying value of goodwill as of 31 December 2020, 2019 and 2018 amounted to nil, respectively.

38. **GOODWILL DAN PEMBELIAN DENGAN DISKON** (Lanjutan)

a. ***Goodwill*** (Lanjutan)

Pada bulan Agustus 2011, Perusahaan melalui entitas anak memperoleh 100% kepemilikan saham di PT Mitrayasa Sarana Informasi.

*38. **GOODWILL AND GAIN FROM BARGAIN PURCHASE** (Continued)*

*a. **Goodwill** (Continued)*

In August 2011, the Company through its subsidiaries acquired 100% shares ownership in PT Mitrayasa Sarana Informasi.

Posisi Keuangan	Nilai wajar/ Fair value	Nilai tercatat/ Carrying value	*Financial Position*
ASET LANCAR	351.152	351.152	*CURRENT ASSETS*
ASET TIDAK LANCAR	353.940	353.940	*NON-CURRENT ASSETS*
JUMLAH ASET	705.092	705.092	*TOTAL ASSETS*
LIABILITAS JANGKA PENDEK	395.712	395.712	*CURRENT LIABILITIES*
LIABILITAS JANGKA PANJANG	333.474	333.474	*NON-CURRENT LIABILITIES*
JUMLAH LIABILITAS	729.186	729.186	*TOTAL LIABILITIES*
NILAI WAJAR DARI ASET BERSIH YANG DAPAT DIIDENTIFIKASI	24.094	24.094	*FAIR VALUE OF IDENTIFIABLE NET ASSETS*
HARGA PEMBELIAN SAHAM		200.000	*SHARE PURCHASE PRICE*
JUMLAH		224.094	*TOTAL*
ASET TIDAK BERWUJUD YANG DICATAT SEBAGAI ASET LAINNYA		5.474	*INTANGIBLE ASSET THAT RECORDED AS OTHER ASSETS*
GOODWILL		218.620	*GOODWILL*

Untuk tahun yang berakhir pada 31 Desember 2020, 2019 dan 2018, berdasarkan perhitungan penilai independen, terdapat penurunan nilai *goodwill* sebesar nihil, Rp 36.507 dan nihil. Nilai tercatat *goodwill* pada 31 Desember 2020, 2019 dan 2018 masing-masing sebesar Rp 173.613, Rp 173.613 dan Rp 210.120.

For the years ended 31 December 2020, 2019 and 2018, based on independent appraisal calculations, there was an impairment of goodwill amounting to nil and Rp 36,507. The carrying amount of goodwill as of 31 December 2020, 2019 and 2018 was sebesar Rp 173,613, Rp 173,613 and Rp 210,120, respectively.

Pada bulan April 2010, PT Metric Solusi Integrasi memperoleh 70% kepemilikan saham di PT Solu Sindo Kreasi Pratama. *Goodwill* yang timbul atas transaksi ini adalah sebesar Rp 133.840. Untuk tahun yang berakhir pada 31 Desember 2020, 2019 dan 2018, berdasarkan perhitungan penilai independen, tidak terdapat penurunan nilai *goodwill*. Nilai tercatat *goodwill* pada 31 December 2020, 2019 dan 2018 masing-masing sebesar Rp 126.347.

In April 2010, PT Metric Solusi Integrasi acquired a 70% ownership in PT Solu Sindo Kreasi Pratama. Goodwill arising from this transaction amounted to Rp 133,840. For the year ended 31 December 2020, 2019 and 2018, based on independent appraisal calculations, there was no impairment in goodwill. The carrying amount of goodwill as at 31 December 2020, 2019 and 2018 amounted to Rp 126,347, respectively.

Pada bulan Juni 2008, PT Prima Media Selaras (PMS) menerbitkan hak memesan efek terlebih dahulu (*subscription rights* (SR)) kepada pemegang saham pendiri. SR tersebut memberikan hak kepada pemiliknya untuk dapat memesan terlebih dahulu saham-saham baru yang akan diterbitkan PMS sebanyak 60.000 (nilai penuh) saham.

In June 2008, PT Prima Media Selaras (PMS) issued subscription rights (SR) to its former shareholders, providing rights to subscribe 60,000 (full amount) new PMS shares.

38. **GOODWILL DAN PEMBELIAN DENGAN DISKON** (Lanjutan)

a. ***Goodwill*** (Lanjutan)

Jika SR tersebut dilaksanakan, maka kepemilikan PT Tower Bersama (TB) pada PMS akan terdilusi hingga hanya menjadi sebesar 20%. Untuk mempertahankan kepemilikannya tersebut pada bulan Agustus 2009, TB telah membeli SR tersebut dari HKDN Investment Ltd. sebagai pemilik akhir, sebesar US$ 25.900.000. Nilai akuisisi dari pembelian SR tersebut serta biaya transaksi lainnya adalah sebesar Rp 255.391 dicatat sebagai *goodwill*.

Untuk tahun yang berakhir pada 31 Desember 2020, 2019 dan 2018, berdasarkan perhitungan penilai independen, terdapat penurunan nilai *goodwill* sebesar nihil, Rp 10.914 dan Rp 4.468. Nilai tercatat *goodwill* pada 31 Desember 2020, 2019 dan 2018 masing-masing sebesar Rp 49.785, Rp 49.785 dan Rp 60.699.

Penurunan nilai atas *goodwill* tersebut dicatat pada kerugian atas penurunan nilai *goodwill* pada laporan laba rugi dan penghasilan komprehensif lain konsolidasian.

38. GOODWILL AND GAIN FROM BARGAIN PURCHASE (Continued)

*a. **Goodwill** (Continued)*

If SR is implemented, then the ownership PT Tower Bersama (TB) in the PMS will be diluted to only 20%. To maintain the ownership in August 2009, TB has purchased the SR of HKDN Investment Ltd. as the final owner, for US$ 25,900,000. Acquisition value of the SR purchase and other transaction costs are Rp 255,391 was recorded as goodwill.

For the years ended 31 December 2020, 2019 and 2018, based on independent appraisal calculations, there was an impairment of goodwill of nil, Rp 10,914 and Rp 4.468. The carrying amount of goodwill as of 31 December 2020, 2019 and 2018 was Rp 49,785, Rp 49,785 and Rp 60,699, respectively.

Impairment of goodwill is recorded in loss on impairment of goodwill in the consolidated statements of profit or loss and other comprehensive income.

31 Desember 2020	**Saldo awal/ *Beginning balance***	**Penurunan/ *Impairment***	**Saldo akhir/ *Ending balance***	***31 December 2020***
PT Metric Solusi Integrasi	178.430	-	178.430	*PT Metric Solusi Integrasi*
PT Tower Bersama	171.315	-	171.315	*PT Tower Bersama*
PT Tower Bersama Infrastructure Tbk	31.444	-	31.444	*PT Tower Bersama Infrastructure Tbk*
Jumlah	381.189	-	381.189	***Total***

31 Desember 2019	**Saldo awal/ *Beginning balance***	**Penurunan/ *Impairment***	**Saldo akhir/ *Ending balance***	***31 December 2019***
PT Metric Solusi Integrasi	189.382	(10.952)	178.430	*PT Metric Solusi Integrasi*
PT Tower Bersama	207.784	(36.469)	171.315	*PT Tower Bersama*
PT Tower Bersama Infrastructure Tbk	31.444	-	31.444	*PT Tower Bersama Infrastructure Tbk*
Jumlah	428.610	(47.421)	381.189	***Total***

31 Desember 2018	**Saldo awal/ *Beginning balance***	**Penurunan/ *Impairment***	**Saldo akhir/ *Ending balance***	***31 December 2018***
PT Metric Solusi Integrasi	189.382	-	189.382	*PT Metric Solusi Integrasi*
PT Tower Bersama	212.252	(4.468)	207.784	*PT Tower Bersama*
PT Tower One	11.254	(11.254)	-	*PT Tower One*
PT Tower Bersama Infrastructure Tbk	-	-	31.444	*PT Tower Bersama Infrastructure Tbk*
Jumlah	412.888	(15.722)	428.610	***Total***

38. **GOODWILL DAN PEMBELIAN DENGAN DISKON** (Lanjutan)

b. **Pembelian dengan diskon**

Pada bulan Desember 2018, Perusahaan memperoleh 51,00% kepemilikan saham di PT Visi Telekomunikasi Infrastruktur Tbk (GOLD).

*38. **GOODWILL AND GAIN FROM BARGAIN PURCHASE** (Continued)*

*b. **Gain from bargain purchase***

In December 2018, The Company acquired 51.00% shares ownership in PT Visi Telekomunikasi Infrastruktur Tbk (GOLD).

	2018	
Nilai Wajar Diakui Pada Tanggal Akuisisi		***Fair Value Recognized at Acqusition Date***
Aset	239.437	*Asset*
Liabilitas	(145.164)	*Liabilities*
Nilai wajar aset neto pada tanggal akuisisi	94.273	*Fair value of net assets on acquisition date*
Kepentingan non-pengendali	(46.194)	*Non-controlling interest*
Bagian proporsional atas aset neto pada entitas anak	48.079	*Proportionate on net assets of subsidiaries*
Imbalan tunai yang dialihkan	(35.601)	*Cash consideration transferred*
Pembelian dengan diskon atas akuisisi	12.478	***Gain on bargain purchase from acquisition***

Pada tanggal akuisisi nilai wajar atas aset neto GOLD ditentukan berdasarkan penilaian dari penilai independen KJPP Yufrizal, Deny Kamal dan Rekan dalam laporannya pada tanggal 15 Maret 2019. Dalam menentukan nilai wajar, Penilai Independen menggunakan metode penilaian dengan mengkombinasikan dua pendekatan, yaitu pendekatan pendapatan dan pendekatan aset.

Perusahaan memperoleh kepemilikan saham tersebut dengan diskon sebesar Rp 12.478. Pembelian dengan diskon tersebut telah diakui dalam laporan laba rugi dan penghasilan komprehensif lain konsolidasian.

At the acquisition date, the fair value of GOLD's net assets was determined based on the evaluation of independent appraisers KJPP Yufrizal, Deny Kamal and Partners in their report on 15 March 2019. In determining fair value, the Independent Appraiser uses the valuation method by combining two approaches, namely the income approach and the asset approach.

The Company obtained ownership of the shares with a discount of Rp 12,478. Gain on purchases with discount has been recognized in the consolidated statement of profit or loss and other comprehensive income.

39. KEPENTINGAN NON-PENGENDALI / *NON-CONTROLLING INTEREST*

2020

Entitas anak / *Subsidiaries*	Saldo awal / *Beginning balance*	Porsi non-pengendali atas laba entitas anak / *Non-controlling portion on net profit of subsidiaries*	Surplus revaluasi / *Revaluation surplus*	Porsi non-pengendali dari instrumen derivatif / *Non-controlling portion from derivative instrument*	Porsi non-pengendali dari aset *pengampunan pajak* / *Non-controlling portion from Difference of tax amnesty assets*	Porsi non-pengendali dari pembagian deviden tunai entitas anak / *Non-controlling portion from cash dividens subsidiaries*	Porsi non-pengendali dari keuntungan aktuaria / *Non-controlling portion from actuarial gain*	Saldo akhir / *Ending balance*
PT United Towerindo	25.303	621	(432)	-	(6)	-	8	25.494
PT Tower Bersama	126.624	10.555	15.804	(862)	(14)	(5.320)	18	146.805
PT Tower One	(123)	12	-	-	-	-	-	(111)
PT Metric Solusi Integrasi	(144.176)	386	1.751	84	(2)	(232)	(19)	(142.208)
PT Telenet Internusa	846	125	110	-	(1)	(50)	-	1.030
PT Triaka Bersama	1.334	-	-	-	-	-	-	1.334
PT Solusi Menara Indonesia	105.659	270	1.307	(20)	-	-	-	107.216
PT Visi Telekomunikasi Infrastruktur Tbk	178.946	6.439	(697)	-	-	-	634	185.322
PT Gihon Telekomunikasi Indonesia Tbk	235.299	38.543	911	-	-	(5.453)	(26)	269.274
Jumlah / *Total*	529.712	56.951	18.754	(798)	(23)	(11.055)	615	594.156

2019

Entitas anak / *Subsidiaries*	Saldo awal / *Beginning balance*	Porsi non-pengendali atas laba entitas anak / *Non-controlling portion on net profit of subsidiaries*	Surplus revaluasi / *Revaluation surplus*	Porsi non-pengendali dari instrumen derivatif / *Non-controlling portion from derivative instrument*	Porsi non-pengendali dari pembagian deviden tunai entitas anak / *Non-controlling portion from cash dividens subsidiaries*	Porsi non-pengendali dari keuntungan aktuaria / *Non-controlling portion from actuarial gain*	Porsi non-Penyesuaian perubahan kepemilikan efektif pada entitas anak / *Adjustment for effect on ownership changes in subsidiaries*	Saldo akhir / *Ending balance*
PT United Towerindo	24.663	728	(113)	-	-	25	-	25.303
PT Tower Bersama	94.461	10.636	28.857	(2.567)	(4.860)	97	-	126.624
PT Tower One	(154)	(14)	42	3	-	-	-	(123)
PT Metric Solusi Integrasi	(131.768)	233	(12.283)	7	(385)	20	-	(144.176)
PT Telenet Internusa	928	151	38	-	(271)	-	-	846
PT Triaka Bersama	1.334	-	-	-	-	-	-	1.334
PT Solusi Menara Indonesia	105.659	-	-	-	-	-	-	105.659
PT Visi Telekomunikasi Infrastruktur Tbk	69.097	3.451	(8.023)	-	-	368	114.053	178.946
PT Gihon Telekomunikasi Indonesia Tbk	144.666	31.482	61.167	-	(3.681)	(624)	2.289	235.299
Jumlah / *Total*	308.886	46.667	69.685	(2.557)	(9.197)	(114)	116.342	529.712

39. **KEPENTINGAN NON-PENGENDALI** (Lanjutan) / *39. **NON-CONTROLLING INTEREST** (Continued)*

2018

Entitas anak / *Subsidiaries*	Saldo awal / *Beginning balance*	Porsi non-pengendali atas laba entitas anak / *Non-controlling portion on net profit of subsidiaries*	Surplus revaluasi / *Revaluation surplus*	Porsi non-pengendali dari instrumen derivatif / *Non-controlling portion from derivative instrument*	Porsi non-pengendali dari perubahan nilai wajar investasi - tersedia untuk dijual / *Non-controlling portion from change in fair value available-for-sale*	Porsi non-pengendali dari pembagian deviden tunai entitas anak / *Non-controlling portion from cash dividens subsidiaries*	Porsi non-pengendali dari keuntungan aktuaria / *Non-controlling portion from actuarial gain*	Saldo akhir / *Ending balance*
PT United Towerindo	24.066	1.601	(1.008)	-	-	-	4	24.663
PT Tower Bersama	91.346	6.923	(1.751)	6.889	-	(9.000)	54	94.461
PT Tower One	(123)	(8)	(7)	-	-	(16)	-	(154)
PT Metric Solusi Integrasi	(102.040)	319	(5.806)	(21.803)	(943)	(1.525)	30	(131.768)
PT Telenet Internusa	1.267	112	(24)	-	-	(427)	-	928
PT Triaka Bersama	1.334	-	-	-	-	-	-	1.334
PT Solusi Menara Indonesia	81.200	-	-	24.459	-	-	-	105.659
PT Visi Telekomunikasi Infrastruktur Tbk	-	13.104	9.908	-	-	-	-	69.097
PT Gihon Telekomunikasi Indonesia Tbk	-	-	-	-	-	-	-	144.666
Jumlah / *Total*	97.050	22.051	1.312	9.545	(943)	(10.968)	88	308.886

40. **LABA BERSIH PER SAHAM DASAR YANG DAPAT DIATRIBUSIKAN KEPADA PEMEGANG SAHAM BIASA ENTITAS INDUK**

Untuk tahun yang berakhir 31 Desember 2020, 2019 dan 2018, laba bersih yang dapat diatribusikan kepada pemegang saham biasa entitas induk yang digunakan untuk perhitungan laba per saham dasar masing-masing adalah Rp 1.009.625, Rp 819.454 dan Rp 680.581. Jumlah rata-rata tertimbang saham (dalam nilai penuh) untuk tahun yang berakhir 31 Desember 2020, 2019 dan 2018, masing-masing sebanyak 20.860.674.895 saham, 20.874.064.243 saham dan 21.770.094.580 saham setelah dikurangi dengan saham treasuri (Catatan 29).

*40. **BASIC EARNINGS PER SHARE ATTRIBUTABLE TO COMMON SHAREHOLDERS OF THE PARENT COMPANY***

For the years ended 31 December 2020, 2019 and 2018, net income attributable to common shareholders of Parent Company which are used to calculate the basic earnings per share were Rp 1,009,625, Rp 819,454 and Rp 680,581, respectively. Total weighted average shares issued for the years ended 31 December 2020, 2019 and 2018, are 20,860,674,895 shares, 20,874,064,243 shares and 21,770,094,580 shares, respectively, after deducted by the treasury stock (Note 29).

41. **PERJANJIAN PENTING**

a. **PERJANJIAN SEWA MENARA *BASE TRANSCEIVER STATION* (BTS) DAN SISTEM TELEKOMUNIKASI DALAM GEDUNG**

Entitas anak (PT Tower Bersama, PT Telenet Internusa, PT Gihon Telekomunikasi Indonesia Tbk, PT Permata Karya Perdana, PT United Towerindo, PT Batavia Towerindo, PT Bali Telekom, PT Prima Media Selaras, PT Solusi Menara Indonesia, PT Solu Sindo Kreasi Pratama, PT Mitrayasa Sarana Informasi, PT Towerindo Konvergensi, dan PT Triaka Bersama) memiliki perjanjian sewa dengan para operator sebagai berikut:

*41. **SIGNIFICANT AGREEMENTS***

*a. **RENTAL AGREEMENT TOWER BASE TRANSCEIVER STATION (BTS) AND TELECOMMUNICATIONS SYSTEMS IN BUILDINGS***

Subsidiaries (PT Tower Bersama, PT Telenet Internusa, PT Gihon Telekomunikasi Indonesia Tbk, PT Permata Karya Perdana, PT United Towerindo, PT Batavia Towerindo, PT Bali Telekom, PT Prima Media Selaras, PT Solusi Menara Indonesia, PT Solu Sindo Kreasi Pratama, PT Mitrayasa Sarana Informasi, PT Towerindo Konvergensi, and PT Triaka Bersama) have lease agreements with operators as follows:

41. **PERJANJIAN PENTING** (Lanjutan)

a. **PERJANJIAN SEWA MENARA *BASE TRANSCEIVER STATION* (BTS) DAN SISTEM TELEKOMUNIKASI DALAM GEDUNG** (Lanjutan)

1. **PT Hutchison 3 Indonesia**

Pada berbagai tanggal antara tahun 2007 sampai dengan 2020, entitas anak dan Hutchison menandatangani Perjanjian Sewa Induk ("MLA"), mengenai sewa pemanfaatan lokasi yang diperlukan untuk pengoperasian peralatan komunikasi. Jangka waktu perjanjian ini adalah 12 tahun, dan dapat diperpanjang untuk jangka waktu 6 tahun.

2. **PT XL Axiata Tbk (XL)**

Pada berbagai tanggal antara tahun 2007 sampai dengan 2020, entitas anak dan XL menandatangani Perjanjian Sewa Induk ("MLA"), sebagaimana telah diubah beberapa kali dalam bentuk amandemen, mengenai sewa pemanfaatan infrastruktur menara untuk penempatan peralatan telekomunikasi. Jangka waktu perjanjian ini adalah 10 tahun, dan dapat diperpanjang dengan menginformasikan secara tertulis kepada entitas anak. Jangka waktu sewa dimulai sejak tanggal sertifikat siap instalasi ("RFI") di masing-masing lokasi.

3. **PT Indosat Tbk (Indosat)**

Pada berbagai tanggal antara tahun 2008 sampai dengan 2020, entitas anak dan Indosat telah menandatangani beberapa Perjanjian Sewa Induk ("MLA"), mengenai sewa pemanfaatan lokasi yang diperlukan untuk pengoperasiaan peralatan telekomunikasi. Jangka waktu perjanjian ini adalah 10 tahun, dan dapat diperpanjang untuk jangka waktu 10 tahun, kecuali apabila Indosat tidak ingin memperpanjang masa sewa dan menginformasikan secara tertulis kepada entitas anak. Jangka waktu sewa dimulai sejak tanggal sertifikat siap instalasi ("RFI") di masing-masing lokasi.

4. **PT Telekomunikasi Selular (Telkomsel)**

Pada berbagai tanggal di tahun 2004 sampai dengan 2020, entitas anak telah menandatangani sejumlah Perjanjian Sewa Induk ("MLA") dengan Telkomsel mengenai pemanfaatan infrastruktur menara untuk penempatan peralatan telekomunikasi. Jangka waktu perjanjian adalah 10 tahun sejak tanggal penandatanganan Berita Acara Penggunaan Site (BAPS) untuk masing-masing lokasi menara.

*41. **SIGNIFICANT AGREEMENTS** (Continued)*

*a. **RENTAL AGREEMENT TOWER BASE TRANSCEIVER STATION (BTS) AND TELECOMMUNICATIONS SYSTEMS IN BUILDINGS** (Continued)*

*1. **PT Hutchison 3 Indonesia***

On a number of dates in and between 2007 and 2020, the subsidiaries and Hutchison signed Master Lease Agreements ("MLA") to lease telecommunication infrastructure space for installation of telecommunication equipment. The agreements are for lease years of 12 years and can be extended for 6 years.

*2. **PT XL Axiata Tbk (XL)***

On a number of dates in and between 2007 and 2020, the subsidiaries and XL signed the Master Lease Agreement ("MLA"), as amended several times, regarding lease of telecommunication infrastructure space for installation of telecommunication equipment. The lease year is for 10 years and can be extended by agreement. The lease years start from the date of installation ("RFI") on each location.

*3. **PT Indosat Tbk (Indosat)***

On a number of dates in and between 2008 and 2020, the subsidiaries and Indosat signed a number of Master Lease Agreements ("MLA") regarding lease of telecommunication infrastructure space for installation of telecommunication equipment. The lease year is for 10 years and can be extended for another 10 years, unless Indosat does not intend to extend by informing the subsidiaries in writing. The lease year starts from the date of installation ("RFI") on each location.

*4. **PT Telekomunikasi Selular (Telkomsel)***

On a number of dates in and between 2004 and 2020, the subsidiaries and Telkomsel signed a number of Master Lease Agreement ("MLA") regarding lease telecommunication infrastructure space for installation of telecommunication equipment. The lease year is for 10 years, starting from when the Minutes of Site Utilisation (BAPS) has been signed.

41. **PERJANJIAN PENTING** (Lanjutan)

a. **PERJANJIAN SEWA MENARA *BASE TRANSCEIVER STATION* (BTS) DAN SISTEM TELEKOMUNIKASI DALAM GEDUNG** (Lanjutan)

5. **PT Smartfren Telecom Tbk (Smartfren)**

Pada berbagai tanggal di tahun 2005 sampai dengan 2020, entitas anak dan Smartfren, telah menandatangani beberapa Perjanjian Sewa Induk ("MLA"), sebagaimana telah beberapa kali diubah dalam bentuk amandemen, mengenai pemanfaatan infrastruktur menara untuk penempatan peralatan telekomunikasi. Jangka waktu awal sewa adalah 10 tahun dan dapat diperpanjang berdasarkan kesepakatan tertulis dari masing-masing pihak.

Jumlah estimasi pembayaran sewa minimum di masa depan untuk perjanjian-perjanjian sewa induk di atas adalah sebagai berikut:

*41. **SIGNIFICANT AGREEMENTS** (Continued)*

*a. **RENTAL AGREEMENT TOWER BASE TRANSCEIVER STATION (BTS) AND TELECOMMUNICATIONS SYSTEMS IN BUILDINGS** (Continued)*

*5. **PT Smartfren Telecom Tbk (Smartfren)***

On a number of dates in and between 2005 and 2020, the subsidiaries and Smartfren signed a number of Master Lease Agreements ("MLA"), as amended several times, regarding lease of telecommunication infrastructure space for installation of telecommunication equipment. The lease year is for 10 years and can be extended by agreement.

Total estimated future minimum lease payments for the above master lease agreements are as follows:

	2020	2019	2018	
Kurang dari satu tahun	5.117.594	4.888.613	4.322.430	*Less than one year*
Dari satu tahun sampai dengan lima tahun	12.859.263	11.681.038	14.152.264	*From one year to five years*
Lebih dari lima tahun	6.780.980	8.882.991	5.222.632	*More than five years*
Jumlah	24.757.837	25.452.642	23.697.326	***Total***

b. **PENANDATANGANAN PERJANJIAN JUAL BELI ASET BERSYARAT DENGAN PT INTI BANGUN SEJAHTERA TBK**

Pada tanggal 21 Desember 2020, PT Tower Bersama, entitas anak, menandatangani Perjanjian Pembelian Aset IBST untuk pembelian hingga 3.000 menara dengan nilai senilai Rp 3.975.000 (US$ 280 juta). Pembelian Aset IBST diharapkan selesai menjelang awal kuartal kedua 2021, dengan tunduk pada persetujuan tertentu, termasuk dari pemegang saham dan pemberi pinjaman Perusahaan dan IBST. Perusahaan mengumumkan masuknya Perjanjian Pembelian Aset IBST pada tanggal 22 Desember 2020, sesuai dengan Peraturan OJK No. 31/POJK.04/2015 tanggal 22 Desember 2015 tentang Keterbukaan Informasi atau Fakta Material oleh Emiten atau Perusahaan Publik. Transaksi ini telah memperoleh persetujuan dari pemegang saham sesuai hasil Rapat Umum Pemegang Saham Luar Biasa (RUPSLB) pada tanggal 30 Mei 2021. Pada tanggal 7 April 2021, transaksi penjualan 3000 menara telekomunikasi milik IBST teresebut telah diselesaikan melalui penandatanganan Akta Pengalihan dan Akta Perjanjian Pengalihan dan Pengambilalihan.

*b. **SIGNING OF CSPA WITH PT INTI BANGUN SEJAHTERA TBK***

On 21 December 2020, The Company, PT Tower Bersama, subsidiary, entered into the IBST Asset Purchase Agreement for the purchase of up to 3,000 towers for a consideration of Rp 3,975,000 (US$ 280 million). The IBST Asset Purchase is expected to be completed by the start of the second quarter of 2021, subject to certain approvals, including from the Company's and IBST's shareholders and lenders. The Company announced entry into the IBST Asset Purchase Agreement on 22 December 2020, in accordance with OJK Rule No. 31/POJK.04/2015 dated 22 December 2015 on Material Information or Facts Disclosure by Issuers or Public Companies. The transaction has obtained an approval from the shareholders as confirmed in the result of the Extraordinary General Meeting of Shareholders (EGMS) dated 30 May 2021. On 7 April 2021, the purchase of IBST's 3,000 telecommunication towers has been completed through the signing of Deed of Transfer and Deed of Assignment and Assumption.

42. ASET DAN LIABILITAS MONETER DALAM MATA UANG ASING

Pada tanggal 31 Desember 2020, 2019 dan 2018, Perusahaan dan entitas anak memiliki aset dan liabilitas moneter dalam mata uang asing sebagai berikut:

42. MONETARY ASSETS AND LIABILITIES DENOMINATED IN FOREIGN CURRENCIES

As of 31 December 2020, 2019 and 2018, the Company and subsidiaries have assets and liabilities dominated in foreign currency as follows:

	2020		2019		2018		
	US$ (nilai penuh)/ *(full amount)*	Ekuivalen rupiah/ *Rupiah equivalent*	US$ (nilai penuh)/ *(full amount)*	Ekuivalen rupiah/ *Rupiah equivalent*	US$ (nilai penuh)/ *(full amount)*	Ekuivalen rupiah/ *Rupiah equivalent*	
Aset							***Assets***
Kas dan setara kas	22.580.007	318.491	20.085.174	279.204	13.062.221	189.152	*Cash and cash equivalent*
Piutang usaha	11.335.767	159.891	5.242.285	72.873	1.409.640	20.413	*Account receivables*
Aset keuangan derivatif	76.921.314	1.084.975	94.391.770	1.312.140	179.931.704	2.605.591	*Derivative financial assets*
Jumlah aset	110.837.089	1.563.357	119.719.229	1.664.217	194.403.565	2.815.156	***Total assets***
Liabilitas							***Liabilities***
Pinjaman sindikasi	733.000.000	10.338.965	1.093.000.000	15.193.793	1.035.000.000	14.987.835	*Syndication loan*
Surat utang	700.000.000	9.873.500	350.000.000	4.865.350	350.000.000	5.068.350	*Notes*
Utang usaha	5.790.543	81.676	12.195.829	169.534	11.257.216	163.016	*Trade payables*
Utang bunga :							*Interest payables :*
Surat utang	22.136.657	312.238	11.760.033	163.476	11.692.246	169.315	*Notes*
Pinjaman sindikasi	1.810.649	25.539	4.415.433	61.379	5.602.077	81.124	*Syndication loan*
Jumlah liabilitas	1.462.737.850	20.631.918	1.471.371.295	20.453.532	1.413.551.539	20.469.640	***Total liabilities***
Liabilitas - Bersih	1.351.900.761	19.068.561	1.351.652.066	18.789.315	1.219.147.974	17.654.484	***Liabilities - Net***

Pada tanggal 31 Desember 2020, 2019 dan 2018, Perusahaan dan entitas anak telah melakukan lindung nilai untuk pinjaman jangka panjang dan surat utang atas risiko perubahan nilai mata uang asing dan suku bunga pinjaman masing-masing sebesar US$ 1.619.500.000, US$ 1.443.000.000 dan US$ 1.385.000.000.

As of 31 December 2020, 2019 and 2018, the Company and subsidiaries have hedged their loan facility and notes of US$ 1.619.500.000, US$ 1,443,000,000 and US$ 1,385,000,000, respectively, over the risks from the volatility of foreign exchange and interest rate.

43. MANAJEMEN RISIKO KEUANGAN

Aktivitas Perusahaan dan entitas anak mengandung berbagai macam risiko-risiko keuangan: risiko pasar, risiko kredit, risiko likuiditas dan risiko operasional. Secara keseluruhan, program manajemen risiko keuangan Perusahaan dan entitas anak terfokus untuk menghadapi ketidakpastian pasar uang dan meminimalisasi potensi kerugian yang berdampak pada kinerja keuangan Perusahaan dan entitas anak.

a. **Risiko pasar**

Perusahaan dan entitas anak menyadari adanya risiko pasar yang terjadi akibat fluktuasi mata uang Rupiah terhadap US Dolar, serta fluktuasi suku bunga pinjaman, sehingga entitas anak melakukan kontrak lindung nilai dengan tujuan melakukan aktivitas lindung nilai atas ketidakpastian fluktuasi suku bunga dan fluktuasi mata uang asing yang timbul dari arus kas pokok dan bunga pinjaman dari entitas anak.

Risiko Nilai Tukar Mata Uang Asing

Perubahan nilai tukar telah, dan diperkirakan akan terus, memberikan pengaruh terhadap hasil usaha dan arus kas Perusahaan dan entitas anak. Beberapa pinjaman dan belanja modal Perusahaan adalah, dan diperkirakan akan terus, didenominasi dengan mata uang US Dolar. Sebagian besar pendapatan Perusahaan dan entitas anak adalah dalam mata uang Rupiah.

Pada saat ini, Perusahaan dan entitas anak melakukan aktivitas lindung nilai terhadap sebagian besar dari eksposur atas mata uang asing dikarenakan penerimaan dari pendapatan usaha tahunan dalam mata uang Dolar Amerika Serikat lebih sedikit dibandingkan dengan jumlah pembayaran belanja modal, pinjaman dan bunga dalam mata uang Dolar Amerika Serikat.

Sebagai bagian dari usaha Perusahaan dan entitas anak untuk mengelola eksposur atas mata uang asing, Perusahaan melakukan kontrak berjangka dan kontrak swap valuta asing dengan lembaga-lembaga keuangan internasional. Untuk kontrak berjangka, pada umumnya Perusahaan dan entitas anak membayar sejumlah premi dengan jumlah yang tetap.

43. FINANCIAL RISK MANAGEMENT

The Company and subsidiaries activities are exposed to few financial risks: market risk, credit risk, liquidity risk and operational risk. The Company and subsidiaries overall risk management program focuses to mitigate the volatility of financial markets and to minimize potential adverse effects on the Company and subsidiaries financial performance.

*a. **Market risk***

The Company and subsidiaries are aware of market risk due to foreign exchange fluctuation of Rupiah against US Dollar and interest rate fluctuation, hence, the subsidiaries have entered into hedging contracts to hedge the uncertainty of interest rate and foreign exchange fluctuations arising from the loan principal and interest payments from each subsidiaries.

Foreign Exchange Rate

Changes in exchange rates have affected and may continue to affect the Company's and subsidiaries results of operations and cash flows. Some of the Company's debts and capital expenditures are, and expected will continue to be, denominated in US Dollars. Most of the Company's and subsidiaries revenues are denominated in Rupiah.

Currently, the Company and subsidiaries hedges a large portion of its foreign currency exposure principally because the receipts of annual USD-denominated operating revenue are less than the sum of payments of USD-denominated capital expenditures.

In an effort to manage foreign currency exposure, the Company and subsidiaries enters into forward foreign currency contracts with international financial institutions. For the forward foreign currency contracts, the Company and subsidiaries typically pays a fixed rate premium.

43. **MANAJEMEN RISIKO KEUANGAN** (Lanjutan)

a. **Risiko pasar** (Lanjutan)

Risiko Nilai Tukar Mata Uang Asing (Lanjutan)

Sebagai hasil dari kontrak tersebut, Perusahaan dan entitas anak yakin bahwa Perusahaan dan entitas anak telah mengurangi beberapa risiko nilai tukar mata uang asing, meskipun aktivitas lindung nilai yang dilakukan oleh Perusahaan dan entitas anak tidak mencakup seluruh eksposur mata uang asing dan terdapat kemungkinan bahwa perjanjian pengganti atas aktivitas lindung nilai tersebut tidak tersedia pada saat kontrak lindung nilai tersebut telah selesai.

Pada tanggal 31 Desember 2020, jika Rupiah menguat 1% terhadap Dolar Amerika Serikat namun seluruh variabel lainnya tetap, maka laba tahun berjalan lebih rendah sebesar Rp 37.731 (2019: Rp 12.697 dan 2018: Rp 30.463) terutama yang timbul sebagai akibat keuntungan selisih kurs atas penjabaran aset dan liabilitas moneter dalam mata uang asing.

Jika bagian utang berbunga dalam valuta asing (Catatan 25, 26 dan 27.b) yang telah dilindung nilai diukur dengan menggunakan kurs lindung nilainya, maka saldo utang berbunga pada 31 Desember 2020, 2019 dan 2018 setelah dikurangi biaya pinjaman yang belum diamortisasi masing-masing adalah sebagai berikut:

*43. **FINANCIAL RISK MANAGEMENT** (Continued)*

*a. **Market risk** (Continued)*

*a. **Ma***

***Foreign Exchange Rate** (Continued)*

As a result of these contracts, the Company and subsidiaries believe that the Company and subsidiaries have reduced some of the risk of foreign currency exchange rates, although hedging activity undertaken by the Company and subsidiaries do not include all foreign currency exposure and there is the possibility that a replacement agreement over the hedges are not available at the time of the hedge contract has been completed.

On 31 December 2020, if the Rupiah had strengthened by 1% against the US Dollar with all other variables held constant, profit for the year would have been Rp 37,731 (2019: Rp 12,697, 2018: Rp 30,463) lower, mainly as a result of foreign exchange gains on translation of monetary assets and liabilities denominated in foreign currency.

If the hedged portion of foreign-currency interest-bearing-debt (Notes 25, 26 and 27.b) is valued using it's hedge rate, the balance of interest-bearing debt on 31 December 2020, 2019 and 2018, net of unamortized borrowing costs are as follow:

	2020		2019		2018		
	Saldo pinjaman / *The balance of loans*		Saldo pinjaman / *The balance of loans*		Saldo pinjaman / *The balance of loans*		
	Kurs laporan posisi keuangan / *Rate of consolidated statements of financial position date*	Kurs lindung nilai / *Hedging rate*	Kurs laporan posisi keuangan / *Rate of consolidated statements of financial position date*	Kurs lindung nilai / *Hedging rate*	Kurs laporan posisi keuangan / *Rate of consolidated statements of financial position date*	Kurs lindung nilai / *Hedging rate*	
Pinjaman sindikasi	10.338.965	9.905.205	15.193.793	14.397.704	14.987.835	13.181.570	*Syndication loans*
Pinjaman non-sindikasi	61.300	61.300	75.850	75.850	81.676	81.676	*Non-syndication loans*
Surat utang	13.661.500	12.940.051	7.853.350	7.293.000	7.934.350	7.171.000	*Notes*
Liabilitas sewa - kendaraan (Catatan 27.b)	16.082	16.082	-	-	-	-	*Lease liabilities - vehicle (Nnote 27.b)*
Sewa pembiayaan	-	-	18.891	18.891	17.963	17.963	*Finance lease*
Dikurangi :							***Less:***
Biaya pinjaman yang belum diamortisasi (Catatan 2f)	(214.436)	(214.436)	(181.878)	(181.878)	(160.712)	(160.712)	*Unamortized borrowing costs (Note 2f)*
Jumlah - Bersih	23.863.411	22.708.202	22.960.006	21.603.567	22.861.112	20.291.497	***Total - Net***

43. **MANAJEMEN RISIKO KEUANGAN** (Lanjutan)

a. **Risiko pasar** (Lanjutan)

Risiko Tingkat Suku Bunga

Perusahaan dan entitas anak menghadapi risiko tingkat suku bunga yang disebabkan oleh perubahan tingkat suku bunga pinjaman yang dikenakan bunga. Suku bunga atas pinjaman jangka pendek dan jangka panjang dapat berfluktuasi sepanjang tahun pinjaman. Kebijakan keuangan memberikan panduan bahwa eksposur tingkat bunga harus diidentifikasi dan diminimalisasi/ dinetralisasi secara tepat waktu.

Untuk mengukur risiko pasar atas pergerakan suku bunga, Perusahaan dan entitas anak melakukan analisa marjin dan pergerakan suku bunga, dan melakukan transaksi kontrak swap tingkat bunga untuk melindungi suku bunga pinjaman dalam mata uang asing terhadap risiko ketidakpastian tingkat suku bunga.

Profil liabilitas jangka panjang Perusahaan dan entitas anak setelah memperhitungkan transaksi lindung nilai adalah sebagai berikut:

*43. **FINANCIAL RISK MANAGEMENT** (Continued)*

*a. **Market risk** (Continued)*

Interest Rate Risk

The Company and subsidiaries are exposed to interest rate risk through the impact of rate changes on interest-bearing liabilities. Interest rate for short and long-term borrowing can fluctuate over the borrowing year. The treasury policy sets the guideline that the interest rate exposure shall be identified and minimised/ neutralised promptly.

To measure market risk of interest rate fluctuation, the Company and subsidiaries primarily uses interest margin and spread analysis, and enters into interest rate swap contracts to hedge the foreign currency interest loans from interest rate uncertainty.

The Company and subsidiaries long-term liabilities profile after taking into account hedging transactions are as follows:

	2020	2019	2018	
Pinjaman jangka panjang - setelah dikurangi bagian yang jatuh tempo dalam satu tahun				*Long-term loans - net of current portion*
Pihak ketiga	6.421.154	15.115.908	11.688.940	*Third parties*

b. **Risiko kredit**

Perusahaan memiliki risiko kredit yang terutama berasal dari simpanan di bank, piutang usaha, piutang lain-lain, piutang derivatif dan aset lain-lain-investasi bersih dalam sewa pembiayaan.

Entitas anak menghadapi risiko kredit, yaitu ketidakmampuan pelanggan untuk membayar sewa dari menara ataupun pemancar milik entitas anak.

Kualitas Kredit Aset Keuangan

Perusahaan dan entitas anak mengelola risiko kredit yang terkait dengan simpanan di bank dan piutang derivatif dengan memonitor reputasi, peringkat kredit, dan membatasi risiko agregat dari masing-masing pihak dalam kontrak.

Terkait dengan kredit yang diberikan kepada pelanggan, Perusahaan dan entitas anak menetapkan syarat dan ketentuan fasilitas kredit kepada pelanggan selular dan pelanggan lainnya, seperti dealer, distributor, operator lainnya terkait interkoneksi dan jelajah internasional. Jaminan tambahan juga disyaratkan dalam kondisi tertentu. Umumnya jaminan yang digunakan adalah bank garansi.

Penyewaan jasa menara telekomunikasi kepada operator selular dilakukan secara tunai. Kelayakan kredit dan prosedur penagihan ditelaah secara baik dan tepat waktu. Tidak terdapat konsentrasi risiko kredit yang signifikan terkait dengan piutang usaha, hal ini disebabkan keragaman pelanggan.

*b. **Credit risk***

The Company is exposed to credit risk primarily from deposits with banks, trade receivables, other receivables, derivatives receivables and other assets-net investment in finance lease.

The subsidiaries are exposed to credit risk from the customer's inability to pay the tower or in building system rental fees owed to the Company's subsidiaries.

Credit Quality of Financial assets

The Company and subsidiaries manages credit risk exposed from its deposits with banks and derivatives receivables by monitoring reputation, credit ratings and limiting the aggregate risk to any individual counterparty.

In respect of credit exposures given to customers, the Company and subsidiaries established general terms and conditions of credit facility to subscribers and non-subscribers such as dealers, distributors, interconnection and roaming partners. On a case by case basis, additional security is required. Common type used is bank guarantee.

Rental of telecommunication tower to the operators is required to be settled in cash. Credit worthiness and collection procedures are reviewed properly and promptly. There are no significant concentrations of credit risk with respect to trade receivables due to its diverse customer base.

43. **MANAJEMEN RISIKO KEUANGAN** (Lanjutan) / *43. **FINANCIAL RISK MANAGEMENT** (Continued)*

b. **Risiko kredit** (Lanjutan) / *b. **Credit risk** (Continued)*

Kualitas Kredit Aset Keuangan (Lanjutan) / ***Credit Quality of Financial assets** (Continued)*

Manajemen yakin terhadap kemampuan untuk mengendalikan dan menjaga eksposur risiko kredit pada tingkat yang minimal. Eksposur maksimum risiko kredit pada tanggal pelaporan adalah sebagai berikut:

Management is confident in its ability to control and sustain minimal exposure of credit risk. The maximum credit risk exposure at the reporting date is as follows:

	2020	2019	2018	
Kas dan setara kas	947.341	525.242	220.586	*Cash and cash equivalent*
Piutang usaha - pihak ketiga	710.722	466.547	383.303	*Trade receivables - third parties*
Piutang lain-lain	262.885	305.778	77.660	*Other receivables*
Pendapatan yang masih harus diterima	491.190	522.332	546.608	*Accrued revenue*
Uang jaminan	1.708	2.281	2.067	*Refundable deposits*
Jumlah	2.413.846	1.822.180	1.230.224	***Total***

c. **Risiko likuiditas** / *c. **Liquidity risk***

Risiko likuiditas timbul apabila Perusahaan dan entitas anak mengalami kesulitan dalam mendapatkan sumber pendanaan untuk membiayai modal kerja dan belanja modal. Risiko likuiditas juga dapat timbul akibat ketidaksesuaian atas sumber dana yang dimiliki dengan pembayaran liabilitas yang telah jatuh tempo.

Liquidity risk arises in situations where the Company and subsidiaries have difficulties in obtaining funding sources to fund their working capital and capital expenditure. Liquidity risk also arises in situations where there is a mismatch between the funding sources and any obligations that have matured.

Perusahaan dan entitas anak melakukan mitigasi risiko likuiditas dengan cara menganalisa ketersediaan arus kas dan struktur pendanaan sesuai dengan Pedoman Pengendalian Intern Perusahaan.

The Company and subsidiaries mitigate liquidity risk by analyzing the cashflow availability as well as their funding structure in accordance with the Company's Internal Control Manual.

Risiko likuiditas timbul dalam keadaan di mana Perusahaan dan entitas anak mengalami kesulitan dalam mendapatkan sumber pendanaan. Manajemen risiko likuiditas berarti menjaga kecukupan saldo kas dan setara kas. Perusahaan dan entitas anak mengelola risiko likuiditas dengan mengawasi arus kas aktual dan proyeksi secara terus menerus dan mengawasi profil tanggal jatuh tempo aset dan liabilitas keuangan.

Liquidity risk arises in situations where the Company and subsidiaries has difficulties in obtaining funding. Prudent liquidity risk management implies maintaining sufficient cash and cash equivalents. The Company and subsidiaries manages liquidity risk by continuously monitoring forecast and actual cash flows and monitor the maturity profiles of financial assets and liabilities.

Perusahaan dan entitas anak memonitor proyeksi persyaratan likuiditas untuk memastikan bahwa Perusahaan dan entitas anak memiliki saldo kecukupan kas untuk memenuhi keperluan operasi serta menjaga kecukupan dalam fasilitas pinjaman yang belum ditarik sepanjang waktu sehingga Perusahaan dan entitas anak memenuhi semua batas atau persyaratan fasilitas pinjaman.

The Company and subsidiaries monitors forecasts of the liquidity requirements to ensure that it has sufficient cash to meet operational needs while maintaining sufficient headroom on its undrawn committed borrowing facilities at all times so that the Company and subsidiaries does not breach the borrowing limits or covenants on any of its borrowing facilities.

Proyeksi tersebut mempertimbangkan rencana pembiayaan utang Perusahaan dan kepatuhan persyaratan pinjaman. Manajemen percaya bahwa strategi melakukan *cash sweeping* dan *pooling of funds* dari sejumlah rekening bank ke dalam rekening bank operasional utama dapat memastikan pendanaan yang terkonsentrasi dan optimalisasi likuiditas yang lebih baik.

Such forecasting takes into consideration the Company's debt financing plans and covenant compliance. Management believes that the strategy to manage cash sweeping and pooling of funds across accounts in main operating banks can ensure the better concentration of funds and optimisation of liquidity.

43. **MANAJEMEN RISIKO KEUANGAN** (Lanjutan)

c. **Risiko likuiditas** (Lanjutan)

Tabel berikut ini menunjukkan analisis jatuh tempo liabilitas keuangan Perusahaan dan entitas anak dalam rentang waktu yang menunjukkan jatuh tempo kontraktual untuk semua liabilitas keuangan non-derivatif dan derivatif di mana jatuh tempo kontraktual sangat penting untuk pemahaman terhadap arus kas. Jumlah yang diungkapkan dalam tabel adalah arus kas kontraktual yang tidak terdiskonto (termasuk pembayaran pokok dan bunga).

*43. **FINANCIAL RISK MANAGEMENT** (Continued)*

*c. **Liquidity risk** (Continued)*

The following table analyse the Company and subsidiaries financial liabilities into relevant maturity groupings based on their contractual maturities for all non-derivative financial liabilities and derivative financial instruments for which the contractual maturities are essential for an understanding of the timing of the cash flows. The amounts disclosed in the table are the contractual undiscounted cash flows (including principal and interest payment).

	2020					
	Jumlah tercatat/ *Carrying amount*	Arus kas kontraktual/ *Contractual cash flow*	Kurang dari setahun/ *Less than one year*	Antara satu dan tiga tahun/ *Between one and three years*	Lebih dari tiga tahun/ *More than three years*	
Utang usaha - pihak ketiga dan utang lain-lain	592.057	592.057	592.057	-	-	*Trade payables - third parties and other payable*
Beban masih harus dibayar	1.156.790	1.156.790	1.156.790	-	-	*Accrued expenses*
Liabilitas sewa	466.512	466.512	152.617	313.895	-	*Lease liabilities*
Pinjaman jangka panjang	10.278.847	10.400.265	3.910.975	2.369.220	4.120.070	*Long-term loans*
Surat utang	13.568.482	13.661.500	6.933.750	1.791.000	4.936.750	*Notes payable*
Jumlah	26.062.688	26.277.124	12.746.189	4.474.115	9.056.820	***Total***

	2019					
	Jumlah tercatat/ *Carrying amount*	Arus kas kontraktual/ *Contractual cash flow*	Kurang dari setahun/ *Less than one year*	Antara satu dan tiga tahun/ *Between one and three years*	Lebih dari tiga tahun/ *More than three years*	
Utang usaha - pihak ketiga dan utang lain-lain	288.530	288.530	288.530	-	-	*Trade payables - third parties and other payable*
Beban masih harus dibayar	1.168.585	1.168.585	1.168.585	-	-	*Accrued expenses*
Pinjaman jangka panjang	15.134.799	15.288.534	4.644	10.066.877	5.217.013	*Long-term loans*
Surat utang	7.825.207	7.853.350	2.150.000	5.703.350	-	*Notes payable*
Jumlah	24.417.121	24.598.999	3.611.759	15.770.227	5.217.013	***Total***

	2018					
	Jumlah tercatat/ *Carrying amount*	Arus kas kontraktual/ *Contractual cash flow*	Kurang dari setahun/ *Less than one year*	Antara satu dan tiga tahun/ *Between one and three years*	Lebih dari tiga tahun/ *More than three years*	
Utang usaha - pihak ketiga dan utang lain-lain	335.739	335.739	335.739	-	-	*Trade payables - third parties and other payable*
Beban masih harus dibayar	1.466.028	1.466.028	1.466.028	-	-	*Accrued expenses*
Pinjaman jangka panjang	14.972.087	15.288.534	3.284.699	6.558.889	5.243.886	*Long-term loans*
Surat utang	7.889.025	7.853.350	628.000	2.238.000	5.068.350	*Notes payable*
Jumlah	24.662.879	24.943.651	5.714.466	8.796.889	10.312.236	***Total***

43. **MANAJEMEN RISIKO KEUANGAN** (Lanjutan)

c. **Risiko likuiditas** (Lanjutan)

Berikut rincian pinjaman jangka panjang dan surat utang jangka panjang sesuai dengan jadwal jatuh tempo:

*43. **FINANCIAL RISK MANAGEMENT** (Continued)*

*c. **Liquidity risk** (Continued)*

Details of the long-term loans and long-term notes according to the maturity schedule are as follow:

	2020		2019		2018		
	Jumlah tercatat/ *Carrying amount*	Arus kas kontraktual *Contractual cash flows*	Jumlah tercatat/ *Carrying amount*	Arus kas kontraktual *Contractual cash flows*	Jumlah tercatat/ *Carrying amount*	Arus kas kontraktual *Contractual cash flows*	
Kurang dari setahun	10.755.692	10.844.725	2.151.556	2.154.644	3.894.562	3.912.699	*Less than one year*
Antara satu dan tiga tahun	4.054.598	4.160.220	15.663.025	15.770.227	8.765.048	8.796.889	*Between one and three years*
Lebih dari tiga tahun	9.037.039	9.056.820	5.145.425	5.217.013	10.201.502	10.312.236	*More than three years*
Jumlah	23.847.329	24.061.765	22.960.006	23.141.884	22.861.112	23.021.824	***Total***

d. **Estimasi nilai wajar**

Nilai wajar aset dan liabillitas keuangan di estimasi untuk keperluan pengakuan dan pengukuran atau untuk keperluan pengungkapan.

PSAK 68 "Pengukuran Nilai Wajar" mensyaratkan pengungkapan atas pengukuran nilai wajar dengan tingkat hirarki nilai wajar sebagai berikut:

a) harga kuotasian (tidak disesuaikan) dalam pasar aktif untuk aset atau liabilitas yang identik (tingkat 1);

b) input selain harga kuotasian yang termasuk dalam tingkat 1 yang dapat diobservasi untuk aset atau liabilitas, baik secara langsung (misalnya harga) atau secara tidak langsung (misalnya derivasi dari harga) (tingkat 2); dan

c) input untuk aset atau liabilitas yang bukan berdasarkan data pasar yang dapat diobservasi (input yang tidak dapat diobservasi) (tingkat 3).

Aset dan liabilitas keuangan Perusahaan yang diukur dan diakui pada nilai wajar (tingkat 2) adalah piutang dan utang derivatif.

Nilai wajar instrumen keuangan yang tidak diperdagangkan di pasar aktif ditentukan dengan menggunakan teknik penilaian tertentu. Teknik tersebut menggunakan data pasar yang dapat diobservasi sepanjang tersedia, dan seminimal mungkin mengacu pada estimasi. Apabila seluruh input signifikan atas nilai wajar dapat diobservasi, instrumen keuangan ini termasuk dalam tingkat 2.

*d. **Fair value estimation***

The fair value of financial assets and financial liabilities must be estimated for recognition and measurement or for disclosure purposes.

PSAK 68 "Fair Value Measurements" requires disclosure of fair value measurements by level of the following fair value measurement hierarchy:

a) quoted prices (unadjusted) in active markets for identical assets or liabilities (level 1);

b) inputs other than quoted prices included within level 1 that are observable for the asset or liability, either directly (as prices) or indirectly (derived from prices) (level 2); and

c) inputs for the asset or liability that are not based on observable market data (unobservable inputs) (level 3).

The Company's financial assets and liabilities that are measured and recognized at fair value (level 2) are derivative receivables and payables.

The fair value of financial instruments that are not traded in an active market is determined using valuation techniques. These valuation techniques maximise the use of observable market data where it is available and rely as little as possible on estimates. If all significant inputs required to fair value an instrument are observable, the instrument is included in level 2.

43. **MANAJEMEN RISIKO KEUANGAN** (Lanjutan)

d. **Estimasi nilai wajar** (Lanjutan)

Jika satu atau lebih input yang signifikan tidak berdasarkan data pasar yang dapat diobservasi, maka instrumen tersebut masuk ke dalam tingkat 3.

Teknik penilaian tertentu digunakan untuk menentukan nilai instrumen keuangan mencakup:

- penggunaan harga yang diperoleh dari bursa atau pedagang efek untuk instrumen sejenis dan;
- teknik lain seperti analisis arus kas yang didiskonto digunakan untuk menentukan nilai instrumen keuangan lainnya.

Tabel di bawah ini menggambarkan nilai tercatat dan nilai wajar dari aset dan liabilitas keuangan:

*43. **FINANCIAL RISK MANAGEMENT** (Continued)*

*d. **Fair value estimation** (Continued)*

If one or more of the significant inputs is not based on observable market data, the instrument is included in level 3.

Specific valuation techniques used to value financial instruments include:

- *the use of quoted market prices or dealer quotes for similar instruments and;*
- *other techniques, such as discounted cash flows analysis, are used to determine fair value for the remaining financial instruments.*

The following table shows the fair values of financial assets and liabilities, together with the carrying amounts, are as follow:

	2020		2019		2018		
	Nilai tercatat/ *Carrying amount*	Nilai wajar/ *Fair Value*	Nilai tercatat/ *Carrying amount*	Nilai wajar/ *Fair Value*	Nilai tercatat/ *Carrying amount*	Nilai wajar/ *Fair Value*	
Aset keuangan							***Financial assets***
Kas dan setara kas	947.341	947.341	525.242	525.242	220.586	220.586	*Cash and cash equivalents*
Piutang usaha -							*Trade receivables -*
pihak ketiga	710.722	710.722	466.547	466.547	383.303	383.303	*third parties*
Piutang lain-lain	262.885	262.885	305.778	305.778	77.660	77.660	*Other receivables*
Pendapatan yang masih							
harus diterima	491.190	491.190	522.332	522.332	546.608	546.608	*Accrued revenue*
Investasi	-	-	1.508	1.508	1.508	1.508	*Investment*
Uang jaminan	1.708	1.708	2.281	2.281	2.067	2.067	*Refundable deposits*
Jumlah	2.413.846	2.413.846	1.823.688	1.823.688	1.231.732	1.231.732	***Total***

	2020		2019		2018		
	Nilai tercatat/ *Carrying amount*	Nilai wajar/ *Fair Value*	Nilai tercatat/ *Carrying amount*	Nilai wajar/ *Fair Value*	Nilai tercatat/ *Carrying amount*	Nilai wajar/ *Fair Value*	
Liabilitas keuangan							***Financial liabilities***
Utang usaha - pihak ketiga	571.000	571.000	247.591	247.591	231.711	231.711	*Trade payables - third parties*
Utang lain-lain	21.057	21.057	40.939	40.939	104.028	104.028	*Other payables*
Beban masih harus dibayar	1.156.790	1.156.790	1.168.585	1.168.585	1.466.028	1.466.028	*Accrued expenses*
Liabilitas sewa (Catatan 27.b)	466.512	466.512	-	-	-	-	*Lease liabilities (Note 27.b)*
Pinjaman jangka panjang:							*Long-term loan:*
sewa pembiayaan	-	-	18.891	18.891	17.963	17.963	*Finance lease*
pihak ketiga	10.278.847	10.278.847	15.115.908	15.115.908	14.954.124	14.954.124	*third parties*
Surat utang	13.568.482	13.568.482	7.825.207	7.825.207	7.889.025	7.889.025	*Notes*
Jumlah	26.062.688	26.062.688	24.417.121	24.417.121	24.662.879	24.662.879	***Total***

43. **MANAJEMEN RISIKO KEUANGAN** (Lanjutan)

d. **Estimasi nilai wajar** (Lanjutan)

Nilai wajar atas sebagian besar aset dan liabilitas keuangan mendekati nilai tercatat karena dampak pendiskontoan yang tidak signifikan.

Nilai wajar dari pinjaman jangka panjang dinilai menggunakan *discounted cash flows* berdasarkan tingkat suku bunga efektif terakhir yang berlaku untuk masing-masing pinjaman yang diutilisasi.

e. **Risiko operasional**

Risiko operasional adalah risiko kerugian yang diakibatkan oleh kurang memadainya atau kegagalan dari proses internal, faktor manusia dan sistem atau dari kejadian-kejadian eksternal. Risiko ini melekat dalam semua proses bisnis, kegiatan operasional, sistem dan layanan Perusahaan dan entitas anak.

f. **Manajemen risiko permodalan**

Tujuan Perusahaan dan entitas anak dalam mengelola permodalan adalah untuk melindungi kemampuan Perusahaan dan entitas anak dalam mempertahankan kelangsungan usaha, sehingga entitas dapat tetap memberikan imbal hasil bagi pemegang saham dan manfaat bagi pemangku kepentingan lainnya dan untuk mengelola struktur modal yang optimal untuk meminimalisasi biaya modal yang efektif. Dalam rangka mengelola struktur modal, Perusahaan dan entitas anak mungkin menyesuaikan jumlah dividen, menerbitkan saham baru atau menambah/mengurangi jumlah utang.

Strategi Perusahaan selama tahun 2020, 2019 dan 2018 adalah mempertahankan rasio utang senior bersih terhadap EBITDA yang disesuaikan dan disetahunkan kurang dari 5 kali (Catatan 25).

*43. **FINANCIAL RISK MANAGEMENT** (Continued)*

*d. **Fair value estimation** (Continued)*

The fair value of most of the financial assets and liabilities approximates their carrying amount, as the impact of discounting is not significant.

The fair value of long-term loans are estimated by using discounted cash flows applying the effective interest rate charged by the lenders for the last utilisation in each currency borrowings.

*e. **Operational risk***

Operational risk is the risk of losses resulting from inadequate internal processes or a failure of such processes, human factors and systems or from external events. This risk is inherent in all business processes, operations and services of the Company and subsidiaries.

*f. **Capital risk management***

The objectives of the Company and subsidiaries when managing capital are to safeguard the ability of the Company and subsidiaries to continue as a going concern in order to provide returns for shareholders and benefits for other stakeholders and to maintain an optimal capital structure to minimize the effective cost of capital. In order to maintain the capital structure, the Company and subsidiaries may from time to time adjust the amount of dividends, issue new shares or increase/reduce debt levels.

The Company's strategy for 2020, 2019 and 2018 was to maintain the ratio of net senior debt to annualized adjusted EBITDA to be less than 5 times (Note 25).

44. **TRANSAKSI NON-KAS**

Transaksi non-kas Perusahaan dan entitas anaknya adalah sebagai berikut:

*44. **NON-CASH TRANSACTIONS***

Non-cash transactions of the Company and it subsidiaries are as follows:

	2020	2019	2018	
Surplus revaluasi	3.405.454	1.600.720	83.074	*Revaluation surplus*
Liabilitas sewa aset hak guna	450.430	-	-	*Right of use assets lease liabilities*
Aset hak guna	334.627	-	-	*Right of use assets*
Kapitalisasi kenaikan nilai revaluasi properti investasi	34.778	79.427	7.728	*Capitalization increase in revaluation value of investment properties*
Surat sanggup bayar (Catatan 7)	-	(221.425)	221.425	*Promissory notes (Note 7)*
Piutang PT Hamparan Cipta Sejati (Catatan 6)	-	221.425	-	*Receivable of PT Hamparan Cipta Sejati (Note 6)*
Konversi utang menjadi modal saham	-	63.476	-	*Conversion of debt to equity*
Jumlah	4.225.289	1.743.623	312.227	***Total***

Tabel berikut menjelaskan perubahan pada liabilitas Perusahaan dan entitas anak yang timbul dari aktivitas pendanaan, yang meliputi perubahan terkait kas dan non kas:

The following table describes changes in the Company and subsidiaries liabilities arising from financing activities, which include changes related to cash and non-cash:

44. **TRANSAKSI NON-KAS** (Lanjutan) / *44. **NON-CASH TRANSACTIONS** (Continued)*

	1 Januari/ *1 January* 2020	Penambahan/ *Additions*	Pengurangan/ *Deductions*	Perubahan non kas/ *Non-cash changes*: Pergerakan kurs/ *Exchange rate movements*	Perubahan non kas/ *Non-cash changes*: Perubahan lainnya/*Other changes*	31 Desember/ *31 December* 2020	
Surat Utang	7.853.350	7.728.900	(2.150.000)	229.250	-	13.661.500	*Notes payable*
Pinjaman jangka panjang							*Long-term loans*
Pihak ketiga	15.269.643	5.911.224	(10.823.527)	42.925	-	10.400.265	*Third parties*
Sewa pembiayaan	18.891	-	-	-	(18.891)	-	*Finance lease*
Liabilitas sewa							*Lease liabilities*
Aset hak guna	318.453	60.572	(22.199)	-	93.604	450.430	*Right of use assets*
Kendaraan (Catatan 27.b)	-	-	(8.445)	-	24.527	16.082	*Vehicles (Note 27.b)*
Jumlah	23.460.337	13.700.696	(13.004.171)	272.175	99.240	24.528.277	***Total***

	1 Januari/ *1 January* 2019	Penambahan/ *Additions*	Pengurangan/ *Deductions*	Perubahan non kas/ *Non-cash changes*: Pergerakan kurs/ *Exchange rate movements*	Perubahan non kas/ *Non-cash changes*: Perubahan lainnya/*Other changes*	31 Desember/ *31 December* 2019	
Surat Utang	7.934.350	750.000	(628.000)	(203.000)	-	7.853.350	*Notes payable*
Pinjaman jangka panjang							*Long-term loans*
Pihak ketiga	15.069.511	10.512.614	(9.694.752)	(617.730)	-	15.269.643	*Third parties*
sewa pembiayaan	17.963	-	(6.272)	-	7.200	18.891	*Finance lease*
Utang pihak berelasi	63.476	-	-	-	(63.476)	-	*Due to related parties*
Jumlah	23.085.300	11.262.614	(10.329.024)	(820.730)	(56.276)	23.141.884	***Total***

	1 Januari/ *1 January* 2018	Penambahan/ *Additions*	Pengurangan/ *Deductions*	Penambahan dari kombinasi bisnis/ Addition of business *combination*	Perubahan non kas/ *Non-cash changes*: Pergerakan kurs/ *Exchange rate movements*	Perubahan non kas/ *Non-cash changes*: Perubahan lainnya/*Other changes*	31 Desember/ *31 December* 2018	
Surat Utang	6.371.800	1.236.000	-	-	326.550	-	7.934.350	*Notes payable*
Pinjaman jangka panjang								*Long-term loans*
Pihak ketiga	14.199.997	3.887.051	(4.095.560)	-	1.078.023	-	15.069.511	*Third parties*
Sewa pembiayaan	11.054	-	(4.838)	-	-	11.747	17.963	*Finance lease*
Utang pihak berelasi	-	-	-	63.476	-	-	63.476	*Due to related parties*
Jumlah	20.582.851	5.123.051	(4.100.398)	63.476	1.404.573	11.747	23.085.300	***Total***

45. SEGMEN OPERASI / *45. OPERATING SEGMENT*

a. Segmen Primer / *a. Primary Segment*

2020	Menara/ *Tower*	Repeater/ *Repeater*	Gedung/ *Building*	Konsolidasian/ *Consolidation*	*2020*
Pendapatan					***Revenue***
Pihak ketiga	5.282.926	36.535	8.228	5.327.689	*Third parties*
Hasil					***Result***
Beban pokok pendapatan	1.080.992	9.878	2.195	1.093.065	*Cost of revenue*
Hasil segmen				4.234.624	*Segments result*
Beban usaha yang tidak dapat dialokasi				418.623	*Operating expenses which can not be allocated*
Laba dari Operasi				3.816.001	*Profit from operation*
Kenaikan nilai wajar atas properti investasi				34.778	*Increase of fair value of investment properties*
Laba selisih kurs - Bersih				37.452	*Gain on foreign exchange - Net*
Pendapatan bunga				14.869	*Interest income*
Penurunan nilai wajar atas menara telekomunikasi				(4.584)	*Decrease of fair value of telecommunication towers*
Beban kerugian kredit ekspektasian aset keuangan				(23.623)	*Expected credit losses expense - financial assets*
Beban Pajak Final				(155.723)	*Final income tax*
Beban keuangan - Lainnya				(191.345)	*Financial expenses - Others*
Beban keuangan - Pinjaman dan surat utang				(1.943.161)	*Financial expenses - long term loans and notes*
Lainnya - Bersih				(75.023)	*Others - Net*
Laba Sebelum Pajak				1.509.641	*Profit Before Tax*
Beban Pajak Penghasilan					*Income Tax Expenses*
Kini				(254.752)	*Current*
Tangguhan				(188.126)	*Deferred*
Laba Bersih				1.066.763	*Net Profit*
Aset segmen	28.198.813	351.355	188.194	28.738.362	*Segment assets*
Aset tidak dapat dialokasi				7.782.941	*Unallocated assets*
Jumlah aset				36.521.303	*Total assets*
Liabilitas segmen				-	*Segment liabilities*
Liabilitas tidak dapat dialokasi				27.217.465	*Unallocated liabilities*
Jumlah liabilitas				27.217.465	*Total liabilities*

45. **SEGMEN OPERASI** (Lanjutan) / *45. **OPERATING SEGMENT** (Continued)*

a. Segmen Primer (Lanjutan) / *a. Primary Segment (Continued)*

2019	Menara/ *Tower*	Repeater/ *Repeater*	Gedung/ *Building*	Konsolidasian/ *Consolidation*	*2019*
Pendapatan					***Revenue***
Pihak ketiga	4.656.569	30.220	11.953	4.698.742	*Third parties*
Hasil					***Result***
Beban pokok pendapatan	887.660	11.089	4.705	903.454	*Cost of revenue*
Hasil segmen				3.795.288	*Segments result*
Beban usaha yang tidak dapat dialokasi				426.434	*Operating expenses which can not be allocated*
Laba dari Operasi				3.368.854	*Profit from operation*
Kenaikan nilai wajar atas properti investasi				79.427	*Increase of fair value of investment properties*
Pendapatan bunga				10.440	*Interest income*
Laba selisih kurs - Bersih				8.966	*Gain on foreign exchange - Net*
Penurunan nilai wajar atas menara telekomunikasi				(40.405)	*Decrease of fair value of telecommunication towers*
Penurunan atas *goodwill*				(47.421)	*Impairment of goodwill*
Beban keuangan - Lainnya				(76.761)	*Financial expenses - Others*
Beban Pajak Final				(81.394)	*Final income tax*
Beban keuangan - Pinjaman dan surat utang				(1.940.149)	*Financial expenses - long term loans and notes*
Lainnya - Bersih				(58.962)	*Others - Net*
Laba Sebelum Pajak				1.222.595	*Profit Before Tax*
Beban Pajak Penghasilan					*Income Tax Expenses*
Kini				(261.448)	*Current*
Tangguhan				(95.026)	*Deferred*
Laba Bersih				866.121	*Net Profit*
Aset segmen	24.363.834	186.734	98.726	24.649.294	*Segment assets*
Aset tidak dapat dialokasi				6.222.416	*Unallocated assets*
Jumlah aset				30.871.710	*Total assets*
Liabilitas segmen				-	*Segment liabilities*
Liabilitas tidak dapat dialokasi				25.348.426	*Unallocated liabilities*
Jumlah liabilitas				25.348.426	*Total liabilities*

45. **SEGMEN OPERASI** (Lanjutan) / *45. **OPERATING SEGMENT** (Continued)*

a. Segmen Primer (Lanjutan) / *a. Primary Segment (Continued)*

2018	Menara/ *Tower*	Repeater/ *Repeater*	Gedung/ *Building*	Konsolidasian/ *Consolidation*	*2018*
Pendapatan					***Revenue***
Pihak ketiga	4.294.741	17.870	5.526	4.318.137	*Third parties*
Hasil					***Result***
Beban pokok pendapatan	767.222	16.860	-	784.082	*Cost of revenue*
Hasil segmen				3.534.055	*Segments result*
Beban usaha yang tidak dapat dialokasi				381.463	*Operating expenses which can not be allocated*
Laba dari Operasi				3.152.592	*Profit from operation*
Kenaikan nilai wajar atas properti investasi				7.728	*Increase of fair value of investment properties*
Pendapatan bunga				8.431	*Interest income*
Laba selisih kurs - Bersih				2.221	*Gain on foreign exchange - Net*
Penurunan nilai wajar atas menara telekomunikasi				-	*Decrease of fair value of telecommunication towers*
Penurunan atas *goodwill*				(15.722)	*Impairment of goodwill*
Beban keuangan - Lainnya				(68.024)	*Financial expenses - Others*
Beban Pajak Final				(17.310)	*Final income tax*
Beban keuangan - Pinjaman dan surat utang				(2.003.573)	*Financial expenses - long term loans and notes*
Lainnya - Bersih				(49.368)	*Others - Net*
Laba Sebelum Pajak				1.016.975	*Profit Before Tax*
Beban Pajak Penghasilan					*Income Tax Expenses*
Kini				(187.395)	*Current*
Tangguhan				(126.948)	*Deferred*
Laba Bersih				702.632	*Net Profit*
Aset segmen	21.126.749	268.184	98.726	21.493.659	*Segment assets*
Aset tidak dapat dialokasi				7.620.088	*Unallocated assets*
Jumlah aset				29.113.747	*Total assets*
Liabilitas segmen				-	*Segment liabilities*
Liabilitas tidak dapat dialokasi				25.348.426	*Unallocated liabilities*
Jumlah liabilitas				25.348.426	*Total liabilities*

45. **SEGMEN OPERASI** (Lanjutan) / *45. **OPERATING SEGMENT** (Continued)*

b. Segmen Sekunder / *b. Secunder Segment*

2020	**Jawa dan Bali/ *Java and Bali***	**Sumatera/ *Sumatra***	**Kalimantan/ *Borneo***	**Sulawesi/ *Sulawesi***	**Konsolidasian/ *Consolidation***	***2020***
Pendapatan	3.053.819	1.426.335	392.311	455.224	5.327.689	*Revenue*
Beban	552.159	396.740	75.815	68.351	1.093.065	*Expense*
Aset segmen yang dapat dialokasikan	16.291.567	7.019.485	2.001.651	3.425.659	28.738.362	*Segment assets which can be allocated*
Aset segmen yang tidak dapat dialokasikan					7.782.941	*Segment assets which can not be allocated*
Jumlah aset					36.521.303	*Total assets*
Liabilitas segmen yang tidak dapat dialokasikan					27.221.184	*Segment liabilities which can not be allocated*

2019	**Jawa dan Bali/ *Java and Bali***	**Sumatera/ *Sumatra***	**Kalimantan/ *Borneo***	**Sulawesi/ *Sulawesi***	**Konsolidasian/ *Consolidation***	***2019***
Pendapatan	2.671.840	1.274.710	338.178	414.014	4.698.742	*Revenue*
Beban	515.707	241.990	63.970	81.787	903.454	*Expense*
Aset segmen yang dapat dialokasikan	13.535.059	7.012.916	1.762.804	2.338.515	24.649.294	*Segment assets which can be allocated*
Aset segmen yang tidak dapat dialokasikan					6.222.416	*Segment assets which can not be allocated*
Jumlah aset					30.871.710	*Total assets*
Liabilitas segmen yang tidak dapat dialokasikan					25.434.182	*Segment liabilities which can not be allocated*

2018	**Jawa dan Bali/ *Java and Bali***	**Sumatera/ *Sumatra***	**Kalimantan/ *Borneo***	**Sulawesi/ *Sulawesi***	**Konsolidasian/ *Consolidation***	***2018***
Pendapatan	2.515.040	1.143.303	297.950	361.844	4.318.137	*Revenue*
Beban	465.533	199.203	52.941	66.405	784.082	*Expense*
Aset segmen yang dapat dialokasikan	11.558.291	6.097.145	1.726.947	2.111.276	21.493.659	*Segment assets which can be allocated*
Aset segmen yang tidak dapat dialokasikan					7.620.088	*Segment assets which can not be allocated*
Jumlah aset					34.215.966	*Total assets*
Liabilitas segmen yang tidak dapat dialokasikan					22.410.705	*Segment liabilities which can not be allocated*

46. PERISTIWA SETELAH PERIODE PELAPORAN

a. Pencairan pinjaman

Surat Utang dalam USD sebesar US$ 300 juta

Pada tanggal 20 Januari 2021, Perusahaan menerbitkan 2,75% *Senior Unsecured Notes* ("Surat Utang") dengan nilai agregat sebesar US$ 300.000.000. Surat Utang ini dikenakan bunga sebesar 2,75% per tahun yang jatuh tempo pada tanggal 20 Januari dan 20 Juli setiap tahun, dimulai pada tanggal 20 Juli 2021. Surat Utang ini akan jatuh tempo pada tanggal 20 Januari 2026.

Dana dari penerbitan surat utang ini digunakan untuk membiayai kembali sebagian Fasilitas Pinjaman *Revolving* Seri B sebesar US$100.000.000 dalam US$ 1.000.000.000 Facility agreement, sebagian Fasilitas Pinjaman *Revolving* dalam US$ 200.000.000 *Facility Agreement* dan sebagian Fasilitas Pinjaman *Revolving* dalam US$ 375.000.000 *Facility Agreement*.

Fasilitas Pinjaman *Revolving* PT Bank UOB Indonesia ("UOB")

Pada berbagai tanggal dibulan Januari sampai dengan 18 Juni 2021, GHON, entitas anak, telah mencairkan sebagian Fasilitas Pinjaman *Revolving* dari UOB sebesar Rp 131.500 (lihat catatan 25).

Pada berbagai tanggal di bulan Juli sampai dengan 20 September 2021, GHON, entitas anak, telah menarik sebagian Fasilitas Pinjaman *Revolving* dari UOB sebesar Rp 137.800 (lihat catatan 25).

Fasilitas Pinjaman PT Bank QNB Indonesia Tbk ("QNB")

Pada tanggal 8 Januari 2021, GHON, entitas anak, telah menarik sebagian Fasilitas Pinjaman dari QNB sebesar Rp 13.500 (lihat catatan 25).

Fasilitas Pinjaman *Revolving* Seri B sebesar US$ 100 juta

Pada tanggal 16 Februari, 29 Maret, 30 Maret dan 10 Agustus 2021, entitas anak, telah menarik sebagian Fasilitas Pinjaman *Revolving* Seri B sebesar US$ 100 juta dalam US$ 1.000.000.000 *Facility Agreement* sebesar US$ 35.200.000, US$ 10.000.000, US$ 41.900.000 dan US$ 10.000.000 (lihat catatan 25.a.2).

Fasilitas Pinjaman *Revolving* sebesar US$ 200 juta

Pada tanggal 6 Januari, 19 Januari, 16 Februari, 30 Maret, 15 April, 22 April, 1 Juli, 22 Juli dan 6 Agustus 2021, entitas anak telah menarik sebagian Fasilitas Pinjaman *Revolving* sebesar US$ 200 juta dalam US$ 200.000.000 *Facility Agreement* sebesar US$ 10.000.000, US$ 12.700.000, US$ 59.600.000, US$ 9.500.000, US$ 5.000.000, US$ 7.000.000, US$ 43.000.000, US$ 10.000.000 dan US$ 15.000.000 (lihat catatan 25.b).

46. EVENTS AFTER THE REPORTING PERIOD

a. Loan withdrawal

Notes in USD amounted to US$ 300 million

On 20 January 2021, the Company issued 2.75% Senior Unsecured Notes ("Notes") with an aggregate value of US$ 300,000,000. These notes bear interest at 2.75% per annum and pay interest on 20 January and 20 July each year, commencing on 20 July 2021. The Notes will mature on 20 January 2026.

The proceeds from the issuance of the Notes were used to refinance part of outstanding revolving B of US$ 100 million under US$ 1,000,000,000 Credit Facilities, part of outstanding revolving loan facility under US$ 200 million Revolving Loan Facility, and part of oustanding Revolving Loan Facility under US$ 375 million Revolving Loan Facility.

PT Bank UOB Indonesia Revolving Credit Facility ("UOB")

On several dates in January to 18 June 2021, GHON, the Subsidiary, has partially withdrawn a revolving loan facility from UOB amounting to Rp 131,500 (see note 25).

On several dates in July to 20 September 2021, GHON, the Subsidiary, has partially withdrawn a revolving loan facility from UOB amounting to Rp 137,800 (see note 25).

PT Bank QNB Indonesia Tbk Credit Facility ("QNB")

On 8 January 2021, GHON, the Subsidiary, has partially withdrawn a loan facility from QNB amounting to Rp 13,500 (see note 25).

Facility B of US$ 100 million Revolving Loan Facility

On 16 February, 29 March, 30 March and 10 August 2021, the Subsidiary has partially withdrawn the facility B of US$ 100 million Revolving Loan Facility under US$ 1,000,000,000 Credit Facilities amounting to US$ 35,200,000, US$ 10,000,000, US$ 41,900,000 and US$ 10,000,000 (see note 25.a.2).

US$ 200 million Revolving Loan Facility

On 6 January, 19 January, 16 February, 30 March, 15 April, 22 April, 1 July, 22 July and 6 August 2021, the subsidiary, has partially withdrawn the US$ 200 million Revolving Loan Facility under US$ 200,000,000 Revolving Loan Facility amounting to US$ 10,000,000, US$ 12,700,000 and US$ 59,600,000, US$ 9,500,000, US$ 5,000,000, US$ 7,000,000, US$ 43,000,000, US$ 10,000,000 and US$ 15,000,000 (see note 25.b).

46. **PERISTIWA SETELAH PERIODE PELAPORAN** (Lanjutan)

a. **Pencairan pinjaman** (Lanjutan)

Fasilitas pinjaman *Revolving* sebesar US$ 275 juta

Pada tanggal 29 Januari dan 30 Maret 2021, entitas anak, telah menarik seluruh Fasilitas Pinjaman *Revolving* sebesar US$ 275 juta dalam US$ 275.000.000 *Facility Agreement* sebesar US$ 275.000.000 dan US$ 205.500.000.

Pada tanggal 18 Agustus 2021, entitas anak, telah menarik sebagian Fasilitas pinjaman *Revolving* sebesar US$ 275 juta dalam US$ 275 juta *Revolving Loan Facility* sebesar US$ 10.000.000.

Fasilitas Pinjaman *Revolving* sebesar US$ 375 juta

Pada tanggal 4 Februari, 16 Februari, 2 Maret, 18 Maret, 30 Maret, 15 April, 17 Mei dan 15 September 2021, entitas anak, telah menarik sebagian Fasilitas Pinjaman *Revolving* sebesar US$ 375 juta dalam US$ 375.000.000 *Facility Agreement* sebesar US$ 23.000.000, US$ 255.200.000, US$ 45.900.000, US$ 21.100.000, US$ 20.100.000, US$ 46.000.000, US$ 12.000.000 dan US$ 16.300.000 (lihat catatan 25.c).

Obligasi Berkelanjutan IV Tahap III

Pada tanggal 17 Februari 2021, Perusahaan menerbitkan Obligasi Berkelanjutan IV Tower Bersama Infrastructure Tahap III Tahun 2021 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan IV Tahap III"). Nominal Obligasi Berkelanjutan IV Tahap III ini adalah sebesar Rp 2.915.000. Obligasi ini dicatatkan pada Bursa Efek Indonesia pada tanggal 18 Februari 2021.

Obligasi Berkelanjutan IV Tahap III ini diterbitkan dalam 2 (dua) seri sebagai berikut:

a. Obligasi seri A dengan nilai nominal sebesar Rp 1.898.000 dengan tingkat bunga tetap sebesar 5,50% per tahun. Jangka waktu obligasi seri A adalah 370 (tiga ratus tujuh puluh) Hari Kalender.
b. Obligasi seri B dengan nilai nominal sebesar Rp 1.017.000 dengan tingkat bunga tetap sebesar 6,75% per tahun berjangka waktu 3 (tiga) tahun.

Hasil bersih yang diperoleh dari penerbitan Obligasi Berkelanjutan IV Tahap III telah digunakan seluruhnya untuk pembayaran kewajiban keuangan entitas anak.

Obligasi Berkelanjutan IV Tahap IV

Pada tanggal 9 April 2021, Perusahaan menerbitkan Obligasi Berkelanjutan IV Tower Bersama Infrastructure Tahap IV Tahun 2021 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan IV Tahap IV") sebesar 5,5% per tahun. Nominal Obligasi Berkelanjutan IV Tahap IV ini adalah sebesar Rp 970.000. Obligasi ini dicatatkan pada Bursa Efek Indonesia pada tanggal 12 April 2021.

Hasil bersih yang diperoleh dari penerbitan Obligasi Berkelanjutan IV Tahap IV telah digunakan seluruhnya untuk pembayaran kewajiban keuangan entitas anak.

*46. **EVENTS AFTER THE REPORTING PERIOD** (Continued)*

*a. **Loan withdrawal** (Continued)*

US$ 275 million Revolving loan Facility

On 29 January and 30 March 2021, the subsidiary, has fully withdrawn the US$ 275 million Revolving Loan Facility under US$ 275 million Revolving Loan Facility amounting to US$ 275,000,000 and US$ 205,500,000.

On 18 August 2021, the Subsidiary has partially withdrawn US$ 275 million Revolving Loan Facility under US$ 275 million Revolving Loan Facility amounting to US$ 10,000,000.

US$ 375 million Revolving Loan Facility

On 4 February, 16 February, 2 March, 18 March, 30 March, 15 April, 17 May and 15 September 2021, the subsidiary, has partially withdrawn the US$ 375 million Revolving Loan Facility under US$ 375,000,000 Revolving Loan Facility amounting to US$ 23,000,000, US$ 255,200,000, US$ 45,900,000, US$ 21,100,000, US$ 20,100,000 and US$ 46,000,000, US$ 12,000,000 and US$ 16,300,000 (see note 25.c).

Continuous Bonds IV Phase III

On 17 Februari 2021, The Company issued Continous Bonds IV Tower Bersama Infrastructure phase III Year 2021 with a Fixed Interest Rate ("Continuous Bonds IV Phase III"). The Continuous Bonds IV Phase III has a total principal of Rp 2,915,000. These bonds are listed on the Indonesia stock exchange on 18 February 2021.

These Continuous Bonds IV Phase III were issued inseries consisting of:

a. Series A Bonds with nominal value of Rp 1,898,000 at a fixed interest rate of 5.50% per year. The term of the Series A Bonds is 370 (three hundred and seventy) Calendar Days.
b. Series B Bonds with nominal value of Rp 1,017,000 at a fixed interest rate of 6.75% per year. The term of the Series B Bonds is 3 (three) years.

The net proceeds obtained from the issuance of Continuous Bonds IV Phase III were used entirely for the payment of financial liabilities of subsidiaries.

Continuous Bonds IV Phase IV

On 9 April 2021, The Company issued Continous Bonds IV Tower Bersama Infrastructure Phase IV Year 2021 with a Fixed Interest Rate ("Continuous Bonds IV Phase IV") amounted to 5.5% per year. The Continuous Bonds IV Phase IV has a total principal of Rp 970,000. These bonds are listed on the Indonesia stock exchange on 12 April 2021.

The net proceeds obtained from the issuance of Continuous Bonds IV Phase IV were used entirely for the payment of financial liabilities of subsidiaries.

46. **PERISTIWA SETELAH PERIODE PELAPORAN** (Lanjutan)

a. **Pencairan pinjaman** (Lanjutan)

Obligasi Berkelanjutan V Tahap I

Pada tanggal 19 Agustus 2021, Perusahaan menerbitkan Obligasi Berkelanjutan V Tower Bersama Infrastructure Tahap I Tahun 2021 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan V Tahap I") sebesar 4,25% per tahun. Nominal Obligasi Berkelanjutan V Tahap I ini adalah sebesar Rp 1.200.000. Obligasi ini dicatatkan pada Bursa Efek Indonesia pada tanggal 20 Agustus 2021.

Hasil bersih yang diperoleh dari penerbitan Obligasi Berkelanjutan V Tahap I telah digunakan seluruhnya untuk pembayaran kewajiban keuangan entitas anak.

Bunga Obligasi dibayarkan setiap triwulan, dimana Bunga Obligasi pertama akan dibayarkan pada tanggal 19 November 2021, sedangkan Bunga Obligasi terakhir sekaligus dengan pelunasan Obligasi Berkelanjutan V Tahap I akan dibayarkan pada tanggal 29 Agustus 2022.

b. **Pembayaran pinjaman**

Fasilitas Pinjaman *Revolving* PT Bank UOB Indonesia ("UOB")

Pada berbagai tanggal dibulan Januari sampai dengan 11 Juni 2021, GHON, entitas anak, telah melunasi sebagian Fasilitas Pinjaman *Revolving* dari UOB sebesar Rp 110.600 (lihat catatan 25).

Pada berbagai tanggal dibulan Juli sampai dengan 20 September 2021, GHON, entitas anak, telah melunasi sebagian Fasilitas Pinjaman *Revolving* dari UOB sebesar Rp 124.200 (lihat catatan 25).

Fasilitas Pinjaman PT Bank QNB Indonesia Tbk ("QNB")

Pada tanggal 28 Januari, 26 Februari, 26 Maret, 28 April dan 28 Mei 2021, GHON, entitas anak, telah melunasi sebagian Fasilitas Pinjaman dari QNB sebesar Rp 4.167 (lihat catatan 25).

Pada tanggal 28 Juli dan 28 Agustus 2021, GHON, entitas anak, telah melunasi sebagian Fasilitas Pinjaman dari QNB sebesar Rp 1.667 (lihat catatan 25).

Fasilitas pinjaman *Revolving* Seri B sebesar US$ 100 juta

Pada tanggal 22 Januari, 3 Februari dan 7 Mei 2021, entitas anak, telah melunasi sebagian Fasilitas Pinjaman *Revolving* Seri B sebesar US$ 100 juta dalam US$ 1.000.000.000 *Facility Agreement* sebesar US$ 42.100.000, US$ 36.900.000 dan US$ 5.000.000 (lihat catatan 25.a.2).

Pada tanggal 7 Juli 2021, entitas anak, telah melunasi sebagian Fasilitas pinjaman Revolving Seri B sebesar US$ 100 juta dalam US$ 1.000.000.000 Facility agreement sebesar US$ 20.000.000 (lihat catatan 25.a.2).

*46. **EVENTS AFTER THE REPORTING PERIOD** (Continued)*

*a. **Loan withdrawal** (Continued)*

Continuous Bonds V Phase I

On 19 August 2021, The Company issued Continous Bonds V Tower Bersama infrastructure Phase I Year 2021 with a Fixed Interest Rate ("Continuous Bonds V Phase I") of 4.25% per annum. The Continuous Bonds V Phase I has a total principal of Rp 1,200,000. These bonds are listed on the Indonesia stock exchange on 20 August 2021.

The net proceeds obtained from the issuance of Continuous Bonds V Phase I were used entirely for the payment of financial liabilities of subsidiaries.

Interest for Continuous Bonds IV Phase IV will be paid on a quarterly basis on the interest payment date. The first payment of interest is on 19 November 2021. The date of the last interest payment, which is also the due date of Continuous Bond V phase I, is on 29 August 2022.

*b. **Loan repayment***

PT Bank UOB Indonesia Revolving Credit Facility ("UOB")

On several dates in January to 11 June 2021, GHON, the Subsidiary, has partially repaid a revolving loan facility from UOB amounting to Rp 110,600 (see note 25).

On several dates in July to 1 September 2021, GHON, the Subsidiary, has partially repaid a revolving loan facility from UOB amounting to Rp 124,200 (see note 25).

PT Bank QNB Indonesia Tbk Credit Facility ("QNB")

On 28 January, 26 February, 26 March, 28 April and 28 May 2021, GHON, the Subsidiary, has partially repaid a Loan Facility from QNB amounting to Rp 4,167 (see note 25).

On 28 July and 28 August 2021, GHON, the Subsidiary, has partially repaid a loan facility from QNB amounting to Rp 1,667 (see note 25).

Facility B of US$ 100 million Revolving Loan Facility

On 22 January, 3 February and 7 May 2021, the Subsidiary has partially repaid the facility B of US$ 100 million Revolving Loan Facility under US$ 1,000,000,000 Credit Facilities amounting to US$ 42,100,000, US$ 36,900,000 and US$ 5,000,000 (see note 25.a.2).

On 7 July 2021, the Subsidiary has partially repaid the facility B of US$ 100 million revolving loan facility under US$ 1,000,000,000 Credit Facilities amounting to US$ 20,000,000 (see note 25.a.2).

46. **PERISTIWA SETELAH PERIODE PELAPORAN** (Lanjutan)

b. **Pembayaran pinjaman** (Lanjutan)

Fasilitas D sebesar US$ 275 juta

Pada tanggal 29 Januari 2021, entitas anak, telah melunasi seluruh Fasilitas D sebesar US$ 275 juta dalam US$ 1.000.000.000 *Facility Agreement* sebesar US$ 275.000.000 (lihat catatan 25.a.4).

Fasilitas Pinjaman *Revolving* sebesar US$ 200 juta

Pada tanggal 22 Januari, 3 Februari, 3 Maret dan 7 Mei 2021, entitas anak telah melunasi sebagian Fasilitas Pinjaman *Revolving* sebesar US$ 200 juta dalam US$ 200.000.000 *Facility Agreement* sebesar US$ 16.200.000, US$ 9.100.000, US$ 30.900.000 dan US$ 10.000.000 (lihat catatan 25.b).

Pada tanggal 19 Agustus 2021, entitas anak telah melunasi sebagian Fasilitas Pinjaman *Revolving* sebesar US$ 200 juta dalam US$ 200 juta *Facility Agreement* sebesar US$ 10.000.000 (lihat catatan 25.b).

Fasilitas Pinjaman *Revolving* sebesar US$ 375 juta

Pada tanggal 22 Januari, 14 April dan 3 Juni 2021, entitas anak, telah melunasi sebagian Fasilitas Pinjaman *Revolving* sebesar US$ 375 juta dalam US$ 375.000.000 *Facility Agreement* sebesar US$ 292.100.000, US$ 75.000.000 dan US$ 40.000.000 (lihat catatan 25.c).

Pada tanggal 31 Agustus 2021, entitas anak telah melunasi sebagian Fasilitas Pinjaman *Revolving* sebesar US$ 375 juta dalam US$ 375 juta *Facility Agreement* sebesar US$ 82.000.000 (lihat catatan 25.c).

5,25% *Senior Unsecured Note* sebesar US$ 350 juta

Pada tanggal 22 Februari 2021, TBG Global Pte Ltd, entitas anak telah melunasi seluruh surat utang dalam USD sebesar US$ 350.000.000. Surat utang tersebut jatuh tempo pada tanggal 10 Februari 2022 (lihat catatan 26.a).

Fasilitas Pinjaman *Revolving* sebesar US$ 275 juta

Pada tanggal 24 Februari 2021, entitas anak, telah melunasi sebagian Fasilitas Pinjaman *Revolving* sebesar US$ 275 juta dalam US$ 275.000.000 *Facility Agreement* sebesar US$ 205.500.000.

Pada tanggal 12 Agustus 2021, entitas anak, telah melunasi sebagian Fasilitas pinjaman *Revolving* sebesar US$ 275 juta dalam US$ 275 juta *Revolving Loan Facility* sebesar US$ 10.000.000.

Obligasi Berkelanjutan III Tahap IV

Pada tanggal 1 April 2021, Perusahaan telah melunasi Obligasi Berkelanjutan III Tahap IV Seri A dengan nilai nominal Rp 633.000 (lihat catatan 26.g).

*46. **EVENTS AFTER THE REPORTING PERIOD** (Continued)*

*b. **Loan repayment** (Continued)*

Facility D US$ 275 million Loan Facility

On 29 January 2021, the Subsidiary has fully repaid the facility D of US$ 275 million Loan Facility under US$ 1,000,000,000 Credit Facilities amounting to US$ 275,000,000 (see note 25.a.4).

US$ 200 million Revolving Loan Facility

On 22 January, 3 February, 3 March and 7 May 2021, the subsidiary, has partially repaid the US$ 200 million Revolving Loan Facility under US$ 200,000,000 Revolving Loan Facility amounting to US$ 16,200,000, US$ 9,100,000, US$ 30,900,000 and US$ 10,000,000 (see note 25.b).

On 19 August 2021, the subsidiary, has partially repaid the US$ 200 million revolving loan facility under US$ 200 million Revolving Loan Facility amounting to US$ 10,000,000 (see note 25.b).

US$ 375 million Revolving Loan Facility

On 22 January, 14 April and 3 June 2021, the subsidiary, has partially repaid the US$ 375 million Revolving Loan Facility under US$ 375,000,000 Revolving Loan Facility amounting to US$ 292,100,000, US$ 75,000,000 and US$ 40,000,000 (see note 25.c).

On 31 August 2021, the subsidiary, has partially repaid the US$ 375 million revolving loan facility under US$ 375 million Revolving Loan Facility amounting to US$ 82,000,000 (see note 25.c).

5.25% Senior Unsecured Notes amounted to US$ 350 million

On 22 February 2021, TBG Global Pte Ltd, the subsidiary, has fully repaid the notes in USD amounted to US$ 350,000,000. The Notes will mature on 10 February 2022 (see note 26.a).

US$ 275 million Revolving Loan Facility

On 24 February 2021, the subsidiary, has partially repaid the US$ 275 million Revolving Loan Facility under US$ 275,000,000 Revolving Loan Facility amounting to US$ 205,500,000.

On 12 August 2021, the Subsidiary has partially repaid US$ 275 million Revolving Loan Facility under US$ 275 million Revolving Loan Facility amounting to US$ 10,000,000.

Continuous Bonds III Phase IV

On 1 April 2021, The Company has fully repaid the Continuous Bonds III Phase IV Seri A with nominal value Rp 633.000 (see note 26.g).

46. **PERISTIWA SETELAH PERIODE PELAPORAN** (Lanjutan)

b. **Pembayaran pinjaman** (Lanjutan)

Obligasi Berkelanjutan III Tahap I

Pada tanggal 5 Juli 2021, Perusahaan telah melunasi Obligasi berkelanjutan III Tahap I sebesar Rp 608.000 (lihat catatan 26.d).

Obligasi Berkelanjutan IV Tahap I

Pada tanggal 17 September 2021, Perusahaan telah melunasi Obligasi berkelanjutan IV Tahap I Seri A sebesar Rp 231.000 (lihat catatan 26.h).

c. **Fasilitas Pinjaman *Revolving* sebesar US$ 275 juta**

Pada tanggal 20 Januari 2021, Entitas Anak tertentu telah mendatangani Perjanjian Fasilitas Pinjaman *Revolving* ("Perjanjian RLF") sebesar US$ 275.000.000 untuk menyediakan tambahan dana untuk modal kerja.

Pinjaman ini tidak memiliki jaminan, dan Entitas Anak yang menjadi peserta RLF ini memberikan jaminan bersama (*cross guarantee*) atas Perjanjian RLF.

Dalam Perjanjian Fasilitas Pinjaman tersebut, Entitas Anak diharuskan untuk memenuhi beberapa kondisi, diantaranya:
a. Net senior debt dari entitas anak/ EBITDA yang disesuaikan dan dianualisasi maksimum sebesar 5 kali;
b. Top tier revenue ratio minimum sebesar 50,00%

Kreditor yang berpartisipasi pada fasilitas ini adalah:
- Credit Agricole Corporate and Investment Bank
- DBS Bank Ltd
- Oversea-Chinese Banking Corporation Limited
- Sumitomo Mitsui Banking Corporation Singapore Branch
- United Overseas Bank Limited
- PT Bank BNP Paribas Indonesia
- PT Bank CIMB Niaga Tbk
- PT Bank HSBC Indonesia
- PT Bank Mizuho Indonesia
- PT Bank OCBC NISP Tbk

Fasilitas ini dikenakan marjin bunga sebesar 1,85% per tahun di atas LIBOR untuk kreditur dalam negeri, dan 1,75% per tahun untuk kreditur luar negeri.

Fasilitas ini akan jatuh tempo pada bulan Juni 2026.

*46. **EVENTS AFTER THE REPORTING PERIOD** (Continued)*

*b. **Loan repayment** (Continued)*

Continuous Bonds III Phase I

On 5 July 2021, The Company, has fully paid Continuous Bonds III Phase I amounting to Rp 608.000 (see note 26.d).

Continuous Bonds IV Phase I

On 17 September 2021, The Company, has fully paid Continuous Bonds IV Phase I Series A amounting to Rp 231.000 (see note 26.h).

*c. **US$ 275 million Revolving Loan Facility***

On 20 January 2021, certain Subsidiaries entered into a Revolving Loan Facility Agreement ("RLF Agreement") amounting to US $ 275,000,000 to provide additional funds for working capital.

This loan has no collateral, and the Subsidiary that is a participant of the RLF provides a cross guarantee for the RLF Agreement.

In the Loan Facility Agreement, the Subsidiary is required to comply with several conditions, including:

a. Net senior debt from subsidiaries / adjusted and annualized EBITDA up to a maximum of 5 times;

b. Minimum top tier revenue ratio of 50.00%

Creditors who participate in this facility are:
- *Credit Agricole Corporate and Investment Bank*
- *DBS Bank Ltd*
- *Oversea-Chinese Banking Corporation Limited*
- *Sumitomo Mitsui Banking Corporation Singapore Branch*
- *United Overseas Bank Limited*
- *PT Bank BNP Paribas Indonesia*
- *PT Bank CIMB Niaga Tbk*
- *PT Bank HSBC Indonesia*
- *PT Bank Mizuho Indonesia*
- *PT Bank OCBC NISP Tbk*

This facility bears an interest margin of 1.85% per annum above LIBOR for domestic creditors and 1.75% per annum for foreign creditors.

This Facility will mature in June 2026.

46. **PERISTIWA SETELAH PERIODE PELAPORAN** (Lanjutan)

d. **Penandatanganan Perubahan Perjanjian Fasilitas Pinjaman dengan PT Bank UOB Indonesia Tbk**

Pada tanggal 9 Maret 2021, GHON, Entitas Anak telah mendatangani Perubahan Perjanjian Fasilitas Pinjaman dengan PT Bank UOB Indonesia Tbk dengan surat No. 209/03/2021. Perubahan perjanjian tersebut antara lain merubah:

1. Fasilitas RCF 1 yang bersifat *Uncommitted* yang semula hingga jumlah pokok sebesar Rp 50.000 dinaikkan menjadi hingga jumlah pokok sebesar Rp 100.000.
2. Fasilitas RCF 2 yang bersifat *Committed* yang semula hingga jumlah pokok sebesar Rp 100.000 diturunkan menjadi hingga jumlah pokok sebesar Rp 50.000.
3. Fasilitas RCF 1 diperpanjang berlaku terhitung sejak tanggal 31 Oktober 2020 sampai dengan tanggal 31 Oktober 2021,
4. Fasilitas RCF 2 diperpanjang berlaku terhitung sejak tanggal 10 Januari 2021 sampai dengan tanggal 10 Januari 2023.

e. **Rapat Umum Pemegang Saham Luar Biasa (RUPSLB)**

Pada tanggal 30 Maret 2021, Perusahaan mengadakan Rapat Umum Pemegang Saham Luar Biasa yang telah memberikan persetujuan kepada Perusahaan untuk:
1. Rencana PT Tower Bersama, yang merupakan Entitas Anak Perusahaan, untuk membeli dan mengambilalih menara telekomunikasi dari PT Inti Bangun Sejahtera Tbk ("IBST") termasuk menyewa tanah-tanah milik IBST di mana sebagian menara telekomunikasi yang dibeli berdiri, yang merupakan suatu Transaksi Material berdasarkan Peraturan Otoritas Jasa Keuangan No. 7/POJK.04/2020 tentang Transaksi Material dan Perubahan Kegiatan Usaha (lihat catatan 41.b).
2. Pembagian dividen tunai yang berasal dari saldo laba yang belum dtentukan penggunaannya per 31 Desember 2019. Pembayaran dividen final tersebut dilaksanakan dengan memperhitungkan saham treasuri pada tanggal pengumuman penerimaan dividen (*recording date*) 12 April 2021 sehingga pembayaran dividen per saham adalah sebesar Rp 32 (tiga puluh dua Rupiah). Perusahaan telah membayar dividen tersebut pada tanggal 29 April 2021.

f. **Berakhirnya status badan hukum PT Selaras Karya Makmur (Dalam likuidasi)**

Berakhirnya status badan hukum PT Selaras Karya Makmur (dalam likuidasi), entitas anak telah dicatat dan dihapus dari Daftar Perseroan berdasarkan surat Kementrian Hukum dan Hak Asasi Manusia nomor AHU-AH.01.03-00101 tanggal 22 Maret 2021.

46. EVENTS AFTER THE REPORTING PERIOD (Continued)

d. Signing of the Amendment to the Loan Facility Agreement with PT Bank UOB Indonesia Tbk

On 9 March 2021, GHON, a Subsidiary Company has signed the Amendment of the Loan Facility Agreement with PT Bank UOB Indonesia Tbk with letter No. 209/03/2021. Changes in the agreement include changing:

1. *Uncommitted RCF 1 facility, which originally has a principal amount of Rp 50,000, increased to an amount of principal amounting to IDR 100,000.*
2. *Committed RCF 2 Facility, which originally had a principal amount of Rp 100,000 reduced to a principal amount of Rp 50,000.*
3. *The RCF 1 facility is extended and is valid from 31 October 2020 until the date 31 October 2021,*
4. *The extended RCF 2 facility starts from 10 January 2021 until the date 10 January 2023.*

e. Extraordinary General Meeting of Shareholders

On 30 March 2021, The Company held a Extraordinary General Meeting Shareholders (EGMS) and obtained approval:
1. *For the plan of PT Tower Bersama, which is the Company's Subsidiary, to buy and take over the telecommunication towers from PT Inti Bangun Sejahtera Tbk ("IBST") including leasing land owned by IBST where some of the purchased telecommunication towers are located, that constitutes as a material transaction according to Financial Services Authority (OJK) Rule No. 17/POJK.04/2020 regarding Material Transactions and Main Business Activity Changes (see note 41.b).*
2. *Distribution of cash dividend which comes from Unappropriated Retained Earnings balance as of 31 December 2019. The final dividend payment is carried out by calculating treasury shares on the date of announcement of dividend receipt (recording date) 12 April 2021 so that dividend payments per share is Rp 32 (thirty two Rupiah). The company has paid the dividend on 29 April 2021.*

f. The end of the legal entity status of PT Selaras Karya Makmur (under liquidation)

The end of the legal entity status (under liquidation) of PT Selaras Karya Makmur, the subsidiary has been recorded and deleted from the Company Register based on the letter of the Ministry of Law and Human Rights number AHU-AH.01.03-00101 dated 22 March 2021.

46. **PERISTIWA SETELAH PERIODE PELAPORAN** (Lanjutan)

g. **Penyelesaian Pembelian dan Pengalihan 3.000 Menara dari PT Inti Bangun Sejahtera Tbk**

Transaksi penjualan 3.000 menara telekomunikasi dari PT Inti Bangun Sejahtera Tbk (IBST) kepada PT Tower Bersama (TB), entitas anak, telah diselesaikan melalui penandatanganan (1) Akta Pengalihan dan (2) Akta Perjanjian Pengalihan dan Pengambilalihan pada tanggal 7 April 2021.

Penyelesaian transaksi tersebut terjadi setelah dipenuhinya syarat-syarat pendahuluan, antara lain telah diperolehnya persetujuan dari masing-masing pemegang saham Perusahaan dan IBST pada masing-masing Rapat Umum Pemegang Saham Luar Biasa (RUPSLB) kedua entitas pada tanggal 30 Maret 2021.

h. **Pelunasan piutang PT Hamparan Cipta Sejati (HCS)**

Pada tanggal 29 April 2021, HCS telah melunasi seluruh utangnya sebesar Rp 221.425 (lihat Catatan 6).

i. **Rapat Umum Pemegang Saham Tahunan (RUPST)**

Pada tanggal 28 Mei 2021, Perusahaan mengadakan Rapat Umum Pemegang Saham Tahunan (RUPST).

RUPST memberikan keputusan sebagai berikut:

1. Persetujuan Laporan Tahunan Perseroan Tahun 2020 dan Pengesahan Laporan Keuangan Konsolidasian Perusahaan untuk tahun buku yang berakhir pada tanggal 31 Desember 2020.

2. Penetapan Penggunaan Laba Bersih untuk Tahun Buku 2020. Sebesar Rp 500 ditetapkan untuk menambah cadangan umum guna memenuhi ketentuan Pasal 70 Undang Undang Perseroan Terbatas No. 40 Tahun 2007 dan digunakan sesuai dengan ketentuan Pasal 25 Anggaran Dasar Perseroan. Sisanya akan digunakan untuk menambah saldo laba (*Retained Earnings*) untuk mendukung pengembangan usaha Perusahaan.

3. Menyetujui penunjukan Akuntan Publik untuk mengaudit Laporan Keuangan Perusahaan Tahun Buku 2021.

4. Melimpahkan kewenangan kepada Dewan Komisaris untuk menetapkan gaji, honorarium dan tunjangan lainnya untuk anggota Direksi dan Dewan Komisaris untuk Tahun Buku 2021.

5. Laporan pertanggungjawaban penggunaan dana hasil (i) PUB III Tahap IV Tahun 2020; (ii) PUB IV Tahap I Tahun 2020; (iii) PUB IV Tahap II Tahun 2020; (iv) PUB IV Tahap III Tahun 2021; dan (v) PUB IV Tahap IV Tahap IV Tahun 2021.

*46. **EVENTS AFTER THE REPORTING PERIOD** (Continued)*

*g. **Completion of the Purchase and Transfer of 3,000 Towers from PT Inti Bangun Sejahtera Tbk***

The sale of 3,000 telecommunication towers from PT Inti Bangun Sejahtera Tbk (IBST) to PT Tower Bersama (TB), a subsidiary, has been completed, through the signing of (1) Deed of Transfer and (2) Assignment and Assumption Agreement (Deed) on 7 April 2021.

The transaction was concluded upon the fulfilment of condition precedents, which among others is the approval from the Company's and IBST's shareholders on each of the Extraordinary General Meeting of Shareholders (EGMS) on 30 March 2021.

*h. **Repayment of PT Hamparan Cipta Sejati (HCS) receivables***

On 29 April 2021, HCS has fully paid its payables amounting to Rp 221,425 (see Note 6).

*i. **Annual General Meeting of Shareholders (AGMS)***

On 28 May 2021, the Company held the Annual General Meeting of Shareholders (AGMS).

The detail resolutions of the AGMS are as follows:

1. Approval of the Company's Annual Report for the financial year 2020 and Ratify the Consolidated Financial Statements for the financial year ended 31 December 2020.

2. Determine the Allocation of Net Profits for Financial Year 2020. An amount of Rp 500 is stipulated to increase general reserves to meet the provisions of Article 70 of the Limited Law No. 40 of 2007 and used in accordance with the provisions of 25 of the Company's Articles of Association. The remainder will be used to increase Retained Earnings to support the Company's business development.

3. Approved the Appointment of a Public Accountant to audit the Company's Financial Statements for Financial Year 2021.

4. Delegate the authority to the Board of Commissioners to determine the salaries, honorarium, and other benefits for members of the Board of Directors and Board of Commissioners for financial year 2021.

5. Use of proceeds report of (i) Continuous Rupiah Bond III Phase IV Year 2020; (ii) Continuous Rupiah Bond IV Phase I Year 2020; (iii) Continuous Rupiah Bond IV Phase II Year 2020; (iv) Continuous Rupiah Bond IV Phase III Year 2021; and (v) Continuous Rupiah Bond IV Phase IV Year 2021.

46. **PERISTIWA SETELAH PERIODE PELAPORAN** (Lanjutan)

j. **Undang-Undang Tentang Penciptaan Lapangan Kerja**

Pemerintah menerbitkan 49 peraturan pelaksana dari Undang-Undang Nomor 11 Tahun 2020 tentang Penciptaan Lapangan Kerja, yang terdiri dari 45 Peraturan Pemerintah dan 4 Peraturan Presiden. Pelaksanaan Undang-Undang Cipta Kerja membutuhkan beberapa peraturan pelaksanaan teknis. Sebanyak 49 peraturan tersebut ditetapkan oleh Presiden Republik Indonesia dan diumumkan oleh Kementerian Hukum dan Hak Asasi Manusia pada tanggal 2 Februari 2021. Pada tanggal penerbitan laporan keuangan, manajemen masih mengevaluasi potensi dampak dari peraturan baru tersebut.

*46. **EVENTS AFTER THE REPORTING PERIOD** (Continued)*

*j. **The Law Concerning Job Creation***

The Government issued 49 implementing regulations from Law Number 11 of 2020 concerning Job Creation, which consist of 45 Government Regulation and 4 Presidential Decree. The implementation of the Job Creation Law requires a number of technical implementation regulation. The 49 regulations were stipulated by the President of Republic of Indonesia and promulgated by Ministry of Law and Human Rights on 2 February 2021. As at the issuance of the financial statements, the management is still evaluating the potential impact of this new regulation.

47. **DAMPAK PANDEMI VIRUS KORONA (COVID-19)**

Sejak 1 Januari 2020, pandemi virus korona (Covid-19) telah menyebar ke beberapa negara, termasuk Indonesia. Dalam rangka mencegah virus ini, banyak negara telah mengambil langkah-langkah pencegahan dan strategi antara lain, seperti membatasi perjalanan masuk dan keluar dari suatu negara, karantina kewilayahan area tertentu, menunda acara dan pertemuan, mempersempit pergerakan orang. Inisiatif ini telah memperlambat ekonomi secara umum dan berdampak buruk terhadap operasi banyak perusahaan.

Manajemen Perusahaan menyadari permasalahan ini dan telah mengambil langkah-langkah untuk mengelola sumber daya dan operasi Perusahaan secara hati-hati *(prudent)* dengan meninjau kembali dan memitigasi semaksimal mungkin dampak terhadap keberlanjutan usaha, kepatuhan terhadap kontrak, rantai pasokan, kesehatan dan keselamatan dan teknologi.

Manajemen berpendapat bahwa pandemi ini tidak bersifat permanen dan pada tanggal penerbitan laporan keuangan, dampak pandemi Covid-19 belum mengakibatkan peningkatan signifikan dalam risiko kredit. Pelanggan Perusahaan masih dapat melaksanakan kewajibannya kepada Perusahaan secara normal, demikian juga Perusahaan tetap dapat memenuhi kewajiban kepada para krediturnya.

*47. **IMPACT OF THE CORONA VIRUS PANDEMIC (COVID-19)***

Since 1 January 2020, the outbreak of corona virus (Covid-19) has spread to several countries including Indonesia. In order to contain the virus, many countries have adopted precautionary measures and strategies among others, such as limiting travels in and out of the countries, lock down of selected areas, postponing events and gatherings and discouraging movements of people. These initiatives have slowed down the economy in general and adversely affected the operations of many companies.

The Company's management is aware of this issue and have taken steps to address this by managing its resources and operations prudently by reviewing and mitigating as much as possible impact on sustainability, contract compliance, supply chain, health and safety and technology.

Management believes that this pandemic is not permanent, and at the issuance date of the financial statements, the impact of the Covid-19 pandemic has not resulted in a significant increase in credit risk. The Company's customers can still carry out their obligations to the Company normally, as well as the Company can still fulfill obligations to its creditors.

48. **PENERBITAN KEMBALI LAPORAN KEUANGAN KONSOLIDASIAN**

Dalam rangka penerbitan surat utang berdenominasi mata uang asing, Perusahaan telah menerbitkan kembali laporan keuangan konsolidasian untuk tahun yang berakhir 31 Desember 2020, 2019 dan 2018 dengan beberapa perubahan penyajian dan pengungkapan pada laporan posisi keuangan konsolidasian, laporan laba rugi dan penghasilan komprehensif lain konsolidasian, laporan arus kas konsolidasian dan Catatan 6, 12, 18, 20, 25, 26, 28, 33, 36, 41, 43, 45, 46 dan 49 atas laporan keuangan konsolidasian terdahulu.

*48. **REISSUANCE OF CONSOLIDATED FINANCIAL STATEMENTS***

In order to issue debt securities denominated in foreign currencies, the Company has reissued the consolidated financial statements for the year ended 31 December 2020, 2019 and 2018 with several changes in presentation and disclosure in the consolidated statements of financial position, statements of profit or loss and other comprehensive income, consolidated cash flows and Notes 6, 12, 18, 20, 25, 26, 28, 33, 36, 41, 43, 45, 46 and 49 to the previous consolidated financial statements.

49. KONTINJENSI

Saat ini, salah satu entitas anak sedang menghadapi beberapa perkara hukum dengan beberapa pihak penggugat terkait sewa lahan di sebagian kecil lokasi menara telekomunikasi milik entitas anak tersebut berdiri. Total nilai gugatan materil yang diajukan adalah sebesar Rp 700. Pada 31 Desember 2020, status perkara-perkara tersebut telah ada yang dimenangkan oleh Perusahaan dan masih ada yang dalam proses persidangan. Selain perkara tersebut di atas, salah satu entitas anak yang lain juga sedang dalam proses berperkara untuk menggugat Pemerintah Kabupaten Badung untuk (i) membangunkan kembali 5 menara telekomunikasi yang dibongkar sebelumnya oleh Pemerintah Kabupaten Badung; (ii) membayar ganti rugi materiil senilai Rp 23.957 ditambah bunga 4%; dan (iii) membayar ganti rugi inmateriil senilai Rp 100.

Setelah berkonsultasi dengan konsultan hukum yang menjadi kuasa hukum entitas-entitas anak dalam menangani perkara-perkara tersebut, manajemen berkeyakinan akan dapat memenangkan seluruh perkara tersebut, baik pada pengadilan tingkat pertama, tingkat banding, dan tingkat kasasi. Menurut manajemen, perkara hukum tersebut tidak berdampak signifikan terhadap laporan keuangan konsolidasian Perusahaan dan entitas anak dan tidak memberikan pengaruh secara berarti dan tidak berdampak material terhadap kedudukan, peranan dan/atau kelangsungan usaha Perusahaan dan entitas anak, sehingga tidak diperlukan adanya provisi atas perkara-perkara tersebut.

49. CONTINGENCIES

Currently, one of the subsidiary is facing several legal cases with several plaintiffs regarding the lease of land where a small portion of location the telecommunication tower owned by the subsidiary is built. The total value of the material claims filed is Rp 700. As of 31 December 2020, some cases have been won by the Company and some are still in the trial process. In addition to the cases mentioned above, another subsidiary is also in the process of litigation to sue the Badung Regency Government for (i) rebuilding 5 telecommunications towers previously demolished by the Badung Regency Government; (ii) pay material compensation in the amount of Rp 23,957 plus 4% interest; and (iii) pay immaterial compensation of Rp 100.

After consulting with the attorney who is the legal representative of the subsidiaries in handling the case, the management believes that they will be able to win the case, both at the court of first instance, the level of appeal, and the level of cassation. According to management, the legal case has no significant impact on the Company and subsidiaries's consolidated financial statements and does not have a significant and no material impact on the position, role and/or business continuity of the Company and subsidiaries, so there is no need for provisions for these cases.

50. OTORISASI LAPORAN KEUANGAN

Manajemen Perusahaan telah mengotorisasi laporan keuangan konsolidasian untuk diterbitkan pada tanggal 24 September 2021.

50. AUTHORIZATION OF FINANCIAL STATEMENTS

The Company's management has authorized to issue these consolidated financial statements on 24 September 2021.

PT TOWER BERSAMA INFRASTRUCTURE Tbk
DAN ENTITAS ANAK / *AND ITS SUBSIDIARIES*

LAPORAN KEUANGAN KONSOLIDASIAN INTERIM/
INTERIM CONSOLIDATED FINANCIAL STATEMENTS

UNTUK PERIODE 6 (ENAM) BULAN YANG BERAKHIR 30 JUNI 2021/
FOR THE PERIOD OF 6 (SIX) MONTHS ENDED 30 JUNE 2021

These Interim Consolidated Financial Statements are Originally Issued in Indonesian Language

PT TOWER BERSAMA INFRASTRUCTURE Tbk
DAN ENTITAS ANAK
LAPORAN KEUANGAN KONSOLIDASIAN INTERIM
UNTUK PERIODE 6 (ENAM) BULAN YANG BERAKHIR
30 JUNI 2021

PT TOWER BERSAMA INFRASTRUCTURE Tbk
AND ITS SUBSIDIARIES
INTERIM CONSOLIDATED FINANCIAL STATEMENTS
FOR THE PERIOD OF 6 (SIX) MONTHS ENDED
30 JUNE 2021

D A F T A R I S I

C O N T E N T S

	Ekshibit/ *Exhibit*	
Pernyataan Direksi		***Directors' Statement***
Laporan Atas Reviu Informasi Keuangan Konsolidasian Interim		***Report on Review of Interim Consolidated Financial Information***
Laporan Posisi Keuangan Konsolidasian Interim	A	*Interim Consolidated Statement of Financial Position*
Laporan Laba Rugi dan Penghasilan Komprehensif Lain Konsolidasian Interim	B	*Interim Consolidated Statement of Profit or Loss and Other Comprehensive Income*
Laporan Perubahan Ekuitas Konsolidasian Interim	C	*Interim Consolidated Statement of Changes in Equity*
Laporan Arus Kas Konsolidasian Interim	D	*Interim Consolidated Statement of Cash Flows*
Catatan atas Laporan Keuangan Konsolidasian Interim	E	*Notes to Interim Consolidated Financial Statements*

TOWER BERSAMA GROUP

SURAT PERNYATAAN DIREKSI
TENTANG TANGGUNG JAWAB ATAS
LAPORAN KEUANGAN KONSOLIDASIAN
PADA TANGGAL 30 JUNI 2021
DAN UNTUK PERIODE 6 (ENAM) BULAN YANG BERAKHIR
30 JUNI 2021 DAN 2020
PT TOWER BERSAMA INFRASTRUCTURE Tbk
DAN ENTITAS ANAK

Kami yang bertandatangan di bawah ini :

1. Nama : Herman Setya Budi
   Alamat kantor : The Convergence Indonesia Lt. 11, Kawasan Rasuna Epicentrum, Jl. HR Rasuna Said, Jakarta Selatan 12940
   Alamat Domisili sesuai KTP atau kartu identitas lain : Mega Kebon Jeruk F/26 RT. 005, RW. 001 Joglo, Kembangan Jakarta Barat
   Nomor Telepon : +62 21 2924 8900
   Jabatan : Presiden Direktur
2. Nama : Helmy Yusman Santoso
   Alamat kantor : The Convergence Indonesia Lt. 11, Kawasan Rasuna Epicentrum, Jl. HR Rasuna Said, Jakarta Selatan 12940
   Alamat Domisili sesuai KTP atau kartu identitas lain : Jl. Gedong Sawah IV/2 RT. 002, RW. 001, Pabaton Bogor Tengah Bogor
   Nomor Telepon : +62 21 2924 8900
   Jabatan : Direktur

Menyatakan bahwa :

1. Bertanggung jawab atas penyusunan dan penyajian Laporan Keuangan Perusahaan.
2. Laporan Keuangan Perusahaan telah disusun dan disajikan sesuai dengan prinsip akuntansi yang berlaku umum/ standar akuntansi keuangan yang berlaku di Indonesia.
3. a. Semua informasi dalam laporan keuangan perusahaan telah dimuat secara lengkap dan benar; dan
   b. Laporan keuangan perusahaan tidak mengandung informasi atau fakta material yang tidak benar, dan tidak menghilangkan informasi atau fakta material.
4. Bertanggung jawab atas sistim pengendalian intern dalam Perusahaan.

Demikian pernyataan ini dibuat dengan sebenarnya.

Jakarta, 29 September 2021

Presiden Direktur / President Director

(Herman Setya Budi)

DIRECTORS' STATEMENT LETTER
ABOUT RESPONSIBILITY TO
THE CONSOLIDATED FINANCIAL STATEMENTS
AS OF 30 JUNE 2021
AND FOR THE PERIOD OF 6 (SIX) MONTHS ENDED
30 JUNE 2021 AND 2020
PT TOWER BERSAMA INFRASTRUCTURE Tbk
AND SUBSIDIARIES

We, the undersigned :

1. Name : Herman Setya Budi
   Office address : The Convergence Indonesia Lt. 11, Kawasan Rasuna Epicentrum, Jl. HR Rasuna Said, Jakarta Selatan 12940
   Domicile as stated in ID Card or other identity : Mega Kebon Jeruk F/26 RT. 005, RW. 001 Joglo, Kembangan Jakarta Barat
   Phone Number : +62 21 2924 8900
   Position : President Director
2. Name : Helmy Yusman Santoso
   Office address : The Convergence Indonesia Lt. 11, Kawasan Rasuna Epicentrum, Jl. HR Rasuna Said, Jakarta Selatan 12940
   Domicile as stated in ID Card or other identity : Jl. Gedong Sawah IV/2 RT. 002, RW. 001, Pabaton Bogor Tengah Bogor
   Phone Number : +62 21 2924 8900
   Position : Director

State that :

1. We are responsible for the preparation and presentation of the Company's Financial Statements.
2. The Company's Consolidated Financial Statements have been prepared in accordance with accounting principles generally accepted in Indonesia.
3. a. All information has been fully and correctly disclosed in the Company's Financial Statements.
   b. The Company's Financial Statements do not contain false material information or facts, nor do they omit material information or facts, and
4. We are responsible for the Company's internal control systems.

This statement has been prepared base on the facts.

Jakarta, 29 September 2021

Direktur / Director

(Helmy Yusman Santoso)

METERAI TEMPEL 10000 F0D65AJX284219411

PT. Tower Bersama Infrastructure, Tbk
Gedung The Convergence Indonesia (TCI), Lantai 11
Kawasan Rasuna Epicentrum
Jl. H.R. Rasuna Said, Jakarta Selatan 12940
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www.bdo.co.id

Tanubrata Sutanto Fahmi Bambang & Rekan
Certified Public Accountant
Licence No. 622/KM.1/2016

Prudential Tower, 17th Floor
Jl. Jend. Sudirman Kav. 79
Jakarta 12910 - Indonesia

This Interim consolidated report is originally issued in Indonesian language

No. : 144/6.T053/STM.3/06.21
Hal : **Informasi Keuangan Konsolidasian Interim 30 Juni 2021**

No. : 144/6.T053/STM.3/06.21
*Re : **Interim Consolidated Financial Information 30 June 2021***

Laporan atas Reviu Informasi Keuangan Konsolidasian Interim

Report on Review of Interim Consolidated Financial Information

D i r e k s i
PT Tower Bersama Infrastructure Tbk
dan entitas anak
J a k a r t a

D i r e c t o r
PT Tower Bersama Infrastructure Tbk
and subsidiaries
J a k a r t a

Pendahuluan

Kami telah mereviu informasi keuangan konsolidasian interim PT Tower Bersama Infrastructure Tbk dan entitas anak, yang terdiri dari laporan posisi keuangan konsolidasian interim tanggal 30 Juni 2021, serta laporan laba rugi dan penghasilan komprehensif lain, laporan perubahan ekuitas dan laporan arus kas konsolidasian interim untuk periode enam bulan yang berakhir 30 Juni 2021 dan 2020, dan suatu ikhtisar kebijakan akuntansi signifikan dan catatan penjelasan lainnya. Manajemen bertanggung jawab atas penyusunan dan penyajian wajar informasi keuangan konsolidasian interim ini sesuai dengan Standar Akuntansi Keuangan di Indonesia. Tanggung jawab kami adalah untuk menyatakan suatu kesimpulan atas informasi keuangan konsolidasian interim ini berdasarkan reviu kami.

Introduction

We have reviewed the interim consolidated financial information of PT Tower Bersama Infrastructure Tbk and subsidiaries, which comprise the interim consolidated statement of financial position as of 30 June 2021, and the interim consolidated statement of profit or loss and other comprehensive income, statement of changes in equity and statement of cash flows for the six-months period ended 30 June 2021 and 2020, and a summary of significant accounting policies and other explanatory notes. Management is responsible for the preparation and fair presentation of these interim consolidated financial information in accordance with Indonesian Financial Accounting Standards. Our responsibility is to express a conclusion on these interim consolidated financial information based on our review.

Ruang Lingkup Reviu

Kami melaksanakan reviu kami berdasarkan Standar Perikatan Reviu 2410, "Reviu atas Informasi Keuangan interim yang Dilaksanakan oleh Auditor Independen Entitas" ("SPR 2410"), yang ditetapkan oleh Institut Akuntan Publik Indonesia ("IAPI"). Suatu reviu atas informasi keuangan interim terdiri dari pengajuan pertanyaan, terutama kepada pihak yang bertanggung jawab atas bidang keuangan dan akuntansi, serta penerapan prosedur analitis dan prosedur reviu lainnya. Suatu reviu memiliki ruang lingkup yang secara substansial kurang daripada suatu audit yang dilaksanakan berdasarkan Standar Audit yang ditetapkan oleh IAPI dan sebagai konsekuensinya, tidak memungkinkan kami untuk memperoleh keyakinan bahwa kami akan mengetahui seluruh hal signifikan yang mungkin teridentifikasi dalam suatu audit. Oleh karena itu, kami tidak menyatakan suatu opini audit.

Scope of Review

We conducted our review in accordance with Standard on Review Engagements 2410, "Review of interim Financial Information Performed by the Independent Auditor of the Entity" ("SPR 2410"), established by the Indonesian Institute of Certified Public Accountants ("IAPI"). A review of interim financial information consists of making inquiries, primarily of persons responsible for financial and accounting matters, and applying analytical and other review procedures. A review is substantially less in scope than an audit conducted in accordance with Standards on Auditing established by IAPI and consequently, does not enable us to obtain assurance that we would become aware of all significant matters that might be identified in an audit. Accordingly, we do not express an audit opinion.

Kesimpulan

Berdasarkan reviu kami, tidak ada hal-hal yang menjadi perhatian kami yang menyebabkan kami percaya bahwa informasi keuangan konsolidasian interim terlampir tidak menyajikan secara wajar, dalam semua hal yang material, posisi keuangan konsolidasian PT Tower Bersama Infrastructure Tbk dan entitas anak tanggal 30 Juni 2021, serta kinerja keuangan dan arus kas konsolidasiannya untuk periode enam bulan yang berakhir pada 30 Juni 2021 dan 2020, sesuai dengan Standar Akuntansi Keuangan di Indonesia.

Hal lainnya

Sebelum laporan ini, kami telah menerbitkan laporan atas reviu informasi keuangan konsolidasian interim No. 134/5.T053/STM.2/06.21 tanggal 2 September 2021 atas laporan keuangan konsolidasian interim PT Tower Bersama Infrastructure Tbk dan entitas anak untuk periode enan bulan yang berakhir 30 Juni 2021. Sehubungan dengan penambahan pengungkapan informasi dalam laporan keuangan konsolidasian interim Perusahaan terkait dengan rencana penawaran sekuritas seperti yang dijelaskan dalam Catatan 45 atas laporan keuangan konsolidasian interim, manajemen Perusahaan menerbitkan kembali laporan keuangan konsolidasian interim untuk periode enam bulan yang berakhir 30 Juni 2021.

Laporan ini diterbitkan dengan tujuan untuk dicantumkan dalam offering memorandum sehubungan dengan rencana penerbitan surat utang berdenominasi mata uang asing PT Tower Bersama Infrastructure Tbk dan entitas anak, serta tidak ditujukan dan tidak diperkenankan untuk digunakan untuk tujuan lain.

Conclusion

Based on our review, nothing has come to our attention that causes us to believe that the accompanying interim consolidated financial information does not present fairly, in all material respects, the consolidated financial position of PT Tower Bersama Infrastructure Tbk and subsidiaries as of 30 June 2021, and their consolidated financial performance and cash flows for the six-months period ended 30 June 2021 and 2020, in accordance with Indonesia Financial Accounting Standards.

Other matters

Prior to this report, we have issued a report on review of interim consolidated financial information No. 134/5.T053/STM.2/06.21 dated 2 September 2021 on the interim consolidated financial information of PT Tower Bersama Infrastructure Tbk and subsidiaries for the six-months period ended 30 June 2021. In connection with the additional disclosures to the Company's interim consolidated financial information regarding the plan for security offering as disclosed in Note 45 to the interim consolidated financial statements, the Company's management reissued the interim consolidated financial statements for the six-months period ended 30 June 2021.

This report is issued with purpose to be included in the offering memorandum in connection with the plan for issuance of the notes denominated in foreign currency of PT Tower Bersama Infrastructure Tbk and subsidiaries, and are not intended and shall not be used for any other purpose.

Kantor Akuntan Publik
TANUBRATA SUTANTO FAHMI BAMBANG & Rekan



Sutomo, SE, Ak, MM, CPA, CA, SAS
NIAP AP.0007/
License No. AP.0007

29 September 2021

MF/yn

These Interim Consolidated Financial Statements are Originally Issued in Indonesian Language

Ekshibit A

PT TOWER BERSAMA INFRASTRUCTURE Tbk
DAN ENTITAS ANAK
LAPORAN POSISI KEUANGAN KONSOLIDASIAN INTERIM
30 JUNI 2021
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

Exhibit A

PT TOWER BERSAMA INFRASTRUCTURE Tbk
AND ITS SUBSIDIARIES
INTERIM CONSOLIDATED STATEMENT OF FINANCIAL POSITION
30 JUNE 2021
(Expressed in million Rupiah, unless otherwise stated)

	30 Juni/ *30 June* 2021	Catatan/ *Notes*	31 Desember/ *31 December* 2020	
ASET				***ASSETS***
ASET LANCAR				***CURRENT ASSETS***
Kas dan setara kas	894.447	**4**	947.341	*Cash and cash equivalents*
Piutang usaha - pihak ketiga	904.096	**5**	710.722	*Trade receivables - third parties*
Piutang lain-lain	74.575	**6**	262.885	*Other receivables*
Pendapatan yang masih harus diterima	583.131	**8**	491.190	*Accrued revenue*
Persediaan dan perlengkapan	132.241	**9**	118.312	*Inventories and supplies*
Uang muka dan beban dibayar di muka	96.250	**10**	534.604	*Advance payments and prepaid expenses*
Pajak dibayar di muka	866.354	**19a**	162.340	*Prepaid taxes*
Jumlah Aset Lancar	**3.551.094**		**3.227.394**	***Total Current Assets***
ASET TIDAK LANCAR				***NON-CURRENT ASSETS***
Aset pajak tangguhan - bersih	29.965	**19d**	60.726	*Deferred tax assets - net*
Aset tetap				*Property and equipment*
(setelah dikurangi akumulasi penyusutan				*(net of accumulated depreciation of*
sebesar Rp 245.684 dan Rp 241.511				*Rp 245,684 and Rp 241,511*
masing-masing pada 30 Juni 2021				*as of 30 June 2021 and*
dan 31 Desember 2020)	32.752.320	**11**	28.738.362	*31 December 2020, respectively)*
Properti investasi - nilai wajar	388.798	**12**	388.020	*Investment properties - fair value*
Aset hak guna				*Right of use assets*
(setelah dikurangi akumulasi penyusutan				*(net of accumulated depreciation of*
sebesar Rp 1.762.459 dan Rp 1.580.994				*Rp 1,762,459 and Rp 1,580,994*
masing-masing pada 30 Juni 2021				*as of 30 June 2021 and*
dan 31 Desember 2020)	3.329.709	**13**	2.614.882	*31 December 2020, respectively)*
Uang jaminan	1.883	**14**	1.708	*Refundable deposits*
Aset keuangan derivatif	1.397.984	**15**	1.084.975	*Derivative financial assets*
Taksiran klaim pajak penghasilan	-	**19e**	15.903	*Estimated claims for income tax refund*
Goodwill	372.910	**35**	381.189	*Goodwill*
Aset tidak lancar lainnya	11.936	**16**	8.144	*Other non-current assets*
Jumlah Aset Tidak Lancar	**38.285.505**		**33.293.909**	***Total Non-Current Assets***
JUMLAH ASET	**41.836.599**		**36.521.303**	***TOTAL ASSETS***

Lihat Catatan atas Laporan Keuangan Konsolidasian Interim pada Ekshibit E terlampir yang merupakan bagian tidak terpisahkan dari Laporan Keuangan Konsolidasian secara keseluruhan

See accompanying Notes to Interim Consolidated Financial Statements on Exhibit E which are an integral part of the Consolidated Financial Statements taken as a whole

These Interim Consolidated Financial Statements are Originally Issued in Indonesian Language

Ekshibit A/2

PT TOWER BERSAMA INFRASTRUCTURE Tbk
DAN ENTITAS ANAK
LAPORAN POSISI KEUANGAN KONSOLIDASIAN INTERIM
30 JUNI 2021
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

Exhibit A/2

PT TOWER BERSAMA INFRASTRUCTURE Tbk
AND ITS SUBSIDIARIES
INTERIM CONSOLIDATED STATEMENT OF FINANCIAL POSITION
30 JUNE 2021
(Expressed in million Rupiah, unless otherwise stated)

	30 Juni/ *30 June* 2021	Catatan/ *Notes*	31 Desember/ *31 December* 2020	
LIABILITAS DAN EKUITAS				***LIABILITIES AND EQUITY***
LIABILITAS JANGKA PENDEK				***CURRENT LIABILITIES***
Utang usaha - pihak ketiga	136.233	**17**	571.000	*Trade payables - third parties*
Utang lain-lain	29.189	**18**	21.057	*Other payables*
Utang pajak	89.927	**19b**	56.522	*Taxes payable*
Pendapatan yang diterima di muka	2.728.810	**20**	1.061.994	*Unearned income*
Beban masih harus dibayar	1.103.104	**21**	1.156.790	*Accrued expenses*
Liabilitas sewa - bagian yang jatuh tempo dalam waktu satu tahun	167.402	**24**	152.617	*Lease liabilities - current portion*
Surat utang - bagian jangka pendek	3.960.344	**23**	6.900.451	*Notes - current portion*
Pinjaman jangka panjang - bagian yang jatuh tempo dalam waktu satu tahun				*Long-term loans - current portion*
Pihak ketiga	3.012.352	**22**	3.857.445	*Third parties*
Jumlah Liabilitas Jangka Pendek	**11.227.361**		**13.777.876**	***Total Current Liabilities***
LIABILITAS JANGKA PANJANG				***NON-CURRENT LIABILITIES***
Liabilitas pajak tangguhan - bersih	-	**19d**	11.411	*Deferred tax liabilities - net*
Liabilitas sewa - setelah dikurangi bagian yang jatuh tempo dalam satu tahun	475.855	**24**	313.895	*Lease liabilities - non-current portion*
Surat utang - setelah dikurangi bagian yang jatuh tempo dalam satu tahun	12.145.367	**23**	6.668.031	*Notes - net of current portion*
Pinjaman jangka panjang - setelah dikurangi bagian yang jatuh tempo dalam satu tahun				*Long-term loans - net of current portion*
Pihak ketiga	8.743.721	**22**	6.421.402	*Third parties*
Cadangan imbalan pasca-kerja	26.556	**32**	24.850	*Provision for post-employment benefits*
Jumlah Liabilitas Jangka Panjang	**21.391.499**		**13.439.589**	***Total Non-Current Liabilities***
Jumlah Liabilitas	**32.618.860**		**27.217.465**	***Total Liabilities***

Lihat Catatan atas Laporan Keuangan Konsolidasian Interim pada Ekshibit E terlampir yang merupakan bagian tidak terpisahkan dari Laporan Keuangan Konsolidasian secara keseluruhan

See accompanying Notes to Interim Consolidated Financial Statements on Exhibit E which are an integral part of the Consolidated Financial Statements taken as a whole

These Interim Consolidated Financial Statements are Originally Issued in Indonesian Language

Ekshibit A/3

PT TOWER BERSAMA INFRASTRUCTURE Tbk
DAN ENTITAS ANAK
LAPORAN POSISI KEUANGAN KONSOLIDASIAN INTERIM
30 JUNI 2021
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

Exhibit A/3

PT TOWER BERSAMA INFRASTRUCTURE Tbk
AND ITS SUBSIDIARIES
INTERIM CONSOLIDATED STATEMENT OF FINANCIAL POSITION
30 JUNE 2021
(Expressed in million Rupiah, unless otherwise stated)

	30 Juni/ *30 June* 2021	Catatan/ *Notes*	31 Desember/ *31 December* 2020	
EKUITAS				***EQUITY***
Modal saham				*Share capital*
Pada 30 Juni 2021 dan 31 Desember 2020 nilai nominal masing-masing Rp 20 (nilai penuh) per saham. Modal dasar sebanyak 72.100.600.000 saham				*As of 30 June 2021 and 31 December 2020 par value Rp 20 (full amount) per shares, repectively. Authorized capital of 72,100,600,000 shares*
Modal ditempatkan dan disetor penuh: 30 Juni 2021 dan 31 Desember 2020 masing-masing sebanyak 22.656.999.445 saham	453.140	**25**	453.140	*Issued and fully paid-in capital: 30 June 2021 and 31 December 2020 are 22,656,999,445 shares, respectively*
Saham treasuri	(1.028.268)	**26**	(1.028.268)	*Treasury stock*
Tambahan modal disetor - bersih	(578.017)	**27**	(520.500)	*Additional paid-in capital - net*
Penghasilan komprehensif lain	7.566.207	**28**	7.600.888	*Other comprehensive income*
Saldo laba				*Retained earnings*
Cadangan wajib	62.600	**34**	62.100	*Statutory reserves*
Belum ditentukan penggunaannya	2.309.547	**34**	2.142.322	*Unappropriated*
Jumlah ekuitas yang diatribusikan kepada pemilik entitas induk	8.785.209		8.709.682	***Total equity attributable to equity holder of the parent company***
Kepentingan non-pengendali	432.530	**36**	594.156	***Non-controlling interest***
Jumlah Ekuitas	**9.217.739**		**9.303.838**	***Total Equity***
JUMLAH LIABILITAS DAN EKUITAS	**41.836.599**		**36.521.303**	***TOTAL LIABILITIES AND EQUITY***

Lihat Catatan atas Laporan Keuangan Konsolidasian Interim pada Ekshibit E terlampir yang merupakan bagian tidak terpisahkan dari Laporan Keuangan Konsolidasian secara keseluruhan

See accompanying Notes to Interim Consolidated Financial Statements on Exhibit E which are an integral part of the Consolidated Financial Statements taken as a whole

These Interim Consolidated Financial Statements are Originally Issued in Indonesian Language

Ekshibit B

PT TOWER BERSAMA INFRASTRUCTURE Tbk
DAN ENTITAS ANAK
LAPORAN LABA RUGI DAN
PENGHASILAN KOMPREHENSIF LAIN KONSOLIDASIAN INTERIM
UNTUK PERIODE 6 (ENAM) BULAN YANG BERAKHIR
30 JUNI 2021
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

Exhibit B

PT TOWER BERSAMA INFRASTRUCTURE Tbk
AND ITS SUBSIDIARIES
INTERIM CONSOLIDATED STATEMENT OF PROFIT OR LOSS AND
OTHER COMPREHENSIVE INCOME
FOR THE PERIOD OF 6 (SIX) MONTHS ENDED
30 JUNE 2021
(Expressed in million Rupiah, unless otherwise stated)

	30 Juni/ *30 June* 2021	Catatan/ *Notes*	30 Juni/ *30 June* 2020	
PENDAPATAN	2.971.379	**29**	2.577.352	***REVENUE***
BEBAN POKOK PENDAPATAN	729.089	**30**	482.961	***COST OF REVENUE***
LABA KOTOR	**2.242.290**		**2.094.391**	***GROSS PROFIT***
BEBAN USAHA	213.484	**31**	211.520	***OPERATING EXPENSES***
LABA DARI OPERASI	**2.028.806**		**1.882.871**	***INCOME FROM OPERATIONS***
PENDAPATAN (BEBAN) LAIN-LAIN				***OTHER INCOME (CHARGES)***
Pendapatan bunga	8.231		6.108	*Interest income*
Laba selisih kurs - Bersih	26.281		10.239	*Gain on foreign exchange - Net*
Pemulihan (beban) kerugian kredit ekspektasian aset keuangan	492	**5,6,8**	(12.803)	*Expected credit losses recovery (expense) - financial assets*
Penurunan nilai *goodwill*	(8.279)	**35**	(25.000)	*Impairment of goodwill*
Pajak penghasilan final	(136.702)	**19c**	(44.605)	*Final income tax*
Beban keuangan - Pinjaman dan surat utang	(989.051)	**22,23**	(960.264)	*Financial expenses - long term loans and notes*
Beban keuangan - Lainnya	(96.174)	**33**	(120.003)	*Financial expenses - Others*
Lainnya - Bersih	(12.728)		(43.646)	*Others - Net*
Beban Lain-lain - Bersih	(1.207.930)		(1.189.974)	***Other Charges - Net***
LABA SEBELUM PAJAK PENGHASILAN	**820.876**		**692.897**	***PROFIT BEFORE INCOME TAX***
BEBAN PAJAK PENGHASILAN		**19c,d**		***INCOME TAX EXPENSES***
Kini	(111.647)		(103.950)	*Current*
Tangguhan	(19.393)		(51.027)	*Deferred*
Beban Pajak Penghasilan - Bersih	(131.040)		(154.977)	***Income Tax Expenses - Net***
LABA BERSIH PERIODE BERJALAN	**689.836**		**537.920**	***NET PROFIT FOR THE CURRENT PERIOD***

Lihat Catatan atas Laporan Keuangan Konsolidasian Interim pada Ekshibit E terlampir yang merupakan bagian tidak terpisahkan dari Laporan Keuangan Konsolidasian secara keseluruhan

See accompanying Notes to Interim Consolidated Financial Statements on Exhibit E which are an integral part of the Consolidated Financial Statements taken as a whole

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Ekshibit B/2

PT TOWER BERSAMA INFRASTRUCTURE Tbk DAN ENTITAS ANAK LAPORAN LABA RUGI DAN PENGHASILAN KOMPREHENSIF LAIN KONSOLIDASIAN INTERIM UNTUK PERIODE 6 (ENAM) BULAN YANG BERAKHIR 30 JUNI 2021 (Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

Exhibit B/2

PT TOWER BERSAMA INFRASTRUCTURE Tbk AND ITS SUBSIDIARIES INTERIM CONSOLIDATED STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME FOR THE PERIOD OF 6 (SIX) MONTHS ENDED 30 JUNE 2021 (Expressed in million Rupiah, unless otherwise stated)

	30 Juni/ *30 June* 2021	Catatan/ *Notes*	30 Juni/ *30 June* 2020	
LABA BERSIH PERIODE BERJALAN	689.836		537.920	***NET PROFIT FOR THE CURRENT PERIOD***
PENGHASILAN KOMPREHENSIF LAIN				***OTHER COMPREHENSIVE INCOME***
Pos-pos yang tidak akan direklasifikasi ke laba rugi				***Items that will not be reclassified to profit or loss***
Surplus (defisit) revaluasi	(59.289)	**11**	349.141	*Revaluation surplus (deficit)*
Keuntungan aktuaria	280	**32**	-	*Actuarial gain*
Pos-pos yang akan direklasifikasi ke laba rugi				***Items that may be reclassified to profit or loss***
Selisih translasi mata uang asing	(91)		(408)	*Difference translation of foreign currency*
Perubahan lindung nilai arus kas	159.605	**28**	445.851	*Changes in value of cash flow hedges*
JUMLAH PENGHASILAN KOMPREHENSIF PERIODE BERJALAN	**790.341**		**1.332.504**	***TOTAL COMPREHENSIVE INCOME FOR THE CURRENT PERIOD***
Laba bersih yang diatribusikan kepada :				***Net profit attributable to :***
Pemilik entitas induk	663.267		510.483	*Equity holder of the parent company*
Kepentingan non-pengendali	26.569	**36**	27.437	*Non-controlling interest*
Jumlah	689.836		537.920	***Total***
Jumlah laba komprehensif yang dapat diatribusikan kepada :				***Total comprehensive income attributable to :***
Pemilik entitas induk	760.491		1.268.264	*Equity holder of the parent company*
Kepentingan non-pengendali	29.850	**36**	64.240	*Non-controlling interest*
Jumlah	**790.341**		**1.332.504**	***Total***
LABA BERSIH PER SAHAM DASAR YANG DAPAT DIATRIBUSIKAN KEPADA PEMEGANG SAHAM BIASA ENTITAS INDUK (nilai penuh)	**31,79**	**25,37**	**24,47**	***BASIC EARNINGS PER SHARE ATTRIBUTABLE TO THE EQUITY HOLDER OF PARENT COMPANY (full amount)***

Lihat Catatan atas Laporan Keuangan Konsolidasian Interim pada Ekshibit E terlampir yang merupakan bagian tidak terpisahkan dari Laporan Keuangan Konsolidasian secara keseluruhan

See accompanying Notes to Interim Consolidated Financial Statements on Exhibit E which are an integral part of the Consolidated Financial Statements taken as a whole

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Ekshibit C

PT TOWER BERSAMA INFRASTRUCTURE Tbk DAN ENTITAS ANAK
LAPORAN PERUBAHAN EKUITAS KONSOLIDASIAN INTERIM
UNTUK PERIODE 6 (ENAM) BULAN YANG BERAKHIR 30 JUNI 2021
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

Exhibit C

PT TOWER BERSAMA INFRASTRUCTURE Tbk AND ITS SUBSIDIARIES
INTERIM CONSOLIDATED STATEMENT OF CHANGES IN EQUITY
FOR THE PERIOD OF 6 (SIX) MONTHS ENDED 30 JUNE 2021
(Expressed in million Rupiah, unless otherwise stated)

				Penghasilan komprehensif lain/ *Other comprehensive income*				Saldo laba/ *Retained earnings*					
	Modal saham/ *Capital share*	Tambahan modal disetor - Bersih/ *Additional paid-in capital - Net*	Saham treasuri/ *Treasury stock*	Surplus revaluasi/ *Revaluation surplus*	Cadangan lindung nilai arus kas/ *Cash flows hedging reserves*	Selisih translasi atas mata uang asing/ *Difference translation of foreign currency*	Keuntungan aktuaria/ *Actuarial gain*	Cadangan wajib/ *Statutory reserves*	Belum ditentukan penggunaannya/ *Unappropriated*	Jumlah ekuitas yang diatribusikan kepada pemilik entitas induk/ *Total equity attribute to equity holder of parent company*	Kepentingan non-pengendali/ *Non-controlling interest*	Jumlah ekuitas konsolidasian/ *Total consolidated equity*	
Saldo per 1 Januari 2021	453.140	(520.500)	(1.028.268)	7.768.171	(110.819)	(62.309)	5.845	62.100	2.142.322	8.709.682	594.156	9.303.838	*Balance as of 1 January 2021*
Laba bersih periode berjalan	-	-	-	-	-	-	-	-	663.267	663.267	26.569	689.836	*Net profit for the current period*
Surplus (defisit) revaluasi (Catatan 11)	-	-	-	(62.597)	-	-	-	-	-	(62.597)	3.308	(59.289)	*Revaluation surplus (deficit) (Note 11)*
Selisih penyusutan nilai wajar dengan biaya perolehan	-	-	-	(196.652)	-	-	-	-	196.652	-	-	-	*Difference in fair value depreciation with acquisition cost*
Cadangan lindung nilai arus kas (Catatan 28a)	-	-	-	-	159.792	-	-	-	-	159.792	(187)	159.605	*Cash flows hedging reserves (Note 28a)*
Keuntungan aktuaria (Catatan 32)	-	-	-	-	-	-	120	-	-	120	160	280	*Actuarial gain (Note 32)*
Selisih translasi atas mata uang asing (Catatan 28b)	-	-	-	-	-	(91)	-	-	-	(91)	-	(91)	*Difference translation of foreign currency (Note 28b)*
Selisih nilai transaksi restrukturisasi entitas sepengendali (catatan 27)	-	(57.517)	-	66.336	(1.557)	-	(32)	-	-	7.230	(177.230)	(170.000)	*Difference arising from restructuring transactions of entities under common control (Note 27)*
Cadangan wajib (Catatan 34)	-	-	-	-	-	-	-	500	(500)	-	-	-	*Statutory reserves (Note 34)*
Pembagian dividen tunai - entitas anak (Catatan 34)	-	-	-	-	-	-	-	-	-	-	(14.246)	(14.246)	*Cash dividends - subsidiaries (Note 34)*
Pembagian dividen tunai (Catatan 34)	-	-	-	-	-	-	-	-	(692.194)	(692.194)	-	(692.194)	*Cash dividends (Note 34)*
Saldo per 30 Juni 2021	453.140	(578.017)	(1.028.268)	7.575.258	47.416	(62.400)	5.933	62.600	2.309.547	8.785.209	432.530	9.217.739	*Balance as of 30 June 2021*
	Catatan 25/ *Note 25*	Catatan 27/ *Note 27*	Catatan 26/ *Note 26*	Catatan 28/ *Note 28*	Catatan 28a / *Note 28a*	Catatan 28b/ *Note 28b*	Catatan 32/ *Note 32*	Catatan 34/ *Note 34*			Catatan 36/ *Note 36*		

Lihat Catatan atas Laporan Keuangan Konsolidasian Interim pada Ekshibit E terlampir yang merupakan bagian tidak terpisahkan dari Laporan Keuangan Konsolidasian secara keseluruhan

See accompanying Notes to Interim Consolidated Financial Statements on Exhibit E which are an integral part of the Consolidated Financial Statements taken as a whole

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Ekshibit C/2

PT TOWER BERSAMA INFRASTRUCTURE Tbk DAN ENTITAS ANAK
LAPORAN PERUBAHAN EKUITAS KONSOLIDASIAN INTERIM
UNTUK PERIODE 6 (ENAM) BULAN YANG BERAKHIR 30 JUNI 2021
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

Exhibit C/2

PT TOWER BERSAMA INFRASTRUCTURE Tbk AND ITS SUBSIDIARIES
INTERIM CONSOLIDATED STATEMENT OF CHANGES IN EQUITY
FOR THE PERIOD OF 6 (SIX) MONTHS ENDED 30 JUNE 2021
(Expressed in million Rupiah, unless otherwise stated)

				Penghasilan komprehensif lain/ *Other comprehensive income*				Saldo laba/ *Retained earnings*					
	Modal saham/ *Capital share*	Tambahan modal disetor - Bersih/ *Additional paid-in capital - Net*	Saham treasuri/ *Treasury stock*	Surplus revaluasi/ *Revaluation surplus*	Cadangan lindung nilai arus kas/ *Cash flows hedging reserves*	Selisih translasi atas mata uang asing/ *Difference translation of foreign currency*	Keuntungan aktuaria/ *Actuarial gain*	Cadangan wajib/ *Statutory reserves*	Belum ditentukan penggunaannya/ *Unappropriated*	Jumlah ekuitas yang diatribusikan kepada pemilik entitas induk/ Total equity *attribute to equity holder of parent company*	Kepentingan non-pengendali/ *Non-controlling interest*	Jumlah ekuitas konsolidasian/ *Total consolidated equity*	
Saldo per 1 Januari 2020	453.140	(519.015)	(1.028.268)	4.570.827	(43.811)	(61.761)	11.349	61.600	1.549.511	4.993.572	529.712	5.523.284	*Balance as of 1 January 2020*
Laba bersih periode berjalan	-	-	-	-	-	-	-	-	510.483	510.483	27.437	537.920	*Net profit for the current period*
Surplus revaluasi	-	-	-	314.504	-	-	-	-	-	314.504	34.637	349.141	*Revaluation surplus*
Selisih penyusutan nilai wajar dengan biaya perolehan	-	-	-	(53.753)	-	-	-	-	53.753	-	-	-	*Difference in fair value depreciation with acquisition cost*
Cadangan lindung nilai arus kas	-	-	-	-	443.685	-	-	-	-	443.685	2.166	445.851	*Cash flows hedging reserves*
Selisih translasi atas mata uang asing	-	-	-	-	-	(408)	-	-	-	(408)	-	(408)	*Difference translation of foreign currency*
Selisih aset pengampunan pajak	-	(1.485)	-	-	-	-	-	-	-	(1.485)	(23)	(1.508)	*Difference of tax amnesty assets*
Cadangan wajib (Catatan 34)	-	-	-	-	-	-	-	500	(500)	-	-	-	*Statutory reserves (Note 34)*
Pembagian dividen tunai - entitas anak (Catatan 34)	-	-	-	-	-	-	-	-	-	-	(5.602)	(5.602)	*Cash dividends - subsidiaries (Note 34)*
Pembagian dividen tunai (Catatan 34)	-	-	-	-	-	-	-	-	(605.670)	(605.670)	-	(605.670)	*Cash dividends (Note 34)*
Saldo per 30 Juni 2020	453.140	(520.500)	(1.028.268)	4.831.578	399.874	(62.169)	11.349	62.100	1.507.577	5.654.681	588.327	6.243.008	*Balance as of 30 June 2020*

Lihat Catatan atas Laporan Keuangan Konsolidasian Interim pada Ekshibit E terlampir yang merupakan bagian tidak terpisahkan dari Laporan Keuangan Konsolidasian secara keseluruhan

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Ekshibit D

PT TOWER BERSAMA INFRASTRUCTURE Tbk
DAN ENTITAS ANAK
LAPORAN ARUS KAS KONSOLIDASIAN INTERIM
UNTUK PERIODE 6 (ENAM) BULAN YANG BERAKHIR
30 JUNI 2021
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

Exhibit D

PT TOWER BERSAMA INFRASTRUCTURE Tbk
AND ITS SUBSIDIARIES
INTERIM CONSOLIDATED STATEMENT OF CASH FLOWS
FOR THE PERIOD OF 6 (SIX) MONTHS ENDED
30 JUNE 2021
(Expressed in million Rupiah, unless otherwise stated)

	30 Juni/ *30 June* 2021	Catatan/ *Notes*	30 Juni/ *30 June* 2020	
ARUS KAS DARI AKTIVITAS OPERASI				***CASH FLOWS FROM OPERATING ACTIVITIES***
Penerimaan kas dari pelanggan	4.322.878		2.959.502	*Cash received from customers*
Penerimaan jasa giro dan bunga deposito	8.231		6.108	*Interest received from current accounts and deposits*
Pembayaran kas ke karyawan	(169.176)		(146.660)	*Cash paid to employees*
Pembayaran pajak penghasilan	(623.754)		(180.818)	*Payments of income tax*
Pembayaran kas ke pemasok	(555.785)		(303.264)	*Cash paid to supplier*
Kas bersih diperoleh dari aktivitas operasi	2.982.394		2.334.868	***Net cash flows provided by operating activities***
ARUS KAS DARI AKTIVITAS INVESTASI				***CASH FLOWS FROM INVESTING ACTIVITIES***
Penambahan properti investasi	(3.991)	**12**	(38.085)	*Acquisition of investment properties*
Pembelian saham	(170.000)	**27**	-	*Purchase of shares*
Penambahan aset hak guna	(734.335)	**13**	(222.580)	*Acquisition of right of use assets*
Penambahan aset tetap	(4.425.185)	**11**	(1.016.446)	*Acquisition of property and equipment*
Kas bersih yang digunakan untuk aktivitas investasi	(5.333.511)		(1.277.111)	***Net cash flows used in investing activities***
ARUS KAS DARI AKTIVITAS PENDANAAN				***CASH FLOWS FROM FINANCING ACTIVITIES***
Penerimaan pinjaman jangka panjang	16.158.498	**22**	3.804.406	*Withdrawals of long-term loans*
Penerbitan surat utang	8.109.000	**23**	6.278.900	*Issuance of notes*
Penerimaan derivatif	343.283	**15**	439.625	*Receipt from settlement of derivatives*
Penerimaan dari pihak ketiga	221.425	**6**	-	*Receipt from third party*
Pembayaran dividen - entitas anak	(14.245)	**34**	(5.602)	*Dividend payment - subsidiaries*
Pembayaran liabilitas sewa - kendaraan	(2.938)	**24**	(3.783)	*Payments of lease liabilities - vehicles*
Pembayaran liabilitas sewa - aset hak guna	(22.967)	**24**	(6.915)	*Payments of lease liabilities - right of use assets*
Pembayaran dividen	(692.194)	**34**	(605.670)	*Dividend payment*
Pembayaran bunga dan biaya pinjaman jangka panjang dan surat utang	(1.182.358)	**22,23**	(946.167)	*Payments of interest and cost of borrowing for long-term loan and notes*
Pembayaran pinjaman jangka panjang dan surat utang	(20.629.668)	**22,23**	(9.784.024)	*Payments of long-term loans and notes*
Kas bersih yang diperoleh dari (digunakan untuk) aktivitas pendanaan	2.287.836		(829.230)	***Net cash flows provided by (used in) financing activities***
Pengaruh perubahan kurs mata uang asing pada kas dan setara kas	10.387		8.054	***Effect from changes in foreign exchange rates on cash and cash equivalents***
KENAIKAN (PENURUNAN) BERSIH KAS DAN SETARA KAS	(52.894)		236.581	***NET INCREASE (DECREASE) ON CASH AND CASH EQUIVALENTS***
KAS DAN SETARA KAS PADA AWAL PERIODE	947.341		525.242	***CASH AND CASH EQUIVALENTS AT BEGINNING OF PERIOD***
KAS DAN SETARA KAS PADA AKHIR PERIODE	894.447	**4**	761.823	***CASH AND CASH EQUIVALENTS AT THE END OF PERIOD***

Lihat Catatan atas Laporan Keuangan Konsolidasian Interim pada Ekshibit E terlampir yang merupakan bagian tidak terpisahkan dari Laporan Keuangan Konsolidasian secara keseluruhan

See accompanying Notes to Interim Consolidated Financial Statements on Exhibit E which are an integral part of the Consolidated Financial Statements taken as a whole

1. UMUM

a. Pendirian Perusahaan

PT Tower Bersama Infrastructure Tbk ("Perusahaan"), berdomisili di Jakarta Selatan, didirikan berdasarkan akta Notaris No. 14 tanggal 8 November 2004 yang dibuat di hadapan Notaris Dewi Himijati Tandika, S.H, Notaris di Jakarta, dan telah disahkan oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Keputusan No. C-28415HT.01.01.TH.2004 tanggal 12 November 2004. Anggaran dasar Perusahaan telah mengalami beberapa kali perubahan, terakhir berdasarkan akta Notaris No. 43 tanggal 18 Mei 2020, yang dibuat dihadapan Jose Dima Satria, S.H., M.Kn., Notaris di Jakarta Selatan ("Akta No. 43/2020"), yang telah diberitahukan kepada Menteri Hukum dan Hak Asasi Manusia Republik Indonesia (Menkumham) berdasarkan Surat Penerimaan Pemberitahuan Perubahan Anggaran Dasar No. AHU-AH.01.03-0233270 tanggal 2 Juni 2020 dan didaftarkan pada Daftar Perusahaan No. AHU-0087844.AH.01.11.TAHUN 2020 tanggal 2 Juni 2020. Berdasarkan Akta No. 43/2020, para pemegang saham dalam Rapat Umum Pemegang Saham (RUPS) Perusahaan telah menyetujui: perubahan dan penyusunan Kembali anggaran dasar Perusahaan dalam rangka penyesuaian dengan Peraturan OJK No. 15/POJK.04/2020 tentang Rencana dan Penyelenggaraan Rapat Umum Pemegang Saham Perusahaan Terbuka dan Peraturan OJK No.16/POJK.04/2020 tentang Pelaksanaan Rapat Umum Pemegang Saham Perusahaan Terbuka secara Elektronik.

Berdasarkan Pasal 3 dari anggaran dasar Perusahaan, kegiatan usaha utama Perusahaan, aktivitas Perusahaan dan aktivitas konsultasi manajemen lainnya. Untuk menunjang kegiatan usaha utama, Perusahaan dapat melakukan kegiatan usaha penunjang yaitu:

a. konstruksi sentral komunikasi;
b. instalasi telekomunikasi; dan
c. aktivitas telekomunikasi dengan kabel

Perusahaan, melalui entitas anak, telah memulai kegiatan komersialnya pada tahun 2004. Pada saat ini, kegiatan utama Perusahaan adalah melakukan investasi atau penyertaan pada entitas anak. Pada tahun laporan yang disajikan, Perusahaan tidak melakukan ekspansi atau perampingan usaha yang signifikan.

Perusahaan merupakan entitas induk Perusahaan dan entitas anak terakhir. Perusahaan tidak memiliki entitas induk terakhir tertentu.

Perusahaan beralamat di Gedung The Convergence Indonesia lantai 11, Kawasan Rasuna Epicentrum, Jl HR Rasuna Said, Jakarta Selatan 12940.

1. GENERAL

a. The Company's Establishment

PT Tower Bersama Infrastructure Tbk (the "Company"), domiciled in South Jakarta, was established based on the Notarial deed No. 14 dated 8 November 2004 drawn up in the presence of Dewi Himijati Tandika, S.H, a Notary in Jakarta, and was approved by the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. C-28415.HT.01.01.TH.2004 dated 12 November 2004. The articles of association of the Company have been amended several times, most recently based on notarial deed No. 43 dated 18 May 2020, which was created in front of Jose Dima Satria, S.H., M.Kn., Notary in South Jakarta ("Deed No. 43/2020"), which has been notified to the Minister of Law and Human Rights of the Republic of Indonesia (Menkumham) based on the Letter of Acceptance Notification of Change Articles of Association No. AHU-AH.01.03-0233270 dated 2 June 2020 and registered in the Company Register No. AHU-0087844.AH.01.11.TAHUN 2020 dated 2 June 2020. Based on Deed No. 43/2020, the shareholders at the Company's General Meeting of Shareholders (GMS) have approved: amendments and rearrangements of the Company's articles of association in order to comply with OJK Regulation No. 15 / POJK.04 / 2020 concerning the Planning and Implementation of General Meeting of Shareholders of Public Companies and OJK Regulation No.16 / POJK.04 / 2020 concerning the Implementation of Electronic General Meeting of Shareholders of Public Companies.

Based on Article 3 of the Company's articles of association, the Company's main business activities, Company activities and other management consulting activities. To support the main business activities, the Company can conduct supporting business activities, namely:

a. central construction of communication;
b. telecommunications installation; and
c. telecommunications activities with cables

The Company, through its subsidiaries, commenced its commercial operations in 2004. Currently, the Company's main activity is investing in subsidiaries. In the reporting year, the Company did not conduct significant expansion or downsizing.

The Company is the ultimate parent of the group. The Company has no the ultimate parent entity.

The Company's address is at The Convergence Indonesia, 11th floor, Kawasan Rasuna Epicentrum, Jl HR Rasuna Said, Jakarta Selatan 12940.

1. UMUM (Lanjutan)

b. **Dewan Komisaris, Direksi, Komite Audit dan Karyawan**

Berdasarkan akta notaris No. 43 tanggal 18 Mei 2020 yang dibuat di hadapan Notaris Jose Dima Satria, S.H, M.Kn, Notaris di Jakarta, dan telah disahkan oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Keputusan No. AHU-AH.01.03-0233282 mengenai Perubahan Direksi dan Komisaris Perusahaan.

Susunan Komisaris Perusahaan pada tanggal 30 Juni 2021 dan 31 Desember 2020 adalah sebagai berikut:

Presiden Komisaris	:	Edwin Soeryadjaya	:	*President Commissioner*
Komisaris	:	Winato Kartono	:	*Commissioner*
Komisaris Independen	:	Ludovicus Sensi Wondabio	:	*Independent Commissioners*
		Wahyuni Bahar		

Susunan Direksi Perusahaan pada tanggal 30 Juni 2021 dan 31 Desember 2020 adalah sebagai berikut:

Presiden Direktur & *Chief Operating Officer*	:	Herman Setya Budi	:	*President Director & Chief Operating Officer*
Wakil Presiden Direktur & *Chief Executive Officer*	:	Hardi Wijaya Liong	:	*Vice President Director & Chief Executive Officer*
Direktur & *Chief of Business Development*	:	Budianto Purwahjo	:	*Director & Chief of Business Development*
Direktur & *Chief Financial Officer*	:	Helmy Yusman Santoso	:	*Director & Chief Financial Officer*
Direktur Independen & *Chief of Product & Innovation*	:	Gusandi Sjamsudin	:	*Independent Director & Chief of Product & Innovation*

Susunan Komite Audit Perusahaan pada tanggal 30 Juni 2021 dan 31 Desember 2020 adalah sebagai berikut:

Ketua	:	Ludovicus Sensi Wondabio	:	*Chairman*
Anggota	:	Agustino Sunarko	:	*Members*
		Agung Nugroho Soedibyo		

Berdasarkan Surat Edaran Dewan Komisaris tanggal 5 Juni 2020, Dewan Komisaris memutuskan untuk merubah susunan Komite Audit Perusahaan.

Cakupan manajemen kunci Perusahaan adalah para komisaris dan direksi.

Pada tanggal 9 Juli 2010, Perusahaan menunjuk Bapak Helmy Yusman Santoso sebagai Sekretaris Perusahaan.

*1. **GENERAL** (Continued)*

*b. **Boards of Commissioners, Directors, Audit Committee and Employees***

In accordance with notarial deed No. 43 dated 18 May 2020 drawn up in the presence of Jose Dima Satria, S.H, M.Kn., a Notary in Jakarta, and has been approved by Ministry of Law and Human Rights of the Republic of Indonesia as stated in his Decision Letter No. AHU-AH.01.03-0233282 regarding Changes the Directors and the Commissioners of the Company.

The Commissioners of the Company as of 30 June 2021 and 31 December 2020 are as follows:

The Directors of the Company as of 30 June 2021 and 31 December 2020 are as follows:

The Audit Committee of the Company as of 30 June 2021 and 31 December 2020 are as follows:

In accordance with Circular Approval Letter of Board of Commissioner dated 5 June 2020, Board of Commissioner has decided to change the composition of the Audit Commitee of the Company.

The scope of the Company's key management is the commissioners and directors.

On 9 July 2010, the Company appointed Mr. Helmy Yusman Santoso as the Corporate Secretary.

1. UMUM (Lanjutan)

b. **Dewan Komisaris, Direksi, Komite Audit dan Karyawan** (Lanjutan)

Sesuai dengan Peraturan No. IX.I.7, Lampiran Keputusan No. Kep-496/BL/2008 tanggal 28 November 2008 tentang Pembentukan dan Pedoman Penyusunan Piagam Unit Audit Internal yang telah diubah dengan peraturan Otoritas Jasa Keuangan (OJK) No. 56/POJK.04/2015 tentang Pembentukan dan Pedoman Penyusunan Piagam Unit Audit Internal, Perusahaan telah memiliki Piagam Audit Internal tanggal 10 Januari 2011. Perusahaan telah menunjuk Bapak Supriatno Arham sebagai kepala unit Audit Internal berdasarkan Surat Keputusan Direksi No. 954/TBG-SKP-00/HOS/03/XII/2014 tanggal 7 Mei 2014.

Jumlah remunerasi yang dibayarkan untuk Dewan Komisaris Perusahaan untuk periode 6 (enam) bulan dan tahun yang berakhir 30 Juni 2021 dan 31 Desember 2020 masing-masing sebesar Rp 10.280 dan Rp 13.136.

Jumlah remunerasi yang dibayarkan untuk Dewan Direksi Perusahaan untuk periode 6 (enam) bulan dan tahun yang berakhir 30 Juni 2021 dan 31 Desember 2020 masing-masing sebesar Rp 20.972 dan Rp 27.865.

Pada tanggal 30 Juni 2021 dan 31 Desember 2020, Perusahaan dan entitas anak masing-masing mempekerjakan 646 karyawan dan 655 karyawan (tidak diaudit).

c. **Struktur Entitas Anak**

Perusahaan secara langsung memiliki lebih dari 50% saham di entitas anak sebagai berikut:

***1. GENERAL** (Continued)*

*b. **Boards of Commissioners, Directors, Audit Committee and Employees** (Continued)*

In accordance with Regulation No. IX.I.7, Decision No. Kep-496/BL/2008 dated 28 November 2008 on the Establishment and Development Guidelines for Internal Audit Charter, which has been changed with Otoritas Jasa Keuangan (OJK) rule No. 56/POJK.04/2015 on the Establishment and Development Guidelines for Internal Audit Charter the Company has Internal Audit Charter dated 10 January 2011. The Company appointed Mr. Supriatno Arham as the Head Of Internal Auditor based on the Directors' Decree No. 954/TBG-SKP-00/HOS/03/XII/ 2014 dated 7 May 2014.

Total remuneration paid to the Board of Commissioners of the Company for the period 6 (six) month and year ended 30 June 2021 and 31 December 2020 amounted to Rp 10,280 and Rp 13,136, respectively.

Total remuneration paid to the Board of Directors of the Company for the the period 6 (six) month and year ended 30 June 2021 and 31 December 2020 amounted to Rp 20,972 and Rp 27,865, respectively.

As of 30 June 2021 and 31 December 2020, the Company and subsidiaries employed 646 staffs and 655 staffs (unaudited), respectively.

*c. **Structure of Subsidiaries***

The Company owns directly the shareholding greater than 50% in the following subsidiaries:

Entitas anak / *Subsidiaries*	Dimulainya kegiatan operasi/ *Commencement of operation*	Persentase kepemilikan pada 30 Juni/ *Percentage of ownership at 30 June* 2021	Jumlah aset sebelum eliminasi/ *Total assets before elimination*	
			30 Juni/ *30 June* 2021	31 Desember/ *31 December* 2020
PT Telenet Internusa	1999	99,50%	325.974	305.752
PT United Towerindo dan entitas anak/ *and subsidiaries*	2004	100,00%	586.828	507.293
PT Tower Bersama dan entitas anak/ *and subsidiaries*	2006	100,00%	26.938.349	19.889.744
PT Tower One dan entitas anak/ *and subsidiary*	2006	99,90%	625.940	427.581
PT Triaka Bersama	2010	100,00%	116.961	107.030
PT Metric Solusi Integrasi dan entitas anak/ *and subsidiary*	2010	100,00%	14.693.553	13.089.881
PT Solusi Menara Indonesia	2011	99,91%	6.480.231	7.799.322
TBG Global Pte Ltd dan entitas anak/ *and subsidiary*	2013	100,00%	4.852.386	14.367.102
PT Menara Bersama Terpadu	2013	99,99%	9.991	10.000
PT Gihon Telekomunikasi Indonesia Tbk dan entitas anak/ *and subsidiary*	2001	50,43%	899.698	828.494
PT Visi Telekomunikasi Infrastruktur Tbk dan entitas anak/ *and subsidiary*	1995	51,09%	358.039	338.400

1. **UMUM** (Lanjutan)

c. **Struktur Entitas Anak** (Lanjutan)

Semua entitas anak berdomisili di Jakarta dan memiliki alamat yang sama dengan Perusahaan, kecuali TBG Global Pte Ltd yang berdomisili di Singapura.

Perusahaan melalui entitas anak memiliki kepemilikan tidak langsung lebih dari 50% pada perusahaan-perusahaan sebagai berikut:

*1. **GENERAL** (Continued)*

*c. **Structure of Subsidiaries** (Continued)*

All subsidiaries are domiciled in Jakarta and their address is the same as the Company's address, except for TBG Global Pte Ltd which is domiciled in Singapore.

The Company owns indirectly through subsidiaries the shareholdings greater than 50% in the following companies:

Entitas anak / *Subsidiaries*	Kepemilikan melalui entitas anak/ *Ownership of subsidiaries*	Dimulainya kegiatan operasi/ *Commencement of operation*	Persentase kepemilikan pada 30 Juni/ *Percentage of ownership at 30 June* 2021	Jumlah aset sebelum eliminasi/ *Total assets before elimination* 30 Juni/ *30 June* 2021	31 Desember/ *31 December* 2020
PT Batavia Towerindo	PT United Towerindo dan/ *and* PT Tower Bersama	2006	99,80%	182.342	191.248
PT Selaras Karya Makmur	PT United Towerindo	2013	00,00%	-	15
PT Prima Media Selaras	PT Tower Bersama	2003	100,00%	233.396	232.303
PT Bali Telekom	PT Tower One	2003	100,00%	278.639	289.817
PT Solu Sindo Kreasi Pratama	PT Metric Solusi Integrasi	1999	99,71%	12.360.506	10.365.837
PT Mitrayasa Sarana Informasi	PT Tower Bersama dan/ *and* PT Solu Sindo Kreasi Pratama	2004	100,00%	1.108.355	1.049.704
PT Towerindo Konvergensi	PT Tower Bersama	2009	100,00%	675.201	634.255
PT Jaringan Pintar Indonesia	PT Tower Bersama	2015	83,44%	26.226	26.041
Tower Bersama Singapore Pte Ltd	TBG Global Pte Ltd	2012	100,00%	4.787.657	7.183.932
PT Gihon Lima Jaya	PT Gihon Telekomunikasi Indonesia Tbk	2018	99,00%	1.244	1.246
PT Permata Karya Perdana	PT Visi Telekomunikasi Infrastruktur Tbk	2013	99,99%	357.860	327.408

Pada 31 Januari 2020, PT Tower Bersama, entitas anak melepaskan kepemilikan 90% saham atas PT Infrastruktur Digital Indonesia.

On 31 January 2020, PT Tower Bersama, a subsidiary, released 90% ownership of PT Infrastruktur Digital Indonesia.

Status badan hukum PT Selaras Karya Makmur (dalam likuidasi), entitas anak telah dihapus dari Daftar Perseroan berdasarkan surat Kementerian Hukum dan Hak Asasi Manusia nomor AHU-AH.01.03-00101 tanggal 22 Maret 2021.

The legal entity status (under liquidation) of PT Selaras Karya Makmur, the subsidiary has been deleted from the Company Register based on the letter of the Ministry of Law and Human Rights number AHU-AH.01.03-00101 dated 22 March 2021.

Berikut adalah keterangan dari masing-masing entitas anak.

The followings are the information about the subsidiaries.

c.1 **PT Telenet Internusa**

PT Telenet Internusa ("TI") adalah suatu Perseroan Terbatas didirikan di Indonesia berdasarkan akta pendirian No. 8 tanggal 6 September 1999, dibuat dihadapan Dr. Wiratni Ahmadi, S.H, Notaris di Bandung.

*c.1 **PT Telenet Internusa***

PT Telenet Internusa ("TI") is a Limited Liability Company established in Indonesia based on the deed of establishment No. 8 dated 6 September 1999, drawn up in the presence of Dr. Wiratni Ahmadi, S.H, a Notary in Bandung.

1. **UMUM** (Lanjutan)

c. **Struktur Entitas Anak** (Lanjutan)

c.1 **PT Telenet Internusa** (Lanjutan)

Akta Pendirian TI telah disahkan oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dalam Surat Keputusan No. C-18566.HT.01.01.TH. 2001 tanggal 6 November 2001 dan akta tersebut telah diumumkan dalam Berita Negara Republik Indonesia No. 15 tanggal 21 Februari 2006, Tambahan No. 1896.

Anggaran dasar TI telah mengalami beberapa kali perubahan, terakhir dengan Akta No. 181 tanggal 23 Desember 2019, dibuat dihadapan Darmawan Tjoa, S.H, S.E, Notaris di Jakarta, mengenai perubahan Pasal 3 maksud dan tujuan serta kegiatan usaha. Perubahan anggaran dasar tersebut telah disetujui oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Keputusan No. AHU-0108920.AH.01.02 Tahun 2019 tanggal 26 Desember 2019.

Berdasarkan Pasal 3 dari anggaran dasar TI, ruang lingkup usaha TI adalah konstruksi sentral telekomunikasi dan perdagangan besar peralatan komunikasi.

c.2 **PT United Towerindo dan entitas anak**

PT United Towerindo ("UT") adalah suatu Perseroan Terbatas didirikan di Indonesia berdasarkan akta pendirian No. 40 tanggal 30 Juni 2004, dibuat dihadapan Darmawan Tjoa, S.H, S.E, Notaris di Jakarta. Akta pendirian UT telah disahkan oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dalam Surat Keputusan No. C-18090. HT.01.01.TH.2004 tanggal 20 Juli 2004 dan telah diumumkan dalam Berita Negara Republik Indonesia No. 65 tanggal 13 Agustus 2004, Tambahan No. 7930.

Anggaran dasar UT telah mengalami beberapa kali perubahan, terakhir dengan akta No. 170 tanggal 23 Desember 2019, dibuat dihadapan Darmawan Tjoa, S.H, S.E, Notaris di Jakarta, mengenai perubahan Pasal 3 maksud dan tujuan serta kegiatan usaha. Perubahan anggaran tersebut telah disetujui oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Keputusan No. AHU-0108319.AH.01.02 Tahun 2019 tanggal 23 Desember 2019.

Berdasarkan Pasal 3 dari anggaran dasar UT, ruang lingkup usaha UT adalah konstruksi sentral komunikasi dan perdagangan besar peralatan komunikasi.

UT memiliki entitas anak yaitu PT Batavia Towerindo.

1. ***GENERAL*** *(Continued)*

c. ***Structure of Subsidiaries*** *(Continued)*

c.1 ***PT Telenet Internusa*** *(Continued)*

TI's deed of Establishment was approved by the Ministry of Law and Human Rights the Republic of Indonesia in his Decree No. C-18566.HT.01.01.TH. 2001 dated 6 November 2001 and was published in the State Gazette Republic Indonesia No. 15 dated 21 February 2006, Supplement No.1896.

TI's articles of association have been amended several times, the latest amendment was based on Deed No. 181 dated 23 December 2019, drawn up in the presence of Darmawan Tjoa, S.H, S.E, a Notary in Jakarta, regarding the amendment to Article 3 of the purposes and objectives as well as business activities. This amendment has been approved by the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. AHU-0108920. AH.01.02 Tahun 2019 dated 26 December 2019.

In accordance with Article 3 of TI articles of association, the scope of the TI business is the telecommunications central construction and the wholesale trade of communications equipment.

c.2 ***PT United Towerindo and subsidiary***

PT United Towerindo ("UT") is a Limited Liability Company established in Indonesia based on the deed of establishment No. 40 dated 30 June 2004, drawn up in the presence of Darmawan Tjoa, S.H, S.E, a Notary in Jakarta. UT's deed of establishment was approved by the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. C-18090.HT.01.01. TH.2004 dated 20 July 2004 and was published in the State Gazette of the Republic of Indonesia No. 65 dated 13 August 2004, Supplement No. 7930.

UT's articles of association have been amended several times, the latest amendment was based on deed No. 170 dated 23 December 2019, drawn up in the presence of Darmawan Tjoa, S.H, S.E, a Notary in Jakarta, regarding the amendment to Article 3 of the purposes and objectives as well as business activities. This amendment has been approved by the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. AHU-0108319.AH.01.02 Tahun 2019 dated 23 December 2019.

In accordance with Article 3 of UT's articles of association, the scope of UT's business is the central construction of communications and the trade in communication equipment.

UT has a subsidiaries company which are PT Batavia Towerindo.

1. **UMUM** (Lanjutan)

c. **Struktur Entitas Anak** (Lanjutan)

c.3 **PT Tower Bersama dan entitas anak**

PT Tower Bersama ("TB") adalah suatu Perseroan Terbatas didirikan di Indonesia berdasarkan akta pendirian No. 5 tanggal 4 Juli 2006, dibuat dihadapan Darmawan Tjoa, S.H, S.E, Notaris di Jakarta. Akta pendirian TB telah disahkan oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dalam Surat Keputusan No. C-20821.HT.01.01.TH.2006 tanggal 17 Juli 2006 dan telah diumumkan dalam Berita Negara Republik Indonesia No. 104 tanggal 29 Desember 2006, Tambahan No.13530.

Anggaran dasar TB telah mengalami beberapa kali perubahan, terakhir dengan akta No. 168 tanggal 23 Desember 2019, dibuat dihadapan Darmawan Tjoa, S.H, S.E, Notaris di Jakarta, mengenai perubahan Pasal 3 maksud dan tujuan serta kegiatan usaha. Perubahan anggaran dasar tersebut telah disetujui oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Keputusan No. AHU-0108308.AH.01.02.Tahun 2019 tanggal 23 Desember 2019.

Berdasarkan Pasal 3 dari anggaran dasar TB, ruang lingkup usaha entitas anak adalah konstruksi sentral komunikasi, perdagangan besar peralatan komunikasi, perdagangan besar mesin, peralatan dan perlengkapan lainnya, aktivitas telekomunikasi dengan kabel, *internet service provider* dan jasa system komunikasi.

TB memiliki 4 (empat) entitas anak yaitu PT Prima Media Selaras, PT Mitrayasa Sarana Informasi PT Towerindo Konvergensi dan PT Jaringan Pintar Indonesia dimiliki oleh PT Tower Bersama masing-masing sejak Juni 2008, 8 Agustus 2011, 7 Oktober 2011 dan 4 Oktober 2016.

c.4 **PT Tower One dan entitas anak**

PT Tower One ("TO") adalah suatu Perseroan Terbatas didirikan di Indonesia berdasarkan akta pendirian No. 6 tanggal 21 September 2006, dibuat dihadapan Angela Meilany Basiroen, S.H, Notaris di Jakarta.

1. ***GENERAL** (Continued)*

*c. **Structure of Subsidiaries** (Continued)*

*c.3 **PT Tower Bersama and subsidiaries***

PT Tower Bersama ("TB") is a Limited Liability Company established in Indonesia based on the deed of establishment No. 5 dated 4 July 2006, drawn up in the presence of Darmawan Tjoa, S.H, S.E, a Notary in Jakarta. TB's deed of establishment was approved by the Ministry of Law and Human Rights of the Republic of Indonesia No. C-20821.HT.01.01.TH.2006 dated 17 July 2006 and was published in the State Gazette of the Republic of Indonesia in his Decree No. 104 dated 29 December 2006, Supplement No. 13530.

TB's articles of association have been amended several times, the latest amendment was based on deed No. 169 dated 23 December 2019, drawn up in the presence of Darmawan Tjoa, SH, SE, a Notary in Jakarta, regarding the amendment to Article 3 of the purposes and objectives as well as business activities. This amendment has been approved by the Ministry of Law and Human Rights of the Republic of Indonesia No. AHU-0108308.AH.01.02.Tahun 2019 dated 23 December 2019.

In accordance with Article 3 of TB's articles of association, the scope of its the central construction of communications, the wholesale trade of communications equipment, the wholesale trade of machinery, equipment and other equipment, telecommunications activities with cable, internet service providers and communication system services.

TB has 4 (four) subsidiaries companies which are PT Prima Media Selaras, PT Mitrayasa Sarana Informasi, PT Towerindo Konvergensi and PT Jaringan Pintar Indonesia were acquired by PT Tower Bersama on June 2008, 8 August 2011, 7 October 2011 and 4 October 2016, respectively.

*c.4 **PT Tower One and subsidiary***

PT Tower One ("TO") is a Limited Liability Company established in Indonesia based on the Deed of Establishment No. 6 dated 21 September 2006, drawn up in the presence of Angela Meilany Basiroen, S.H, a Notary in Jakarta.

1. **UMUM** (Lanjutan)

   c. **Struktur Entitas Anak** (Lanjutan)

      c.4 **PT Tower One dan entitas anak** (Lanjutan)

      Akta pendirian TO telah disahkan oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dalam Surat Keputusan No. W7-03499.HT.01.01-TH.2006 tanggal 8 Desember 2006 dan akta tersebut telah diumumkan dalam Berita Negara Republik Indonesia No. 63 tanggal 7 Agustus 2009, Tambahan No. 21141.

      Anggaran dasar TO telah mengalami beberapa kali perubahan, terakhir dengan Akta No. 174 tanggal 23 Desember 2019, dibuat dihadapan Darmawan Tjoa, S.H, S.E, Notaris di Jakarta, mengenai perubahan Pasal 3 maksud dan tujuan serta kegiatan usaha. Perubahan Anggaran Dasar tersebut telah disetujui oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Keputusan No. AHU-0108326.AH.01.02.Tahun 2019 tanggal 23 Desember 2019. Berdasarkan Pasal 3 dari anggaran dasar TO, ruang lingkup usaha TO adalah aktivitas perusahaan holding dan aktivitas konsultasi manajemen lainnya.

      TO memiliki entitas anak yaitu PT Bali Telekom.

      c.5 **PT Triaka Bersama**

      PT Triaka Bersama ("TRB") adalah suatu Perseroan Terbatas didirikan di Indonesia berdasarkan akta pendirian No. 33 tanggal 15 Mei 2009, dibuat dihadapan Darmawan Tjoa, S.H, S.E, Notaris di Jakarta. Akta pendirian TRB telah disahkan oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dalam Surat Keputusan No. AHU-24774.AH.01.01.Tahun 2009 tanggal 5 Juni 2009 dan telah diumumkan dalam Berita Negara Republik Indonesia No. 63 tanggal 7 Agustus 2009, Tambahan No. 20847.

      Anggaran dasar TRB terakhir diubah dengan akta No. 175 tanggal 23 Desember 2019, dibuat dihadapan Darmawan Tjoa, S.H, S.E, Notaris di Jakarta, mengenai perubahan Pasal 3 maksud dan tujuan serta kegiatan usaha. Perubahan anggaran dasar tersebut telah disetujui oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Keputusan No. AHU-0108325.AH.01.02.Tahun 2019 tanggal 23 Desember 2019.

      Berdasarkan Pasal 3 dari anggaran dasar TRB, ruang lingkup usaha TRB adalah berusaha dalam jasa konstruksi sentral komunikasi dan perdagangan besar peralatan komunikasi.

1. ***GENERAL** (Continued)*

   c. ***Structure of Subsidiaries** (Continued)*

      *c.4 **PT Tower One and subsidiary** (Continued)*

      TO's deed of establishment was approved by the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. W7-03499.HT.01.01-TH.2006 dated 8 December 2006 and was published in the State Gazette of the Republic of Indonesia in his Decree No. 63 dated 7 August 2009, Supplement No. 21141.

      TO's articles of association have been amended several times, the latest amendment was based on Deed No. 174 dated 23 December 2019, drawn up in the presence of Darmawan Tjoa, S.H, S.E, a Notary in Jakarta, regarding the purposes and objectives as well as business activities. This amendment has been approved by the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. AHU-0108326.AH.01.02.Tahun 2019 dated 23 December 2019. In accordance with Article 3 of TO's articles of association, the scope of its activities of the holding company and other management consulting activities.

      TO has a subsidiary company which is PT Bali Telekom.

      *c.5 **PT Triaka Bersama***

      PT Triaka Bersama ("TRB") is a Limited Liability Company established in Indonesia based on the deed of establishment No. 33 dated 15 May 2009, drawn up in the presence of Darmawan Tjoa, S.H, S.E, a Notary in Jakarta. TRB's Deed of Establishment was approved by the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. AHU-24774.AH.01.01. Tahun 2009 dated 5 June 2009 and was published in the State Gazette of the Republic of Indonesia No. 63 dated 7 August 2009, Supplement No. 20847.

      TRB's articles of association were last amended by the deed No.175 dated 23 Decemeber 2019, drawn up in the presence of Darmawan Tjoa, S.H, S.E, a Notary in Jakarta, regarding the purposes and objectives as well as business activities. This amendment has been approved by the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. AHU-0108325.AH.01.02.Tahun 2019 dated 23 December 2019.

      In accordance with Article 3 of TRB's articles of association, the scope of its activities the central construction of communications and the trade in communication equipment.

1. **UMUM** (Lanjutan)

   c. **Struktur Entitas Anak** (Lanjutan)

      c.6 **PT Metric Solusi Integrasi dan entitas anak**

      PT Metric Solusi Integrasi ("MSI") adalah suatu Perseroan Terbatas didirikan di Indonesia berdasarkan akta pendirian No. 20 tanggal 12 Maret 2010, dibuat dihadapan Darmawan Tjoa, S.H, S.E, Notaris di Jakarta. Akta pendirian MSI telah disahkan oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dalam Surat Keputusan No. AHU-13915.AH.01.01.Tahun 2010 tanggal 18 Maret 2010. Anggaran dasar MSI telah mengalami beberapa kali perubahan. Terakhir dengan akta No. 176 tanggal 23 Desember 2019, dibuat dihadapan Darmawan Tjoa, S.H, S.E, Notaris di Jakarta, mengenai perubahan Pasal 3 maksud dan tujuan serta kegiatan usaha. Perubahan anggaran dasar tersebut telah disetujui oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Keputusan No. AHU-0108321.AH.01.02 Tahun 2019 tanggal 23 Desember 2019.

      Berdasarkan Pasal 3 dari anggaran dasar MSI, ruang lingkup usaha MSI adalah aktivitas perusahaan holding dan aktivitas konsultasi manajemen lainnya.

      MSI memiliki entitas anak yaitu PT Solu Sindo Kreasi Pratama.

      c.7 **PT Solusi Menara Indonesia**

      PT Solusi Menara Indonesia ("SMI") adalah suatu Perseroan Terbatas yang didirikan di Indonesia berdasarkan Akta pendirian No. 77 tanggal 19 Desember 2011, dibuat dihadapan Darmawan Tjoa, S.H, S.E, Notaris di Jakarta. Akta pendirian SMI telah disahkan oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia sesuai dengan Surat Keputusan No. AHU-63259.AH.01.01.Tahun 2011 tanggal 22 Desember 2011.

      Anggaran dasar SMI terakhir diubah dengan akta No. 178 tanggal 23 Desember 2019, dibuat dihadapan Darmawan Tjoa, S.H, S.E, Notaris di Jakarta, mengenai perubahan Pasal 3 maksud dan tujuan serta kegiatan usaha. Perubahan anggaran dasar tersebut telah disetujui oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Keputusan No. AHU-0108324.40.AH.01.02.Tahun 2019 tanggal 23 Desember 2019.

      Berdasarkan Pasal 3 dari anggaran dasar SMI, ruang lingkup usaha SMI adalah konstruksi sentral telekomunikasi dan perdagangan besar peralatan.

*1. **GENERAL** (Continued)*

   *c. **Structure of Subsidiaries** (Continued)*

      *c.6 **PT Metric Solusi Integrasi and subsidiary***

      PT Metric Solusi Integrasi ("MSI") is a Limited Liability Company established in Indonesia based on the deed of establishment No. 20 dated 12 March 2010 drawn up in the presence of Darmawan Tjoa, SH, SE, a Notary in Jakarta. MSI's deed of establishment was approved by the Ministry of Law and Human Rights the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. AHU-13915.AH.01.01.Tahun 2010 dated 18 March 2010. MSI's articles of association have been amended several times. The latest amendment was based on deed No. 176 dated 23 December 2019, drawn up in the presence of Darmawan Tjoa, S.H, S.E, a Notary in Jakarta, regarding the purposes and objectives as well as business activities. This amendment has been approved by the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. AHU-0108321.AH.01.02 Tahun 2019 dated 23 December 2019.

      In accordance with Article 3 of MSI's articles of association, the scope of its activities of holding companies and other management consulting activities.

      MSI has a subsidiary company which is PT Solu Sindo Kreasi Pratama.

      *c.7 **PT Solusi Menara Indonesia***

      PT Solusi Menara Indonesia ("SMI") is a Limited Liability Company established in Indonesia under the deed of establishment No. 77 dated 19 December 2011, drawn up in the presence of Darmawan Tjoa, S.H, S.E, a Notary in Jakarta. SMI's Deed of Establishment was approved by the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. AHU-63259. AH.01.01.Tahun 2011 dated 22 December 2011.

      SMI's articles of association have been amended based on the deed No. 178 dated 23 December 2019, drawn up in the presence of Darmawan Tjoa, S.H, S.E, a Notary in Jakarta, regarding the purposes and objectives as well as business activities. This amendment has been approved by the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. AHU-0108324.40.AH.01.02.Tahun 2019 dated 23 December 2019.

      According to Article 3 of SMI's articles of association, the scope of its telecommunication central construction and the wholesale trade of equipment.

1. **UMUM** (Lanjutan)

c. **Struktur Entitas Anak** (Lanjutan)

c.8 **TBG Global Pte Ltd. dan entitas anak**

TBG Global Pte Ltd. ("TBGG") adalah suatu Perseroan Terbatas yang didirikan berdasarkan hukum Negara Singapura sesuai dengan nomor pendaftaran 201302879K di tahun 2013.

TBGG memiliki entitas anak yaitu Tower Bersama Singapore Pte Ltd.

c.9 **PT Menara Bersama Terpadu**

PT Menara Bersama terpadu ("MBT") adalah suatu Perseroan Terbatas yang didirikan di Indonesia berdasarkan akta pendirian No. 11 tanggal 8 Januari 2013, dibuat dihadapan Darmawan Tjoa, S.H, S.E, Notaris di Jakarta. Akta pendirian MBT telah disahkan oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia sesuai dengan Surat Keputusan No. AHU-02685.AH.01.01.Tahun 2013 tanggal 25 Januari 2013.

Berdasarkan Pasal 3 dari anggaran dasar MBT, ruang lingkup usaha MBT adalah konstruksi sentral telekomunikasi dan perdagangan besar peralatan.

c.10 **PT Gihon Telekomunikasi Indonesia Tbk dan entitas anak**

PT Gihon Telekomunikasi Indonesia Tbk ("GHON"), bertempat kedudukan di Jakarta, didirikan berdasarkan akta Notaris Nurmiati, S.H., No. 58 tanggal 27 April 2001 dan telah mendapat pengesahan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Keputusan No. C-00679.HT.01.01.TH.2001 tanggal 10 Mei 2001.

Anggaran dasar GHON telah mengalami beberapa kali perubahan dan yang terakhir berdasarkan Akta Notaris Ashoya Ratam S.H., M.Kn., Notaris di Kota Jakarta, No. 13 tanggal 18 Mei 2021, mengenai hasil keputusan rapat umum pemegang saham. Perubahan anggaran dasar tersebut telah memperoleh persetujuan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia sebagaimana tercantum dalam Surat Keputusan No. AHU-AH.01.03-0383643 tanggal 17 Juni 2021.

*1. **GENERAL** (Continued)*

*c. **Structure of Subsidiaries** (Continued)*

*c.8 **TBG Global Pte Ltd. and subsidiary***

TBG Global Pte Ltd. ("TBGG") is a Limited Liability Company incorporated under the law of Republic of Singapore based on registration number 201302879K in 2013.

TBGG has a subsidiary company which is Tower Bersama Singapore Pte Ltd.

*c.9 **PT Menara Bersama Terpadu***

PT Menara Bersama Terpadu ("MBT") is a Limited Liability Company Incorporated in Indonesia under deed of establishment No. 11 dated 8 January 2013, drawn up in the presence of Darmawan Tjoa, S.H, S.E, a Notary in Jakarta. MBT's deed establishment was approved by the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. AHU-02685.AH.01.01.Tahun 2013 dated 25 January 2013.

According to Article 3 of MBT's articles of association, the scope of its telecommunications central construction and the wholesale trade of equipment.

*c.10 **PT Gihon Telekomunikasi Indonesia Tbk and subsidiary***

PT Gihon Telekomunikasi Indonesia Tbk ("GHON") was established in Jakarta, based on the Notarial deed Nurmiati, S.H., No. 58 dated 27 April 2001 and was approved by the Ministry of Law and Human Rights based on its Decision Letter No. C-00679.HT.01.01.TH.2001 dated 10 May 2001.

The Company's articles of association has been amended several times, the latest based on Notarial Ashoya Ratam, S.H., M.Kn., Notary in Jakarta, No. 13 dated 18 May 2021, regarding resolution of the general meeting of shareholders. The amendment was approved by Minister of Law and Human Rights of Republic Indonesia on its Decision Letter No. AHU- AH.01.03-0383643 dated 17 June 2021.

1. **UMUM** (Lanjutan)

   c. **Struktur Entitas Anak** (Lanjutan)

      c.10 **PT Gihon Telekomunikasi Indonesia Tbk dan entitas anak** (Lanjutan)

      Berdasarkan pasal 3 dari anggaran dasar GHON, kegiatan usaha GHON adalah menjalankan usaha dalam bidang jasa, khususnya penunjang telekomunikasi, meliputi penyewaan dan operational leasing mesin dan peralatan industri. Untuk menunjang kegiatan usaha utama, Perusahaan dapat melakukan kegiatan usaha penunjang yaitu konstruksi sentral telekomunikasi, instalasi telekomunikasi, dan aktivitas telekomunikasi dengan kabel.

      GHON memiliki entitas anak yaitu PT Gihon Lima Jaya.

      c.11 **PT Visi Telekomunikasi Infrastruktur Tbk dan entitas anak**

      PT Visi Telekomunikasi Infrastruktur Tbk ("GOLD"), dahulu didirikan dengan nama PT Bima Nuansa Cempaka berdasarkan Akta Notaris Afdal Gazali, S.H., No. 136 tanggal 8 November 1995 dan telah mendapat pengesahaan dari Menteri Kehakiman Republik Indonesia berdasarkan Surat Keputusan No. C2-17.467.HT.01.01 Tahun 1995 tanggal 29 Desember 1995 dan telah diumumkan dalam Berita Negara Republik Indonesia No. 36, Tambahan No. 4144 tanggal 3 Mei 1996. Berdasarkan Akta Notaris No. 120 tanggal 26 Mei 2016 dari Hasbullah Abdul Rasyid, S.H., M.Kn., Notaris di Jakarta, nama Entitas Induk diubah menjadi PT Visi Telekomunikasi Infrastruktur Tbk. Akta tersebut telah disahkan oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia berdasarkan Surat Keputusan No. AHU-0011039.AH.01.02. Tahun 2016 tanggal 10 Juni 2016 dan telah diumumkan dalam Berita Negara Republik Indonesia No. 59, Tambahan No. 12851 tanggal 26 Juli 2016.

      Anggaran Dasar GOLD telah mengalami beberapa kali perubahan, terakhir berdasarkan Akta No. 60 tanggal 4 Juni 2021, dibuat dihadapan Jose Dima Satria, S.H., S.E., Notaris di Jakarta, mengenai perubahan Pasal 18 Ayat 3 mengenai Tugas dan Wewenang Direksi. Perubahan anggaran dasar tersebut telah mendapatkan penerimaan pemberitahuan perubahan anggaran dasar dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Keputusan No. AHU-AH.01.03-0400872 tanggal 25 Juni 2021

*1. **GENERAL** (Continued)*

   *c. **Structure of Subsidiaries** (Continued)*

      *c.10 **PT Gihon Telekomunikasi Indonesia Tbk and subsidiary** (Continued)*

      Based on Article 3 of GHONs articles of association, the main business activities of GHON is providing services, specifically supporting telecommunications including rental and operational lease for industrial machinery and equipment. To support the main business activities, the Company can conduct supporting business activities, namely central telecommunications constructions, telecommunication installation, and cable telecommunications activities.

      GHON has a subsidiary company which is PT Gihon Lima Jaya.

      *c.11 **PT Visi Telekomunikasi Infrastruktur Tbk and subsidiary***

      PT Visi Telekomunikasi Infrastruktur Tbk ("GOLD") formerly was established by name PT Bima Nuansa Cempaka based on the Notarial deed Afdal Gazali, S.H., No. 136 dated 8 November 1995 and was approved by the Ministry of Justice based on its Decision Letter No. C2-17.467.HT.01.01 Year 1995 dated 29 December 1995 and was published in the Official Gazette of the Republic of Indonesia No. 36, Supplement No. 4144 dated 3 May 1996. Based on Notarial Deed No. 120 dated 26 May 2016 from Hasbullah Abdul Rasyid, S.H., M.Kn., Notary in Jakarta, the name of the Parent Entity was changed to PT Visi Telekomunikasi Infrastruktur Tbk. Th deed was approved by the Minister of Law and Human Rights of the Republic of Indonesia based on Decree No. AHU-0011039.AH.01.02.Tahun 2016 dated 10 June 2016 and has been announced in the State Gazette of the Republic of Indonesia No. 59, Supplement No. 12851 dated 26 July 2016.

      GOLD's Articles of Association have been amended several times, most recently based on Jose Dima Satria, S.H., S.E., Notarial Deed, No. 60 dated 4 June 2021, in connection with the Amendment to Article 18 Paragraph 3 regarding the Duties and Authorities of the Board of Directors. The amendment has been approved which late approved by Minister of Law and Human Rights of Republic Indonesia on its Decision Letter No. AHU.AH.01.03-0400872 dated 25 June 2021.

1. **UMUM** (Lanjutan)

c. **Struktur Entitas Anak** (Lanjutan)

c.11 **PT Visi Telekomunikasi Infrastruktur Tbk dan entitas anak** (Lanjutan)

Berdasarkan pasal 3 anggaran dasar GOLD, ruang lingkup kegiatan GOLD adalah dalam bidang jasa penyediaan infrastruktur telekomunikasi, termasuk melakukan investasi atau penyertaan pada perusahaan lain yang bergerak di bidang kegiatan penunjang telekomunikasi dan berusaha dalam bidang jasa, khususnya jasa penunjang telekomunikasi.

GOLD memiliki entitas anak yaitu PT Permata Karya Perdana.

d. **Penawaran Umum Saham**

Pada tanggal 15 Oktober 2010, Perusahaan memperoleh pernyataan efektif dari Ketua Badan Pengawas Pasar Modal dan Lembaga Keuangan (Bapepam-LK) dengan suratnya No. S-9402/BL/2010 untuk melakukan penawaran umum sebanyak 551.111.000 saham dengan nilai nominal Rp 100 (nilai penuh) per saham kepada masyarakat melalui Bursa Efek Indonesia dengan harga penawaran perdana sebesar Rp 2.025 (nilai penuh) per saham. Pada tanggal 26 Oktober 2010, seluruh saham tersebut telah dicatatkan di Bursa Efek Indonesia.

e. **Penawaran Umum Obligasi**

Pada tanggal 9 April 2021, Perusahaan menerbitkan Obligasi Berkelanjutan IV Tower Bersama Infrastructure Tahap IV Tahun 2021 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan IV Tahap IV") sebesar 5,5% per tahun. Nominal Obligasi Berkelanjutan IV Tahap IV ini adalah sebesar Rp 970.000 (Catatan 23). Obligasi ini dicatatkan pada Bursa Efek Indonesia pada tanggal 12 April 2021.

Pada tanggal 17 Februari 2021, Perusahaan menerbitkan Obligasi Berkelanjutan IV Tower Bersama Infrastructure Tahap III Tahun 2021 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan IV Tahap III"). Nominal Obligasi Berkelanjutan IV Tahap III ini adalah sebesar Rp 2.915.000 (Catatan 23). Obligasi ini dicatatkan pada Bursa Efek Indonesia pada tanggal 18 Februari 2021.

Obligasi Berkelanjutan IV Tahap III ini diterbitkan dalam 2 (dua) seri sebagai berikut:

a. Obligasi seri A dengan nilai nominal sebesar Rp 1.898.000 dengan tingkat bunga tetap sebesar 5,50% per tahun. Jangka waktu obligasi seri A adalah 370 (tiga ratus tujuh puluh) Hari Kalender.

b. Obligasi seri B dengan nilai nominal sebesar Rp 1.017.000 dengan tingkat bunga tetap sebesar 6,75% per tahun, berjangka waktu 3 (tiga) tahun.

*1. **GENERAL** (Continued)*

*c. **Structure of Subsidiaries** (Continued)*

*c.11 **PT Visi Telekomunikasi Infrastruktur Tbk and subsidiary** (Continued)*

Based on Article 3 of the GOLD's articles of association, the scope of GOLD activities is the field of providing telecommunications infrastructure services, including investing or participating in similar companies engaged in telecommunication support activities and business in the field of services, particularly telecommunications support services.

GOLD has a subsidiary company which is PT Permata Karya Perdana.

*d. **Share Public Offering***

On 15 October 2010, the Company received an effective statement from the Chairman of the Capital Market and Financial Institution Supervisory Agency (Bapepam-LK) in its Decision Letter No. S-9402/BL/2010 to offer 551,111,000 of its shares to the public with par value of Rp 100 (full amount) per share through the Indonesia Stock Exchange, at an initial offering price of Rp 2,025 (full amount) per share. On 26 October 2010, those shares were listed on the Indonesia Stock Exchange.

*e. **Bonds Offering***

On 9 April 2021, The Company issued Continous Bonds IV Tower Bersama infrastructure Phase IV Year 2021 with a Fixed Interest Rate ("Continuous Bonds IV Phase IV") of 5.5% per annum. The Continuous Bonds IV Phase IV has a total principal of Rp 970,000 (Note 23). These bonds are listed on the Indonesia stock exchange on 12 April 2021.

On 17 February 2021, The Company issued Continous Bonds IV Tower Bersama infrastructure Phase III Year 2021 with a Fixed Interest Rate ("Continuous Bonds IV Phase III"). The Continuous Bonds IV Phase III has a total principal of Rp 2,915,000 (Note 23). These bonds are listed on the Indonesia stock exchange on 18 February 2021.

These Continuous Bonds IV Phase III were issued in 2 (two) series consisting of:

a. Series A Bonds with nominal value of Rp 1,898,000 at a fixed interest rate of 5.50% per year. The term of the Series A Bonds is 370 (three hundred and seventy) Calendar Days.

b. Series B Bonds with nominal value of Rp 1,017,000 at a fixed interest rate of 6.75% per year. The term of the Series B Bonds is 3 (three) years.

1. **UMUM** (Lanjutan)

   e. **Penawaran Umum Obligasi** (Lanjutan)

   Pada tanggal 2 Desember 2020, Perusahaan menerbitkan Obligasi Berkelanjutan IV Tower Bersama Infrastructure Tahap II Tahun 2020 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan IV Tahap II"). Nominal Obligasi Berkelanjutan IV Tahap II ini adalah sebesar Rp 750.000 (Catatan 23). Obligasi ini dicatatkan pada Bursa Efek Indonesia pada tanggal 3 Desember 2020.

   Obligasi Berkelanjutan IV Tahap II ini diterbitkan dalam 2 (dua) seri sebagai berikut:

   a. Obligasi seri A dengan nilai nominal sebesar Rp 295.000 dengan tingkat bunga tetap sebesar 5,75% per tahun. Jangka waktu obligasi seri A adalah 370 (tiga ratus tujuh puluh) Hari Kalender.

   b. Obligasi seri B dengan nilai nominal sebesar Rp 455.000 dengan tingkat bunga tetap sebesar 7,25% per tahun berjangka waktu 3 (tiga) tahun.

   Pada tanggal 8 September 2020, Perusahaan menerbitkan Obligasi Berkelanjutan IV Tower Bersama Infrastructure Tahap I Tahun 2020 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan IV Tahap I"). Nominal Obligasi Berkelanjutan IV Tahap I ini adalah sebesar Rp 700.000 (Catatan 23). Obligasi ini dicatatkan pada Bursa Efek Indonesia pada tanggal 9 September 2020.

   Obligasi Berkelanjutan IV Tahap I ini diterbitkan dalam 2 (dua) seri sebagai berikut:

   1. Obligasi seri A dengan nilai nominal sebesar Rp 231.000 dengan tingkat bunga tetap sebesar 6,30% per tahun. Jangka waktu obligasi seri A adalah 370 (tiga ratus tujuh puluh) Hari Kalender.

   2. Obligasi seri B dengan nilai nominal sebesar Rp 469.000 dengan tingkat bunga tetap sebesar 8,00% per tahun, berjangka waktu 3 (tiga) tahun.

   Pada tanggal 24 Maret 2020, Perusahaan menerbitkan Obligasi Berkelanjutan III Tower Bersama Infrastructure Tahap IV Tahun 2020 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan III Tahap IV"). Nominal Obligasi Berkelanjutan III Tahap IV ini adalah sebesar Rp 1.500.000 (Catatan 23). Obligasi ini dicatatkan pada Bursa Efek Indonesia pada tanggal 26 Maret 2020.

   Obligasi Berkelanjutan III Tahap IV ini diterbitkan dalam 2 (dua) seri sebagai berikut:

   1. Obligasi seri A dengan nilai nominal sebesar Rp 633.000 dengan tingkat bunga tetap sebesar 6,25% per tahun. Jangka waktu obligasi seri A adalah 370 (tiga ratus tujuh puluh) Hari Kalender.

*1. **GENERAL** (Continued)*

   *e. **Bonds Offering** (Continued)*

   On 2 December 2020, The Company issued Continous Bonds IV Tower Bersama Infrastructure Phase II Year 2020 with a Fixed Interest Rate ("Continuous Bonds IV Phase II"). The Continuous Bonds IV Phase II has a total principal of Rp 750,000 (Note 23). These bonds are listed on the Indonesia stock exchange on 3 December 2020.

   These Continuous Bonds IV Phase II were issued in series consisting of:

   a. Series A Bonds with nominal value of Rp 295,000 at a fixed interest rate of 5.75% per year. The term of the Series A Bonds is 370 (three hundred and seventy) Calendar Days.

   b. Series B Bonds with nominal value of Rp 455,000 at a fixed interest rate of 7.25% per year. The term of the Series B Bonds is 3 (three) years.

   On 8 September 2020, the Company issued Continuous Bonds IV phase I Year 2020 with a Fixed Interest Rate ("Continuous Bonds IV Phase I"). The Continuous Bonds IV Phase I has a total principal of Rp 700,000 (Note 23). These bonds are listed on the Indonesia stock exchange on 9 September 2020.

   These Continuous Bonds IV Phase I were issued in 2 (two) series consisting of:

   1. Series A Bonds with nominal value of Rp 231,000 at a fixed interest rate of 6.30% per year. The term of the Series A Bonds is 370 (three hundred and seventy) Calendar Days.

   2. Series B Bonds with nominal value of Rp 469,000 at a fixed interest rate of 8.00% per year. The term of the Series B Bonds is 3 (three) years.

   On 24 March 2020, the Company issued Continuous Bonds III phase IV Year 2020 with a Fixed Interest Rate ("Continuous Bonds III Phase IV"). The Continuous Bonds III Phase IV has a total principal of Rp 1,500,000 (Note 23). These bonds are listed on the Indonesia stock exchange on 26 March 2020.

   These Continuous Bonds III Phase IV were issued in 2 (two) series consisting of:

   1. Series A Bonds with nominal value of Rp 633,000 at a fixed interest rate of 6.25% per year. The term of the Series A Bonds is 370 (three hundred and seventy) Calendar Days.

1. **UMUM** (Lanjutan)

   e. **Penawaran Umum Obligasi** (Lanjutan)

   Obligasi Berkelanjutan III Tahap IV ini diterbitkan dalam 2 (dua) seri sebagai berikut: (Lanjutan)

   2. Obligasi seri B dengan nilai nominal sebesar Rp 867.000 dengan tingkat bunga tetap sebesar 7,75% per tahun, berjangka waktu 3 (tiga) tahun.

   Pada tanggal 24 Mei 2019, Perusahaan menerbitkan Obligasi Berkelanjutan III Tower Bersama Infrastructure Tahap III Tahun 2019 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan III Tahap III") sebesar 8,0% per tahun. Nominal Obligasi Berkelanjutan III Tahap III ini adalah sebesar Rp 750.000. Obligasi ini dicatatkan pada Bursa Efek Indonesia pada tanggal 27 Mei 2019.

   Pada tanggal 18 Oktober 2018, Perusahaan menerbitkan Obligasi Berkelanjutan III Tower Bersama Infrastructure Tahap II Tahun 2018 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan III Tahap II") sebesar 8,5% per tahun. Nominal Obligasi Berkelanjutan III Tahap II ini adalah sebesar Rp 628.000. Obligasi ini dicatatkan pada bursa efek Indonesia pada tanggal 19 Oktober 2018.

   Pada tanggal 5 Juli 2018, Perusahaan menerbitkan Obligasi Berkelanjutan III Tower Bersama Infrastructure Tahap I Tahun 2018 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan III Tahap I") sebesar 8,5% per tahun. Nominal Obligasi Berkelanjutan III Tahap I ini adalah sebesar Rp 608.000 (Catatan 23). Obligasi ini dicatatkan pada bursa efek Indonesia pada tanggal 6 Juli 2018.

   Pada tanggal 19 September 2017, Perusahaan menerbitkan Obligasi Berkelanjutan II Tower Bersama Infrastructure Tahap III Tahun 2017 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan II Tahap III") sebesar 8,4% per tahun. Nominal Obligasi Berkelanjutan II Tahap III ini adalah sebesar Rp 700.000. Obligasi ini dicatatkan pada bursa efek Indonesia pada tanggal 19 September 2017.

   Pada tanggal 21 April 2017, Perusahaan menerbitkan Obligasi Berkelanjutan II Tower Bersama Infrastructure Tahap II Tahun 2017 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan II Tahap II") sebesar 8,75% per tahun. Nominal Obligasi Berkelanjutan II Tahap II ini adalah sebesar Rp 700.000. Obligasi ini dicatatkan pada bursa efek Indonesia pada tanggal 25 April 2017.

   Pada tanggal 1 Juli 2016, Perusahaan menerbitkan Obligasi Berkelanjutan II Tower Bersama Infrastructure Tahap I Tahun 2016 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan II Tahap I") sebesar 9,25% per tahun. Nominal Obligasi Berkelanjutan II Tahap I ini adalah sebesar Rp 230.000 (Catatan 23). Obligasi ini dicatatkan pada bursa efek Indonesia pada tanggal 1 Juli 2016.

*1. **GENERAL** (Continued)*

   *e. **Bonds Offering** (Continued)*

   These Continuous Bonds III Phase IV were issued in 2 (two) series consisting of: (Continued)

   2. Series B Bonds with nominal value of Rp 867,000 at a fixed interest rate of 7.75% per year. The term of the Series B Bonds is 3 (three) years.

   On 24 May 2019, the Company issued Continuous Bonds III phase III Year 2019 with a Fixed Interest Rate ("Continuous Bonds III Phase III") of 8.0% per annum. The Continous Bonds III Phase III has a total principal of Rp 750,000. These bonds are listed on the Indonesia stock exchange on 27 May 2019.

   On 18 October 2018, the Company issued Continous Bonds III phase II Year 2018 with a Fixed Interest Rate ("Continous Bonds III Phase II") of 8.5% per annum. The Continous Bonds III Phase II has a total principal of Rp 628,000. These bonds are listed on the Indonesia stock exchange on 19 October 2018.

   On 5 July 2018, the Company issued Continous Bonds III phase I Year 2018 with a Fixed Interest Rate ("Continous Bonds III Phase I") of 8.5% per annum. The Continous Bonds III Phase II has a total principal of Rp 628,000 (Note 23). These bonds are listed on the Indonesia stock exchange on 19 October 2018.

   On 19 September 2017, the Company issued Continous Bonds II phase III Year 2017 with a Fixed Interest Rate ("Continous Bonds II Phase III") of 8.4% per annum. The Continous Bonds II Phase III has a total principal of Rp 700,000 (Note 23). These bonds are listed on the Indonesia stock exchange on 19 September 2017.

   On 21 April 2017, the Company issued Continous Bonds II phase II Year 2017 with a Fixed Interest Rate ("Continous Bonds II Phase III") of 8.75% per annum. The Continous Bonds II Phase II has a total principal of Rp 700,000 (Note 23). These bonds are listed on the Indonesia stock exchange on 25 April 2017.

   On 1 July 2016, the Company issued Continuous Bonds II phase I Year 2016 with a Fixed Interest Rate ("Continuous Bonds II Phase I") of 9.25% per annum. The Continuous Bonds II Phase I has a total principal of Rp 230,000 (Note 23). These bonds are listed on the Indonesia stock exchange on 1 July 2016.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN**

a. **Dasar penyajian laporan keuangan konsolidasian**

Laporan keuangan konsolidasian ini telah disajikan sesuai dengan standar akuntansi keuangan di Indonesia yang mencakup Pernyataan Standar Akuntansi Keuangan (PSAK) serta peraturan Badan Pengawas Pasar Modal dan Lembaga Keuangan (Bapepam-LK), yang fungsinya dialihkan kepada Otoritas Jasa Keuangan ("OJK") sejak tanggal 1 Januari 2013) yaitu Peraturan No. VIII.G.7 tanggal 25 Juni 2012 tentang "Pedoman Penyajian Laporan Keuangan".

Laporan keuangan konsolidasian disusun berdasarkan basis akrual, dan dasar pengukuran dengan menggunakan konsep biaya historis, kecuali untuk akun tertentu yang diukur dengan menggunakan dasar seperti yang disebutkan dalam catatan yang relevan.

Laporan arus kas konsolidasian disusun dengan menggunakan metode langsung, menyajikan penerimaan dan pengeluaran kas dan setara kas yang dikelompokkan ke dalam aktivitas operasi, investasi dan pendanaan.

Laporan keuangan konsolidasian Perusahaan dan entitas anak disajikan dalam Rupiah (IDR) yang merupakan mata uang fungsional, kecuali untuk entitas anak TBG Global Pte Ltd disajikan dalam Dolar Amerika Serikat (USD) yang merupakan mata uang fungsional. Seluruh angka dalam laporan keuangan konsolidasian dibulatkan menjadi jutaan Rupiah, kecuali dinyatakan lain.

Penyusunan laporan keuangan konsolidasian berdasarkan PSAK mensyaratkan penggunaan estimasi akuntansi kritikal tertentu. Penyusunan laporan keuangan konsolidasian juga mensyaratkan manajemen Perusahaan untuk menggunakan pertimbangan dalam menerapkan kebijakan akuntansi Perusahaan. Hal-hal di mana pertimbangan dan estimasi yang signifikan telah dibuat dalam penyusunan laporan keuangan konsolidasian beserta dampaknya diungkapkan dalam Catatan 3.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES***

a. ***Basis of preparation of the consolidated financial statements***

The consolidated financial statements have been prepared in accordance with generally accepted accounting principles in Indonesia comprising of the Statements of Financial Accounting Standards (PSAK) and rules established by the Capital Market and Financial Institution Supervisory Agency (Bapepam-LK), which function has been transferred to Financial Service Authority ("OJK") starting at 1 January 2013) No. VIII.G. dated 25 June 2012 regarding "Financial Statements Presentation Guidance".

The consolidated financial statements have been prepared using the accrual basis, and the measurement basis used is historical cost concept, except for certain accounts which are measured on the bases described in the relevant notes herein.

The consolidated statement of cash flows, which has been prepared using direct method, present receipts and disbursements of cash and cash equivalent classified into operating, investing and financing activities.

The consolidated financial statements of the Company and subsidiaries are presented in Rupiah (IDR) which is the functional currency, except TBG Global Pte Ltd the subsidiary of the Company, is presented in United States Dollar (USD), which is the fuctional currency. Amounts in the consolidated financial statements are rounded to and stated in millions of Rupiah, unless otherwise stated.

The preparation of consolidated financial statements in compliance with PSAK requires the use of certain critical accounting estimates. It also requires the Company management to exercise judgment in applying the Company's accounting policies. The areas where significant judgments and estimates have been made in preparing the consolidated financial statements and their effects are disclosed in Note 3.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

b. **Standar baru, amandemen, revisi, penyesuaian dan Interpretasi Standar Akuntansi Keuangan efektif 1 Januari 2021**

Standar baru, amendemen, revisi, penyesuaian dan interpretasi yang telah diterbitkan, dan yang akan berlaku efektif untuk tahun buku yang dimulai pada atau setelah 1 Januari 2021 namun tidak berdampak secara subtansial terhadap kebijakan akuntansi Perusahaan dan pengaruh material terhadap laporan keuangan adalah sebagai berikut:

- Amendemen PSAK 55, Amendemen PSAK 60, Amendemen PSAK 62, Amendemen PSAK 71 dan Amendemen PSAK 73: Reformasi Acuan Suku Bunga Tahap 2

  Reformasi acuan suku bunga tersebut mengacu pada reformasi global yang menyepakati penggantian IBOR dengan acuan suku bunga alternatif. Adapun isu akuntansi yang timbul dari penggantian IBOR dibagi menjadi dua tahap yaitu:

  - Tahap 1 (pre-replacement issues)

    Merupakan isu atas ketidakpastian yang muncul menjelang periode transisi yang mempengaruhi pelaporan keuangan pada periode sebelum penggantian acuan suku bunga.

  - Tahap 2 (replacement issues)

    Membahas isu yang mungkin mempengaruhi pelaporan keuangan selama reformasi acuan suku bunga, termasuk dampak perubahan arus kas kontraktual atau hubungan lindung nilai yang timbul dari penggantian acuan suku bunga dengan acuan alternatif yang baru. Amendemen ini mengubah persyaratan dalam PSAK 71: Instrumen Keuangan, PSAK 55: Instrumen Keuangan: Pengakuan dan Pengukuran, PSAK 60: Instrumen Keuangan: Pengungkapan, PSAK 62: Kontrak Asuransi dan PSAK 73: Sewa yang terkait dengan perubahan dasar untuk menentukan arus kas kontraktual dari aset keuangan, liabilitas keuangan dan liabilitas sewa, akuntansi lindung nilai, dan pengungkapan.

2. *SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)*

b. New Standards, Amendments, Improvements and Interpretations of Financial Accounting Standards effective from 1 January 2021

New standards, amendments, revisions, improvements and interpretations issued and effective for the financial year at or after 1 January 2021, but does not have a substantial impact on the Company's accounting policies and the material effects on the financial statements are as follows:

- *Amendment to PSAK 55, Amendment to PSAK 60, Amendment to PSAK 62, Amendment to PSAK 71 and Amendment to PSAK 73: Interest Rate Reference Reform Phase 2*

  The reform of the interest rate reference refers to the global reform which agreed to replace the IBOR with an alternative interest rate reference. The accounting issues arising from the replacement of IBOR are divided into two stages, namely:

  - *Stage 1 (pre-replacement issues)*

    This is an issue of uncertainty that arises before the transition period that affects financial reporting in the period prior to the change of the interest rate reference.

  - *Stage 2 (replacement issues)*

    Discusses issues that may affect financial reporting during interest rate benchmark reform, including the impact of changes in contractual cash flows or hedging relationships arising from replacing the interest rate benchmark with a new alternative benchmark. This amendment changes the requirements in PSAK 71: Financial Instruments, PSAK 55: Financial Instruments: Recognition and Measurement, PSAK 60: Financial Instruments: Disclosures, PSAK 62: Insurance Contracts and PSAK 73: Leases relating to changes in the basis for determining contractual cash flows from financial assets, financial liabilities and lease liabilities, hedge accounting, and disclosures.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

b. **Standar baru, amendemen, revisi, penyesuaian dan Interpretasi Standar Akuntansi Keuangan efektif 1 Januari 2021** (Lanjutan)

- Amendemen PSAK 22: Kombinasi bisnis

  Amendemen ini mengklarifikasi definisi bisnis dengan tujuan untuk membantu entitas dalam menentukan apakah suatu transaksi seharusnya dicatat sebagai kombinasi bisnis atau akuisisi aset. Secara umum, Amendemen PSAK 22 tersebut:

  a. mengamendemen definisi bisnis;
  b. menambahkan pengujian konsentrasi opsional yang mengizinkan penilaian yang disederhanakan apakah rangkaian aktivitas dan aset yang diakuisisi bukan merupakan suatu bisnis;
  c. mengklarifikasi unsur bisnis bahwa untuk dipertimbangkan sebagai suatu bisnis, suatu rangkaian terintegrasi dari aktivitas dan aset yang diakuisi mencakup, minimum, input dan proses substantif yang bersama-sama berkontribusi secara signifikan terhadap kemampuan untuk menghasilkan output;
  d. menambahkan pedoman dan contoh ilustratif untuk membantu entitas menilai apakah proses substantif telah diakuisisi.

Terdapat sejumlah standar dan interpretasi yang telah dikeluarkan oleh Dewan Standar Akuntansi Keuangan - IAI yang efektif dalam periode akuntansi masa depan dan bahwa Perusahaan telah memutuskan untuk tidak mengadopsi penerapan dini.

Standar baru, interpretasi dan amendemen yang belum efektif:

- Amendemen PSAK 1: Penyajian Laporan Keuangan

  Amendemen PSAK 1 Penyajian Laporan Keuangan mengklarifikasi bahwa kewajiban diklasifikasikan sebagai lancar atau tidak lancar, berdasarkan pada hak yang ada pada akhir periode pelaporan. Klasifikasi tidak terpengaruh oleh ekspektasi entitas atau peristiwa setelah tanggal pelaporan (misalnya penerimaan waver atau pelanggaran perjanjian). Amendemen tersebut juga mengklarifikasi apa yang dimaksud PSAK 1 perihal 'penyelesaian' liabilitas.

  Amendemen tersebut dapat memengaruhi klasifikasi liabilitas, terutama untuk entitas yang sebelumnya mempertimbangkan intensi manajemen untuk menentukan klasifikasi dan untuk beberapa liabilitas yang dapat dikonversi menjadi ekuitas.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

b. ***New Standards, Amendments, Improvements and Interpretations of Financial Accounting Standards effective from 1 January 2021 (****Continued)*

- *Amendments to PSAK 22: Business combinations*

  This amendment clarifies the definition of business for the purpose of assisting the entity in determining whether a transaction should be accounted for as a business combination or an asset acquisition. In general, the Amendments to PSAK 22:

  a. amend the definition of business;
  b. added an optional concentration test that allows a simplified assessment of whether the acquired set of activities and assets is not a business;
  c. clarify the business element that to be considered as a business, an integrated set of activities and assets acquired includes, as a minimum, substantive inputs and processes that together contribute significantly to the ability to produce outputs;
  d. adds illustrative guidance and examples to help the entity assess whether substantive processes have been acquired.

There are a number of standards and interpretations that have been issued by the Financial Accounting Standards Board - IAI that are effective in future accounting periods and that the Company has decided not to adopt early on.

New standards, interpretations and amendments that are not yet effective:

- *Amendments to PSAK 1: Presentation of Financial Statements*

  The amendments PSAK 1 Presentation of Financial Statement clarify that liabilities are classified as either current or non-current, depending on the rights that exist at the end of the reporting period. Classification is unaffected by the expectations of the entity or events after the reporting date (eg the receipt of a waver or a breach of covenant). The amendments also clarify what PSAK 1 means when it refers to the 'settlement' of a liability.

  The amendments could affect the classification of liabilities, particularly for entities that previously considered management's intentions to determine classification and for some liabilities that can be converted into equity.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

b. **Standar baru, amendemen, revisi, penyesuaian dan Interpretasi Standar Akuntansi Keuangan efektif 1 Januari 2021** (Lanjutan)

- Amendemen PSAK 1: Penyajian Laporan Keuangan (Lanjutan)

  Standar ini harus diterapkan secara retrospektif sesuai dengan persyaratan normal dalam PSAK 25 Kebijakan Akuntansi, Perubahan Estimasi Akuntansi, dan Kesalahan. Amendemen tersebut akan berlaku efektif pada 1 Januari 2023 dan penerapan lebih awal diizinkan.

- Amendemen PSAK 57: Provisi, Liabilitas Kontinjensi, Dan Aset Kontinjensi Tentang Kontrak Yang Merugi—Biaya Memenuhi Kontrak

  Amendemen ini mengklarifikasi biaya untuk memenuhi suatu kontrak dalam kaitannya dalam menentukan apakah suatu kontrak merupakan kontrak memberatkan. Amendemen ini mengatur bahwa biaya untuk memenuhi kontrak terdiri dari biaya yang berhubungan langsung dengan kontrak. Biaya yang berhubungan langsung dengan kontrak terdiri dari biaya inkremental untuk memenuhi kontrak tersebut, dan alokasi biaya lain yang berhubungan langsung untuk memenuhi kontrak.

- PSAK 74: Kontrak Asuransi

  PSAK 74 Kontrak Asuransi ini telah mencakup relaksasi beberapa ketentuan sebagaimana diatur dalam Amendments to IFRS 17 Insurance Contract yang antara lain memberikan penambahan pengecualian ruang lingkup, penyesuaian penyajian laporan keuangan, penerapan opsi mitigasi risiko dan beberapa modifikasi pada ketentuan transisi.

  Penerapan PSAK 74 Kontrak Asuransi akan membuat Laporan Keuangan perusahaan asuransi menjadi "berdayabanding" *(comparable)* dengan industri-industri lain seperti perbankan dan perusahaan jasa keuangan lainnya karena PSAK 62 Kontrak Asuransi yang berlaku saat ini (adopsi dari IFRS 4) masih memungkinkan pelaporan yang bervariasi di setiap yurisdiksi/negara. Selain itu, PSAK 74 juga mensyaratkan pemisahan yang jelas antara pendapatan yang dihasilkan dari bisnis asuransi dengan pendapatan dari kegiatan investasi sehingga seluruh stakeholders (pemangku kepentingan) dari laporan keuangan, termasuk pemegang polis maupun investor, mendapatkan informasi yang transparan atas laporan keuangan perusahaan yang memiliki kontrak asuransi untuk produk perlindungan asuransi dengan fitur investasi.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

b. ***New Standards, Amendments, Improvements and Interpretations of Financial Accounting Standards effective from 1 January 2021 (****Continued)*

- *Amendments to PSAK 1: Presentation of Financial Statements (Continued)*

  This standard must be applied retrospectively in accordance with the normal requirements in PSAK 25 Accounting Policies, Changes in Accounting Estimates and Errors. The amendments will become effective on 1 January 2023 and earlier application is permitted.

- *Amendments to PSAK 57: Provisions, Contingent Liabilities, and Contingent Assets on Losing Contracts—Cost of Fulfilling Contracts*

  This amendment clarifies the cost of fulfilling a contract in relation to determining whether a contract is a burdensome contract. This amendment stipulates that the costs to fulfill the contract consist of costs directly related to the contract. The costs directly related to the contract consist of the incremental costs to fulfill the contract, and the allocation of other costs directly related to fulfilling the contract.

- *PSAK 74: Insurance contract*

  This PSAK 74 Insurance Contract has included relaxation of several provisions as stipulated in the Amendments to IFRS 17 Insurance Contract which among others provides additional scope exceptions, adjustments to the presentation of financial statements, implementation of risk mitigation options and some modifications to transitional provisions.

  The application of PSAK 74 Insurance Contracts will make the Financial Statements of insurance companies "comparable" with other industries such as banking and other financial service companies because the current PSAK 62 Insurance Contracts (adoption of IFRS 4) still allows for varied reporting in each jurisdiction/country. In addition, PSAK 74 also requires a clear separation between income generated from the insurance business and income from investment activities so that all stakeholders (stakeholders) from financial statements, including policy holders and investors, obtain transparent information on the financial statements of companies that have contracts. insurance for insurance protection products with investment features.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

b. **Standar baru, amendemen, revisi, penyesuaian dan Interpretasi Standar Akuntansi Keuangan efektif 1 Januari 2021** (Lanjutan)

- Penyesuaian PSAK 69: Agrikultur

  PSAK 69 (Penyesuaian 2020) mengklarifikasi pengakuan dan pengukuran pada paragraf 22 yang sebelumnya "entitas tidak memperhitungkan arus kas untuk pembiayaan aset, perpajakan atau penumbuhan kembali aset biologis setelah panen", menjadi "entitas tidak memperhitungkan arus kas untuk pembiayaan aset atau penumbuhan kembali aset biologis setelah panen"

- Penyesuaian PSAK 71: Instrumen Keuangan

  PSAK 71 (Penyesuaian 2020) mengklarifikasi fee (imbalan) yang diakui oleh peminjam terkait penghentian pengakuan liabilitas keuangan (Bagian 3.3) pada Paragraf PP3.3.6. Dalam menentukan fee (imbalan) yang dibayarkan setelah dikurangi fee (imbalan) yang diterima, peminjam hanya memasukkan fee (imbalan) yang dibayarkan atau diterima antara peminjam dan pemberi pinjaman, termasuk fee (imbalan) yang dibayar atau diterima baik peminjam atau pemberi pinjaman atas nama pihak lain.

- Penyesuaian PSAK 73: Sewa

  PSAK 73 (Penyesuaian 2020) mengklarifikasi pengukuran oleh penyewa dan pencatatan perubahan masa sewa terkait "perbaikan properti sewaan"

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

b. ***New Standards, Amendments, Improvements and Interpretations of Financial Accounting Standards effective from 1 January 2021 (****Continued)*

- *Adjustment of PSAK 69: Agriculture*

  PSAK 69 (Adjustment 2020) clarifies the recognition and measurement in paragraph 22 which previously "entities do not take into account cash flows for financing assets, taxation or regrowth of biological assets after harvest", to "entities do not take into account cash flows for financing assets or regrowth biological assets. after harvest"

- *Adjustment of PSAK 71: Financial Instruments*

  PSAK 71 (2020 Adjustment) clarifies the fee (compensation) recognized by the borrower in relation to derecognition of a financial liability (Section 3.3) in Paragraph B3.3.6. In determining the fee (reward) paid after deducting the fee (reward) received, the borrower only includes the fee (reward) paid or received between the borrower and the lender, including fees (reward) paid or received by either the borrower or lender on behalf of the lender. other parties.

- *Adjustment of PSAK 73: Lease*

  PSAK 73 (Adjustment 2020) clarifies the measurement by lessee and recording of changes in the lease term related to "repair of leased property"

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

c. **Prinsip-prinsip konsolidasian**

Laporan keuangan konsolidasian meliputi akun-akun Induk Perusahaan dan seluruh entitas anak seperti yang dijelaskan di Catatan 1c. Pengendalian didapat ketika Perusahaan dan entitas anak terekspos atau memiliki hak atas imbal hasil variabel dari keterlibatannya dengan *investee* dan memiliki kemampuan untuk mempengaruhi imbal hasil tersebut melalui kekuasaannya atas *investee*. Dengan demikian, Perusahaan dan entitas anak mengendalikan *investee* jika dan hanya jika Perusahaan dan entitas anak memiliki:

- kekuasaan atas *investee* (contoh hak saat ini yang memberikan kemampuan kini untuk mengarahkan aktivitas relevan *investee*);
- eksposur atau hak atas imbal hasil variabel dari keterlibatannya dengan *investee*; dan
- kemampuan untuk menggunakan kekuasaannya atas *investee* untuk mempengaruhi jumlah imbal hasilnya.

Ketika Perusahaan dan entitas anak mempunyai hak suara kurang dari mayoritas atau hak serupa terhadap *investee*, Perusahaan dan entitas anak mempertimbangkan seluruh fakta dan keadaan dalam menilai apakah terdapat kekuasaan atas sebuah *investee*, termasuk:

- pengaturan kontraktual dengan pemilik hak suara lain *investee*;
- hak yang timbul dari pengaturan kontraktual lain; dan
- hak suara Perusahaan dan entitas anak dan hak suara potensial.

Perusahaan dan entitas anak menilai kembali apakah terdapat atau tidak pengendalian terhadap *investee* jika fakta dan keadaan yang menunjukkan bahwa ada perubahan satu atau lebih dari tiga elemen pengendalian. Entitas anak dikonsolidasi secara penuh sejak tanggal pengendalian dialihkan ke Perusahaan dan entitas anak dan dihentikan untuk dikonsolidasi sejak tanggal pengendalian ditransfer keluar dari Perusahaan dan entitas anak. Aset, liabilitas, pendapatan dan beban dari entitas anak, yang diakuisisi atau dijual selama tahun berjalan, termasuk dalam laporan laba rugi dari tanggal Perusahaan dan entitas anak mendapatkan pengendalian sampai dengan tanggal Perusahaan dan entitas anak berhenti untuk mengendalikan entitas anak.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

c. ***Principles of consolidation***

The consolidated financial statements include the accounts of the Parent Company and all the subsidiaries mentioned in Note 1c. Control is achieved when the Company and subsidiaries is exposed, or has rights, to variable returns from its involvement with the investee and has the ability to affect those returns through power over the investee. Specifically, the Company and subsidiaries controls an investee if and only if the Company and subsidiaries has:

- *power over the investee (i.e. existing rights that give the current ability to direct the relevant activities of the investee);*
- *exposure, or rights, to variable returns from its involvement with the investee; and*
- *the ability to use its power over the investee to affect its returns.*

When the Company and subsidiaries has less than majority of the voting rights or similar rights to an investee, the Company and subsidiaries considers all relevant facts and circumstances in assessing whether it has power over an investee, including:

- *the contractual arrangement with the other vote holders of the investee;*
- *rights arising from other contractual arrangements; and*
- *voting rights of the Company and subsidiaries and potential voting rights.*

The Company and subsidiaries re-assesses whether or not it controls an investee if facts and circumstances indicate that there are changes to one or more of the three elements of control. Subsidiaries are fully consolidated from the date control is transferred to the Company and subsidiaries and cease to be consolidated from the date control is transferred out of the Company and subsidiaries. Assets, liabilities, income and expenses of a subsidiary acquired or disposed of during the year are included in the statement of income from the date the Company and subsidiaries gains control until the date the Company and subsidiaries ceases to control the subsidiary.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

c. **Prinsip-prinsip konsolidasian** (Lanjutan)

Laba rugi dan setiap komponen penghasilan komprehensif lain diatribusikan ke pemilik entitas induk dari Perusahaan dan entitas anak dan kepentingan non-pengendali, meskipun hal tersebut mengakibatkan kepentingan non-pengendali memiliki saldo defisit. Ketika diperlukan, penyesuaian dibuat pada laporan keuangan entitas anak agar kebijakan akuntansinya seragam dengan kebijakan akuntansi Perusahaan dan entitas anak. Seluruh aset dan liabilitas, ekuitas, pendapatan, beban dan arus kas dalam intra Perusahaan dan entitas anak terkait dengan transaksi antar entitas dalam Perusahaan dan entitas anak dieliminasi seluruhnya dalam konsolidasi.

Jika kehilangan pengendalian atas suatu entitas anak, maka Perusahaan dan entitas anak:

- menghentikan pengakuan aset (termasuk setiap *goodwill*) dan liabilitas entitas anak;
- menghentikan pengakuan jumlah tercatat setiap KNP;
- menghentikan pengakuan akumulasi selisih penjabaran, yang dicatat di ekuitas, bila ada;
- mengakui nilai wajar pembayaran yang diterima;
- mengakui setiap sisa investasi pada nilai wajarnya;
- mengakui setiap perbedaan yang dihasilkan sebagai keuntungan atau kerugian dalam laporan laba rugi dan penghasilan komprehensif lain konsolidasian; dan
- mereklasifikasi bagian induk atas komponen yang sebelumnya diakui sebagai penghasilan komprehensif ke laporan laba rugi dan penghasilan komprehensif lain konsolidasian, atau mengalihkan secara langsung ke saldo laba.

Perubahan dalam bagian kepemilikan entitas induk pada entitas anak yang tidak mengakibatkan hilangnya pengendalian dicatat sebagai transaksi ekuitas. Ketika pengendalian atas entitas anak hilang, bagian kepemilikan yang tersisa di entitas tersebut diukur kembali pada nilai wajarnya dan keuntungan atau kerugian yang dihasilkan diakui dalam laporan laba rugi dan penghasilan komprehensif lain konsolidasian.

Kepentingan Non-Pengendali ("KNP") mencerminkan bagian atas laba rugi dan aset bersih dari entitas anak yang tidak dapat diatribusikan secara langsung maupun tidak langsung oleh Perusahaan, yang masing-masing disajikan dalam laporan laba rugi dan penghasilan komprehensif lain konsolidasian dan dalam ekuitas pada laporan posisi keuangan konsolidasian, terpisah dari bagian yang dapat diatribusikan kepada pemilik entitas induk.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

c. ***Principles of consolidation*** *(Continued)*

Profit or loss and each component of other comprehensive income are attributed to the equity holders of the parent of the Company and subsidiaries and to the non-controlling interests, even if this results in the non-controlling interests having a deficit balance. When necessary, adjustments are made to the financial statements of subsidiaries to bring their accounting policies into line with accounting policies of the Company and subsidiaries. All intra-Company and subsidiaries assets and liabilities, equity, income expenses and cash flows relating to transactions between members of the Company and subsidiaries are eliminated in full on consolidation.

In case of loss of control over a subsidiary, the Company and subsidiaries:

- *derecognizes the assets (including goodwill) and liabilities of the subsidiary;*
- *derecognizes the carrying amount of any NCI;*
- *derecognizes the cumulative translation differences, recorded in equity, if any;*
- *recognizes the fair value of the consideration received;*
- *recognizes the fair value of any investment retained;*
- *recognizes the surplus or deficit in profit or loss in consolidated statement of profit or loss and other comprehensive income; and*
- *reclassifies the parent's share of components previously recognized in comprehensive income to consolidated statement of profit or loss and other comprehensive income or retained earnings, as appropriate.*

Changes in the parent's ownership interest in a subsidiary that do not result in the loss of control are accounted for as equity transactions. When control over a previous subsidiary is lost, any remaining interest in the entity is remeasured at fair value and the resulting gain or loss is recognised in consolidated statement of profit or loss and other comprehensive income.

Non-Controlling Interest ("NCI") represents the portion of the profit or loss and net assets of the subsidiary attributable to equity interests that are not owned directly or indirectly by the Company, which is presented in the consolidated statement of comprehensive income and under the equity section of the consolidated statement of financial position, respectively, separately from the corresponding portion attributable to the equity holders of the parent company.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

d. **Kombinasi bisnis**

Ketika Perusahaan dan entitas anak melakukan akuisisi atas sebuah bisnis, Perusahaan dan entitas anak mengklasifikasikan dan menentukan aset keuangan yang diperoleh dan liabilitas keuangan yang diambil alih berdasarkan pada persyaratan kontraktual, kondisi ekonomi dan kondisi terkait lain yang ada pada tanggal akuisisi. Hal ini termasuk pengelompokan derivatif melekat dalam kontrak utama oleh pihak yang diakuisisi.

Kombinasi bisnis dicatat dengan menggunakan metode akuisisi *(acquisition method)*. Biaya perolehan dari sebuah akuisisi diukur pada nilai agregat imbalan yang dialihkan, diukur pada nilai wajar pada tanggal akuisisi dan jumlah setiap KNP pada pihak yang diakuisisi. Untuk setiap kombinasi bisnis, pihak pengakuisisi mengukur KNP pada entitas yang diakuisisi baik pada nilai wajar ataupun pada proporsi kepemilikan KNP atas aset bersih yang teridentifikasi dari entitas yang diakuisisi. Biaya-biaya akuisisi yang timbul dibebankan langsung dalam laporan laba rugi dan penghasilan komprehensif lain konsolidasian.

Jika imbalan tersebut kurang dari nilai wajar aset bersih entitas anak yang diakuisisi, selisih tersebut diakui sebagai keuntungan dari pembelian dengan diskon pada laporan laba rugi dan penghasilan komprehensif lain konsolidasian. Sebelum mengakui keuntungan dari pembelian dengan diskon, Perusahaan menilai kembali apakah telah mengidentifikasi dengan tepat seluruh aset yang diperoleh dan liabilitas yang diambil-alih serta mengakui setiap aset atau liabilitas tambahan yang dapat diidentifikasi dalam pengkajian kembali tersebut. Perusahaan selanjutnya mengkaji kembali prosedur yang digunakan untuk mengukur jumlah yang dipersyaratkan untuk diakui pada tanggal akuisisi untuk seluruh hal-hal berikut ini:

a. aset teridentifikasi yang diperoleh dan liabilitas yang diambil-alih;
b. kepentingan non-pengendali pada pihak yang diakuisisi, jika ada;
c. untuk kombinasi bisnis yang dilakukan secara bertahap, kepentingan ekuitas pihak pengakuisisi yang dimiliki sebelumnya pada pihak yang diakuisisi; dan
d. imbalan yang dialihkan.

Tujuan dari kajian kembali ini untuk meyakinkan bahwa pengukuran tersebut telah mencerminkan dengan tepat semua informasi yang tersedia pada tanggal akuisisi.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

d. ***Business combination***

When the Company and subsidiaries acquires a business, it assesses the financial assets acquired and liabilities assumed for appropriate classification and designation in accordance with the contractual terms, economic circumstances and pertinent conditions as at the acquisition date. This includes the separation of embedded derivatives in host contracts by the acquiree.

Business combinations are accounted for using the acquisition method. The cost of an acquisition is measured as the aggregate of the consideration transferred, measured at acquisition date fair value and the amount of any NCI in the acquiree. For each business combination, the acquirer measures the NCI in the acquiree either at fair value or at the proportionate share of the acquiree's identifiable net assets. Transaction costs incurred are directly expensed in the consolidated statement of profit or loss and other comprehensive income.

If the consideration is less than the fair value of the net assets of the subsidiary acquired, the difference is recognized as a gain from a bargain purchase in the consolidated statement of profit or loss and other comprehensive income. Prior to recognizing the gain from the bargain purchase, the Company reassesses whether it has correctly identified all of the assets acquired and liabilities taken over and recognizes any additional assets or liabilities that may be identified in the reassessment. The Company further reviews the procedures used to measure the amount required to be recognized at the acquisition date for all of the following:

a. identifiable assets acquired and liabilities taken over;
b. non-controlling interests of the acquired party, if any;
c. for business combinations achieved in stages, the acquirer's previously held equity interests in the acquired party; and
d. consideration transferred.

The purpose of the review is to ensure that the remeasurement accurately reflects all the information available at the acquisition date.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

d. **Kombinasi bisnis** (Lanjutan)

Imbalan kontinjensi yang dialihkan oleh pihak pengakuisisi diakui pada nilai wajar tanggal akuisisi. Perubahan nilai wajar atas imbalan kontinjensi setelah tanggal akuisisi yang diklasifikasikan sebagai aset atau liabilitas, akan diakui dalam laporan laba rugi dan penghasilan komprehensif lain konsolidasian atau penghasilan komprehensif lain sesuai dengan PSAK 55 (Revisi 2014). Jika diklasifikasikan sebagai ekuitas, imbalan kontinjensi tidak diukur kembali dan Penyelesaian selanjutnya diperhitungkan dalam ekuitas.

Dalam suatu kombinasi bisnis yang dilakukan secara bertahap, pihak pengakuisisi mengukur kembali kepentingan ekuitas yang dimiliki sebelumnya pada pihak yang diakuisisi pada nilai wajar tanggal akuisisi dan mengakui keuntungan atau kerugian yang dihasilkan melalui laporan laba atau rugi.

Pada tanggal akuisisi, *goodwill* awalnya diukur pada biaya perolehan yang merupakan selisih lebih nilai agregat dari imbalan yang dialihkan dan jumlah setiap KNP atas selisih jumlah dari aset teridentifikasi yang diperoleh dan liabilitas yang diambil alih. Jika imbalan tersebut kurang dari nilai wajar aset bersih entitas anak yang diakuisisi, selisih tersebut diakui sebagai laba atau rugi.

Setelah pengakuan awal, *goodwill* diukur pada jumlah tercatat dikurangi akumulasi kerugian penurunan nilai. Untuk tujuan uji penurunan nilai, *goodwill* yang diperoleh dari suatu kombinasi bisnis, sejak tanggal akuisisi dialokasikan kepada setiap Unit-Penghasil Kas ("UPK") dari Perusahaan dan entitas anak yang diharapkan akan bermanfaat dari sinergi kombinasi tersebut, terlepas dari apakah aset atau liabilitas lain dari pihak yang diakuisisi ditetapkan atas UPK tersebut.

Jika *goodwill* telah dialokasikan pada suatu UPK dan operasi tertentu atas UPK tersebut dihentikan, maka *goodwill* yang diasosiasikan dengan operasi yang dihentikan tersebut termasuk dalam jumlah tercatat operasi tersebut ketika menentukan keuntungan atau kerugian dari penjualan operasi. *Goodwill* yang dilepaskan tersebut diukur berdasarkan nilai relatif operasi yang dihentikan dan porsi UPK yang ditahan.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

d. ***Business combination*** *(Continued)*

Any contingent consideration to be transferred by the acquirer will be recognized at fair value at the acquisition date. Subsequent changes to the fair value of the contingent consideration which is deemed to be an asset or liability will be recognized in accordance with PSAK 55 (Revised 2014) either in consolidated statement of profit or loss and other comprehensive income or as other comprehensive income. If the contingent consideration is classified as equity, it should not be remeasured until it is finally settled within equity.

In a business combination achieved in stages, the acquisition date fair value of the acquirer's previously held equity interest in the acquire is remeasured to fair value at the acquisition date through profit or loss.

At acquisition date, goodwill is initially measured at cost being the excess of the aggregate of the consideration transferred and the amount recognized for NCI over the net identifiable assets acquired and liabilities assumed. If this consideration is lower than the fair value of the net assets of the subsidiary acquired, the difference is recognized in profit or loss.

After initial recognition, goodwill is measured at cost less any accumulated impairment losses. For the purpose of impairment testing, goodwill acquired in a business combination is allocated from the acquisition date, to each Cash-Generating Units ("CGU") of the Company and subsidiaries that are expected to benefit from the combination, irrespective of whether other assets or liabilities of the acquirer are assigned to those CGUs.

Where goodwill forms part of a CGU and part of the operation within that CGU is disposed of, the goodwill associated with the operation disposed of is included in the carrying amount of the operation when determining the gain or loss on disposal of the operation. Goodwill disposed of in this circumstance is measured based on the relative values of the operation disposed of and the portion of the CGU retained.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

e. **Penjabaran mata uang asing**

Transaksi dalam mata uang asing dicatat berdasarkan kurs yang berlaku pada saat terjadinya transaksi. Pada tanggal laporan posisi keuangan konsolidasian, aset dan liabilitas moneter dalam mata uang asing disesuaikan ke dalam Rupiah untuk mencerminkan kurs tengah Bank Indonesia pada tanggal tersebut. Jika ada keuntungan atau kerugian akan dikreditkan atau dibebankan pada laporan laba rugi dan penghasilan komprehensif lain konsolidasian pada tahun berjalan.

Laba rugi kurs yang terjadi dikreditkan atau dibebankan pada operasi tahun berjalan, kecuali rugi kurs yang dikapitalisasi.

Pembukuan akun TBG Global Pte. Ltd., entitas anak (Catatan 1c), dilakukan di dalam mata uang selain Rupiah. Untuk tujuan penyajian Laporan keuangan konsolidasian, aset dan liabilitas entitas anak pada tanggal laporan posisi keuangan konsolidasian, dijabarkan ke dalam mata uang Rupiah dengan menggunakan kurs nilai tukar pada tanggal laporan posisi keuangan konsolidasian, sementara laporan laba rugi dan penghasilan komprehensif lain konsolidasian dijabarkan dengan menggunakan kurs nilai tukar tahun yang bersangkutan. Hasil penyesuaian penjabaran ditampilkan sebagai bagian ekuitas sebagai *"Selisih Translasi atas Mata Uang Asing"*.

Pada tanggal 30 Juni 2021 dan 31 Desember 2020 kurs tengah yang digunakan untuk US$ 1 masing-masing adalah Rp 14.496 dan Rp 14.105 (nilai penuh).

f. **Aset dan liabilitas keuangan dan instrumen ekuitas**

Perusahaan dan entitas anak mengakui aset keuangan atau liabilitas keuangan dalam laporan posisi keuangan konsolidasian, jika dan hanya jika, Perusahaan dan entitas anak menjadi salah satu pihak dalam ketentuan kontrak instrumen keuangan tersebut.

1. Aset keuangan

Aset keuangan diklasifikasikan sebagai aset keuangan yang diukur pada biaya perolehan diamortisasi, nilai wajar melalui penghasilan komprehensif lain atau nilai wajar melalui laporan laba rugi, dengan menggunakan dua dasar, yaitu:

a) Model bisnis entitas dalam mengelola aset keuangan dan
b) Karakteristik arus kas kontraktual dari aset keuangan.

Perusahaan dan entitas anak menentukan klasifikasi aset keuangannya pada saat pengakuan awalnya, sepanjang diperbolehkan, mengevaluasi penentuan klasifikasi aset keuangan pada setiap akhir tahun.

2. *SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)*

*e. **Foreign currency translations***

Transactions involving foreign currencies are recorded at the rates prevailing at the time the transactions are made. At the consolidated statement of financial position date, monetary assets and liabilities denominated in foreign currencies are adjusted to Rupiah to reflect Bank Indonesia's middle rate on the said date. Any resulting gains or losses are credited or charged to the consolidated statement of profit or loss and other comprehensive income for the current year.

Foreign exchange gains and losses are credited or charged to operations for the year, except for capitalized foreign exchange losses.

The accounting of TBG Global Pte. Ltd., a subsidiary (Note 1c), is maintained in currency other than Rupiah. For presentation purposes of the consolidated financial statements, assets and liabilities of the subsidiaries at consolidated statements of financial position date are translated into Rupiah using the exchange rates at consolidated financial position date, while consolidated statements of profit or loss and other comprehensive income are translated at the average rates of exchange for the respective year. Resulting translation adjustments are shown as part of equity as "Difference from Translation of Foreign Currency".

As of 30 June 2021 and 31 December 2020 the exchange rates per US$ 1 equivalents to Rp 14,496 and Rp 14,105 (full amount), respectively.

*f. **Financial assets and liabilities and equity instruments***

The Company and subsidiaries recognized financial assets or financial liabilities in consolidated statement of financial position, when and only when, the Company and subsidiaries become party to contractual provision of the financial instrument.

1. Financial assets

Financial assets are classified as financial assets measures at amortized cost fair value through other comprehensive income or fair value through profit or loss, using two basis, are:

a) The entity's business model in managing financial assets and
b) Characteristics of contractual cash flows from financial assets.

The Company and subsidiaries determine the classification of its financial assets at initial recognition, and when allowed, reevaluates the classification of such financial assets at each year-end.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

f. **Aset dan liabilitas keuangan dan instrumen ekuitas** (Lanjutan)

1. Aset keuangan (Lanjutan)

Aset keuangan yang diukur pada nilai wajar melalui laporan laba atau rugi

Kategori ini meliputi aset keuangan "yang dimiliki untuk diperdagangkan" dan aset keuangan yang ditetapkan pada nilai wajar melalui laporan laba rugi pada awal penentuan. Suatu aset keuangan diklasifikasikan sebagai dimiliki untuk dijual apabila secara prinsip diperoleh untuk tujuan dijual dalam jangka pendek. Aset keuangan yang ditetapkan pada nilai wajar melalui laporan laba rugi pada saat penetapan awal adalah aset keuangan yang dikelola, dan kinerjanya dievaluasi berdasarkan nilai wajar, sesuai dengan suatu strategi investasi yang terdokumentasi. Derivatif juga dikategorikan sebagai investasi yang dimiliki untuk tujuan diperdagangkan, kecuali ditetapkan sebagai lindung nilai efektif. Aset keuangan, yang diukur pada nilai wajar melalui laporan laba rugi diukur pada nilai wajar, dan segala perubahan nilai wajar diakui pada laporan laba rugi.

Perusahaan dan entitas anak memiliki aset keuangan yang diukur pada nilai wajar melalui laporan laba atau rugi berupa kas dan setara kas, uang jaminan, aset keuangan derivatif, taksiran klaim pajak penghasilan dan aset tidak lancar lainnya.

Aset keuangan diukur pada biaya perolehan diamortisasi

Setelah pengakuan awal, aset keuangan tersebut dicatat pada biaya perolehan diamortisasi dengan menggunakan metode suku bunga efektif *(effective interest rate method)*, dimana metode yang digunakan untuk menghitung biaya perolehan yang diamortisasi dari aset keuangan atau liabilitas keuangan (atau Perusahaan dan entitas anak aset keuangan atau liabilitas keuangan) dan alokasi pendapatan bunga atau biaya bunga melebihi tahun yang bersangkutan. Keuntungan dan kerugian terkait diakui dalam laporan laba rugi dan penghasilan komprehensif lain konsolidasian pada saat pinjaman yang diberikan dan piutang dihentikan pengakuannya atau mengalami penurunan nilai, demikian juga melalui proses amortisasi.

Perusahaan dan entitas anak memiliki aset keuangan diukur pada biaya perolehan diamortisasi berupa pendapatan yang masih harus diterima, piutang usaha, dan piutang lain-lain.

Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain

Perusahaan dan entitas anak tidak memiliki aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain pada tanggal 30 Juni 2021.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

f. ***Financial assets and liabilities and equity instruments*** *(Continued)*

1. Financial assets (Continued)

Financial assets measured at fair value through profit or loss

This category includes financial assets "held for trading" and those designated at fair value through profit or loss at inception. A financial asset is classified as held for trading if acquired principally for the purpose of selling in the short term. Financial assets designated at fair value through profit or loss at inception are those that are managed, and their performance evaluated on a fair value basis, in accordance with a documented investment strategy. Derivatives are also categorized as held for trading, unless they are designated as effective hedges. Financial assets, at fair value through profit or loss are measured at fair value, and any fair value changes are recognized in profit or loss.

Financial assets of the Company and subsidiaries measured at fair value through profit or loss include cash and cash equivalents, derivative financial assets, estimated claims for income tax refund and others non-current assets.

Financial assets are measured at amortized costs

After initial recognition, such financial assets are recorded at amortized cost using the effective interest rate method, which is the method used for calculating the amortized cost of a financial asset or financial liability (or group of financial assets or financial liabilities) and for allocatiing interest income or expense interest in future years. Gains and losses are recognized in the consolidated statement of profit or loss and other comprehensive income when the loans and receivables are derecognized or impaired, as well as through the amortization process.

Fiancial assets are measured at amotized costs of the Company and subsidiaries include accrued revenue, trade receivables, and other receivables.

Financial assets measured at fair value through other comprehensive income

The Company and subsidiaries has no financial assets measured at fair value through other comprehensive income as of 30 June 2021.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

f. **Aset dan liabilitas keuangan dan instrumen ekuitas** (Lanjutan)

2. Liabilitas keuangan dan instrumen ekuitas

Instrumen utang dan ekuitas dikelompokkan sebagai liabilitas keuangan atau sebagai ekuitas sesuai dengan substansi pengaturan kontraktual.

Liabilitas keuangan diklasifikasikan sebagai liabilitas keuangan yang diukur pada nilai wajar melalui laporan laba atau rugi dan liabilitas keuangan lainnya. Perusahaan dan entitas anak menentukan klasifikasi liabilitas keuangan pada saat pengakuan awal.

Instrumen ekuitas

Instrumen ekuitas adalah setiap kontrak yang memberikan hak residual atas aset suatu entitas setelah dikurangi dengan seluruh liabilitasnya. Instrumen ekuitas yang diterbitkan oleh Perusahaan dan entitas anak akan dicatat sebesar jumlah yang diperoleh, setelah dikurangi dengan biaya emisi langsung.

Sebuah instrumen merupakan instrumen ekuitas jika, dan hanya jika, kedua kondisi di bawah ini terpenuhi:

(i) Instrumen tersebut tidak memiliki liabilitas kontraktual:
  (a) Untuk memberikan kas atau aset keuangan lainnya kepada entitas lain; atau
  (b) Untuk menukar aset keuangan atau liabilitas keuangan dengan entitas lain dalam kondisi yang tidak menguntungkan bagi penerbit.

(ii) Jika instrumen akan atau dapat diselesaikan oleh penerbit yang memiliki instrumen ekuitas, apabila instrumen itu:
  (a) Non-derivatif yang tidak memiliki liabilitas kontraktual terhadap penerbit untuk memberikan sejumlah variabel terhadap instrumen ekuitas pemilik; atau
  (b) Derivatif yang akan diselesaikan oleh penerbit hanya dengan menukarkan sejumlah uang tunai atau aset keuangan lainnya untuk sejumlah instrumen ekuitas pemilik. Untuk kepentingan ini, instrumen ekuitas milik penerbit tidak meliputi instrumen yang terikat kontrak untuk penerimaan di masa mendatang atau pengiriman instrumen ekuitas milik penerbit.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

f. ***Financial assets and liabilities and equity instruments*** *(Continued)*

2. *Financial liabilities and equity instruments*

Debt and equity instruments are classified as financial liabilities or as equity in accordance with the substance of the contractual arrangement.

Financial liabilities are classified as financial liabilities measured at fair value through profit or loss and other financial liabilities. The Company and subsidiaries determines the classification of financial liabilities at initial recognition.

Equity instruments

An equity instrument is any contract that gives the right to the residual assets of an entity after deducting all of its liabilities. Equity instruments issued by the Company and subsidiaries will be recorded at the amounts received, after deducting direct issurance costs.

An instrument is an equity instrument if, and only if, both following conditions below are met:

(i) The instrument does not have a contractual liabilities:
  (a) To deliver cash or another financial asset to another entity; or
  (b) To exchange financial assets or financial liability with another entity under conditions that are not profitable for issuers.

(ii) If the instrument will or may be settled by the issuer which has an equity instrument, an instrument that:
  (a) Non-derivatives that have no contractual liabilities to the issuer to deliver a variable number of owner's equity instruments; or

  (b) Derivatives that will be completed by the issuer only in exchange for some cash or another financial asset for a number of owner's equity instruments. For this purpose, the instrument does not include the issuer's equity instruments that are under contract for the future receipt or delivery of issuer's equity instruments.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

f. **Aset dan liabilitas keuangan dan instrumen ekuitas** (Lanjutan)

2. Liabilitas keuangan dan instrumen ekuitas (Lanjutan)

Instrumen ekuitas (Lanjutan)

Instrumen keuangan majemuk, seperti obligasi atau instrumen konversi sejenis yang diubah menjadi sejumlah saham biasa oleh pemegangnya, diklasifikasikan secara terpisah sebagai liabilitas keuangan dan ekuitas sesuai dengan materi dalam perjanjian kontraktual. Pada tanggal penerbitan instrumen keuangan majemuk, nilai wajar dari komponen liabilitas diestimasi menggunakan tingkat suku bunga pasar yang berlaku untuk instrumen non-konversi yang sejenis. Jumlah ini dicatat sebagai liabilitas atas dasar biaya perolehan yang diamortisasi dengan menggunakan metode suku bunga efektif sampai dengan pelaksanaan konversi atau pada tanggal jatuh tempo instrumen. Komponen ekuitas ditentukan dengan mengurangi jumlah komponen liabilitas dari nilai wajar instrumen keuangan majemuk secara keseluruhan. Jumlah ini diakui dan dimasukkan ke dalam ekuitas, setelah dikurangi dengan efek pajak penghasilan, dan tidak diperhitungkan kembali.

Instrumen ekuitas Perusahaan dan entitas anak meliputi modal saham.

Liabilitas keuangan

(i) Liabilitas keuangan diukur melalui laporan laba atau rugi

Liabilitas keuangan yang diukur pada nilai wajar melalui laporan laba atau rugi termasuk liabilitas keuangan untuk diperdagangkan dan liabilitas keuangan yang ditetapkan pada saat pengakuan awal untuk diukur pada nilai wajar melalui laporan laba atau rugi.

Liabilitas keuangan diklasifikasikan sebagai kelompok diperdagangkan jika mereka diperoleh untuk tujuan dijual kembali dalam waktu dekat. Liabilitas derivatif juga diklasifikasikan sebagai kelompok diperdagangkan kecuali derivatif yang ditetapkan sebagai instrumen lindung nilai yang efektif. Aset dan liabilitas keuangan diukur pada nilai wajar melalui laporan laba atau rugi dicatat pada laporan posisi keuangan konsolidasian pada nilai wajar dengan pengakuan keuntungan atau kerugian pada laporan laba rugi dan penghasilan komprehensif lain konsolidasian.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

f. ***Financial assets and liabilities and equity instruments*** *(Continued)*

2. Financial liabilities and equity instruments (Continued)

Equity instruments (Continued)

Compound financial instruments, such as convertible bonds or similar instruments convertible into a number of common shares by the holder, are classified separately as financial liabilities and equity in accordance with the substance of the contractual agreement. On the date of issuance of a compound financial instrument, the fair value of the liability component is estimated using market interest rates applicable to similar non-convertible instruments. This amount is recorded as a liability on the basis of amortized cost using the effective interest rate method until the conversion or execution on the maturity date of the instrument. The equity component is determined by deducting the liability component from the fair value of the compound financial instrument taken as a whole. This amount is recognized and included in equity, net of income tax effects, and not recomputed.

Equity instruments of the Company and subsidiaries include share capital.

Financial liabilities

(i) Financial liabilities measured at fair value through profit or loss

Financial liabilities measured at fair value through profit or loss include the financial liabilities held for trading and liabilities designated upon initial recognition at fair value through profit or loss.

Financial liabilities are classified as held for trading if they are acquired for the purpose of resale in the near future. Derivative liabilities are also classified as held for trading unless the derivatives are designated as effective hedging instruments. Financial assets and financial liabilities at fair value through profit or loss are recorded in the consolidated statement of financial position at fair value with gains or losses recognized in the consolidated statement of profit or loss and other comprehensive income.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

f. **Aset dan liabilitas keuangan dan instrumen ekuitas** (Lanjutan)

2. Liabilitas keuangan dan instrumen ekuitas (Lanjutan)

Liabilitas keuangan (Lanjutan)

(i) Liabilitas keuangan diukur melalui laporan laba atau rugi (Lanjutan)

Perusahaan dan entitas anak tidak memiliki liabilitas keuangan yang diukur pada nilai wajar melalui laporan laba atau rugi pada tanggal 30 Juni 2021 dan 31 Desember 2020.

(ii) Liabilitas keuangan lainnya

Kategori ini berhubungan dengan liabilitas keuangan yang tidak dimiliki untuk diperdagangkan atau diukur pada nilai wajar melalui keuntungan atau kerugian pada saat pengakuan liabilitas awal. Termasuk dalam liabilitas yang berasal dari operasi atau pinjaman dan utang.

Liabilitas keuangan lainnya diukur pada biaya perolehan diamortisasi dengan menggunakan metode suku bunga efektif. Pada tanggal laporan posisi keuangan konsolidasian, beban bunga masih harus dibayar dicatat secara terpisah dari pokok pinjaman terkait dalam bagian liabilitas lancar. Keuntungan dan kerugian diakui dalam laporan laba rugi dan penghasilan komprehensif lain konsolidasian ketika liabilitas dihentikan pengakuannya serta melalui proses amortisasi menggunakan metode suku bunga efektif.

Perusahaan dan entitas anak memiliki liabilitas keuangan lainnya berupa utang usaha, utang lain-lain, beban masih harus dibayar, pinjaman jangka panjang dan surat utang.

3. Pengakuan

Pada pengakuan awal, aset atau liabilitas keuangan diukur pada nilai wajar, kecuali untuk aset dan liabilitas keuangan yang diukur pada nilai wajar melalui laporan laba atau rugi, ditambah atau dikurangi dengan biaya transaksi yang secara langsung dapat dibagikan untuk perolehan dari aset atau liabilitas keuangan tersebut. Pengukuran dari aset dan liabilitas keuangan tersebut bergantung pada klasifikasi dari aset dan liabilitas keuangan.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

f. ***Financial assets and liabilities and equity instruments*** *(Continued)*

2. *Financial liabilities and equity instruments (Continued)*

Financial liabilities (Continued)

(i) Financial liabilities measured at fair value through profit or loss (Continued)

The Company and subsidiaries has no financial liabilities measured at fair value through profit or loss as of 30 June 2021 and 31 December 2020.

(ii) Other financial liabilities

This category pertains to financial liabilities that are not held for trading or designated as fair value through profit or loss upon the inception of the liability. This includes liabilities arising from operations or loans and borrowings.

Other financial liabilities are subsequently measured at amortized cost using the effective interest rate method. On the consolidated statement of financial position date, accrued interest is recorded separately from the principal involved in the current liabilities. Gains and losses are recognized in consolidated statement of profit or loss and other comprehensive income when the liability is derecognized, as well as through the amortization using the effective interest rate method.

The Company and subsidiaries have other financial liabilities consisting of trade payables, other payables, accrued expenses, long-term loan and notes.

3. Recognition

At initial recognition, financial assets or liabilities are measured at fair value, except for financial assets and liabilities measured at fair value through profit or loss, plus or minus the transaction costs that are directly attributable to the acquisition of financial assets or issuance of financial liabilities. The subsequent measurement of financial assets and liabilities depends on the classification of financial assets and liabilities.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

f. **Aset dan liabilitas keuangan dan instrumen ekuitas** (Lanjutan)

4. Nilai wajar

Nilai wajar adalah harga yang akan diterima untuk menjual suatu aset atau harga yang akan dibayarkan untuk mengalihkan suatu liabilitas dalam transaksi teratur antara pelaku pasar pada tanggal pengukuran. Pengukuran nilai wajar mengasumsikan bahwa transaksi untuk menjual aset atau mengalihkan liabilitas terjadi:

- di pasar utama untuk aset dan liabilitas tersebut; atau
- jika terdapat pasar utama, di pasar yang paling menguntungkan untuk aset dan liabilitas tersebut

Pasar utama atau pasar yang paling menguntungkan harus dapat diakses oleh Perusahaan dan entitas anak.

Nilai wajar suatu aset atau liabilitas menggunakan asumsi yang akan digunakan pelaku pasar ketika menentukan harga aset atau liabilitas tersebut, dengan asumsi bahwa pelaku pasar bertindak dalam kepentingan ekonomik terbaiknya.

Pengukuran nilai wajar aset non-keuangan memperhitungkan kemampuan pelaku pasar untuk menghasilkan manfaat ekonomik dengan menggunakan aset dalam penggunaan tertinggi dan terbaiknya atau dengan menjualnya kepada pelaku pasar lain yang akan menggunakan aset tersebut dalam penggunaan tertinggi dan terbaiknya.

Perusahaan dan entitas anak menggunakan teknik penilaian yang sesuai dalam keadaan dan dimana data yang memadai tersedia untuk mengukur nilai wajar, memaksimalkan penggunaan input yang dapat diobservasi yang relevan dan meminimalkan penggunaan input yang tidak dapat diobservasi.

PSAK 68 mensyaratkan pengungkapan tertentu yang mensyaratkan klasifikasi aset keuangan dan liabilitas keuangan yang diukur pada nilai wajar dengan menggunakan hirarki nilai wajar yang mencerminkan signifikansi input yang digunakan di dalam melakukan pengukuran nilai wajar. Hirarki nilai wajar memiliki tingkatan sebagai berikut:

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

f. ***Financial assets and liabilities and equity instruments*** *(Continued)*

4. Fair value

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. The fair value measurement is based on the presumption that the transaction to sell or transfer the liability takes place either:

- *in the principal market for the asset or liability; or*
- *in the absence of a principal market, in the most advantageous market for the asset or liability*

The principal or the most advantageous market must be accessible by the Company and subsidiaries.

The fair value of an asset or a liability is measured using the assumptions that market participants would use when pricing the asset or liability, assuming that market participants act in their economic best interest.

A fair value measurement of a non-financial asset takes into account a market participant's ability to generate economic benefits by using its highest and best use or by selling it to another market participant that would use the asset in its highest and best use.

The Company and subsidiaries uses valuation techniques that are appropriate in the circumstances and for which sufficient data are available to measure fair value, maximizing the use of relevant observable inputs and minimizing the use of unobservable inputs.

PSAK 68 requires certain disclosures which require the classification of financial assets and financial liabilities measured at fair value using a fair value hierarchy that reflects the significance of the inputs used in measuring fair value. Fair value hierarchy has the following levels:

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

f. **Aset dan liabilitas keuangan dan instrumen ekuitas** (Lanjutan)

4. Nilai wajar (Lanjutan)

Tingkat 1: Harga kuotasian (tidak disesuaikan) dalam pasar aktif untuk aset atau liabilitas yang identik
Tingkat 2: Input selain harga kuotasian yang termasuk dalam Tingkat 1 yang dapat diobservasi untuk aset atau liabilitas, baik secara langsung (misalnya harga) atau secara tidak langsung (misalnya derivasi dari harga)
Tingkat 3: Input untuk aset atau liabilitas yang bukan berdasarkan data pasar yang dapat diobservasi (input yang tidak dapat diobservasi)

Untuk aset dan kewajiban yang diakui dalam laporan keuangan secara berulang, Perusahaan dan entitas anak menentukan apakah transfer telah terjadi antara Tingkat dalam hirarki dengan menilai kembali kategorisasi (berdasarkan masukan tingkat terendah yang signifikan terhadap pengukuran nilai wajar secara keseluruhan) pada akhir setiap tahun pelaporan.

Nilai wajar instrumen keuangan yang diperdagangkan dalam pasar aktif pada tanggal laporan didasarkan pada harga kuotasi atau kuotasi harga pedagang efek yang mengikat (harga penawaran untuk jangka panjang dan harga pemintaan untuk jangka pendek), tanpa adanya pengurangan untuk biaya transaksi. Sekuritas didefinisikan dalam pencatatan ini sebagai "terdaftar" diperjualbelikan dalam pasar aktif. Dimana Perusahaan dan entitas anak memiliki aset dan liabilitas keuangan dengan posisi saling hapus dalam risiko pasar atau risiko kredit pihak ketiga, telah memilih untuk menggunakan pengukuran pengecualian untuk mengukur nilai wajar atas eksposur risiko bersihnya dengan menerapkan harga penawaran atau permintaan ke posisi pembukaan bersih yang sesuai. Untuk seluruh instrumen keuangan lain yang tidak diperdagangkan dalam pasar aktif, nilai wajar ditentukan dengan menggunakan teknik valuasi yang dianggap tepat dan sesuai kondisi. Teknik penilaian termasuk pendeketan pasar (misalnya menggunakan transaksi *arm's length* yang disesuaikan seperlunya dan mengacu pada nilai pasar instrumen lain yang sama secara substansial) dan pendekatan pendapatan (misalnya analisis arus kas diskonto dan opsi model penentuan harga membuat penggunaan data pasar yang tersedia dan mendukung yang memungkinkan).

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

f. ***Financial assets and liabilities and equity instruments*** *(Continued)*

4. Fair value (Continued)

Level 1: Quoted (unadjusted) prices in active markets for identical assets or liabilities.
Level 2: Inputs other than market quotations included within Level 1 that are observable for the asset or liability, either directly (eg, prices) or indirectly (for example, derivatives prices)

Level 3: Inputs for the asset or liability that are not based on observable market data (unobservable inputs)

For assets and liabilities that are recognized in the financial statement on a recurring basis, the Company and subsidiaries determines whether transfers have occurred between Levels in the hierarchy by reassessing categorization (based on the lowest level input that is significant to the fair value measurement as a whole) at the end of each reporting year.

The fair value for financial instruments traded in active markets at the reporting date is based on their quoted price or binding dealer price quotations (bid price for long positions and ask price for short positions), without any deduction for transaction costs. Securities defined in these accounts as "listed" are traded in an active market. Where the Company and subsidiaries has financial assets and financial liabilities with offsetting positions in market risks or counterparty credit risk, it has elected to use the measurement exception to measure the fair value of its net risk exposure by applying the bid or ask price to the net open position as appropriate. For all other financial instruments not traded in an active market, the fair value is determined by using valuation techniques deemed to be appropriate in the circumstances. Valuation techniques include the market approach (i.e., using recent arm's length market transactions adjusted as necessary and reference to the current market value of another instrument that is substantially the same) and the income approach (i.e., discounted cash flow analysis and option pricing models making as much use of available and supportable market data as possible).

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

f. **Aset dan liabilitas keuangan dan instrumen ekuitas** (Lanjutan)

4. Nilai wajar (Lanjutan)

Seluruh aset dan liabilitas yang nilai wajarnya dinilai dan diungkapkan dalam Laporan keuangan konsolidasian dikategorikan dalam hirarki nilai wajar.

Untuk tujuan pengungkapan nilai wajar, Perusahaan dan entitas anak menentukan kelas aset dan liabilitas yang sesuai dengan dasar sifat, karakteristik dan risiko aset atau liabilitas dan level hirarki nilai wajar seperti yang dijelaskan di atas.

5. Pengukuran biaya perolehan diamortisasi

Biaya perolehan diamortisasi dari aset dan liabilitas keuangan adalah jumlah aset atau liabilitas keuangan yang diukur pada saat pengakuan awal dikurangi pembayaran pokok, ditambah atau dikurangi dengan amortisasi kumulatif dengan menggunakan metode suku bunga efektif yang dihitung dari selisih antara nilai awal dan nilai jatuh temponya, dan dikurangi penyisihan kerugian penurunan nilai.

6. Penurunan nilai dari aset keuangan

Dalam PSAK 71, provisi penurunan nilai atas aset keuangan diukur menggunakan model kerugian kredit ekspetasian dan berlaku untuk aset keuangan yang diukur pada biaya perolehan atau nilai wajar melalui penghasilan komprehensif lain.

Terdapat 2 (dua) basis pengukuran atas kerugian kredit ekspektasian, yaitu kerugian kredit ekspektasian 12 bulan atau kerugian kredit sepanjang umurnya. Perusahaan dan entitas anak akan melakukan analisis pengakuan awal menggunakan kerugian kredit ekspektasian 12 bulan dan akan berpindah basis apabila terjadi peningkatan resiko kredit yang signifikan setelah pengakuan awal.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

f. ***Financial assets and liabilities and equity instruments*** *(Continued)*

4. Fair value (Continued)

All assets and liabilities for which fair value is measured or disclosed in the consolidated financial statements are categorized within the fair value hierarchy.

For the purpose of the fair value disclosures, the Company and subsidiaries has determined classes of assets and liabilities on the basis of the nature, characteristics and risks of the asset or liability and the level of the fair value hierarchy as explained above.

5. Amortized cost measurement

The amortized cost of a financial asset or liability is the amount at which the financial asset or liability is measured at initial recognition, minus principal payments, plus or minus the cumulative amortization using the effective interest rate method, calculated from the difference between initial amount and maturity amount, minus any reduction for impairment.

6. Impairment of financial assets

In PSAK 71, impairment loss provision of financial assets measured at expected credit losses model ("ECLs") and applied for financial assets which measured at amortised cost or fair value through other comprehensive lain

There are 2 (two) basis of the measurement of expected credit losses, 12 month expected credit losses or lifetime expected credit losses. The Group will analyse the initial recognition using the 12 month expected credit losses and will move to lifetime expected credit losses if there is significant increase in credit risk after initial recognition.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

f. **Aset dan liabilitas keuangan dan instrumen ekuitas** (Lanjutan)

7. Penghentian pengakuan

Perusahaan dan entitas anak menghentikan pengakuan aset keuangan pada saat hak kontraktual atas arus kas yang berasal dari aset keuangan tersebut kadaluarsa atau Perusahaan dan entitas anak mentransfer seluruh hak untuk menerima arus kas kontraktual dari aset keuangan dalam transaksi di mana Perusahaan dan entitas anak secara substansial telah mentransfer seluruh risiko dan manfaat atas kepemilikan aset keuangan yang ditransfer. Setiap hak atau liabilitas atas aset keuangan yang ditransfer yang timbul atau yang masih dimiliki oleh Perusahaan dan entitas anak diakui sebagai aset atau liabilitas secara terpisah.

Perusahaan dan entitas anak menghentikan pengakuan liabilitas keuangan pada saat liabilitas yang ditetapkan dalam kontrak dilepaskan, dibatalkan atau kadaluarsa.

Dalam transaksi di mana Perusahaan dan entitas anak secara subtansial tidak memiliki atau tidak mentransfer seluruh risiko dan manfaat atas kepemilikan aset keuangan, Perusahaan dan entitas anak menghentikan pengakuan aset tersebut jika Perusahaan dan entitas anak tidak lagi memiliki pengendalian atas aset tersebut. Hak dan liabilitas yang timbul atau yang masih dimiliki dalam transfer tersebut diakui secara terpisah sebagai aset atau liabilitas.

Dalam transfer di mana pengendalian atas aset masih dimiliki, Perusahaan dan entitas anak tetap mengakui aset yang ditransfer tersebut sebesar keterlibatan yang berkelanjutan, dimana tingkat keberlanjutan Perusahaan dan entitas anak dalam aset yang ditransfer adalah sebesar perubahan nilai aset yang ditransfer.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

f. ***Financial assets and liabilities and equity instruments*** *(Continued)*

7. Derecognition

The Company and subsidiaries derecognize financial assets when the contractual rights of the cash flows arising from the financial assets expire or the Company and subsidiaries transfers all rights to receive contractual cash flows of financial assets in a transaction where the Company and subsidiaries has transferred substantially all the risks and rewards of ownership of financial assets. Any rights or obligations on the transferred financial assets that arise or are still owned by the Company and subsidiaries are recognized as assets or liabilities separately.

The Company and subsidiaries derecognize financial liabilities when the obligation specified in the contract is released, canceled or expired.

In transactions in which the Company and subsidiaries neither retains nor transfers substantially all the risks and rewards of ownership of financial assets, the Company and subsidiaries derecognizes the assets if they do not retain control over the assets. The rights and obligations retained in the transfer are recognized separately as assets and liabilities as appropriate.

In transfers in which control over the asset is retained, the Company and subsidiaries continues to recognize the assets to the extent of their continuing involvement, determined by the extent to which they are exposed to changes in the value of the transferred assets.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

f. **Aset dan liabilitas keuangan dan instrumen ekuitas** (Lanjutan)

8. Saling hapus

Aset keuangan dan liabilitas keuangan disalinghapuskan dan nilai bersihnya disajikan dalam laporan posisi keuangan konsolidasian jika, dan hanya jika, saat ini memiliki hak yang dapat dipaksakan secara hukum untuk melakukan saling hapus atas jumlah yang telah diakui tersebut dan Perusahaan dan entitas anak berintensi untuk menyelesaikan secara bersih atau untuk merealisasikan aset dan menyelesaikan liabilitasnya secara simultan. Hal ini tidak umum terjadi dengan perjanjian induk untuk menyelesaikan secara bersih, dan aset dan kewajiban terkait disajikan sebesar nilai bruto dalam laporan posisi keuangan keuangan konsolidasian.

9. Instrumen keuangan derivatif

Derivatif adalah suatu instrumen keuangan atau kontrak lain dengan tiga karakteristik berikut ini:

a) nilainya berubah sebagai akibat dari perubahan variabel yang telah ditentukan (sering disebut dengan variabel yang mendasari/*underlying*), antara lain: suku bunga, harga instrumen keuangan, harga komoditas, nilai tukar mata uang asing, indeks harga atau indeks suku bunga, peringkat kredit atau indeks kredit, atau variabel lainnya. Untuk variabel non-keuangan, variabel tersebut tidak berkaitan dengan pihak-pihak dalam kontrak

b) tidak memerlukan investasi awal bersih atau memerlukan investasi awal bersih dalam jumlah yang lebih kecil dibandingkan dengan jumlah yang diperlukan untuk kontrak serupa lainnya yang diharapkan akan menghasilkan dampak yang serupa sebagai akibat perubahan faktor pasar

c) diselesaikan pada tanggal tertentu di masa mendatang.

Perusahaan dan entitas anak menggunakan instrumen keuangan derivatif, seperti kontrak *forward* mata uang, untuk melindungi nilai risiko mata uang asing yang berasal dari denominasi pinjaman dalam Dolar Amerika Serikat. Instrumen keuangan derivatif tersebut diakui pada nilai wajar pada tanggal dimana kontrak derivatif dibuat dan selanjutnya dinilai pada nilai wajar. Derivatif dicatat sebagai aset keuangan saat nilai wajar positif dan sebagai liabilitas keuangan saat nilai wajar negatif.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

f. ***Financial assets and liabilities and equity instruments*** *(Continued)*

8. Offsetting

Financial assets and financial liabilities are offset and the net amount reported in the consolidated statement of financial position if and only if there is a currently legal right to offset the recognized amounts and the Company and subsidiaries intends to either settle on a net basis, or to realize the asset and settle the liability simultaneously. This is not generally the case with master netting agreements, and the related assets and liabilities are presented at gross amounts in the consolidated statement of financial position.

9. Derivative financial instruments

A derivative is a financial instrument or other contract with all three of the following characteristics:

a) its value changes in response to the change in a specified interest rate, financial instrument price, commodity price, foreign exchange rate, index of prices or rates, credit rating or credit index, or other variable, provided in the case of a non-financial variable that the variable is not specific to a party to the contract (sometimes called the "underlying")

b) it requires no initial net investment or an initial net investment that is smaller than would be required for other types of contracts that would be expected to have a similar response to changes in market factors

c) it is settled at a future date.

The Company and subsidiaries uses derivative financial instruments, such as forward currency contracts, to hedge its foreign currency risks arising from US dollar (USD)-denominated loans. Such derivative financial instruments are initially recognized at fair value on the date on which a derivative contract is entered into and are subsequently remeasured at fair value. Derivatives are carried as financial assets when the fair value is positive and as financial liabilities when the fair value is negative.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

f. **Aset dan liabilitas keuangan dan instrumen ekuitas** (Lanjutan)

9. Instrumen keuangan derivatif (Lanjutan)

Laba rugi yang berasal dari perubahan nilai wajar derivatif dicatat langsung ke laporan laba rugi dan penghasilan komprehensif lain konsolidasian, kecuali untuk porsi efektif lindung nilai arus kas, yang diakui dalam penghasilan komprehensif lain.

Instrumen derivatif diklasifikasikan sebagai lancar dan tidak lancar berdasarkan penilaian fakta dan keadaan tertentu (seperti dasar arus kas kontraktual). Ketika Perusahaan dan entitas anak mempunyai derivatif sebagai lindung nilai ekonomi dan tidak diterapkan sebagai lindung nilai akuntansi untuk tahun diatas 12 bulan setelah tanggal pelaporan, derivatif diklasifikasikan sebagai tidak lancar.

g. **Transaksi dengan pihak-pihak berelasi**

Suatu pihak dianggap berelasi dengan Perusahaan dan entitas anak jika:

a) langsung atau tidak langsung melalui satu atau lebih perantara, suatu pihak (i) mengendalikan atau dikendalikan oleh, atau berada di bawah pengendalian bersama dengan Perusahaan dan entitas anak; (ii) memiliki kepentingan dalam Perusahaan dan entitas anak yang memberikan pengaruh signifikan atas Perusahaan dan entitas anak; atau (iii) memiliki pengendalian bersama atas Perusahaan dan entitas anak;
b) suatu pihak yang berelasi dengan Perusahaan dan entitas anak;
c) suatu pihak adalah ventura bersama dimana Perusahaan dan entitas anak sebagai *venture*;
d) suatu pihak adalah anggota dari personil manajemen kunci Perusahaan dan entitas anak atau induk;
e) suatu pihak adalah anggota keluarga dekat dengan individu yang diuraikan dalam butir (a) atau (d);
f) suatu pihak adalah entitas yang dikendalikan, dikendalikan bersama atau dipengaruhi signifikan oleh atau untuk dimana hak suara signifikan pada beberapa entitas, langsung maupun tidak langsung, individu seperti diuraikan dalam butir (d) atau (e); atau
g) suatu pihak adalah suatu program imbalan pasca-kerja untuk imbalan kerja dari Perusahaan dan entitas anak atau entitas lain yang terkait dengan Perusahaan dan entitas anak.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

f. ***Financial assets and liabilities and equity instruments*** *(Continued)*

9. Derivative financial instruments (Continued)

Any gains or losses arising from changes in the fair value of derivatives are taken directly to consolidated statement of profit or loss and other comprehensive income, except for the effective portion of cash flow hedges, which is recognized in other comprehensive income.

Derivative instruments are classified as current or non-current based on an assessment of the facts and circumstances (i.e., the underlying contracted cash flows). When the the Company and subsidiaries will hold a derivative as an economic hedge and does not apply hedge accounting for a year beyond 12 months after the reporting date, the derivative is classified as non-current.

g. ***Transactions with related parties***

A party is considered to be related party to the Company and subsidiaries if:

a) directly or indirectly through one or more intermediaries, the party (i) controls, or is controlled by, or is under common control with the Company and subsidiaries; (ii) has an interest in the Company and subsidiaries that gives significant influence over the Company and subsidiaries; or (iii) has joint control over the Company and subsidiaries;
b) the party is an associated of the Company and subsidiaries;
c) the party is a joint venture in which the Company and subsidiaries is a venturer;
d) the party is a member of the key management personnel of the Company and subsidiaries or its parent;
e) the party is a close member of the family of any individual referred to (a) or (d);
f) the party is an entity that is controlled, jointly controlled or significant influenced by or for which significant voting power in such entity resides with, directly or indirectly, any individual referred to (d) or (e); or
g) the party is a post-employment benefits plan for the benefit or employees of the Company and subsidiaries, or any entity that is a related party of the Company and subsidiaries.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

g. **Transaksi dengan pihak-pihak berelasi** (Lanjutan)

Transaksi ini dilakukan berdasarkan persyaratan yang disetujui oleh kedua belah pihak, dimana persyaratan tersebut mungkin tidak sama dengan transaksi lain yang dilakukan dengan pihak-pihak tidak berelasi.

Seluruh transaksi dan saldo yang material dengan pihak-pihak berelasi telah diungkapkan dalam catatan atas Laporan keuangan konsolidasian.

h. **Kas dan setara kas**

Kas dan setara kas merupakan bagian aset keuangan yang tidak digunakan sebagai jaminan atas pinjaman dan tidak dibatasi penggunaannya.

i. **Piutang**

Piutang usaha dan piutang non-usaha pada awalnya diakui sebesar nilai wajar dan selanjutnya diukur pada biaya perolehan diamortisasi dengan menggunakan metode bunga efektif, apabila dampak pendiskontoan signifikan, dikurangi provisi atas penurunan nilai.

Kolektibilitas piutang usaha dan piutang non-usaha ditinjau secara berkala. Piutang yang diketahui tidak tertagih, dihapuskan dengan secara langsung mengurangi nilai tercatatnya. Akun penyisihan digunakan ketika terdapat bukti yang objektif bahwa Perusahaan dan enitas anak tidak dapat menagih seluruh jumlah piutang sesuai dengan persyaratan awal piutang.

Jumlah kerugian penurunan nilai diakui pada laporan laba rugi konsolidasian dan disajikan dalam "Beban kerugian kredit ekspektasian".

j. **Persediaan**

Persediaan diakui sebesar nilai yang lebih rendah antara biaya perolehan dan nilai realisasi bersih *(the lower of cost or net realizable value)*. Biaya perolehan ditentukan dengan menggunakan metode *first-in, first-out (FIFO) method*. Perusahaan dan entitas anak menentukan penyisihan persediaan usang berdasarkan hasil penelaahan terhadap keadaan persediaan pada akhir tahun.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

g. ***Transactions with related parties*** *(Continued)*

The transactions are made based on the terms agreed by the parties, such term may not be the same as those transactions with unrelated parties.

All material transactions and balances with related parties are disclosed in the notes to the consolidated financial statements.

h. ***Cash and cash equivalents***

Cash and cash equivalents are financial assets, which are not being as collateral of loan nor restricted for use.

i. ***Receivables***

Trade and non-trade receivables are recognized initially at fair value and subsequently measured at amortized cost using the effective interest method, if the impact of discounting is significant, less any provision for impairment.

Collectibility of trade and non-trade receivables is reviewed on an ongoing basis. Receivables which are known to be uncollectible are written off by reducing the carrying amount directly. An allowance account is used when there is objective evidence that the Company and subsidiaries will not be able to collect all amounts due according to the original terms of the receivables.

The amount of the impairment loss is recognized in consolidated statement of profit or loss and other comprehensive income within "Expected credit losses expenses".

j. ***Inventories***

Inventories are stated at the lower of cost or net realizable value. Cost is determined based on the first-in, first-out (FIFO) method. The Company and subsidiaries provide a provision for inventory obsolescence based on a review of the condition of inventories at the end of the year.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

k. **Aset tetap**

Aset tetap, kecuali menara telekomunikasi, dicatat dengan menggunakan model biaya yaitu biaya perolehan dikurangi akumulasi penyusutan dan akumulasi penurunan nilai aset, jika ada.

Menara telekomunikasi dicatat dengan menggunakan model revaluasi, yaitu nilai wajar pada tanggal revaluasi dikurangi dengan akumulasi penyusutan dan akumulasi rugi penurunan nilai setelah tanggal revaluasi, jika ada.

Revaluasi pada nilai wajar dilakukan pada setiap tahun pelaporan. Jika jumlah tercatat aset meningkat akibat revaluasi, maka kenaikan tersebut diakui dalam penghasilan komprehensif lain dan terakumulasi dalam ekuitas pada bagian surplus revaluasi. Akan tetapi, kenaikan tersebut diakui dalam laba rugi hingga sebesar jumlah penurunan nilai aset yang sama akibat revaluasi yang pernah diakui sebelumnya dalam laporan laba rugi. Jika jumlah tercatat aset turun akibat revaluasi, maka penurunan tersebut diakui dalam laba rugi. Penurunan nilai tersebut diakui dalam penghasilan komprehensif lain, untuk mengurangi jumlah akumulasi dari surplus revaluasi, sepanjang tidak melebihi saldo surplus revaluasi dari aset tersebut.

Surplus revaluasi aset tetap dapat dialihkan ke saldo laba ketika terjadi penghentian atau pelepasan aset tersebut. Sebagian surplus revaluasi juga dapat dialihkan sejalan dengan penggunaan aset. Dalam hal tersebut, maka surplus revaluasi yang dialihkan ke saldo laba adalah sebesar perbedaan antara jumlah penyusutan berdasarkan nilai revaluasian dan jumlah penyusutan berdasarkan biaya perolehan awalnya. Pengalihan tersebut tidak dilakukan melalui laba rugi.

Penyusutan terhadap aset tetap dihitung dengan metode garis lurus (*straight-line method*), berdasarkan taksiran manfaat ekonomis aset tetap, sebagai berikut:

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

k. ***Property and equipment***

Property and equipment, unless telecommunication towers are stated at cost net of accumulated depreciation and accumulated of asset impairment value, if any.

Telecommunication towers are accounted for using the revaluation model, which is the fair value at the date of revaluation less any accumulated depreciation and accumulated impairment losses after the date of revaluation, if any.

A revaluation at fair value is made at each reporting year. If the carrying amount of the asset increases as a result of the revaluation, the increase is recognized in other comprehensive income and accumulates in equity in the revaluation surplus section. However, the increase is recognized in profit and loss up to the same amount of impairment loss due to revaluation previously recognized in profit or loss. If the carrying amount of the asset decreases as a result of the revaluation, the decrease is recognized in profit or loss. The impairment is recognized in other comprehensive income, to reduce the accumulated amount of the revaluation surplus, as long as it does not exceed the revaluation surplus balance of the asset.

The revaluation surplus of property and equipment may be transferred to the retained earnings when there is a termination or disposal of the asset. Some revaluation surpluses may also be transferred in line with asset use. In that case, the revaluation surplus transferred to retained earnings is the difference between the amount of depreciation based on the revaluation amount and the amount of depreciation based on the initial cost. The transfer is not made through profit or loss.

Depreciation of property and equipment has been computed on a straight-line method, based on the estimated useful lives of the related assets, as follows:

	Masa manfaat/ *Useful lives* Tahun/ *Years*	**Tarif penyusutan / *Depreciation rate***	
Menara telekomunikasi	30	3,33%	*Telecommunication towers*
Bangunan	20	5%	*Buildings*
Menara bergerak	10	10%	*Transportable towers*
Perangkat lunak	4	25%	*Software*
Peralatan, perlengkapan kantor dan perangkat elektronik	4	25%	*Tools, office equipment and electronic hardware*
Kendaraan	4	25%	*Vehicles*
Genset	4	25%	*Gensets*

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

k. **Aset tetap** (Lanjutan)

Beban penyusutan diperhitungkan di dalam laporan laba rugi selama tahun buku di mana beban tersebut terjadi. Akumulasi penyusutan untuk aset yang direvaluasi, dieliminasi terhadap jumlah tercatat bruto dan jumlah tercatat neto setelah eliminasi disajikan kembali sebesar jumlah revaluasiannya.

Perbaikan dan perawatan diperhitungkan ke dalam laporan laba rugi selama tahun di mana perbaikan dan perawatan terjadi. Biaya renovasi dan restorasi utama digabungkan ke dalam nilai tercatat aset jika biaya tersebut memiliki kemungkinan untuk memberikan manfaat di masa depan yang jumlahnya melebihi standar kinerja pada penilaian awal aset yang ada yang akan mengalir ke dalam Perusahaan dan entitas anak, dan disusutkan sebesar sisa umur manfaat aset tersebut.

Nilai residu, masa manfaat, dan metode depresiasi, dikaji pada tiap akhir tahun pelaporan, dan disesuaikan secara prospektif, sesuai dengan keadaan.

Ketika terdapat indikasi penurunan nilai, nilai tercatat aset dinilai dan segera dicatat berdasarkan jumlah terpulihkan.

Keuntungan atau kerugian pelepasan aset tetap ditentukan dengan membandingkan penerimaan dengan nilai tercatat dan dicatat ke dalam laba rugi dari operasi.

Aset dalam penyelesaian dinyatakan sebesar biaya perolehan dan disajikan sebagai bagian dari aset tetap. Akumulasi biaya perolehan akan dipindahkan ke masing-masing akun aset tetap yang bersangkutan pada saat aset tersebut selesai dikerjakan dan siap digunakan.

l. **Properti investasi**

Properti investasi adalah tanah atau bangunan atau bagian dari suatu bangunan atau kedua-duanya yang dikuasai oleh Perusahaan dan entitas anak untuk menghasilkan sewa atau untuk kenaikan nilai atau kedua-duanya, dan tidak digunakan maupun dijual dalam kegiatan operasi.

Properti investasi diukur pada nilai wajar. Nilai wajar properti investasi diakui berdasarkan penilaian dari penilai independen yang memenuhi kualifikasi dan telah diakui, serta didukung oleh bukti pasar. Perubahan nilai wajar properti investasi diakui pada laporan laba rugi dan penghasilan komprehensif lain konsolidasian.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

k. ***Property and equipment*** *(Continued)*

Depreciation expenses are taken to profit or loss during the financial year in which they are incurred. The accumulated depreciation for the revalued asset is eliminated against the gross carrying amount and the net carrying amount after elimination is restated for the amount of revaluation.

Repair and maintenance expenses are taken to profit or loss during the financial year in which they are incurred. The cost of major renovations and restorations is included in the carrying amount of the asset when it is probable that future economic benefits in excess of the originally assessed standard of performance of the existing asset will flow to the Company and subsidiaries, and depreciated over the remaining useful life of the asset.

The residual value, useful life and depreciation method are reviewed at the end of each reporting year, and adjusted prospectively, if appropriate.

Where an indication of impairment exists, the carrying amount of the asset is assessed and written down immediately to its recoverable amount.

Gains or losses on disposal are determined by comparing proceeds with the carrying amount and are included in profit or loss from operations.

Assets in progress are stated at cost and presented as part of the property and equipments. The accumulated cost will be reclassified to the appropriate property and equipments account when the installation is substantially completed and the asset is ready for its intended use.

l. ***Investment properties***

Investment property is land or buildings or part of a building or both which is controlled by the Company and subsidiaries to earn rental or for capital appreciation or both, rather than for use or sale in the ordinary course of business.

Investment property shall be measured at fair value. The fair value of investment property is recognized based on an appraisal by a qualified and authorized independent appraiser and supported by the market evidence. Changes to investment property fair value shall be recognized in the consolidated statements of profit or loss and other comprehensive income.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

l. **Properti investasi** (Lanjutan)

Properti investasi dihentikan pengakuannya (dikeluarkan) dari laporan posisi keuangan konsolidasian pada saat pelepasan atau ketika properti investasi tersebut tidak digunakan lagi secara permanen dan tidak memiliki manfaat ekonomis di masa depan yang dapat diharapkan pada saat pelepasannya. Laba atau rugi yang timbul dari penghentian atau pelepasan properti investasi diakui dalam laporan laba rugi dan penghasilan komprehensif konsolidasian dalam tahun terjadinya penghentian atau pelepasan tersebut.

m. **Penurunan nilai aset non-keuangan**

Pada setiap akhir tahun pelaporan, Perusahaan dan entitas anak menilai apakah terdapat indikasi suatu aset mengalami penurunan nilai. Jika terdapat indikasi tersebut atau pada saat pengujian penurunan nilai aset (yaitu aset tak berwujud dengan umur manfaat tidak terbatas, aset tak berwujud yang belum dapat digunakan, atau *goodwill* yang diperoleh dalam suatu kombinasi bisnis) diperlukan, maka Perusahaan dan entitas anak membuat estimasi formal jumlah terpulihkan aset tersebut.

Jumlah terpulihkan yang ditentukan untuk aset individual adalah jumlah yang lebih tinggi antara nilai wajar aset atau unit penghasil kas ("UPK") dikurangi biaya pelepasan dengan nilai pakainya, kecuali aset tersebut tidak menghasilkan arus kas masuk yang sebagian besar independen dari aset atau kelompok aset lain. Jika nilai tercatat aset lebih besar daripada nilai terpulihkannya, maka aset tersebut mengalami penurunan nilai dan nilai tercatat aset diturunkan menjadi sebesar nilai terpulihkannya. Rugi penurunan nilai segera diakui dalam laba rugi.

Dalam menghitung nilai pakai, estimasi arus kas masa depan bersih didiskontokan ke nilai kini dengan menggunakan tingkat diskonto sebelum pajak yang menggambarkan penilaian pasar terkini atas nilai waktu dari uang dan risiko spesifik dari aset. Jika tidak terdapat transaksi tersebut, Perusahaan dan entitas anak menggunakan model penilaian yang sesuai untuk menentukan nilai wajar aset. Perhitungan-perhitungan ini dikuatkan oleh penilaian berganda atau indikasi nilai wajar yang tersedia.

Dalam menentukan nilai wajar dikurangi biaya untuk menjual, digunakan harga penawaran pasar terakhir, jika tersedia. Kerugian penurunan nilai dari operasi yang dilanjutkan, jika ada, diakui pada laporan laba rugi dan penghasilan komprehensif lain konsolidasian sesuai dengan kategori beban yang konsisten dengan fungsi dari aset yang diturunkan nilainya.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

l. ***Investment properties*** *(Continued)*

The investment property shall be eliminated from the consolidated statements of financial position on disposal or when the investment property is permanently withdrawn from use and no future economic benefits are expected when withdrawn. Gains or losses from investment property withdrawals or disposals are recorded in the consolidated statements of profit or loss and other comprehensive income when incurred.

m. ***Impairment of non-financial assets***

At the end of each reporting year, the Company and subsidiaries assesses whether there is an indication that an asset may be impaired. If any such indication exists or impairment testing for an asset (i.e., an intangible asset with an indefinite useful life, an intangible asset not yet available for use, or goodwill acquired in a business combination) is required, the Company and subsidiaries makes an estimate of the asset's recoverable amount.

An individual asset's recoverable amount is determined by the higher between the fair value asset or cash generating unit ("CGU") less costs to disposal and its value in use, unless the asset does not generate cash inflows that are largely independent of those from assets or group of other assets. Where the carrying amount of an asset exceeds its recoverable amount, the asset is considered impaired and is written-down to its recoverable amount. Impairment losses are recognized immediately in profit or loss.

In assessing the value in use, the estimated net future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset. If no such transactions can be identified, the Company and subsidiaries use an appropriate valuation model to determine the fair value of the assets. These calculations are corroborated by multiple valuation or other available fair value indicators.

In determining fair value less costs to sell, recent market transactions are taken into account, if available. Impairment losses of continuing operations, if any, are recognized in the consolidated statement of profit or loss and other comprehensive income under expense categories that are consistent with the functions of the impaired assets.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

m. **Penurunan nilai aset non-keuangan** (Lanjutan)

Penilaian dilakukan pada akhir setiap tahun pelaporan tahunan apakah terdapat indikasi bahwa rugi penurunan nilai yang telah diakui dalam tahun sebelumnya untuk aset selain *goodwill* mungkin tidak ada lagi atau mungkin telah menurun. Jika indikasi dimaksud ditemukan, maka entitas mengestimasi jumlah terpulihkan aset tersebut. Kerugian penurunan nilai yang telah diakui dalam tahun sebelumnya untuk aset selain *goodwill* dibalik hanya jika terdapat perubahan asumsi-asumsi yang digunakan untuk menentukan jumlah terpulihkan aset tersebut sejak rugi penurunan nilai terakhir diakui. Dalam hal ini, jumlah tercatat aset dinaikkan ke jumlah terpulihkannya. Pembalikan tersebut dibatasi sehingga jumlah tercatat aset tidak melebihi jumlah terpulihkannya maupun jumlah tercatat, bersih setelah penyusutan, seandainya tidak ada rugi penurunan nilai yang telah diakui untuk aset tersebut pada tahun sebelumnya. Pembalikan rugi penurunan nilai diakui dalam laporan laba rugi dan penghasilan komprehensif lain konsolidasian. Setelah pembalikan tersebut, penyusutan aset tersebut disesuaikan di tahun mendatang untuk mengalokasikan jumlah tercatat aset yang direvisi, dikurangi nilai sisanya, dengan dasar yang sistematis selama sisa umur manfaatnya.

n. **Sewa**

Pada tanggal permulaan suatu kontrak, Perusahaan dan entitas anak menilai apakah kontrak merupakan, atau mengandung sewa. Suatu kontrak merupakan, atau mengandung sewa jika kontrak tersebut memberikan hak untuk mengendalikan penggunaan aset identifikasian selama suatu jangka waktu untuk dipertukarkan dengan imbalan.

Untuk menilai apakah suatu kontrak memberikan hak untuk mengendalikan suatu aset identifikasian, Perusahaan dan entitas anak menilai apakah:

- Kontrak melibatkan penggunaan suatu aset identifikasian ini dapat ditentukan secara eksplisit atau implisit dan secara fisik dapat dibedakan atau mewakili secara substansial seluruh kapasitas aset yang secara fisik dapat dibedakan. Jika pemasok memiliki hak substitusi substantif, maka aset tersebut tidak teridentifikasi;

- Perusahaan dan entitas anak memiliki hak untuk mendapatkan secara subtansial seluruh manfaat ekonomi dari penggunaan aset identifikasian;

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

m. ***Impairment of non-financial assets*** *(Continued)*

An assessment is made at the end of each reporting year as to whether there is any indication that previously recognized impairment losses recognized for an asset other than goodwill may no longer exist or may have decreased. If such indication exists, the entity estimates the recoverable amount. A previously recognized impairment loss for an asset is reversed only if there has been a change in the assumptions used to determine the asset's recoverable amount since the last impairment loss was recognized. If that is the case, the carrying amount of the asset is increased to its recoverable amount. The reversal is limited so that the carrying amount of the asset does not exceed its recoverable amount, nor exceed the carrying amount that would have been determined, net of depreciation, had no impairment loss been recognized for the asset in prior years. Reversal of an impairment loss is recognized in the consolidated statement of profit or loss and other comprehensive income. After such a reversal, the depreciation charge on the said asset is adjusted in future years to allocate the asset's revised carrying amount, less any residual value, on a systematic basis over its remaining useful life.

n. ***Leases***

At the inception of a contract, the Company and subsidiaries assesses whether the contract is, or contains a lease. A contract is, or contains a lease if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration.

To assess whether a contract conveys the right to control the use of an identified asset, the Company and subsidiaries assesses whether:

- *The contract involves the use of an identified asset - this may be specified explicitly or implicitly and should be physically distinct or represent substantially all of the capacity of a physically distinct asset. If the supplier has the substantive substitution right, then the asset is not identified;*

- *The Company and subsidiaries has the right to obtain substantially all the economic benefits from use of the asset throughout the period of use;*

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

n. **Sewa** (Lanjutan)

- Perusahaan dan entitas anak memiliki hak untuk mengarahkan penggunaan aset identifikasian. Perusahaan dan entitas anak memiliki hak ini ketika hak pengambilan keputusan yang paling relevan untuk mengubah bagaimana dan untuk tujuan apa aset tersebut digunakan. Dalam kondisi tertentu di mana semua keputusan tentang bagaimana dan untuk tujuan apa aset digunakan telah ditentukan sebelumnya, Perusahaan dan entitas anak memiliki hak untuk mengarahkan penggunaan aset tersebut jika:

  - Perusahaan memiliki hak untuk mengoperasikan aset; dan
  - Perusahaan telah mendesain aset dengan cara menetapkan sebelumnya bagaimana dan untuk tujuan apa aset akan digunakan selama periode penggunaan.

Pada tanggal insepsi atau pada saat penilaian kembali suatu kontrak yang mengandung suatu komponen sewa, Perusahaan dan entitas anak mengalokasikan imbalan dalam kontrak ke masing-masing komponen sewa berdasarkan harga tersendiri relatif dari komponen sewa.

Pada pengakuan awal, Perusahaan dan entitas anak mencatat aset hak-guna dan liabilitas sewa.

Aset hak-guna diukur pada biaya perolehan, dimana meliputi jumlah pengukuran awal liabilitas sewa yang disesuaikan dengan pembayaran sewa yang dilakukan pada atau sebelum tanggal permulaan, ditambah dengan biaya langsung awal yang dikeluarkan dan estimasi biaya yang akan dikeluarkan untuk membongkar dan memindahkan aset pendasar atau untuk merestorasi aset pendasar sesuai kondisi yang disyaratkan dan ketentuan sewa, dikurangi dengan insentif sewa yang diterima.

Aset hak-guna disusutkan dengan menggunakan metode garis-lurus dari tanggal permulaan hingga tanggal yang lebih awal antara akhir masa manfaat aset hak-guna atau akhir masa sewa.

Liabilitas sewa awalnya diukur pada nilai kini atas pembayaran sewa yang belum dibayar pada tanggal permulaan, didiskontokan menggunakan suku bunga implisit dalam sewa atau, jika suku bunga tersebut tidak dapat ditentukan, digunakan suku bunga pinjaman inkremental Perusahaan dan entitas anak.

2. *SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)*

*n. **Leases** (Continued)*

- *The Company and subsidiaries have the right to direct the use of the identified asset. The Company and subsidiaries have this right when it has the decisionmaking rights that are most relevant to changing how and for what purpose the asset is used. In certain circumstances where all the decisions about how and for what purpose the asset is used are predetermined, the Company and subsidiaries has the right to direct the use of the asset if either:*

  - *The Company has the right to operate the asset; and*
  - *The Company has designed the asset in a way that predetermined how and for what purpose it will be used.*

At inception or on re-assessment of a contract that contains a lease component, the Company and subsidiaries allocates consideration in the contract to each lease component on the basis of their relative stand-alone prices.

At initial recognition, the Company and subsidiaries recorded the right-of-use asset and lease liability.

The right-of-use asset is initially measured at cost, which comprises the initial amount of the lease liability adjusted for any lease payment made at or before the commencement date, plus any initial direct cost incurred and an estimate of costs to dismantle and remove the underlying asset or to restore the underlying asset to the condition required by the terms and conditions of the lease, less any lease incentives received.

The right-of-use asset is depreciated using the straight-line method from the commencement date to the earlier of the end of the useful life of the right-of-use asset or the end of the lease term.

The lease liability is initially measured at the present value of the lease payments that are not yet paid at the commencement date, discounted using the interest rate implicit in the lease or, if that rate cannot be readily determined, the Company and subsidiaries 's incremental borrowing rate.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

n. **Sewa** (Lanjutan)

Pembayaran sewa yang termasuk dalam pengukuran liabilitas sewa meliputi:

- Pembayaran tetap, termasuk pembayaran tetap secara-substansi;
- Pembayaran sewa variabel yang bergantung pada suatu indeks atau suku bunga, yang pada awalnya diukur dengan menggunakan indeks atau suku bunga pada tanggal permulaan;
- Jumlah yang diperkirakan akan dibayarkan dalam jaminan nilai residual;
- Harga eksekusi opsi beli dimana Perusahaan dan entitas anak cukup pasti untuk mengeksekusi opsi tersebut, pembayaran sewa dalam periode perpanjangan opsional jika Perusahaan dan entitas anak cukup pasti untuk mengeksekusi opsi perpanjangan; dan
- Penalti untuk penghentian dini dari sewa kecuali jika Perusahaan dan entitas anak cukup pasti untuk tidak mengakhiri lebih dini.

Liabilitas sewa diukur kembali ketika ada perubahan pembayaran sewa masa depan yang timbul dari perubahan indeks atau suku bunga, jika ada perubahan estimasi Perusahaan dan entitas anak atas jumlah yang diperkirakan akan dibayar dalam jaminan nilai residual, atau jika Perusahaan dan entitas anak mengubah penilaiannya apakah akan mengeksekusi opsi beli, perpanjangan atau penghentian.

Ketika liabilitas sewa diukur kembali dengan cara ini, penyesuaian terkait dilakukan terhadap jumlah tercatat aset hak-guna, atau dicatat dalam laba rugi jika jumlah tercatat aset hak-guna telah berkurang menjadi nol.

Sewa jangka pendek dan sewa aset bernilai rendah

Perusahaan dan entitas anak memilih untuk tidak mengakui aset hak guna dan liabilitas sewa untuk sewa jangka pendek yang memiliki masa sewa maksimal 12 bulan dan sewa atas aset bernilai rendah. Perusahaan dan entitas anak mengakui pembayaran sewa terkait dengan sewa ini sebagai beban dengan dasar garis-lurus selama masa sewa.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

n. ***Leases*** *(Continued)*

Lease payments included in the measurement of the lease liability comprise the following:

- *Fixed payments, including in-substance fixed payments;*
- *Variable lease payments that depend on an index or a rate, initially measured using the index or rate as at the commencement date;*
- *Amounts expected to be payable under a residual value guarantee;*
- *The exercise price under a purchase option that the Company and subsidiaries is reasonably certain to exercise, lease payments in an optional renewal period if the Company and subsidiaries is reasonably certain to exercise an extension option; and*
- *Penalties for early termination of a lease unless the Company and subsidiaries is reasonably certain not to terminate early.*

Lease liability remeasured when there is a change in future lease payments arising from a change in an index or rate, if there is a change in the Company and subsidiaries 's estimate of the amount expected to be payable under a residual value guarantee, or if the Company and subsidiaries changes its assessment of whether it will exercise a purchase, extension or termination option.

When the lease liability is remeasured in this way, a corresponding adjustment is made to the carrying amount of the rightof-use assets, or is recorded in profit or loss if the carrying amount of the right-of-use asset has been reduced to zero.

Short-term leases and leases of low-value assets

The Company and subsidiaries have elected not to recognize right-of use assets and lease liabilities for short-term leases that have a maximum lease term of 12 months and leases of low-value assets. The Company and subsidiaries recognize the lease payments associated with these leases as an expense on a straight-line basis over the lease term.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

n. **Sewa** (Lanjutan)

Sewa aset tetap

Perusahaan dan entitas anak melakukan sewa atas aset tetap tertentu yang diklasifikasikan sebagai aset sewa pembiayaan dalam aset tetap.

Jumlah sewa pembiayaan yang awalnya diakui sebagai aset tetap, diukur mana yang lebih rendah antara nilai wajar aset dan nilai kini utang pembayaran sewa minimum selama masa sewa. Komitmen sewa disajikan sebagai liabilitas. Pembayaran sewa dianalisis antara modal dan bunga. Unsur bunga sewa diperhitungkan dan dibebankan di dalam laba rugi selama periode sewa sehingga mencerminkan proporsi tetap liabilitas sewa.

Aset sewa pembiayaan dalam aset tetap disusutkan atas dasar penggunaan selama taksiran umur operasi aset tetap tersebut.

Aset sewa pembiayaan disusutkan dengan metode yang sama dan berdasarkan masa manfaat sebagaimana diestimasikan untuk aset tetap perolehan langsung. Akan tetapi, jika tidak terdapat kepastian yang memadai bahwa Perusahaan dan entitas anak akan memperoleh kepemilikan pada akhir masa sewa, aset sewa pembiayaan disusutkan penuh selama jangka waktu yang lebih pendek antara masa sewa dan umur manfaatnya.

Perjanjian sewa yang tidak memenuhi kriteria di atas, dicatat sebagai sewa operasi dimana pembayarannya diakui sebagai beban dengan dasar garis lurus selama masa sewa.

o. **Perpajakan**

Beban pajak penghasilan

Beban pajak terdiri dari pajak kini dan pajak tangguhan. Pajak diakui dalam laporan laba rugi, kecuali jika berkaitan dengan item yang diakui dalam penghasilan komprehensif lain atau secara langsung dalam ekuitas. Dalam kasus ini, pajak diakui dalam penghasilan komprehensif lain atau langsung dalam ekuitas.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

n. ***Leases*** *(Continued)*

Leases of property and equipment

The Company and subsidiaries leases certain of property and equipment that classified as finance lease assets under property and equipment.

The amount of finance lease that initially recognized as a property and equipment is the lower of the fair value of the leased asset and the present value of the minimum lease payments payable over the term of the lease. The corresponding lease commitment is shown as a liability. Lease payments are analyzed between capital and interest. The interest element is charged to profit or loss over the period of the lease and is calculated so that it represents a constant proportion of the lease liability.

Finance lease assets under property and equipment are depreciated using utilisation basis over their estimated operating life.

Leased assets are depreciated using the same method and based on the useful lives as estimated for directly acquired property and equipment. However, if there is no reasonable certainty that the Company and subsidiaries will obtain ownership by the end of the lease term, the leased assets are fully depreciated over the shorter of the lease terms and their economic useful lives.

Lease arrangements that do not meet the above criteria are accounted for as operating leases for which payments are charged as an expense on the straight-line basis over the lease year.

o. ***Taxation***

Income tax expense

The tax expense comprises current and deferred tax. Tax is recognized in profit or loss, except to the extent that it relates to items recognized in other comprehensive income or directly in equity. In this case, the tax is also recognized in other comprehensive income or directly in equity, respectively.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

o. **Perpajakan** (Lanjutan)

Beban pajak penghasilan (Lanjutan)

i. **Pajak kini**

Beban pajak penghasilan kini dihitung dengan dasar hukum pajak yang berlaku pada tanggal pelaporan. Aset atau liabilitas pajak penghasilan kini terdiri dari kewajiban kepada atau klaim dari otoritas pajak yang berhubungan dengan tahun pelaporan kini atau sebelumnya, yang belum dibayar pada akhir tahun tanggal pelaporan. Pajak penghasilan diperhitungkan berdasarkan tarif pajak dan hukum pajak yang berlaku pada tahun fiskal tersebut. Pada 31 Maret 2020, Pemerintah Indonesia menerbitkan Peraturan Pemerintah Pengganti Undang-Undang No. 1 Tahun 2020 (Perppu No.1/2020) tentang Kebijakan Keuangan Negara dan Stabilitas Sistem Keuangan Untuk Penanganan Pandemi Corona Virus Disease 2019 (COVID-19) Dan/Atau Dalam Rangka Menghadapi Ancaman Yang Membahayakan Perekonomian Nasional Dan/Atau Stabilitas Sistem Keuangan. Perppu ini mengatur penyesuaian tarif Pajak Penghasilan Wajib Pajak badan dalam negeri dan bentuk usaha tetap menjadi 22% yang berlaku pada Tahun Pajak 2020 dan Tahun Pajak 2021 serta tarif 20% yang berlaku pada Tahun Pajak 2022. Seluruh perubahan pada aset atau liabilitas pajak kini diakui sebagai komponen biaya pajak penghasilan dalam laporan laba rugi.

ii. **Pajak tangguhan**

Aset dan liabilitas pajak tangguhan diakui ketika jumlah tercatat dari aset atau liabilitas dalam laporan posisi keuangan konsolidasian berbeda dari dasar perpajakannya, kecuali jika perbedaan itu terjadi karena:

- Pengakuan awal *goodwill*
- Pengakuan awal aset atau liabilitas pada saat transaksi yang bukan merupakan kombinasi bisnis dan pada saat transaksi terjadi tidak mempengaruhi akuntansi atau laba kena pajak, dan
- Investasi pada entitas anak dan pengendalian bersama entitas dimana Perusahaan dan entitas anak mampu mengendalikan waktu pembalikan perbedaan dan kemungkinan besar bahwa perbedaan tersebut tidak akan dibalik pada masa yang akan datang.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

o. ***Taxation*** *(Continued)*

Income tax expense *(Continued)*

i. ***Current tax***

The current Income tax charge is calculated on the basis of the tax laws enacted or substantively enacted at the reporting date. Current income tax assets and/or liabilities comprise those obligations to, or claims from, tax authorities relating to the current or prior reporting year, that are unpaid at the end of each reporting year date. They are calculated according to the tax rates and tax laws applicable to the fiscal years to which they relate, based on the taxable profit for the year. On 31 March 2020, the Government of Indonesia issued Government Regulation in Lieu of Law No. 1 Year 2020 (Perppu No.1/2020) on State Financial Policy and Stability of Financial Systems for the Management of Corona Virus Disease 2019 (Covid-19) and/or Encounter the Threat to National Economy and/or Stability of Financial Systems. Perppu No.1/2020 regulates the adjustment of tax rates for Income Tax of domestic corporate and permanent establishment in the form of a rates reduction to 22% applicable for Fiscal Year 2020 and Fiscal Year 2021 and 20% applicable for Fiscal Year 2022. All changes to current tax assets or liabilities are recognized as a component of income tax expense in profit or loss.

ii. ***Deferred tax***

Deferred tax assets and liabilities are recognised where the carrying amount of an asset or liability in the consolidated statement of financial position differs from its tax base, except for differences arising on:

- *The initial recognition of goodwill*
- *The initial recognition of an asset or liability in a transaction which is not a business combination and at the time of the transaction affects neither accounting or taxable profit, and*

- *Investments in subsidiaries and jointly controlled entities where the Company and subsidiaries is able to control the timing of the reversal of the difference and it is probable that the difference will not reverse in the foreseeable future.*

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

o. **Perpajakan** (Lanjutan)

Beban pajak penghasilan (Lanjutan)

ii. **Pajak tangguhan (**Lanjutan)

Pengakuan dari aset pajak tangguhan terbatas pada saat dimana terdapat kemungkinan besar bahwa laba kena pajak akan tersedia terhadap perbedaan yang dapat digunakan.

Jumlah aset atau liabilitas ditentukan dengan menggunakan tarif pajak pada saat tanggal pelaporan dan di harapkan akan digunakan ketika liabilitas pajak tangguhan/(aset) telah diselesaikan/(dipulihkan).

Aset dan liabilitas pajak tangguhan di saling hapus ketika Perusahaan dan entitas anak memiliki hak hukum untuk saling hapus aset dan liabilitas pajak kini yang berhubungan dengan pungutan oleh otoritas pajak yang sama atas:

- Perusahaan dan entitas anak yang dikenakan pajak adalah sama, atau
- Kelompok entitas yang berbeda yang bertujuan untuk menyelesaikan aset pajak kini secara neto atau untuk merealisasikan aset dan menyelesaikan liabilitas, pada tahun masa depan dimana jumlah aset atau liabilitas pajak tangguhan signifikan diharapkan untuk di selesaikan atau di pulihkan.

iii. **Pajak penghasilan final**

Pada 6 September 2017, Pemerintah Indonesia menerbitkan Peraturan Pemerintah (PP) No. 34 (PP34) tentang Pajak Penghasilan atas Penghasilan dari Persewaan Tanah dan/atau Bangunan. Menurut PP34 ini, untuk sewa menara telekomunikasi yang tahun sewanya dimulai sejak berlakunya PP34 ini pada 2 Januari 2018, maka penghasilan atas sewa menara telekomunikasi tersebut akan dikenakan pajak penghasilan dengan tarif final 10%. Sedangkan penghasilan atas sewa menara telekomunikasi yang tahun sewanya dimulai sebelum berlakunya PP34 tersebut, tetap dikenakan pajak penghasilan dengan tarif non-final.

Pajak Pertambahan Nilai

Pendapatan, beban dan aset diakui bersih dari jumlah PPN, kecuali apabila PPN timbul pada saat pembelian aset atau jasa yang tidak dapat dipulihkan dari otoritas perpajakan, dalam hal ini PPN diakui sebagai bagian dari biaya perolehan aset atau sebagai bagian dari pos biaya, sebagaimana yang berlaku.

2. *SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)*

o. ***Taxation** (Continued)*

***Income tax expense** (Continued)*

ii. ***Deferred tax** (Continued)*

Recognition of deferred tax assets is restricted to those instances where it is probable that taxable profit will be available against which the difference can be utilised.

The amount of the asset or liability is determined using tax rates that have been enacted or substantively enacted by the reporting date and are expected to apply when the deferred tax liabilities/(assets) are settled/(recovered).

Deferred tax assets and liabilities are offset when the Company and subsidiaries has a legally enforceable right to offset current tax assets and liabilities and the deferred tax assets and liabilities relate to taxes levied by the same tax authority on either:

- *The same taxable of the Company and subsidiaries, or*
- *Different Company and subsidiaries entities which intend either to settle current tax assets and liabilities on a net basis, or to realise the assets and settle the liabilities simultaneously, in each future year in which significant amounts of deferred tax assets or liabilities are expected to be settled or recovered.*

iii. ***Final tax income***

On 6 September 2017, the Government of Indonesia issued the Government Regulation (GR) No. 34 (GR34) regarding Income Tax on Income from Land and/or Building Rental. According to the GR34, for lease of telecommunication towers whose lease year commences from the inception of this PP34 on 2 January 2018, the rental telecommunication tower's income shall be subject to the final income tax at rate of 10%. While the rental telecommunication tower income, which is the rental year commencing prior to the enactment of GR34, remains subject to the non final income tax, which is the rental year commencing prior to the enactment of GR34, remains subject to the non final income tax.

Value-Added Tax

Revenue, expenses and assets are recognized net of the amount of VAT, except where the VAT incurred on a purchase of assets or services are not recoverable from the taxation authority, in which case the VAT is recognized as part of the cost of acquisition of the asset or as part of the expense item as applicable.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

o. **Perpajakan** (Lanjutan)

Hal-hal perpajakan lainnya

Penyesuaian atas liabilitas pajak dicatat pada saat Surat Ketetapan Pajak diterima atau pada saat keberatan yang diajukan ditetapkan.

p. **Cadangan imbalan pasca-kerja**

Program manfaat pasti

Perusahaan dan entitas anak mendanai program imbalan pasca-kerja sesuai dengan Undang-Undang No. 11/2020 tentang Cipta Kerja.

Liabilitas atau aset imbalan kerja bersih adalah agregat dari nilai kini liabilitas imbalan pasti pada akhir tahun pelaporan dikurangi dengan nilai wajar aset program (jika ada), disesuaikan dengan dampak yang membatasi aset imbalan pasti bersih terhadap batas atas aset. Batas atas aset adalah nilai sekarang dari manfaat ekonomis yang tersedia dalam bentuk pengembalian dana dari program atau pengurangan iuran masa mendatang tersebut.

Beban tersebut berdasarkan perhitungan aktuaria independen dengan menggunakan metode *"Projected Unit Credit"*.

Biaya imbalan pasti terdiri dari:
- Biaya jasa
- Bunga neto atas liabilitas atau aset imbalan pasti neto
- Pengukuran kembali liabilitas atau aset imbalan pasti neto

Biaya jasa meliputi biaya jasa kini, biaya jasa lalu dan keuntungan atau kerugian dari dan pembayaran yang tidak rutin diakui sebagai beban dalam laba rugi. Biaya jasa lalu diakui pada tanggal yang lebih awal antara ketika amendemen atau kurtailmen program terjadi, dan ketika Perusahaan dan entitas anak mengakui biaya restrukturisasi terkait atau biaya pesangon.

Bunga bersih atas liabilitas atau aset imbalan pasti adalah perubahan selama tahun berjalan pada bunga bersih atas liabilitas atau aset imbalan pasti yang muncul dari waktu ke waktu yang ditentukan dengan mengalikan tingkat diskonto berdasarkan obligasi pemerintah dengan liabilitas atau aset imbalan pasti bersih. Bunga bersih atas liabilitas atau aset imbalan pasti diakui sebagai beban atau pendapatan dalam laba rugi.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

o. ***Taxation*** *(Continued)*

Other taxation matters

Amendments to taxation obligations are recorded when a Tax Assessment Letter is received or, if appealed against, when the results of the appeal are determined.

p. ***Provision for post-employment benefits***

Defined benefit plan

The Company and subsidiaries set up fund for post-employment benefit program in accordance with Labor Law No. 11/2020.

The net pension liability or asset is the aggregate of the present value of the defined benefit obligation at the end of the reporting year reduced by the fair value of plan assets (if any), adjusted for any effect of limiting a net defined benefit asset to the asset ceiling. The asset ceiling is the present value of any economic benefits available in the form of refunds from the plan or reductions in future contributions to the plan.

The provision is estimated based on actuarial calculations prepared by an independent firm of actuaries using the "Projected Unit of Credit" method.

Net pension cost comprises the following:
- *Service cost*
- *Net interest on the net defined benefit liability or asset*
- *Remeasurements of net defined benefit liability or asset*

Service costs which include current service costs, past service costs and gains or losses on nonroutine settlements are recognized as expense in profit or loss. Past service costs are recognized at the earlier of the date when the plan amendment or cuartailment occurs and when the Company and subsidiaries recognises related restructuring cost or termination benefits.

Net interest on the net defined benefit liability or asset is the change during the year in the net defined benefit liability or asset that arises from the passage of time which is determined by applying the discount rate based on government bonds to the net defined benefit liability or asset. Net interest on the net defined benefit liability or asset is recognized as expense or income in profit or loss.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

p. **Cadangan imbalan pasca-kerja** (Lanjutan)

Pengukuran kembali terdiri dari keuntungan dan kerugian aktuaria, imbal hasil aset program dan setiap perubahan dampak batas atas aset, tidak termasuk jumlah yang dimasukan dalam bunga neto atas liabilitas atau aset imbalan pasti. Pengukuran kembali atas liabilitas (aset) imbalan pasti neto diakui dalam penghasilan komprehensif lain pada tahun terjadinya. Pengukuran kembali tidak direklasifikasi ke laba rugi pada tahun berikutnya.

Imbalan jangka panjang lainnya

Perusahaan dan entitas anak juga memberikan manfaat penghargaan jangka panjang lainnya dalam bentuk cuti panjang dan tunjangan cuti panjang.

Beban tersebut berdasarkan perhitungan aktuaria independen dengan menggunakan metode *"Projected-Unit-Credit"*. Beban jasa masa kini termasuk beban jasa lalu dan keuntungan atau kerugian aktuarial dibebankan langsung ke laporan laba rugi tahun berjalan.

q. **Modal saham**

Modal saham diukur pada nilai nominal untuk seluruh saham yang ditempatkan. Pada saat Perusahaan menempatkan lebih dari satu jenis saham, akun terpisah dikelola untuk tiap jenis saham dan jumlah saham yang ditempatkan.

r. **Transaksi restrukturisasi entitas sepengendali**

Transaksi restrukturisasi entitas sepengendali berupa pengalihan aset, liabilitas, saham atau instrumen kepemilikan lainnya yang dilakukan dalam rangka reorganisasi entitas-entitas yang berada dalam suatu Perusahaan dan entitas anak yang sama, bukan merupakan perubahan pemilikan dalam arti substansi ekonomi, sehingga transaksi demikian tidak dapat menimbulkan laba atau rugi bagi seluruh kelompok perusahaan ataupun bagi entitas individual dalam kelompok perusahaan tersebut.

Karena transaksi restrukturisasi antara entitas sepengendali tidak mengakibatkan perubahan substansi ekonomi pemilikan atas aset, liabilitas, saham, atau instrumen kepemilikan lainnya yang dipertukarkan, maka aset maupun liabilitas yang pemilikannya dialihkan (dalam bentuk hukumnya) harus dicatat sesuai dengan nilai tercatat seperti penggabungan usaha berdasarkan metode penyatuan kepemilikan *(pooling-of-interest)*.

Unsur-unsur laporan keuangan dari perusahaan yang direstrukturisasi untuk tahun terjadinya restrukturisasi tersebut dan untuk tahun perbandingan yang disajikan, harus disajikan sedemikian rupa seolah-olah Perusahaan tersebut telah bergabung sejak permulaan tahun yang disajikan tersebut.

2. *SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)*

*p. **Provision for post-employment benefits** (Continued)*

Remeasurements comprising actuarial gains and losses, return on plan assets and any change in the effect of the asset ceiling excluding net interest on defined benefit liability are recognized in other comprehensive income in the year in which they arise. Remeasurements are not reclassified to profit or loss in subsequent years.

Other long-term benefits

The Company and subsidiaries also provide other long-term rewards in the form of long leave and long leave allowances.

The provision is estimated based on actuarial calculations prepared by an independent firm of actuaries using the "Projected Unit of Credit" method. Current service costs including past service cost and actuarial gain or loss are charged directly to statement of profit or loss of the current year.

*q. **Share capital***

Share capital is measured at par value for all shares issued. When the Company issues more than one class of shares, a separate account is maintained for each class of shares and the number of shares issued.

*r. **Restructuring transactions of entities under common control***

Restructuring transactions of entities under common control represent transfer of assets, liabilities, shares or other ownership instruments to reorganize entities within the same Company and subsidiaries, therefore resulting in no changes of ownership in terms of economic substance, and should not result in any gains or losses for the whole Company and subsidiaries companies or for the individual entity in the Company and subsidiaries.

Since restructuring transactions of entities under common control do not result in changes in economic substance of ownership in transferred assets, shares, liabilities or other ownership instruments, the transferred assets or liabilities (in legal form) should be recorded at book value in a manner similar to business combination transactions using the pooling-of-interest method.

The financial statements items of the restructured companies for the year in which the restructuring occurs and for any comparative years should be presented as if the Companies had been combined from the beginning of the earliest year presented.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

r. **Transaksi restrukturisasi entitas sepengendali** (Lanjutan)

Sebelum 1 Januari 2013, selisih antara harga pengalihan dengan nilai tercatat setiap transaksi restrukturisasi antara entitas sepengendali dibukukan dalam akun "Selisih nilai transaksi restrukturisasi entitas sepengendali". Saldo akun tersebut selanjutnya disajikan sebagai unsur ekuitas.

Efektif 1 Januari 2013, selisih antara harga pengalihan dengan nilai tercatat setiap transaksi restrukturisasi antara entitas sepengendali dibukukan dalam akun "Tambahan modal disetor".

s. **Tambahan modal disetor - bersih**

Tambahan modal disetor – bersih merupakan selisih antara harga penawaran dari hasil penawaran umum perdana saham Perusahaan dengan nilai nominal saham, setelah dikurangi dengan biaya-biaya yang terjadi sehubungan dengan penawaran umum perdana saham tersebut.

t. **Saham treasuri**

Ketika Perusahaan membeli modal saham ekuitas (saham treasuri), imbalan yang dibayar, termasuk biaya tambahan yang secara langsung dapat diatribusikan (dikurangi pajak penghasilan) dikurangkan dari ekuitas yang diatribusikan kepada pemilik ekuitas sampai saham tersebut ditarik atau diterbitkan kembali. Apabila saham treasuri ditarik kembali, selisih antara harga perolehan dengan nilai nominal dialokasikan antara tambahan modal disetor dan saldo laba.

u. **Dividen**

Dividen diakui pada saat dividen secara legal menjadi terutang. Dalam dividen terhadap pemegang saham ekuitas, dividen menjadi terutang pada saat diumumkan oleh Direksi. Dalam dividen final, dividen menjadi terutang pada saat dividen diumumkan oleh para pemegang saham pada saat Rapat Umum Pemegang Saham.

v. **Pengakuan pendapatan dan beban**

Pendapatan diakui ketika kemungkinan besar manfaat ekonomi masa depan akan mengalir ke Perusahaan dan entitas anak dan manfaat ini dapat diukur secara handal. Pendapatan diukur dengan nilai wajar imbalan yang diterima, dikurangi diskon dan Pajak Pertambahan Nilai (PPN).

Pendapatan sewa menara diakui selama masa sewa. Pendapatan sewa menara diterima di muka disajikan sebagai akun "Pendapatan yang diterima di muka". Pendapatan sewa menara yang belum ditagih disajikan sebagai akun "Pendapatan yang masih harus diterima" di laporan posisi keuangan konsolidasian. Beban diakui berdasarkan metode akrual *(accrual method)*.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

r. ***Restructuring transactions of entities under common control*** *(Continued)*

Before 1 January 2013, the difference between transfer price and book value for each restructuring transaction of entities under common control is recorded in an account entitled "Differences arising from restructuring transactions of entities under common control". The account balance is presented as a component of the equity.

Effective 1 January 2013, the difference between transfer price and book value for each restructuring transaction of entities under common control is recorded in an account entitled "Additional paid-in capital".

s. ***Additional paid-in capital - net***

Additional paid-in capital – net represents the difference between the offering price of the shares of the Company at the initial public offering with the par value of such shares, net of shares issuance costs.

t. ***Treasury stocks***

Where the Company purchases its share capital (treasury shares), the consideration paid, including any directly attributable incremental costs (net of income taxes) is deducted from equity attributable to the equity holders until the shares are retired or reissued. When the treasury stock is retired, the excess of acquisition cost over par value shall be allocated between the related additional paid-in capital and retained earnings.

u. ***Dividends***

Dividends are recognised when they become legally payable. In the case of dividends to equity shareholders, this is when declared by the directors. In the case of final dividends, this is when approved by the shareholders at the General Meeting of Shareholders.

v. ***Revenue and expenses recognition***

Revenue is recognized when it is likely that future economic benefits will flow to the Company and subsidiaries and these benefits can be measured reliably. Revenue is measured at the fair value of the consideration received, net of discounts and Value Added Tax (VAT).

Tower rental revenue is recognized over the lease year. Tower rental revenue received in advance is presented as "Unearned income". Tower rental revenue that has not been billed yet is presented as "Accrued revenue" in the consolidated statements of financial position. Expenses are recognized based on accrual method.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

w. **Laba (rugi) per saham dasar yang dapat diatribusikan kepada pemegang saham biasa entitas induk**

Laba (rugi) per saham dasar dihitung dengan membagi laba (rugi) bersih pada tahun berjalan yang dapat diatribusikan kepada pemegang saham biasa Perusahaan dengan jumlah rata-rata tertimbang saham beredar dalam tahun berjalan dan telah dikurangi dengan saham treasuri.

Jika jumlah saham biasa atau instrument berpotensi saham biasa yang beredar meningkat sebagai akibat dari kapitalisasi, penerbitan saham bonus atau pemecahan saham, atau menurun sebagai akibat dari penggabungan saham, maka penghitungan laba per saham dasar dan dilusian untuk seluruh periode yang disajikan disesuaikan secara restrospektif.

Pendapatan, beban, aset, hasil, dan liabilitas segmen mencakup unsur-unsur yang dapat diatribusikan secara langsung pada segmen yang dapat dialokasikan menurut dasar yang memadai kepada segmen. Unsur-unsur tersebut ditetapkan sebelum saldo dan transaksi Perusahaan dieliminasi sebagai bagian dari proses konsolidasi.

x. **Provisi dan kontinjensi**

Provisi diakui ketika Perusahaan dan entitas anak memiliki kewajiban (legal maupun konstruktif) sebagai hasil peristiwa lalu; yaitu kemungkinan besar arus keluar sumber daya ekonomi diperlukan untuk menyelesaikan kewajiban dan suatu estimasi terhadap jumlah dapat dilakukan. Apabila dampak nilai waktu uang adalah material, maka provisi didiskontokan dengan menggunakan tarif sebelum pajak, untuk mencerminkan risiko spesifik liabilitas. Ketika pendiskontoan digunakan, kenaikan provisi terkait dengan berlalunya waktu diakui sebagai beban keuangan.

Kewajiban kontinjensi tidak diakui dalam Laporan keuangan konsolidasian. Kewajiban tersebut telah diungkapkan dalam catatan atas laporan keuangan konsolidasian kecuali kemungkinan arus keluar sumber daya ekonomi sangat kecil.

Aset kontinjensi tidak diakui dalam Laporan keuangan konsolidasian tetapi diungkapkan dalam catatan atas Laporan keuangan konsolidasian ketika arus masuk manfaat ekonomi cukup besar.

2. *SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)*

*w. **Basic earnings (loss) per share attributable to the common equity holders of the parent company***

Basic earnings (loss) per share are calculated by dividing net profit (loss) for the current year attributable to the common equity holders of the Company by the weighted average number of outstanding shares during the current year and has been reduced by treasury stock.

If the number of ordinary shares or potential ordinary shares outstanding increases as a result of capitalization, issuance of bonus shares or stock splits, or decreases as a result of a merger of shares, the calculation of basic and diluted earnings per share for all periods presented is adjusted retrospectively.

Segment revenue, expenses, assets, results and liabilities include items directly attributable to a segment as well as those that can be allocated on a reasonable basis to that segment. They are determined before the intra-Group's balances and the Group's transactions are eliminated as part of the consolidation process.

*x. **Provision and contingencies***

Provisions are recognized when the Company and subsidiaries has a present obligation (legal or constructive) as a result of past event; it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate can be made of the amount of the obligation. If the effect of the time value of money is material, provisions are determined by discounting the expected future cash flows at a pre-tax rate, that reflects current market assessment of the time value of money and where appropriate, the risks specific to the liability. Where disounting is used, the increased due to the passage of time is recognized as interest expense.

Contingent liabilities are not recognized in the consolidated financial statements. They are disclosed in the notes to consolidated financial statements unless the possibility of an outflow of resources embodying economic benefits is remote.

Contingent assets are not recognized in the consolidated financial statements but are disclosed in the notes to consolidated financial statements when an inflow of economic benefits is probable.

2. **RINGKASAN KEBIJAKAN AKUNTANSI SIGNIFIKAN** (Lanjutan)

y. **Peristiwa setelah periode pelaporan**

Peristiwa setelah periode pelaporan yang memberikan bukti kondisi yang ada pada akhir periode pelaporan *(adjusting events)* tercermin dalam Laporan keuangan konsolidasian. Peristiwa setelah periode pelaporan yang tidak berdampak pada laporan keuangan diungkapkan dalam catatan atas Laporan keuangan konsolidasian apabila jumlahnya material.

2. ***SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES*** *(Continued)*

y. ***Events after the reporting period***

Events after the reporting period that provide evidence of conditions that existed at the end of the reporting period (adjusting events) are reflected in the consolidated financial statements. Events after the reporting period that are not adjusting events are disclosed in the notes to consolidated financial statements when material.

3. **PERTIMBANGAN, ESTIMASI DAN ASUMSI AKUNTANSI SIGNIFIKAN**

Penyusunan Laporan keuangan konsolidasian Perusahaan dan entitas anak mengharuskan manajemen untuk membuat pertimbangan, estimasi dan asumsi yang mempengaruhi jumlah yang dilaporkan dari pendapatan, beban, aset dan liabilitas, dan pengungkapan atas liabilitas kontijensi, pada akhir tahun pelaporan. Ketidakpastian mengenai asumsi dan estimasi tersebut dapat mengakibatkan penyesuaian material terhadap nilai tercatat aset dan liabilitas dalam tahun pelaporan berikutnya.

Pertimbangan

Klasifikasi Aset dan Liabilitas Keuangan

Perusahaan dan entitas anak menetapkan klasifikasi atas aset dan liabilitas tertentu sebagai aset keuangan dan liabilitas keuangan dengan pertimbangan bila definisi yang ditetapkan PSAK 71 terpenuhi. Dengan demikian, aset keuangan dan liabilitas keuangan diakui sesuai dengan kebijakan akuntansi Perusahaan dan entitas anak seperti yang dijelaskan pada Catatan 2f.

Estimasi dan Asumsi

Penyisihan Kerugian Kredit Ekspektasian

Perusahaan dan entitas anak mengevaluasi akun tertentu jika terdapat informasi bahwa pelanggan yang bersangkutan tidak dapat memenuhi liabilitas keuangannya.

Dalam hal tersebut, Perusahaan dan entitas anak mempertimbangkan, berdasarkan fakta dan situasi yang tersedia, termasuk namun tidak terbatas pada, jangka waktu hubungan dengan pelanggan dan status kredit dari pelanggan berdasarkan catatan kredit dari pihak ketiga dan faktor pasar yang telah diketahui, untuk mencatat provisi spesifik atas jumlah piutang pelanggan guna mengurangi jumlah piutang yang diharapkan dapat diterima oleh Perusahaan dan entitas anak. Provisi spesifik ini dievaluasi kembali dan disesuaikan jika tambahan informasi yang diterima mempengaruhi jumlah penyisihan untuk piutang usaha.

3. ***SIGNIFICANT ACCOUNTING JUDGMENTS, ESTIMATES AND ASSUMPTIONS***

The preparation of consolidated financial statements of the Company and subsidiaries requires management to make judgments, estimates and assumptions that affect the reported amounts of revenues, expenses, assets and liabilities, and the disclosure of contingent liabilities at the end of the reporting year. Uncertainty about these assumptions and estimates could result in outcomes that require a material adjustment to the carrying amount of the asset and liability affected in future years.

Judgments

Classification of Financial assets and Financial Liabilities

The Company and subsidiaries determine the classifications of certain assets and liabilities as financial assets and financial liabilities by judging if they meet the definitions set forth in PSAK 71. Accordingly, the financial assets and financial liabilities are accounted for in accordance with the Company and subsidiaries accounting policies described in Note 2f.

Estimates and Assumptions

Allowance for Expected Credit Losses

The Company and subsidiaries evaluate specific accounts where they have information that certain customers are unable to meet their financial obligations.

In these cases, the Company and subsidiaries use judgment, based on the best available facts and circumstances, including but not limited to, the length of their relationship with the customer and the customer's current credit status based on third party credit reports and known market factors, to record specific provisions for customers against amounts due to reduce the receivable amounts that the Company and subsidiaries expect to collect. These specific provisions are re-evaluated and adjusted as additional information received affects the amounts of allowance for impairment of trade receivables.

3. **PERTIMBANGAN, ESTIMASI DAN ASUMSI AKUNTANSI SIGNIFIKAN (**Lanjutan)

Estimasi dan Asumsi (Lanjutan)

Penyusutan Aset Tetap

Biaya perolehan aset tetap disusutkan dengan menggunakan metode garis lurus berdasarkan taksiran masa manfaat ekonomisnya. Manajemen mengestimasi masa manfaat ekonomis aset tetap antara 4-30 tahun. Ini adalah umur yang secara umum diharapkan dalam industri di mana Perusahaan dan entitas anak menjalankan bisnisnya. Perubahan tingkat pemakaian dan perkembangan teknologi dapat mempengaruhi masa manfaat ekonomis dan nilai sisa aset, dan karenanya beban penyusutan masa depan mungkin direvisi.

Penurunan Nilai *Goodwill*

Perusahaan dan entitas anak disyaratkan untuk melakukan pengujian, secara tahunan, apakah nilai *goodwill* telah mengalami penurunan nilai. Jumlah terpulihkan ditentukan berdasarkan pada perhitungan nilai yang dapat digunakan. Penggunaan metode ini mensyaratkan estimasi atas arus kas masa depan dan penentuan tingkat diskonto untuk menghitung nilai kini arus kas. Informasi lebih lanjut temasuk nilai tercatat terdapat dalam Catatan 35.

Imbalan Pasca-Kerja

Biaya, aset dan liabilitas skema imbalan pasti yang dilakukan oleh Perusahaan dan entitas anak ditentukan dengan menggunakan metode yang bergantung pada estimasi dan asumsi aktuarial. Rincian dari asumsi utama terdapat dalam Catatan 34. Perusahaan dan entitas anak menjalankan masukan dari aktuaris independen terkait dengan kesesuaian asumsi. Perubahan pada asumsi yang digunakan mungkin memiliki efek yang signifikan pada laporan laba rugi dan penghasilan komprehensif lain konsolidasian dan laporan posisi keuangan konsolidasian.

Pajak Penghasilan

Pertimbangan signifikan dilakukan dalam menentukan provisi atas pajak penghasilan badan. Terdapat transaksi dan perhitungan tertentu yang penentuan pajak akhirnya adalah tidak pasti dalam kegiatan usaha normal. Perusahaan dan entitas anak mengakui liabilitas atas pajak penghasilan badan berdasarkan estimasi apakah akan terdapat tambahan pajak penghasilan badan.

*3. **SIGNIFICANT ACCOUNTING JUDGMENTS, ESTIMATES AND ASSUMPTIONS** (Continued)*

***Estimates and Assumptions** (Continued)*

Depreciation of Property and Equipment

The costs of property and equipment are depreciated on a straight-line method over their estimated useful lives. Management estimates the useful lives of these property and equipment to be within 4-30 years. These are common life expectancies applied in the industries where the Company and subsidiaries conduct their businesses. Changes in the expected level of usage and technological development could impact the economic useful lives and the residual values of these assets, and therefore future depreciation charges could be revised.

Impairment of Goodwill

The Company and subsidiaries is required to test, on an annual basis, whether goodwill has suffered any impairment. The recoverable amount is determined based on value in use calculations. The use of this method requires the estimation of future cash flows and the determination of a discount rate in order to calculate the present value of the cash flows. More information including carrying values is included in Note 35.

Post-Employment Benefits

The costs, assets and liabilities of the defined benefit schemes operating by the Company and subsidiaries are determined using methods relying on actuarial estimates and assumptions. Details of the key assumptions are set out in Note 34. The Company and subsidiaries takes advice from independent actuaries relating to the appropriateness of the assumptions. Changes in the assumptions used may have a significant effect on the consolidated statement of profit or loss and other comprehensive income and the consolidated statement of financial position.

Income Taxes

Significant judgment is involved in determining the provision for corporate income tax. There are certain transactions and computation for which the ultimate tax determination is uncertain during the ordinary course of business. The Company and subsidiaries recognizes liabilities for expected corporate income tax issues based on estimates of whether additional corporate income tax will be due.

3. **PERTIMBANGAN, ESTIMASI DAN ASUMSI AKUNTANSI SIGNIFIKAN (**Lanjutan)

Estimasi dan Asumsi (Lanjutan)

Proses hukum

Perusahaan dan entitas anak meninjau perkembangan kasus hukum yang masih berjalan dalam proses hukum dan pada setiap tanggal pelaporan, guna untuk menilai kebutuhan provisi dan pengungkapan dalam laporan keuangannya. Di antara faktor-faktor yang dipertimbangkan dalam membuat keputusan provisi litigasi adalah sifat litigasi, klaim atau penilaian, proses hukum dan tingkat potensi kerusakan dijurisdiksi di mana litigasi, klaim atau penilaian tersebut berada, perkembangan dari kasus (termasuk perkembangan setelah tanggal pelaporan keuangan namun sebelum laporan tersebut dikeluarkan), pendapat atau pandangan penasihat hukum, pengalaman dalam kasus serupa dan keputusan dari manajemen Perusahaan dan entitas anak tentang bagaimana Perusahaan dan entitas anak akan merespon terhadap litigasi, klaim atau penilaian.

Pengukuran nilai wajar

Sehubungan dengan penerapan PSAK 16 (Revisi 2014) "Aset Tetap" dan PSAK 13 (Revisi 2014) "Properti Investasi", Perusahaan dan entitas anak telah memilih model revaluasi dan nilai wajar untuk pengukuran setelah pengakuan awal menara telekomunikasi, tanah dan bangunan. Hirarki nilai wajar aset tetap pada akhir tahun pelaporan merupakan kategori dalam level 3 pengukuran berulang nilai wajar. Untuk menentukan nilai wajar, penilai independen menggunakan kombinasi dua pendekatan sebagai metode penilaian: pendekatan pendapatan, yang mendiskontokan arus kas masa depan, dan pendekatan biaya, yang didasarkan pada biaya penggantian saat ini. Untuk penjelasan lebih detail lihat Catatan 11 dan 12 atas laporan keuangan konsolidasian.

*3. **SIGNIFICANT ACCOUNTING JUDGMENTS, ESTIMATES AND ASSUMPTIONS** (Continued)*

***Estimates and Assumptions** (Continued)*

Legal proceeding

The Company and subsidiaries reviews outstanding legal cases following developments in the legal proceedings and at each reporting date, in order to assess the need for provisions and disclosures in its financial statements. Among the factors considered in making decisions on provisions are the nature of litigation, claim or assessment, the legal process and potential level of damages in the jurisdiction in which the litigation, claim or assessment has been brought, the progress of the case (including the progress after the date of the financial statements but before those statements are issued), the opinions or views of legal advisers, experience on similar cases and any decision of the management of the Company and subsidiaries as to how it will respond to the litigation, claim or assessment.

Fair value measurement

Regarding the implementation of PSAK No. 16 (Revised 2014) "Property and Equipment" and PSAK 13 (revised 2014) "Investment Property", the Company and subsidairies has chosen the revaluation model for the measurement after initial recognition of telecommunication towers, land and building. The fair value hierarchy of property and equipment at the end of reporting year is categorised as a level 3 recurring fair value measurement. To determine the fair value, the independent appraiser utilizes a combination of two approaches as the appraisal method: the income approach, which discounts future cash flows, and the cost approach, which is based on current replacement cost. For more details, see Notes 11 and 12 to our consolidated financial statements.

4. KAS DAN SETARA KAS / *4. CASH AND CASH EQUIVALENTS*

	30 Juni/ *30 June* 2021	31 Desember/ *31 December* 2020	
Kas	656	656	***Cash on hand***
Bank			***Cash in banks***
Rupiah			***Rupiah***
PT Bank UOB Indonesia	294.117	560.223	*PT Bank UOB Indonesia*
PT Bank Central Asia Tbk	8.785	115	*PT Bank Central Asia Tbk*
PT Bank DBS Indonesia	2.928	2.795	*PT Bank DBS Indonesia*
PT Bank Mandiri (Persero) Tbk	1.631	2.382	*PT Bank Mandiri (Persero) Tbk*
PT Bank QNB Indonesia Tbk	1.631	1.377	*PT Bank QNB Indonesia Tbk*
PT Bank Permata Tbk	896	30	*PT Bank Permata Tbk*
PT Bank Danamon Indonesia Tbk	338	8	*PT Bank Danamon Indonesia Tbk*
PT Bank BNP Paribas Indonesia	60	5.041	*PT Bank BNP Paribas Indonesia*
PT Bank ANZ Indonesia	53	1	*PT Bank ANZ Indonesia*
PT Bank CIMB Niaga Tbk	52	1	*PT Bank CIMB Niaga Tbk*
PT Bank OCBC NISP Tbk	14	3	*PT Bank OCBC NISP Tbk*
The Hongkong and Shanghai Banking Corporation Ltd	8	4	*The Hongkong and Shanghai Banking Corporation Ltd*
PT Bank Negara Indonesia (Persero) Tbk	6	4	*PT Bank Negara Indonesia (Persero) Tbk*
MUFG Bank Ltd	2	2	*MUFG Bank Ltd*
	310.521	571.986	
Dolar AS			***US Dollar***
PT Bank UOB Indonesia	505.375	316.043	*PT Bank UOB Indonesia*
PT Bank OCBC NISP Tbk	2.310	10	*PT Bank OCBC NISP Tbk*
PT Bank Permata Tbk	2.103	738	*PT Bank Permata Tbk*
PT Bank Danamon Indonesia Tbk	2.070	77	*PT Bank Danamon Indonesia Tbk*
PT Bank Central Asia Tbk	1.234	32	*PT Bank Central Asia Tbk*
PT Bank BNP Paribas Indonesia	1.170	4	*PT Bank BNP Paribas Indonesia*
PT Bank Mandiri (Persero) Tbk	1.115	1.037	*PT Bank Mandiri (Persero) Tbk*
PT Bank QNB Indonesia Tbk	611	3	*PT Bank QNB Indonesia Tbk*
JP Morgan	392	388	*JP Morgan*
The Hongkong and Shanghai Banking Corporation Ltd	44	32	*The Hongkong and Shanghai Banking Corporation Ltd*
PT Bank ANZ Indonesia	35	37	*PT Bank ANZ Indonesia*
PT Bank Mega Tbk	34	24	*PT Bank Mega Tbk*
MUFG Bank Ltd	24	26	*MUFG Bank Ltd*
PT Bank CIMB Niaga Tbk	19	19	*PT Bank CIMB Niaga Tbk*
PT Bank DBS Indonesia	18	21	*PT Bank DBS Indonesia*
	516.554	318.491	
Sub-jumlah bank	827.075	890.477	*Sub-total cash in banks*
Deposito berjangka			***Time deposit***
PT Bank UOB Indonesia	66.716	56.208	*PT Bank UOB Indonesia*
Sub-jumlah Deposito berjangka	66.716	56.208	*Sub-total time deposit*
Jumlah	894.447	947.341	***Total***

Pada tanggal 30 Juni 2021 dan 31 Desember 2020, bunga deposito yang diperoleh berkisar antara 3,20% sampai 5,80% per tahun.

As of 30 June 2021 and 31 December 2020, time deposits earn an annual interest ranging from 3.20% to 5.80% per year.

Seluruh saldo kas dan setara kas adalah kepada pihak ketiga.

All cash and cash equivalents are to third parties.

5. PIUTANG USAHA - PIHAK KETIGA / *5. TRADE RECEIVABLES – THIRD PARTIES*

Rincian piutang usaha berdasarkan mata uang adalah sebagai berikut:

The details of trade receivables per currency are as follows:

	30 Juni/ *30 June* 2021	31 Desember/ *31 December* 2020	
Pihak ketiga			***Third parties***
Rupiah	887.354	555.061	*Rupiah*
Dolar AS	30.489	159.891	*US Dollar*
Jumlah	917.843	714.952	***Total***
Dikurangi:			*Less :*
Penyisihan kerugian kredit ekspektasian	(13.747)	(4.230)	*Allowance for expected credit losses*
Jumlah - bersih	**904.096**	**710.722**	*Total - net*

Rincian piutang usaha berdasarkan jenis pendapatan adalah sebagai berikut:

The details of trade receivables based on type of revenues are as follows:

	30 Juni/ *30 June* 2021	31 Desember/ *31 December* 2020	
Sewa menara			*Telecommunication towers rental*
PT Smart Telecom	275.545	8.814	*PT Smart Telecom*
PT Indosat Tbk	189.066	245.180	*PT Indosat Tbk*
PT XL Axiata Tbk	162.164	74.264	*PT XL Axiata Tbk*
PT Telekomunikasi Selular	150.076	133.988	*PT Telekomunikasi Selular*
PT Smartfren Telecom Tbk	89.572	107.274	*PT Smartfren Telecom Tbk*
PT Hutchison 3 Indonesia	27.877	127.036	*PT Hutchison 3 Indonesia*
Lainnya	21.104	15.983	*Others*
	915.404	712.539	
Sewa bangunan	2.439	2.413	*Building rental*
Jumlah	917.843	714.952	***Total***
Dikurangi:			*Less :*
Penyisihan kerugian kredit ekspektasian	(13.747)	(4.230)	*Allowance for expected credit losses*
Jumlah - bersih	**904.096**	**710.722**	*Total - net*

Perusahaan menerapkan PSAK 71 dengan pendekatan yang disederhanakan untuk mengukur penyisihan kerugian kredit ekspektasian (PKKE) menggunakan PKKE sepanjang umurnya untuk piutang usaha dan aset kontrak. Untuk mengukur PKKE secara kolektif, piutang usaha dan aset kontrak dikelompokkan berdasarkan risiko kredit dan umur yang sama. Aset kontrak memiliki karakteristik risiko yang sama dengan piutang usaha karena jenis kontrak yang sama.

The Company applies the PSAK 71 simplified approach to measuring Allowance for expected credit losses (AECL) using a lifetime AECL for trade receivables and contract assets. To measure AECL on a collective basis, trade receivables and contract assets are grouped based on similar credit risk and aging. The contract assets have similar risk characteristics to the trade receivables as the same types of contracts.

5. **PIUTANG USAHA - PIHAK KETIGA** (Lanjutan)

Berdasarkan basis tersebut, berikut ini penyisihan kerugian ditentukan untuk piutang usaha:

5. ***TRADE RECEIVABLES - THIRD PARTIES (****Continued)*

On that basis, the loss allowance was determined as follows for trade receivables:

30 Juni 2021/*30 June 2021*	Belum jatuh tempo/ *current*	Jatuh tempo/*overdue* 1-30 hari/*days*	31-60 hari/*days*	61-90 hari/*days*	lebih dari/*over* 90 hari/*days*	Jumlah/*Total*
Jumlah tercatat/*Carry amount*	829.044	74.644	1.870	260	12.025	**917.843**
Kerugian kredit ekspektasian/*Expected credit loss*	11.823	1.084	24	4	812	**13.747**

31 Desember 2020/ *31 December 2020*	Belum jatuh tempo/ *current*	Jatuh tempo/*overdue* 1-30 hari/*days*	31-60 hari/*days*	61-90 hari/*days*	lebih dari/*over* 90 hari/*days*	Jumlah/*Total*
Jumlah tercatat/*Carry amount*	640.851	52.265	6.717	670	14.449	**714.952**
Kerugian kredit ekspektasian/*Expected credit loss*	3.792	309	40	4	85	**4.230**

Mutasi penyisihan kerugian kredit ekspektasian adalah sebagai berikut:

Changes in the allowance for expected credit losses are as follows:

	30 Juni/ *30 June* 2021	**31 Desember/ *31 December* 2020**	
Saldo Awal	(4.230)	-	*Beginning balance*
Penambahan Penyisihan kerugian kredit ekspektasian	(9.517)	(4.230)	*Aditional allowance for expected credit losses*
Saldo Akhir	**(13.747)**	**(4.230)**	***Ending balance***

Umur piutang usaha sejak tanggal faktur adalah sebagai berikut:

Aging of trade receivables from the date of invoice is as follows:

	30 Juni/ *30 June* 2021	**31 Desember/ *31 December* 2020**	
Belum jatuh tempo	829.044	640.851	*Current*
Jatuh tempo			*Overdue*
1 - 30 hari	74.644	52.265	*1 - 30 days*
31 - 60 hari	1.870	6.717	*31 - 60 days*
61 - 90 hari	260	670	*61 - 90 days*
Lebih dari 90 hari	12.025	14.449	*Over 90 days*
	88.799	74.101	
Jumlah - bersih	917.843	714.952	***Total - net***
Dikurangi:			*Less :*
Penyisihan kerugian kredit ekspektasian	(13.747)	(4.230)	*Allowance for expected credit losses*
Jumlah - bersih	**904.096**	**710.722**	***Total - net***

5. **PIUTANG USAHA - PIHAK KETIGA** (Lanjutan)

Berdasarkan penelaahan atas saldo piutang usaha pada akhir periode, manajemen menentukan penyisihan kerugian kredit ekspektasian (PKKE) pada 30 Juni 2021 dan 31 Desember 2020 masing-masing sebesar Rp 13.747 dan Rp 4.230.

5. ***TRADE RECEIVABLES - THIRD PARTIES (Continued)***

Based on the review of the trade receivable accounts at the end of the period, the management determine allowance for expected credit losses (AECL) as of 30 June 2021 and 31 December 2020 are amounting to Rp 13,747 and Rp 4,230, respectively.

6. **PIUTANG LAIN-LAIN** / 6. ***OTHER RECEIVABLES***

	30 Juni/ *30 June* 2021	31 Desember/ *31 December* 2020	
Pihak ketiga			***Third parties***
PT Infrastruktur Digital Indonesia	22.181	5.969	*PT Infrastruktur Digital Indonesia*
Bukti potong pajak penghasilan pasal 23 dan final	19.105	11.326	*Withholding tax slip for income tax article 23 and final*
Operator selular - Tagihan listrik	13.851	13.785	*Cellular operator - Electricity bills*
Karyawan	8.738	9.806	*Employees*
Penjualan menara telekomunikasi	4.860	10.360	*Sale of telecommunication tower*
Asuransi	4.341	5.022	*Insurance*
PT Hamparan Cipta Sejati	-	221.425	*PT Hamparan Cipta Sejati*
Lainnya	2.590	2.303	*Others*
	75.666	279.996	
Dikurangi:			*Less :*
Penyisihan kerugian kredit ekspektasian	(1.091)	(17.111)	*Allowance for expected credit losses*
Jumlah - bersih	**74.575**	**262.885**	***Total - net***

Perusahaan menerapkan PSAK 71 dengan pendekatan yang disederhanakan untuk mengukur penyisihan kerugian kredit ekspektasian (PKKE) menggunakan PKKE sepanjang umurnya untuk piutang lain-lain dan aset kontrak. Untuk mengukur PKKE secara kolektif, piutang lain-lain dan aset kontrak dikelompokkan berdasarkan risiko kredit dan umur yang sama. Aset kontrak memiliki karakteristik risiko yang sama dengan piutang lain – lain karena jenis kontrak yang sama.

The Company applies the PSAK 71 simplified approach to measuring Allowance for expected credit losses (AECL) using a lifetime AECL for trade receivables and contract assets. To measure AECL on a collective basis, otherreceivables and contract assets are grouped based on similar credit risk and aging. The contract assets have similar risk characteristics to the other receivables as the same types of contracts.

Berdasarkan basis tersebut, berikut ini penyisihan kerugian ditentukan untuk piutang lain-lain:

On that basis, the loss allowance was determined as follows for other receivables:

30 Juni 2021/*30 June 2021*	Belum jatuh tempo/ *current*	Jatuh tempo/*overdue* 1-30 hari/*days*	31-60 hari/*days*	61-90 hari/*days*	lebih dari/*over* 90 hari/*days*	Jumlah/*Total*
Jumlah tercatat/*Carry amount*	34.256	9.171	2.815	6.331	23.093	**75.666**
Kerugian kredit ekspektasian/*Expected credit loss*	498	133	41	92	327	**1.091**

31 Desember 2020/ *31 December 2020*	Belum jatuh tempo/ *current*	Jatuh tempo/*overdue* 1-30 hari/*days*	31-60 hari/*days*	61-90 hari/*days*	lebih dari/*over* 90 hari/*days*	Jumlah/*Total*
Jumlah tercatat/*Carry amount*	232.072	968	1.684	1.137	44.135	**279.996**
Kerugian kredit ekspektasian/*Expected credit loss*	15.633	30	52	35	1.361	**17.111**

6. **PIUTANG LAIN-LAIN** (Lanjutan) / 6. ***OTHER RECEIVABLES*** *(Continued)*

Mutasi penyisihan kerugian kredit ekspektasian adalah sebagai berikut: / *Changes in the allowance for expected credit losses are as follows:*

	30 Juni/ *30 June* 2021	31 Desember/ *31 December* 2020	
Saldo Awal	(17.111)	-	*Beginning balance*
Pemulihan (penambahan) Penyisihan kerugian kredit ekspektasian	16.020	(17.111)	*Recovery (additional) allowance for expected credit losses*
Saldo Akhir	**(1.091)**	**(17.111)**	***Ending balance***

Umur piutang lain-lain sejak tanggal faktur adalah sebagai berikut: / *Aging of other receivables from the date of invoice is as follows:*

	30 Juni/ *30 June* 2021	31 Desember/ *31 December* 2020	
Belum jatuh tempo	34.256	232.072	*Current*
Jatuh tempo			*Overdue*
1 - 30 hari	9.171	968	*1 - 30 days*
31 - 60 hari	2.815	1.684	*31 - 60 days*
61 - 90 hari	6.331	1.137	*61 - 90 days*
Lebih dari 90 hari	23.093	44.135	*Over 90 days*
Jumlah	75.666	279.996	***Total***
Dikurangi:			*Less :*
Penyisihan kerugian kredit ekspektasian	(1.091)	(17.111)	*Allowance for expected credit losses*
Jumlah - bersih	**74.575**	**262.885**	***Total - net***

Piutang kepada PT Hamparan Cipta Sejati (HCS) merupakan piutang yang berasal dari pengalihan surat sanggup bayar (Catatan 7). Berdasarkan Perjanjian Pinjaman tanggal 1 Oktober 2019, antara entitas anak (yang menjadi pemilik surat sanggup bayar) dan HCS, piutang ini digunakan oleh HCS untuk kegiatan usahanya, dijamin oleh aset berupa tanah yang dimiliki oleh HCS, dan tidak dikenakan bunga pinjaman. Piutang ini jatuh tempo pada tanggal 31 Oktober 2020 dan sudah diperpanjang sampai dengan tanggal 30 Juni 2021. Piutang ini telah dilunasi pada tanggal 29 April 2021.

Receivables from PT Hamparan Cipta Sejati (HCS) represent receivables were originally derived from the transfer of promissory notes (Note 7). Based on Loan Agreement dated 1 October 2019, between the subsidiaries (who owned the promissory notes) and HCS, these receivables were used by HCS for its business operation, secured by bank of lands owned by HCS, and bears no interest. These receivables was mature on 31 October 2020 and has been extended to 30 June 2021. This receivables has been fully paid on 29 April 2021.

Berdasarkan penelahaan atas saldo piutang lain-lain pada akhir periode, manajemen menentukan penyisihan kerugian kredit ekspektasian (PKKE) pada 30 Juni 2021 dan 31 Desember 2020 masing-masing sebesar Rp 1.091 dan Rp 17.111.

Based on the review of the other receivable accounts at the end of the period, the management determine allowance for expected credit losses (AECL) as of 30 June 2021 and 31 December 2020 are amounting to Rp 1,091 and Rp 17,111, respectively.

7. SURAT SANGGUP BAYAR / *PROMISSORY NOTES*

Pada bulan Desember 2018, Perusahaan dan PT Internux telah menyepakati untuk mengubah piutang usaha PT Internux menjadi Surat Sanggup Bayar senilai Rp 221.425. Surat Sanggup Bayar tersebut tidak memiliki jangka waktu dan dapat dialihkan kepada pihak lain.

In December 2018, the Company and PT Internux have agreed to convert PT Internux's trade receivables into the Promissory Notes amounted to Rp 221,425. The Promissory Notes has no time year and can be transferred to another party.

Surat sanggup bayar ini merupakan konversi piutang usaha dan pelaksanaannya terikat dengan Perjanjian Perdamaian tanggal 30 Oktober 2018. Dalam Perjanjian Perdamaian tersebut, jangka waktu pelunasan piutang kepada Perusahaan maksimal adalah 360 bulan sejak tanggal Perjanjian Perdamaian, tidak terdapat bunga pinjaman dan jaminan.

This promissory note is the conversion of trade receivables and the implementation is bound by the Reconciliation Agreement dated 30 October 2018. In the Reconciliation Agreement, the maximum period of payment of receivables to the Company is 360 months from the date of the Reconciliation Agreement, there are no loan and guarantee interest.

Pada 21 Oktober 2019, Perusahaan dan entitas anak telah mengalihkan Surat Sanggup Bayar tersebut kepada pihak ketiga (Catatan 6).

As of 21 October 2019, the Company and subsidiaries have transferred the Promissory Notes to a third party (Note 6).

8. PENDAPATAN YANG MASIH HARUS DITERIMA / *ACCRUED REVENUE*

	30 Juni/ *30 June* 2021	31 Desember/ *31 December* 2020	
Pihak ketiga			***Third parties***
PT Telekomunikasi Selular	509.727	408.245	*PT Telekomunikasi Selular*
PT Indosat Tbk	46.528	31.151	*PT Indosat Tbk*
PT Smartfren Telecom Tbk	18.059	19.459	*PT Smartfren Telecom Tbk*
PT Hutchison 3 Indonesia	4.936	17.969	*PT Hutchison 3 Indonesia*
PT XL Axiata Tbk	5.628	11.408	*PT XL Axiata Tbk*
PT Smart Telecom	2.799	2.065	*PT Smart Telecom*
Lainnya (masing-masing di bawah Rp 1 miliar)	3.930	3.362	*Others (each below Rp 1 billion)*
Jumlah	591.607	493.659	***Total***
Dikurangi:			*Less :*
Penyisihan kerugian kredit ekspektasian	(8.476)	(2.469)	*Allowance for expected credit losses*
Jumlah - bersih	**583.131**	**491.190**	***Total - net***

Akun ini merupakan pendapatan sewa menara telekomunikasi yang belum ditagih, karena proses pengujian fisik menara dan verifikasi dokumen yang belum selesai pada tanggal laporan posisi keuangan konsolidasian.

This account represents unbilled rental income of telecommunication towers due to the customer's site visit and verification of documents not being completed as of the consolidated statements of financial position date.

8. **PENDAPATAN YANG MASIH HARUS DITERIMA** (Lanjutan) / *8. **ACCRUED REVENUE** (Continued)*

Mutasi penyisihan kerugian kredit ekspektasian adalah sebagai berikut: / *Changes in the allowance for expected credit losses are as follows:*

	30 Juni/ *30 June* 2021	31 Desember/ *31 December* 2020	
Saldo Awal	(2.469)	-	*Beginning balance*
Penambahan Penyisihan kerugian kredit ekspektasian	(6.007)	(2.469)	*Aditional allowance for expected credit losses*
Saldo Akhir	**(8.476)**	**(2.469)**	***Ending balance***

Berdasarkan penelahaan atas saldo pendapatan yang masih harus diterima pada akhir periode, manajemen menentukan penyisihan kerugian kredit ekspektasian (PKKE) pada 30 Juni 2021 dan 31 Desember 2020 masing-masing sebesar Rp 8.476 dan Rp 2.469.

Based on the review of the status of the accrued revenue accounts at the end of the period, the management determine allowance for expected credit losses (AECL) for 30 June 2021 and 31 December 2020 are Rp 8,476 and Rp 2,469, respectively.

9. **PERSEDIAAN DAN PERLENGKAPAN** / *9. **INVENTORIES AND SUPPLIES***

	30 Juni/ *30 June* 2021	31 Desember/ *31 December* 2020	
Material menara	104.343	105.991	*Tower material*
Suku cadang	27.898	12.321	*Spareparts*
Jumlah	132.241	118.312	***Total***

Pada tanggal 30 Juni 2021 dan 31 Desember 2020, tidak ada persediaan dan perlengkapan yang dijaminkan.

As of 30 June 2021 and 31 December 2020, there are no inventories and supplies are pledged as collateral.

Berdasarkan hasil penelaahan pada setiap akhir tahun, manajemen berpendapat tidak perlu membentuk penyisihan penurunan nilai atas akun persediaan. Kecuali material menara, seluruh persediaan dan perlengkapan akan diakui sebagai beban pada saat penggunaan.

Based on a review at the end of the year, the management determines that no impairment provision is necessary provided. Except for tower material, all inventories and supplies will be recognized as expenses at the time of use.

Persediaan yang diakui sebagai beban untuk periode 6 (enam) bulan yang berakhir pada 30 Juni 2021 dan 2020 masing-masing adalah sebesar nihil.

Inventories which recognized as expenses for the period of 6 (six) months ended 30 June 2021 and 2020 are amounted to nil, respectively.

10. UANG MUKA DAN BEBAN DIBAYAR DI MUKA / *10. ADVANCE PAYMENTS AND PREPAID EXPENSES*

	30 Juni/ *30 June* 2021	31 Desember/ *31 December* 2020	
Perizinan	42.474	39.692	*Licenses*
Asuransi	20.348	15.234	*Insurance*
Retribusi	15.072	20.036	*Retribution*
Sewa kantor	4.492	4.725	*Office rental*
Operasional	4.024	4.108	*Operational*
Pembelian menara	-	398.968	*Purchase of towers*
Lainnya	9.840	51.841	*Others*
Jumlah	96.250	534.604	***Total***

Pembelian menara merupakan uang muka pembelian 3.000 menara milik PT Inti Bangun Sejahtera Tbk (IBST) dengan nilai Rp 3.975.000 oleh PT Tower Bersama, entitas anak. Pembelian aset IBST tersebut telah selesai dilaksanakan pada awal kuartal kedua 2021 (Catatan 38.b).

Purchase of towers represents an advance for the purchase of 3,000 towers owned by PT Inti Bangun Sejahtera Tbk (IBST) amounted to Rp 3,975,000 by PT Tower Bersama, a subsidiary. The purchase of those IBST's towers have been completed at the beginning of the second quarter of 2021 (Note 38.b).

Pos lainnya terutama merupakan pembayaran pokok dan bunga surat utang yang belum jatuh tempo sebesar nihil (31 Desember 2020: 25%) namun telah disetorkan ke lembaga kustodian, dan biaya pengiriman material menara sebesar nihil (31 Desember 2020: 47%) ke berbagai daerah yang masih dalam proses rekonsiliasi untuk dialokasi ke masing-masing site terkait.

Other items are mainly payments of principal and interest on debt securities that are not yet due at nil (31 December 2020: 25%) but have been deposited with the custodian, and the cost of sending tower materials of nil (31 December 2020: 47%) to various areas that are still in the process of reconciliation should be allocated to their respective sites.

11. ASET TETAP / *11. PROPERTY AND EQUIPMENT*

30 Juni 2021	Saldo awal/ *Beginning balance*	Penambahan/ *Additions*	Pengurangan/ *Deductions*	Akuisisi/ *Acquisition *)*	Reklasifikasi/ *Reclassification*	Akumulasi penyusutan dan penyesuaian nilai wajar/ *Accumulated depreciation and fair value adjustment*	Reklasifikasi dari properti investasi/ *Reclassified from investment property*	Surplus (defisit) revaluasi/ *Revaluation surplus (deficit)*	Saldo akhir/ *Ending balance*	*30 June 2021*
Model Revaluasi										***Revaluation Model***
Menara telekomunikasi	27.660.399	-	-	3.588.648	954.659	(342.645)	-	(59.289)	31.801.772	*Telecommunication towers*
Akumulasi penyusutan										*Accumulated depreciation*
Menara telekomunikasi	-	342.645	-	-	-	(342.645)	-	-	-	*Telecommunication towers*
Model Biaya										***Cost Model***
Aset tetap dalam										*Property and*
penyelesaian	648.550	840.302	-	-	(954.659)	-	-	-	534.193	*equipment in progress*
Biaya Perolehan										***Cost***
Pemilikan Langsung										***Direct ownership***
Tanah	45.507	-	-	-	-	-	-	-	45.507	*Land*
Bangunan	356.628	766	-	-	-	-	3.213	-	360.607	*Building*
Peralatan,										*Tools,*
perlengkapan kantor										*office equipment and*
dan perangkat elektronik	36.667	2.422	(57)	-	-	-	-	-	39.032	*electronic hardware*
Kendaraan	35.237	2.165	(10.381)	-	-	-	-	-	27.021	*Vehicles*
Genset	30.623	-	(7.013)	-	-	-	-	-	23.610	*Genset*
Menara bergerak	166.262	-	-	-	-	-	-	-	166.262	*Transportable towers*
	670.924	5.353	(17.451)	-	-	-	3.213	-	662.039	
Akumulasi Penyusutan										***Accumulated Depreciation***
Pemilikan Langsung										***Direct Ownership***
Bangunan	88.773	9.802	-	-	-	-	-	-	98.575	*Building*
Peralatan,										*Tools,*
perlengkapan kantor										*office equipment and*
dan perangkat elektronik	19.670	2.612	(53)	-	-	-	-	-	22.229	*electronic hardware*
Kendaraan	21.002	2.637	(10.381)	-	-	-	-	-	13.258	*Vehicles*
Genset	30.504	16	(7.013)	-	-	-	-	-	23.507	*Genset*
Menara bergerak	81.562	6.553	-	-	-	-	-	-	88.115	*Transportable towers*
	241.511	21.620	(17.447)	-	-	-	-	-	245.684	
Nilai Tercatat	28.089.812								32.218.127	***Carrying Value***
Jumlah	28.738.362								32.752.320	***Total***

**)* Terutama merupakan pembelian menara telekomunikasi dari IBST (Catatan 38.b). Selisih antara biaya perolehan dengan nilai menara telekomunikasi yang dicatat sebagai aset tetap, diakui sebagai aset hak guna (Catatan 13).

**) Primarily is purchasing of telecommunication towers from IBST (Note 38.b). The difference between cost of acquisition and the value of telecommunication towers which are recorded as property and equipment is recognized as right of use of assets (Note 13).*

11. **ASET TETAP** (Lanjutan) / 11. ***PROPERTY AND EQUIPMENT*** *(Continued)*

31 Desember 2020	Saldo awal/ *Beginning balance*	Penambahan/ *Additions*	Pengurangan/ *Deductions*	Reklasifikasi/ *Reclassification*	Akumulasi penyusutan dan penyesuaian nilai wajar/ *Accumulated depreciation and fair value adjustment*	Reklasifikasi ke properti investasi/ *Reclassified to investment property*	Surplus revaluasi/ *Revaluation surplus*	Saldo akhir/ *Ending balance*	*31 December 2020*
Model Revaluasi									***Revaluation Model***
Menara telekomunikasi	22.952.811	-	-	1.708.970	(406.836)	-	3.405.454	27.660.399	*Telecommunication towers*
Akumulasi penyusutan									*Accumulated depreciation*
Menara telekomunikasi	-	406.836	-	-	(406.836)	-	-	-	*Telecommunication towers*
Model Biaya									***Cost Model***
Aset tetap dalam penyelesaian	1.237.995	1.119.525	-	(1.708.970)	-	-	-	648.550	*Property and equipment in progress*
Biaya Perolehan									***Cost***
Pemilikan Langsung									***Direct Ownership***
Tanah	45.507	-	-	-	-	-	-	45.507	*Land*
Bangunan	335.981	20.647	-	-	-	-	-	356.628	*Building*
Peralatan, perlengkapan kantor dan perangkat elektronik	113.144	3.841	(84.006)	3.688	-	-	-	36.667	*Tools, office equipment and electronic hardware*
Perangkat lunak	3.688	-	-	(3.688)	-	-	-	-	*Software*
Kendaraan	33.117	8.140	(6.020)	-	-			35.237	*Vehicles*
Genset	30.623	-	-	-	-	-	-	30.623	*Genset*
Menara bergerak	166.035	227	-	-	-	-	-	166.262	*Transportable towers*
Sewa Pembiayaan									***Finance lease***
Kendaraan	28.753	-	-	(28.753)	-	-	-	-	*Vehicles*
	756.848	32.855	(90.026)	(28.753)	-	-	-	670.924	
Akumulasi Penyusutan									***Accumulated Depreciation***
Pemilikan Langsung									***Direct Ownership***
Bangunan	69.875	18.898	-	-	-	-	-	88.773	*Building*
Peralatan, perlengkapan kantor dan perangkat elektronik	94.984	5.004	(84.006)	3.688	-	-	-	19.670	*Tools, office equipment and electronic hardware*
Perangkat lunak	3.034	654	-	(3.688)	-	-	-	-	*Software*
Kendaraan	19.905	5.054	(3.957)	-	-	-	-	21.002	*Vehicles*
Genset	30.476	28	-	-	-	-	-	30.504	*Genset*
Menara bergerak	65.273	16.289	-	-	-	-	-	81.562	*Transportable towers*
Sewa Pembiayaan									***Finance Lease***
Kendaraan	14.813	-	-	(14.813)	-	-	-	-	*Vehicles*
	298.360	45.927	(87.963)	(14.813)	-	-	-	241.511	
Nilai Tercatat	23.411.299							28.089.812	***Carrying Value***
Jumlah	**24.649.294**							**28.738.362**	***Total***

11. **ASET TETAP** (Lanjutan)

Pada 1 Januari 2020, aset tetap – sewa pembiayaan kendaraan direklasifikasi ke aset hak guna sebagai dampak dari penerapan PSAK 73.

Aset tetap dalam penyelesaian merupakan pembangunan infrastruktur menara telekomunikasi, dengan rincian sebagai berikut:

*11. **PROPERTY AND EQUIPMENT** (Continued)*

On January 1, 2020, fixed assets - vehicle finance leases were reclassified to rights of use assets as changes of the application of PSAK 73.

Property and equipment in progress represent the telecommunications towers infrastructures development, detail as follows:

	30 Juni/ *30 June* 2021	**31 Desember/ *31 December* 2020**	
Persentase penyelesaian > 50%			*Percentage of completion > 50%*
Menara telekomunikasi	181.567	209.063	*Telecommunications towers*
In building system	27.454	44.996	*In building system*
Persentase penyelesaian < 50%			*Percentage of completion < 50%*
Menara telekomunikasi	283.990	326.997	*Telecommunications towers*
In building system	41.182	67.494	*In building system*
Jumlah	**534.193**	**648.550**	***Total***

Estimasi penyelesaian aset tetap dalam penyelesaian adalah sekitar 1 bulan sampai 2 tahun sejak tanggal pelaporan. Tidak terdapat hambatan untuk menyelesaikan aset tetap dalam penyelesaian.

The estimation date to complete the property and equipment in progress is between 1 month to 2 years since the reporting date. There are no obstacles to settling property and equipment in progress.

Tidak terdapat kapitalisasi biaya pinjaman untuk aset karena tidak memenuhi kriteria aset kualifikasian.

There is no capitalization of borrowing costs for assets because It does not meet the criteria for qualifying assets.

Untuk periode 6 (enam) bulan yang berakhir pada 30 Juni 2021 dan 2020, beban penyusutan dialokasikan pada beban pokok pendapatan dan beban usaha masing-masing sebesar Rp 349.198 (30 Juni 2020: Rp 161.387) dan Rp 15.067 (30 Juni 2020: Rp 17.572) (Catatan 30 dan 31).

For the period of 6 (six) months ended 30 June 2021 and 2020, depreciation charged to cost of revenue and operating expenses amounted to Rp 349,198 (30 June 2020: Rp 161,387) and Rp 15,067 (30 June 2020: Rp 17,572), respectively (Notes 30 and 31).

Keuntungan pelepasan aset tetap pada periode 6 (enam) bulan dan tahun yang berakhir pada 30 Juni 2021 dan 31 Desember 2020 adalah sebagai berikut:

Loss on disposal of property and equipments for the period of 6 (six) months and the year ended 30 June 2021 and 31 December 2020 are as follows:

	30 Juni/ *30 June* 2021	**31 Desember/ *31 December* 2020**	
Nilai perolehan	57	90.026	*Cost*
Akumulasi penyusutan	(53)	(87.963)	*Acummulated depreciation*
Nilai tercatat	4	2.063	*Carrying value*
Harga pelepasan	-	3.800	*Selling price*
Jumlah keuntungan (kerugian) pelepasan	(4)	1.737	***Total gain (loss) on disposal***

11. **ASET TETAP** (Lanjutan)

Pada 30 Juni 2021 dan 31 Desember 2020, seluruh aset tetap telah diasuransikan kepada PT Lippo General Insurance Tbk, PT Asuransi Umum Mega, PT Asuransi Candi Utama dan PT Asuransi Mitra Pelindung Mustika terhadap kebakaran, pencurian dan risiko kerugian lainnya kepada pihak ketiga berdasarkan suatu paket polis tertentu dengan nilai pertanggungan masing-masing sebesar Rp 12.176.838 dan Rp 10.118.837. Manajemen berpendapat bahwa nilai pertanggungan tersebut cukup untuk menutupi kemungkinan kerugian atas risiko yang dipertanggungkan.

Perusahaan dan entitas anak tidak memiliki aset yang tidak digunakan sementara, dan tidak ada aset yang dihentikan dari penggunaan aktif dan diklasifikasi sebagai tersedia untuk dijual.

Aset yang sudah habis disusutkan dan masih digunakan adalah kendaraan dengan nilai perolehan sebesar Rp 2.984 dan Rp 3.529 pada 30 Juni 2021 dan 31 Desember 2020.

Berdasarkan evaluasi yang dilakukan manajemen, tidak terdapat kejadian atau perubahan atas keadaan yang menunjukan adanya penurunan nilai aset tetap pada tanggal 30 Juni 2021 dan 31 Desember 2020.

Pengukuran nilai wajar

Sehubungan dengan penerapan PSAK 16 (Revisi 2014) "Aset Tetap", Perusahaan dan entitas anak telah memilih model revaluasi untuk pengukuran setelah pengakuan awal menara telekomunikasi. Nilai wajar pada tanggal 30 Juni 2021 ditentukan berdasarkan penilaian dari manajemen dan 31 Desember 2020 ditentukan berdasarkan penilaian dari penilai independen KJPP Martokoesoemo, Pakpahan & Rekan dalam laporannya pada tanggal 17 Maret 2021, dan telah sesuai dengan peraturan No. VIII.C.4 mengenai pedoman penilaian dan penyajian laporan penilaian aset di pasar modal.

Hirarki nilai wajar aset tetap pada akhir tahun pelaporan merupakan kategori dalam level 3 pengukuran berulang nilai wajar. Tidak terdapat transfer antara level selama tahun berjalan.

Dalam menentukan nilai wajar, Penilai Independen menggunakan metode penilaian dengan mengkombinasikan dua pendekatan, yaitu pendekatan pendapatan yang mendiskontokan penerimaan kas dimasa depan, dan pendekatan biaya yang menggunakan biaya penggantian pada saat ini.

Pada 30 Juni 2021, asumsi utama yang digunakan oleh manajemen adalah sebagai berikut:
a. Inflasi per tahun sebesar 3,12%
b. Tingkat bunga diskonto per tahun sebesar 11,28%

Pada 31 Desember 2020, asumsi utama yang digunakan oleh penilai independen adalah sebagai berikut:
c. Inflasi per tahun sebesar 3,12%
d. Tingkat bunga diskonto per tahun sebesar 11,25%

*11. **PROPERTY AND EQUIPMENT** (Continued)*

As of 30 June 2021 and 31 December 2020, all property and equipment have been insured PT Lippo General Insurance Tbk, PT Asuransi Umum Mega, PT Asuransi Candi Utama and PT Asuransi Mitra Pelindung Mustika against fire, theft and other losses to third parties under a blanket policy with sum insured of Rp 12,176,838 and Rp 10,118,837, respectively. Management believes that the sum insured is adequate to cover possible losses from such risks.

The Company and subsidiaries has no assets not in use temporarily, and no assets are discontinued from active use and clasified as available for sale.

Depreciated and still used assets are vehicles at cost of Rp 2,984 and Rp 3,529 as of 30 June 2021 and 31 December 2020, respectively.

Based on evaluation of Management, there were no events or changes in circumstances to indicate any impairment of property and equipment as of 30 June 2021 and 31 December 2020.

Fair value measurement

Regarding the implementation of PSAK 16 (Revised 2014) "Property and Equipment", the Company and subsidiaries has chosen the revaluation model for the measurement after initial recognition of telecommunication towers. The fair value as of 30 June 2021 is determined based on the appraisal of the management and 31 December 2020 is determined based on the appraisal of KJPP Martokoesoemo, Pakpahan & Rekan in their report dated 17 March 2021, and incorporates the regulation No. VIII.C.4 regarding the guidelines of appraisal and presentation of asset appraisal report to capitals market.

The fair value hierarchy of property and equipment at the end of reporting year is categorised as a level 3 recurring fair value measurement. There are no transfers between levels during the year.

To determine the fair value, the Independent Appraiser utilizes a combination of two approaches as the appraisal method: the income approach, which discounts future cash flows, and the cost approach, which is based on current replacement cost.

As of 30 June 2021, the management used the following key assumptions:
a. Inflation per year of 3.12%
b. Discount rate per year of 11.28%

As of 31 December 2020, independent appraiser used the following key assumptions:
c. Inflation per year of 3.12%
d. Discount rate per year of 11.25%

11. **ASET TETAP** (Lanjutan)

Hubungan antara input tidak dapat diobservasi untuk nilai wajar aset tetap adalah lebih tinggi tingkat diskonto digunakan, semakin rendah nilai wajar dan semakin tinggi tingkat pertumbuhan sewa aset tetap digunakan, semakin tinggi nilai wajar.

Tidak terdapat perubahan teknik penilaian pengukuran nilai wajar level 3 pada tahun kini. Pengukuran nilai wajar didasarkan pada item di atas yang tertinggi dan penggunaan terbaik, yang tidak berbeda dari penggunaan yang sebenarnya.

Jika menara telekomunikasi diukur menggunakan model biaya, maka nilai tercatat menara telekomunikasi pada 30 Juni 2021 dan 31 Desember 2020 masing-masing sebesar Rp 23.704.908 dan Rp 19.129.809.

*11. **PROPERTY AND EQUIPMENT** (Continued)*

Relationship between unobservable inputs to fair value of property and equipment is the higher the discount rate used, the lower the fair value and the higher the rental income of property and equipment growth rate used, the higher the fair value.

There were no changes to the valuation techniques of level 3 fair value measurements in the year. The fair value measurement is based on the above items highest and best use, which does not differ from their actual use.

Had the Company's telecommunication tower been measured on a cost model basis as of 30 June 2021 and 31 December 2020 they amounted to Rp 23,704,908 and Rp 19,129,809, respectively.

12. **PROPERTI INVESTASI**

Rincian properti investasi adalah sebagai berikut:

*12. **INVESTMENT PROPERTIES***

The details of investment properties are as follows:

30 Juni 2021	**Saldo awal/ *Beginning balance***	**Penambahan/ *Additions***	**Reklasifikasi ke aset tetap/ *Reclassifications to property and equipment***	**Saldo akhir/ *Ending balance***	***30 June 2021***
Tanah	114.756	3.925	-	118.681	*Land*
Bangunan	188.193	66	(3.213)	185.044	*Building*
	302.949	3.991	(3.213)	303.727	
Akumulasi kenaikan nilai wajar	85.071	-	-	85.071	*Accumulated increase of fair value*
Jumlah	**388.020**			**388.798**	***Total***

31 Desember 2020	**Saldo awal/ *Beginning balance***	**Penambahan/ *Additions***	**Reklasifikasi dari aset tetap/ *Reclassifications from property and equipment***	**Saldo akhir/ *Ending balance***	***31 December 2020***
Tanah	75.393	39.363	-	114.756	*Land*
Bangunan	140.500	47.693	-	188.193	*Building*
	215.893	87.056	-	302.949	
Akumulasi kenaikan nilai wajar	50.293	34.778	-	85.071	*Accumulated increase of fair value*
Jumlah	**266.186**			**388.020**	***Total***

12. **PROPERTI INVESTASI** (Lanjutan)

Sehubungan dengan penerapan PSAK 13 (Revisi 2014) "Properti Investasi", Perusahaan dan entitas anak telah memilih model nilai wajar untuk pengukuran setelah pengakuan awal. Nilai wajar pada tanggal 30 Juni 2021 ditentukan berdasarkan penilaian dari manajemen dan 31 Desember 2020 ditentukan berdasarkan penilaian dari penilai independen KJPP Martokoesoemo, Pakpahan & Rekan dalam laporannya pada tanggal 17 Maret 2021, dan telah sesuai dengan peraturan No. VIII.C.4 mengenai pedoman penilaian dan penyajian laporan penilaian properti di pasar modal.

Hirarki nilai wajar properti investasi pada akhir tahun pelaporan merupakan kategori dalam level 3 pengukuran berulang nilai wajar. Tidak terdapat transfer antara level selama tahun berjalan.

Dalam menentukan nilai wajar, Penilai Independen menggunakan Pendekatan Pasar yaitu pendekatan penilaian yang menggunakan data transaksi atau penawaran atas properti yang sebanding dan sejenis dengan obyek penilaian yang didasarkan pada suatu proses perbandingan dan penyesuaian.

Pendekatan ini digunakan apabila dipasaran umum secara fisik didapat data untuk properti yang hampir sama dan tipikal dengan properti yang dinilai.

Pengukuran nilai wajar

Tidak terdapat perubahan teknik penilaian pengukuran nilai wajar level 3 pada tahun kini. Pengukuran nilai wajar didasarkan pada item di atas yang tertinggi dan penggunaan terbaik, yang tidak berbeda dari penggunaan yang sebenarnya.

Jumlah pendapatan sewa atas properti investasi untuk periode 6 (enam) bulan yang berakhir pada 30 Juni 2021 dan 2020 masing-masing sebesar Rp 4.114 dan Rp 4.114, diakui sebagai bagian dari pendapatan lainnya (Catatan 29).

Tidak terdapat beban operasi langsung yang diakui dalam laporan keuangan. Penyewa membayar beban operasi langsung, seperti biaya listrik, pemeliharaan dan perawatan kepada pihak ketiga.

*12. **INVESTMENT PROPERTIES** (Continued)*

Regarding the implementation of PSAK 13 (Revised 2014) "Investment Property", the Company and subsidiaries has chosen the fair value model for the measurement after initial recognition. The fair value as of 30 June 2021 is determined based on the appraisal of the management and 31 December 2020 is determined based on the appraisal of KJPP Martokoesoemo, Pakpahan & Rekan in their report dated 17 March 2021, and incorporates the regulation No. VIII.C.4 regarding the guidelines of appraisal and presentation of property appraisal report to capitals market.

The fair value hierarchy of investment properties at the end of reporting year is categorised as a level 3 recurring fair value measurement. There are no transfers between levels during the year.

To determine the fair value, the Independent Appraiser utilizes a market approach valuation approach that uses transaction or offer data on comparable and similar property to valuation objects based on a process of comparison and adjustment.

This approach is used if the physical market generally gets data for properties that are almost identical and typical of the property being valued.

Fair value measurement

There were no changes to the valuation techniques of level 3 fair value measurements in the year. The fair value measurement is based on the above items highest and best use, which does not differ from their actual use.

Total Rent revenue earned from investment properties for the period of 6 (six) months ended 30 June 2021 and 2020 amounting to Rp 4,114 and Rp 4,114, respectively, recognized as part of other revenue (Note 29).

There are no direct operating expenses recognized in the financial statements. Tenants pay direct operating expenses, such as electricity, maintenance and maintenance costs to third parties.

13. ASET HAK GUNA / *13. RIGHT OF USE ASSETS*

Sesuai dengan PSAK 73 mengenai "Sewa", akun ini merupakan sewa lahan untuk menara telekomunikasi dan sewa kantor, mencakup biaya sewa dibayar dimuka untuk jangka waktu yang sesuai dengan masa kontrak sewa ditambah dengan estimasi liabilitas sewa untuk mencakup jangka waktu kolokasi, dengan rincian sebagai berikut:

Based on PSAK 73 "Leases", this account represents land leases for telecommunication towers and office leases consists of prepaid land lease with a period matching to the contract term plus the estimation of land lease extension to cover the collocation period, with details as follows:

30 Juni 2021	Saldo Awal/ *Beginning balance*	Penambahan/ *Addition*	Saldo akhir/ *Ending Balance*	*30 June 2021*
Biaya perolehan				***Acquisition costs***
Sewa lahan	4.154.238	894.790	5.049.028	*Land leases*
Sewa kantor	7.446	-	7.446	*Office leases*
Sewa kendaraan	34.192	1.502	35.694	*Vehicles lease*
Jumlah biaya perolehan	4.195.876	896.292	5.092.168	***Total acquisition costs***
Akumulasi penyusutan				***Accumulated depreciation***
Sewa lahan	(1.559.094)	(177.946)	(1.737.040)	*Land leases*
Sewa kantor	(827)	(413)	(1.240)	*Office leases*
Sewa kendaraan	(21.073)	(3.106)	(24.179)	*Vehicles lease*
Jumlah akumulasi penyusutan	(1.580.994)	(181.465)	(1.762.459)	***Total acumulated depreciation***
Nilai tercatat	**2.614.882**		**3.329.709**	***Carrying amount***

31 Desember 2021	Penerapan awal PSAK 73 1 Januari 2020/ *Initial application of PSAK 73 1 January 2020*	Penambahan/ *Addition*	Saldo akhir/ *Ending balance*	*31 December 2021*
Biaya perolehan				***Acquisition costs***
Sewa lahan	3.466.973	687.265	4.154.238	*Land leases*
Sewa kantor	7.446	-	7.446	*Office leases*
Sewa kendaraan	28.753	5.439	34.192	*Vehicles lease*
Jumlah biaya perolehan	3.503.172	692.704	4.195.876	***Total acquisition costs***
Akumulasi penyusutan				***Accumulated depreciation***
Sewa lahan	(1.248.923)	(310.171)	(1.559.094)	*Land leases*
Sewa kantor	-	(827)	(827)	*Office leases*
Sewa kendaraan	(14.813)	(6.260)	(21.073)	*Vehicles lease*
Jumlah akumulasi penyusutan	(1.263.736)	(317.258)	(1.580.994)	***Total acumulated depreciation***
Nilai tercatat	**2.239.436**		**2.614.882**	***Carrying amount***

Apabila terdapat kontrak kolokasi dengan jangka waktu lebih panjang dari kontrak sewa lahan, maka estimasi nilai perpanjangan sewa lahan untuk mencakup jangka waktu kolokasi akan disajikan sebagai Liabilitas Sewa (lihat Catatan 24).

If collocation period longer than existing land lease contract, the estimation of land lease extension to cover the collocation period will be presented as Leases Liability (see Note 24).

13. **ASET HAK GUNA** (Lanjutan)

Untuk periode 6 (enam) bulan yang berakhir pada 30 Juni 2021 dan 30 Juni 2020, beban penyusutan dialokasikan pada beban pokok pendapatan dan beban usaha masing-masing sebesar Rp 177.946 (30 Juni 2020: Rp 148.560) dan Rp 3.519 (30 Juni 2020: Rp 450) (Catatan 30 dan 31).

Pada tanggal 30 Juni 2021, aset tetap-sewa pembiayaan berupa kendaraan telah dijadikan jaminan atas liabilitas sewa pembiayaan (Catatan 24.b).

*13. **RIGHT OF USE ASSETS** (Continued)*

For the period of 6 (six) months ended 30 June 2021 and 30 June 2020, depreciation charged to cost of revenue and operating expenses amounted to Rp 177,946 (30 June 2020: Rp 148,560) and Rp 3,519 (30 June 2020: Rp 450), respectively (Note 30 and 31).

As of 30 June 2021, leased vehicles are collateralized for finance lease liabilities (Note 24.b).

14. **UANG JAMINAN** / *14. **REFUNDABLE DEPOSITS***

	30 Juni/ *30 June* 2021	**31 Desember/ *31 December* 2020**	
Sewa	564	506	*Rental*
Lainnya	1.319	1.202	*Others*
Jumlah	**1.883**	**1.708**	***Total***

15. **ASET KEUANGAN DERIVATIF** / *15. **DERIVATIVE FINANCIAL ASSETS***

	30 Juni/ *30 June* 2021	**31 Desember/ *31 December* 2020**	
Aset keuangan derivatif			***Derivative financial assets***
Derivatif yang ditetapkan sebagai instrumen lindung nilai			*Derivatives designated as hedging instruments*
Swap valuta asing - lindung nilai arus kas	**1.397.984**	**1.084.975**	*Cross currency swaps - cash flow hedges*

Arus kas *swap* valuta asing

Risiko nilai tukar valuta asing muncul ketika operasi individu Perusahaan dan entitas anak memasuki transaksi yang terbagi dalam mata uang selain mata uang fungsionalnya. Ketika risiko terhadap Perusahaan dan entitas anak di pertimbangkan menjadi signifikan, treasuri Perusahaan dan entitas anak akan mencocokan kontrak berjangka valuta asing dengan bank yang mempunyai nama baik.

Cash flow currency swaps

Foreign exchange risk arises when individual operations of the Company and subsidiaries enter into transactions denominated in a currency other than their functional currency. Where the risk to the Company and subsidiaries is considered to be significant, treasury of the Company and subsidiaries will enter into a matching forward foreign exchange contract with a reputable bank.

15. **ASET KEUANGAN DERIVATIF** (Lanjutan)

Arus kas *swap* valuta asing (Lanjutan)

Jumlah pokok nosional dari sisa kontrak berjalan berjangka valuta asing pada tanggal dan 30 Juni 2021 dan 31 Desember 2020 masing-masing sebesar US$ 1.630.445.028 dan US$ 1.619.500.000. Nilai wajar pada masing-masing tanggal diatas adalah sebesar Rp 1.397.984 dan Rp 1.084.975.

Pada tanggal 30 Juni 2021 premi lindung nilai sehubungan dengan *swap* valuta asing masing-masing berkisar antara 2,88% sampai dengan 4,30%.

*15. **DERIVATIVE FINANCIAL ASSETS** (Continued)*

Cash flow currency swaps (Continued)

The notional principal amounts of outstanding forward foreign exchange contracts at 30 June 2021 and 31 December 2020 were US$ 1,630,445,028 and US$ 1,619,500,000, respectively. Their fair value at these respective dates is Rp 1,397,984 and Rp 1,084,975, respectively.

As of 30 June 2021 hedge premiums related to foreign currency swaps ranged from 2.88% to 4.30%, respectively.

Periode atau Tahun/ *Period or Year*	Jumlah kontrak lindung nilai/ *Number of hedging contracts*	Jumlah Nosional/ *Notional amount* (US$ nilai penuh/ *US$ full amount)*	Jatuh tempo/ *Due date*	Beban lindung nilai/ *hedging cost* (dalam jutaan Rupiah/ *in million Rupiah)*	Pihak yang memiliki nilai kontrak lindung nilai lebih dari 10%/ *Parties who earn contracts more than 10%*	
					Pihak dalam kontrak / Counterparties	*%*
30 Juni/ *30 June* 2021 (6 bulan/*months*)	93	1.630.445.028	2 Juli 2021 sampai dengan 29 Juni 2026/ *2 July 2021 to 29 June 2026*	426.451	BNP Paribas, Oversea-Chinese Banking Corporation Limited, The Hongkong And Shanghai Banking Corporation Limited, Credit Agricole Corporate And Investment Bank	54,2%
31 Desember/ 31 December 2020 (12 bulan/months)	96	1.619.500.000	24 Januari 2021 sampai dengan 24 Januari 2025/ *24 January 2021 to 24 January 2025*	842.739	BNP Paribas, Oversea-Chinese Banking Corporation Limited, The Hongkong And Shanghai Banking Corporation Limited, Credit Agricole Corporate And Investment Bank	47,9%

16. **ASET TIDAK LANCAR LAINNYA**

Pada 30 Juni 2021 dan 31 Desember 2020, akun ini terutama merupakan perangkat lunak dan lisensi sebesar 99% dan 93%.

*16. **OTHER NON-CURRENT ASSETS***

At 30 June 2021 and 31 December 2020, this account mainly are software and license of 99% and 93%, respectively.

17. UTANG USAHA - PIHAK KETIGA / *17. TRADE PAYABLES - THIRD PARTIES*

	30 Juni/ *30 June* 2021	31 Desember/ *31 December* 2020	
Pihak ketiga			***Third parties***
Rupiah			***Rupiah***
PT Wahana Infrastruktur Nusantara	20.336	17.796	*PT Wahana Infrastruktur Nusantara*
PT Sanggar Jaya Abadi	9.371	-	*PT Sanggar Jaya Abadi*
PT Jaya Engineering Technology	9.307	2.719	*PT Jaya Engineering Technology*
PT Danusari Mitra Sejahtera	5.878	-	*PT Danusari Mitra Sejahtera*
PT Nayaka Pratama	5.739	2.046	*PT Nayaka Pratama*
PT Communication cable Systems Indonesia Tbk.	2.374	-	*PT Communication cable Systems Indonesia Tbk.*
PT Omadi Investindo	4.621	3.256	*PT Omadi Investindo*
PT Mandiri Infra Tripakarti	4.214	2.546	*PT Mandiri Infra Tripakarti*
PT Tunas Cahaya Mandiri Widyatama	4.038	2.253	*PT Tunas Cahaya Mandiri Widyatama*
PT Berkat Bersama Teknik	3.885	2.518	*PT Berkat Bersama Teknik*
PT Dwi Pari Abadi	2.252	1.721	*PT Dwi Pari Abadi*
PT Dwi Pari Selaras	2.108	1.009	*PT Dwi Pari Selaras*
PT Bach Multi Global	1.188	3.016	*PT Bach Multi Global*
PT Pamengkang Jagat	1.995	-	*PT Pamengkang Jagat*
PT Multi Tiga Cipta	1.765	-	*PT Multi Tiga Cipta*
PT Merekah Sukses	1.716	-	*PT Merekah Sukses*
PT Karya Lintas Sejahtera	1.598	1.187	*PT Karya Lintas Sejahtera*
PT Prasetya Dwi Dharma	1.509	1.625	*PT Prasetya Dwi Dharma*
PT Raka Mitra Bersama	984	1.341	*PT Raka Mitra Bersama*
PT Kustodian Sentral Efek Indonesia	12	12.920	*PT Kustodian Sentral Efek Indonesia*
PT Inti Bangun Sejahtera Tbk	-	397.499	*PT Inti Bangun Sejahtera Tbk*
PT Cipta Jaya Sejahtera Abadi	-	1.564	*PT Cipta Jaya Sejahtera Abadi*
Lainnya (masing-masing di bawah Rp 1 miliar)	51.343	34.308	*Others (each below Rp 1 billion)*
Sub-jumlah	**136.233**	**489.324**	*Sub-total*
Pihak ketiga			***Third parties***
US Dolar			***US Dollar***
Asia Pasific Intertrading Pte Ltd. (saldo pada tanggal 30 Juni 2021 dan 31 Desember 2020 masing-masing adalah sebesar nihil dan US$ 5.790.543)	-	81.676	*Asia Pasific Intertrading Pte Ltd. (as of 30 June 2021 and 31 December 2020 the outstanding balance are nil and US$ 5,790,543, respectively)*
Sub-jumlah	-	81.676	*Sub-total*
Jumlah	**136.233**	**571.000**	***Total***

18. UTANG LAIN-LAIN / *OTHER PAYABLES*

Akun ini merupakan utang lain-lain ke pihak ketiga atas asuransi dan lainnya masing-masing sebesar Rp 29.189 dan Rp 21.057 pada tanggal 30 Juni 2021 dan 31 Desember 2020.

This account represents other payable to third parties for insurance and other amounting to Rp 29,189 and Rp 21,057 as of 30 June 2021 and 31 December 2020, respectively.

19. PERPAJAKAN / *TAXATION*

a. **Pajak Dibayar di Muka** / *Prepaid Taxes*

	30 Juni/ *30 June* 2021	31 Desember/ *31 December* 2020	
Pajak Penghasilan Pasal 28	419.291	94.339	*Income Tax Article 28*
Pajak Pertambahan Nilai – Masukan	447.063	68.001	*Value-Added Tax - Input*
Jumlah	866.354	162.340	***Total***

b. **Utang Pajak** / *Taxes Payable*

	30 Juni/ *30 June* 2021	31 Desember/ *31 December* 2020	
Pajak Penghasilan Pasal 4 (2)	6.144	5.485	*Income Tax Article 4 (2)*
Pajak Penghasilan Pasal 21	2.011	2.728	*Income Tax Article 21*
Pajak Penghasilan Pasal 23	2.972	11.910	*Income Tax Article 23*
Pajak Penghasilan Pasal 25	6.265	6.436	*Income Tax Article 25*
Pajak Penghasilan Pasal 26	1.760	1.531	*Income Tax Article 26*
Pajak Penghasilan Pasal 29	36.610	24.001	*Income Tax Article 29*
Pajak Pertambahan Nilai – Keluaran	34.165	4.431	*Value-Added Tax - Output*
Jumlah	89.927	56.522	***Total***

c. **Perhitungan Pajak Penghasilan** / *Income Tax Calculation*

Penghasilan kena pajak yang dihitung Perusahaan menjadi dasar Surat Pemberitahuan (SPT) yang disampaikan kepada otoritas perpajakan pada setiap tahun.

Taxable income which calculated by the Company uses as basis for Surat Pemberitahuan (SPT) that reported to Director General of Taxes yearly.

Rekonsiliasi antara laba sebelum pajak penghasilan menurut laporan laba rugi dan penghasilan komprehensif lain konsolidasian dengan taksiran laba kena pajak untuk periode 6 (enam) bulan yang berakhir pada 30 Juni 2021 dan 2020, adalah sebagai berikut:

A reconciliation between profit before income tax as shown in the consolidated statements of profit or loss and other comprehensive income with estimated taxable profit for the period of 6 (six) months ended 30 June 2021 and 2020, are as follows:

19. **PERPAJAKAN** (Lanjutan) / *19. **TAXATION** (Continued)*

c. **Perhitungan Pajak Penghasilan** (Lanjutan) / *c. **Income Tax Calculation** (Continued)*

	30 Juni/ *30 June* 2021	30 Juni/ *30 June* 2020	
Pendapatan yang dikenakan pajak penghasilan yang bersifat final	1.367.019	446.049	*Revenue subject to final income tax*
Pendapatan yang dikenakan pajak penghasilan yang tidak bersifat final	1.604.360	2.131.303	*Revenue subject to non final income tax*
Pendapatan konsolidasian	2.971.379	2.577.352	*Consolidated income*
Pajak Penghasilan			***Income Tax***
Pajak penghasilan yang bersifat final	136.702	44.605	*Subject to final income tax*
Pajak penghasilan yang tidak bersifat final	111.647	103.950	*Subject to non final income tax*

Rekonsiliasi antara laba sebelum pajak penghasilan menurut laporan laba rugi komprehensif konsolidasian dan taksiran laba kena pajak Perusahaan untuk periode 6 (enam) bulan yang berakhir pada 30 Juni 2021 dan 2020, adalah sebagai berikut:

A reconciliation between profit before income tax according to the consolidated statements of profit or loss and other comprehensive income and estimated taxable income of the Company for the period of 6 (six) months ended 30 June 2021 and 2020, are as follows:

	30 Juni/ *30 June* 2021	30 Juni/ *30 June* 2020	
Laba sebelum pajak penghasilan, menurut laporan laba rugi komprehensif konsolidasian	820.876	692.897	*Profit before income tax, as per consolidated statements of comprehensive income*
Bagian laba entitas anak sebelum pajak penghasilan - bersih	(105.046)	(181.094)	*Profit of subsidiairies before income taxes - net*
Laba Perusahaan sebelum pajak penghasilan	715.830	511.803	***The Company's profit before income tax***
Koreksi fiskal:			***Fiscal corrections:***
Beda temporer	(372)	37	***Temporary differences***
Beda tetap:			***Permanent differences:***
Beban yang terkait dengan pendapatan yang dikenakan pajak penghasilan yang bersifat final	9.970	5.672	*Expenses related to revenue subject to final income tax*
Bagian laba dari entitas anak	(694.074)	(501.822)	*Gain from subsidiaries*
Lainnya - Bersih	3.127	(9.653)	*Others - Net*
Jumlah koreksi fiskal	(681.349)	(505.766)	***Total fiscal correction***
Taksiran laba kena pajak - Perusahaan	34.481	6.037	***Estimated taxable income - the Company***

19. **PERPAJAKAN** (Lanjutan) / *19. **TAXATION** (Continued)*

c. **Perhitungan Pajak Penghasilan** (Lanjutan) / *c. **Income Tax Calculation** (Continued)*

Taksiran beban pajak penghasilan dan utang pajak penghasilan untuk periode 6 (enam) bulan yang berakhir 30 Juni 2021 dan 30 Juni 2020 adalah sebagai berikut:

Estimated income tax expenses and income tax payable for the period 6 (six) months ended 30 June 2021 and 30 June 2020, are as follows:

	30 Juni/ *30 June* 2021	30 Juni/ *30 June* 2020	
Taksiran laba kena pajak			***Estimated taxable income***
Perusahaan	34.481	6.037	*The Company*
Entitas anak - Bersih	428.076	457.237	*Subsidiaries - Net*
Taksiran beban pajak penghasilan			***Estimated income tax expenses***
Perusahaan	7.586	1.328	*The Company*
Entitas anak	104.060	102.622	*Subsidiaries*
Taksiran beban pajak penghasilan menurut laporan laba rugi komprehensif konsolidasian	111.646	103.950	***Estimated income tax expenses as per consolidated statements of comprehensive income***
Dikurangi:			***Less:***
Pajak Penghasilan Pasal 23	(447.965)	(72.911)	*Income Tax Article 23*
Pajak Penghasilan Pasal 25	(46.362)	(85.861)	*Income Tax Article 25*
Jumlah	(494.327)	(158.772)	***Total***
Taksiran utang pajak penghasilan			***Estimated income tax payable***
(klaim) pajak penghasilan	(382.681)	(54.822)	*(claim for income tax refund)*
Taksiran utang pajak penghasilan			***Estimated income tax payable***
Pajak Penghasilan Pasal 29	36.610	7.175	***Income Tax Article 29***
Taksiran klaim pajak penghasilan	(419.291)	(61.997)	***Estimated claims for income tax refund***

d. **Pajak tangguhan** / *d. **Deferred tax***

Aset pajak tangguhan / *Deferred tax assets*

Aset (liabilitas) pajak tangguhan yang timbul dari perbedaan temporer antara pendapatan dan beban, yang diakui secara komersial dan perpajakan, adalah sebagai berikut:

Deferred tax assets (liabilities) occuring from temporary differences of revenues and expenses recognition between the commercial and tax base are as follows:

30 Juni 2021	**Saldo awal/ *Beginning balance***	**Dikreditkan (dibebankan) ke laba rugi/ *Credited charged) to profit or loss***	**Dikreditkan ke penghasilan komprehensif lain/ *Credited to other comprehensive income***	**Saldo akhir/ *Ending balance***	***30 June 2021***
Rugi fiskal	44.995	(35.263)	-	9.732	*Tax loss*
Cadangan imbalan pasca-kerja	11.914	2.730	43	14.687	*Provision for post-employment benefits*
Penyusutan aset tetap	3.817	1.729	-	5.546	*Depreciation of Property and equipment*
Jumlah - bersih	60.726	(30.804)	43	29.965	***Total - net***

19. **PERPAJAKAN** (Lanjutan) | *19. **TAXATION** (Continued)*

d. **Pajak tangguhan** (Lanjutan) | *d. **Deferred tax** (Continued)*

Aset pajak tangguhan (Lanjutan) | *Deferred tax assets (Continued)*

31 Desember 2020	Saldo awal/ *Beginning balance*	Dikreditkan (dibebankan) ke laba rugi/ *Credited charged) to profit or loss*	Dikreditkan ke penghasilan komprehensif lain/ *Credited to other comprehensive income*	Saldo akhir/ *Ending balance*	*31 December 2020*
Rugi fiskal	240.925	(195.930)	-	44.995	*Tax loss*
Cadangan imbalan pasca-kerja	9.885	2.014	15	11.914	*Provision for post-employment benefits*
Penyusutan aset tetap	(1.219)	5.036	-	3.817	*Depreciation of property and equipment*
Jumlah - bersih	249.591	(188.880)	15	60.726	***Total - net***

Liabilitas pajak tangguhan | *Deferred tax liabilities*

30 Juni 2021	Saldo awal/ *Beginning balance*	Dikreditkan ke laba rugi/ *Credited to profit or loss*	Saldo akhir/ *Ending balance*	*30 June 2021*
Pajak atas pendapatan bunga	(11.411)	11.411	-	*Interest income withholding tax*

31 Desember 2020	Saldo awal/ *Beginning balance*	Dikreditkan (dibebankan) ke laba rugi/ *Credited to (charged to) profit or loss*	Dikreditkan ke penghasilan komprehensif lain/ *Credited to other comprehensive income*	*Reklasifikasi/ Reclasification*	Saldo akhir/ *Ending balance*	*31 December 2020*
Cadangan imbalan pasca-kerja	12.685	(12.685)	-	-	-	*Provision for post-employment benefits*
Pencadangan kerugian penurunan nilai piutang	6.490	(6.490)	-	-	-	*Allowance for impairment losses of trade receivables*
Penyusutan aset tetap	(3.908)	3.908	-	-	-	*property and equipment*
Pajak atas pendapatan bunga	-	-	(165)	(11.246)	(11.411)	*Interest income withholding tax*
Rugi fiskal	(27.267)	16.021	-	11.246	-	*Tax loss*
Jumlah	(12.000)	754	(165)	-	(11.411)	***Total***

e. **Taksiran klaim pajak penghasilan**

Akun ini merupakan taksiran jumlah lebih bayar pajak penghasilan. Jumlah tersebut mungkin berbeda dari jumlah lebih bayar pajak penghasilan yang dilaporkan dalam Surat Pemberitahuan (SPT) Tahunan.

*e. **Estimated claims for income tax refund***

This account represents estimated claims for income tax refund. Such amounts might be different with the amounts reported in the Annual Income Tax Return.

20. PENDAPATAN YANG DITERIMA DI MUKA / *20. UNEARNED INCOME*

	30 Juni/ *30 June* 2021	31 Desember/ *31 December* 2020	
Pihak ketiga			***Third parties***
PT Telekomunikasi Selular	943.570	105.903	*PT Telekomunikasi Selular*
PT Hutchison 3 Indonesia	660.524	278.857	*PT Hutchison 3 Indonesia*
PT XL Axiata Tbk	633.970	455.997	*PT XL Axiata Tbk*
PT Indosat Tbk	276.239	178.050	*PT Indosat Tbk*
PT Smartfren Telecom Tbk	204.960	30.848	*PT Smartfren Telecom Tbk*
PT Smart Telecom	4.395	8.071	*PT Smart Telecom*
PT Sampoerna Telecom	2.816	1.945	*PT Sampoerna Telecom*
Lainnya	2.336	2.323	*Others*
Jumlah	2.728.810	1.061.994	***Total***

Sesuai perjanjian sewa, entitas anak telah menerima pembayaran di muka dari pelanggan untuk jangka waktu 1 (satu) bulan, 3 (tiga) bulan dan 1 (satu) tahun.

Based on the rental agreements, the subsidiaries have received payments in advance for year of 1 (one) month, 3 (three) months and 1 (one) year.

21. BEBAN MASIH HARUS DIBAYAR / *21. ACCRUED EXPENSES*

	30 Juni/ *30 June* 2021	31 Desember/ *31 December* 2020	
Estimasi biaya pembangunan menara telekomunikasi	509.184	578.160	*Estimated construction cost of telecommunication towers*
Beban bunga :			*Interest expenses :*
Surat utang (Catatan 23)	325.754	304.627	*Notes (Note 23)*
Pinjaman jangka panjang (Catatan 22)	25.599	60.842	*Long-term loans (Note 22)*
Karyawan	75.859	106.979	*Employees*
Perbaikan dan pemeliharaan menara	62.490	44.315	*Towers repair and maintenance*
Retensi pembelian menara	60.944	-	*Tower purchase retention*
Jasa konsultan	5.940	5.640	*Consultant fees*
Keamanan	4.743	5.930	*Security*
Listrik	4.437	3.422	*Electricity*
Lainnya	28.154	46.875	*Others*
Jumlah	1.103.104	1.156.790	***Total***

Estimasi biaya pembangunan menara telekomunikasi merupakan estimasi beban masih harus dikeluarkan atas menara telekomunikasi yang telah selesai pembangunannya namun belum ditagihkan seluruh biayanya oleh kontraktor.

Estimated construction cost of telecommunication towers represents the estimated costs to be incurred by the Company in relation to work performed on the telecommunication towers which have been completed but not yet invoiced by contractors.

Retensi pembelian menara adalah dana yang ditahan oleh Perusahaan hingga kondisi tertentu yang dituangkan di Perjanjian Jual Beli Aset Bersyarat terpenuhi.

Tower purchase retention are funds withheld by the Company until certain conditions stipulated in the Conditional Asset Sale and Purchase Agreement are met.

22. PINJAMAN JANGKA PANJANG – PIHAK KETIGA

Akun ini merupakan pinjaman dari pihak ketiga sebagai berikut:

22. LONG-TERM LOANS – THIRD PARTIES

This account represents loans from third parties as follows:

	30 Juni/ *30 June* 2021	31 December/ *31 December* 2020		
Pinjaman sindikasi				***Syndicated loans***
a. Fasilitas US$1 miliar (saldo pada 30 Juni 2021 dan 31 Desember 2020 masing-masing sebesar US$ 95 juta dan US$ 366,9 juta)	1.377.120	5.175.125	*a.*	*US$1 billion facility (balance as of 30 June 2021 and 31 December 2020 amounted to US$ 95 million and US$ 366.9 million, respectively)*
b. Fasilitas US$ 200 juta (saldo pada 30 Juni 2021 dan 31 Desember 2020 masing-masing sebesar US$ 111,6 juta dan US$ 74 juta)	1.617.754	1.043.770	*b.*	*US$ 200 million facility (balance as of 30 June 2021 and 31 December 2020 amounted to US$ 111.6 million and US$ 74 million, respectively)*
c. Fasilitas US$ 375 juta (saldo pada 30 Juni 2021 dan 31 Desember 2020 masing-masing sebesar US$ 334 juta dan US$ 292,1 juta)	4.841.664	4.120.070	*c.*	*US$ 375 million facility (balance as of 30 June 2021 and 31 December 2020 amounted to US$ 334 million and US$ 292.1 million, respectively)*
d Fasilitas US$ 275 juta (saldo pada 30 Juni 2021 dan 31 Desember 2020 masing-masing sebesar US$ 275 juta dan nihil)	3.986.400	-	*c.*	*US$ 275 million facility (balance as of 30 June 2021 and 31 December 2020 amounted to US$ 275 million and niil, respectively)*
Pinjaman non-sindikasi				***Non-syndicated loans***
PT Bank UOB Indonesia	46.700	24.800		*PT Bank UOB Indonesia*
PT Bank QNB Indonesia Tbk	45.000	36.500		*PT Bank QNB Indonesia Tbk*
Jumlah	11.914.638	10.400.265		***Total***
Dikurangi: Biaya pinjaman (Catatan 2f)	(158.565)	(121.418)		*Less : Unamortized borrowing cost (Note 2f)*
Jumlah - bersih	11.756.073	10.278.847		***Total - net***
Saldo yang jatuh tempo dalam satu tahun	(3.012.352)	(3.857.445)		*Balance due less than one year*
Saldo yang jatuh tempo lebih dari satu tahun	8.743.721	6.421.402		***Balance due more than one year***

Pinjaman Sindikasi

a. **Fasilitas Pinjaman US$ 1 miliar**

Pada tanggal 21 November 2014, entitas anak tertentu telah menandatangani perjanjian fasilitas pinjaman ("Perjanjian Fasilitas Pinjaman") sebesar US$ 1.000.000.000 untuk melunasi program pinjaman US$ 2.000.000.000 pada saat itu dan untuk menyediakan tambahan dana untuk modal kerja.

Syndication Loans

a. US$ 1 billion Credit Facilities

On 21 November 2014, certain subsidiaries of have entered into a US$ 1,000,000,000 credit facility agreement (the "Credit Facilities Agreement") to refinance the existing US$ 2,000,000,000 debt program and to provide additional funding for working capital.

22. **PINJAMAN JANGKA PANJANG – PIHAK KETIGA** (Lanjutan)

Pinjaman Sindikasi (Lanjutan)

a. **Fasilitas Pinjaman US$ 1 miliar** (Lanjutan)

Pada tanggal 21 April 2017, Perusahaan dan entitas anak, telah merevisi dan menyajikan kembali Perjanjian Fasilitas Pinjaman yang diubah melalui surat perubahan dan pengesampingan tanggal 6 November 2015 dan 17 Maret 2017.

Pada tanggal 16 Maret 2020, entitas anak melakukan penyesuaian nilai fasilitas pinjaman sindikasi US$ 1 miliar. Amandemen nilai fasilitas tersebut adalah untuk fasilitas pinjaman *revolving* Seri B dari sebesar US$ 300 juta menjadi US$ 100 juta.

Pinjaman ini tidak memiliki jaminan, dan entitas anak yang menjadi peserta fasilitas pinjaman ini memberikan jaminan bersama (*cross guarantee*) atas Perjanjian Fasilitas Pinjaman.

Dalam Perjanjian Fasilitas Pinjaman tersebut, entitas anak diharuskan untuk memenuhi beberapa kondisi, diantaranya:
a. *Net senior debt* dari entitas anak/ EBITDA yang disesuaikan dan dianualisasi maksimum sebesar 5 kali;
b. *Top tier revenue ratio* minimum sebesar 50,00%.

Fasilitas pinjaman ini terdiri dari 4 fasilitas yaitu:

1. **Fasilitas A sebesar US$ 400 juta**

Fasilitas ini dikenakan marjin bunga sebesar 2,10% per tahun di atas LIBOR untuk kreditur dalam negeri, dan 2,00% per tahun untuk kreditur luar negeri.

Fasilitas ini jatuh tempo pada bulan Januari 2020.

Fasilitas ini telah dilunasi seluruhnya pada tanggal 12 Juli 2019.

Saldo pada tanggal 30 Juni 2021 dan 31 Desember 2020 masing-masing sebesar nihil.

Kreditor yang berpartisipasi pada fasilitas ini adalah:

- Oversea-Chinese Banking Corporation Limited
- DBS Bank Ltd
- The Hongkong and Shanghai Banking Corporation Limited
- Credit Agricole Corporate and Investment Bank
- CIMB Bank Berhad
- Sumitomo Mitsui Banking Corporation
- CTBC Bank Co, Ltd
- MUFG Bank, Ltd., Jakarta Branch
- PT Bank HSBC Indonesia
- PT Bank ANZ Indonesia
- PT Bank BNP Paribas Indonesia
- PT Bank UOB Indonesia

22. ***LONG-TERM LOANS - THIRD PARTIES*** *(Continued)*

Syndication Loans *(Continued)*

a. ***US$ 1 billion Credit Facilities*** *(Continued)*

On 21 April 2017, the Company and its subsidiaries have revised and restated the Loan Facility Agreement which was amended through a letter of amendment and waiver on 6 November 2015 and 17 March 2017.

On 16 March 2020, the subsidiary amended the limit of syndicated loan facility of US$ 1 billion. The amendment is for the Series B revolving loan facility from US$ 300 million to become US$ 100 million.

These loans are unsecured, and the subsidiaries who participated in the Credit Facilities provide a cross guarantee to the Lenders under the Credit Facilities Agreement.

Under the Credit Facilities Agreement, the subsidiaries are required to adhere to the following conditions, among others, as follows:
a. Net senior debt of subsidiaries/ annualized adjusted EBITDA ratio shall not exceed 5 times;
b. Minimum top tier revenue ratio of 50.00%.

There are 4 facilities under this credit facilities:

*1. **Facility A US$ 400 million Term Loan Facility***

This facility bears interest margin of 2.10% above LIBOR per annum for onshore lenders and 2.00% per annum for offshore lenders.

This Facility mature in January 2020.

This Facility has been fully paid on dated 12 July 2019.

The outstanding balance as of 30 June 2021 and 31 December 2020 was amounted to nil, respectively.

The lenders who participated in this facility are:

- *Oversea-Chinese Banking Corporation Ltd*
- *DBS Bank Ltd*
- *The Hongkong and Shanghai Banking Corporation Limited*
- *Credit Agricole Corporate and Investment Bank*
- *CIMB Bank Berhad*
- *Sumitomo Mitsui Banking Corporation*
- *CTBC Bank Co, Ltd*
- *MUFG Bank, Ltd., Jakarta Branch*
- *PT Bank HSBC Indonesia*
- *PT Bank ANZ Indonesia*
- *PT Bank BNP Paribas Indonesia*
- *PT Bank UOB Indonesia*

22. **PINJAMAN JANGKA PANJANG – PIHAK KETIGA** (Lanjutan)

Pinjaman Sindikasi (Lanjutan)

a. Fasilitas Pinjaman US$ 1 miliar (Lanjutan)

2. **Fasilitas Pinjaman *Revolving* Seri B sebesar US$ 100 juta**

Fasilitas ini dikenakan marjin bunga sebesar 1,85% per tahun di atas LIBOR untuk kreditur dalam negeri, dan 1,75% per tahun untuk kreditur luar negeri.

Fasilitas ini akan jatuh tempo pada bulan Juni 2022.

Saldo pada tanggal 30 Juni 2021 dan 31 Desember 2020 masing-masing sebesar US$ 95 juta dan US$ 91,9 juta.

Kreditor yang berpartisipasi pada fasilitas ini adalah:

- Oversea-Chinese Banking Corporation Limited
- United Oversea Bank Ltd
- DBS Bank Ltd
- The Hongkong and Shanghai Banking Corporation Limited
- Credit Agricole Corporate and Investment Bank
- CIMB Bank Berhad
- Sumitomo Mitsui Banking Corporation
- MUFG Bank, Ltd., Jakarta Branch
- PT Bank HSBC Indonesia
- PT Bank ANZ Indonesia
- PT Bank BNP Paribas Indonesia
- PT Bank UOB Indonesia

3. **Fasilitas Pinjaman *Revolving* Seri C sebesar US$ 300 juta**

Fasilitas ini dikenakan marjin bunga sebesar 1,60% per tahun di atas LIBOR untuk kreditur dalam negeri dan 1,50% untuk kreditur luar negeri.

Fasilitas ini jatuh tempo pada bulan November 2015 dan telah dilunasi seluruhnya pada tanggal 16 November 2015.

4. **Fasilitas D sebesar US$ 275 juta**

Fasilitas ini dikenakan marjin bunga sebesar 2,10% per tahun di atas LIBOR untuk kreditur dalam negeri dan 2,00% untuk kreditur luar negeri.

Fasilitas ini jatuh tempo pada bulan Juni 2021 dan telah dilunasi seluruhnya pada tanggal 29 Januari 2021.

Saldo pada tanggal 30 Juni 2021 dan 31 Desember 2020 masing-masing sebesar nihil dan US$ 275 juta.

22. ***LONG-TERM LOANS - THIRD PARTIES*** *(Continued)*

Syndication Loan *(Continued)*

a. US$ 1 billion Credit Facilities *(Continued)*

*2. **Facility B of US$ 100 million Revolving Loan Facility***

This facility bears interest margin of 1.85% above LIBOR per annum for onshore lenders and 1.75% per annum for offshore lenders.

This Facility will mature in June 2022.

The outstanding balance as of 30 June 2021 and 31 December 2020 was amounted to US$ 95 million and US$ 91.9 million, respectively.

The lenders who participated in this facility are:

- *Oversea-Chinese Banking Corporation Ltd*
- *United Oversea Bank Ltd*
- *DBS Bank Ltd*
- *The Hongkong and Shanghai Banking Corporation Limited*
- *Credit Agricole Corporate and Investment Bank*
- *CIMB Bank Berhad*
- *Sumitomo Mitsui Banking Corporation*
- *MUFG Bank, Ltd., Jakarta Branch*
- *PT Bank HSBC Indonesia*
- *PT Bank ANZ Indonesia*
- *PT Bank BNP Paribas Indonesia*
- *PT Bank UOB Indonesia*

*3. **Facility C of US$ 300 million Revolving Loan Facility***

This facility bears interest margin of 1.60% above LIBOR per annum for onshore lenders and 1.50% for offshore lenders.

This Facility matures in November 2015 and was fully repaid on 16 November 2015.

*4. **Facility D US$ 275 million Term Loan Facility***

This facility bears interest margin of 2.10% above LIBOR per annum for onshore lenders and 2.00% for offshore lenders.

This Facility mature in June 2021 and was fully repaid on 29 January 2021.

The outstanding balance as of 30 June 2021 and 31 December 2020 was amounted to nil and US$ 275 million, respectively.

22. **PINJAMAN JANGKA PANJANG – PIHAK KETIGA** (Lanjutan)

Pinjaman Sindikasi (Lanjutan)

a. Fasilitas Pinjaman US$ 1 miliar (Lanjutan)

4. **Fasilitas D sebesar US$ 275 juta** (Lanjutan)

Kreditor yang berpartisipasi pada fasilitas ini adalah:

- Oversea-Chinese Banking Corporation Limited
- United Oversea Bank Ltd
- DBS Bank Ltd
- CIMB Bank Berhad
- Sumitomo Mitsui Banking Corporation
- CTBC Bank Co, Ltd
- MUFG Bank, Ltd., Jakarta Branch
- PT Bank HSBC Indonesia
- PT Bank ANZ Indonesia
- PT Bank BNP Paribas Indonesia

b. Fasilitas Pinjaman *Revolving* sebesar US$ 200 juta

Pada tanggal 30 Maret 2017, entitas anak tertentu telah menandatangani perjanjian fasilitas pinjaman *revolving* ("Perjanjian RLF") sebesar US$ 200.000.000 untuk menyediakan tambahan dana untuk modal kerja.

Pinjaman ini tidak memiliki jaminan, dan entitas anak yang menjadi peserta RLF ini memberikan jaminan bersama (*cross guarantee*) atas Perjanjian RLF.

Dalam Perjanjian Fasilitas Pinjaman tersebut, entitas anak diharuskan untuk memenuhi beberapa kondisi, diantaranya:
a. *Net senior debt* dari entitas anak/ EBITDA yang disesuaikan dan dianualisasi maksimum sebesar 5 kali;
b. *Top tier revenue ratio* minimum sebesar 50,00%

Kreditor yang berpartisipasi pada fasilitas ini adalah:
- Oversea-Chinese Banking Corporation Limited
- DBS Bank Ltd
- CIMB Bank Berhad
- PT Bank UOB Indonesia
- MUFG Bank, Ltd
- PT Bank CIMB Niaga Tbk
- PT Bank HSBC Indonesia
- PT Bank ANZ Indonesia
- PT Bank BNP Paribas Indonesia
- PT Bank DBS Indonesia

Fasilitas ini dikenakan marjin bunga sebesar 2,00% per tahun di atas LIBOR untuk kreditur dalam negeri, dan 1,75% per tahun untuk kreditur luar negeri.

Fasilitas ini akan jatuh tempo pada bulan Juni 2022.

Saldo pada tanggal 30 Juni 2021 dan 31 Desember 2020 masing-masing sebesar US$ 111,6 juta dan US$ 74 juta.

22. ***LONG-TERM LOANS – THIRD PARTIES*** *(Continued)*

Syndication Loan *(Continued)*

a. US$ 1 billion Credit Facilities *(Continued)*

*4. **Facility D US$ 275 million Term Loan Facility** (Continued)*

The lenders who participated in this facility are:

- *Oversea-Chinese Banking Corporation Ltd*
- *United Oversea Bank Ltd*
- *DBS Bank Ltd*
- *CIMB Bank Berhad*
- *Sumitomo Mitsui Banking Corporation*
- *CTBC Bank Co, Ltd*
- *MUFG Bank, Ltd., Jakarta Branch*
- *PT Bank HSBC Indonesia*
- *PT Bank ANZ Indonesia*
- *PT Bank BNP Paribas Indonesia*

b. US$ 200 million Revolving Loan Facility

On 30 March 2017, certain subsidiaries have entered into a US$ 200,000,000 revolving loan facility agreement (the "RLF Agreement") to provide additional funding for working capital.

These loans are unsecured, and the subsidiaries who participated in the RLF provide a cross guarantee to the Lenders under the RLF Agreement.

Under the RLF Agreement, the subsidiaries are required to adhere to the following covenants, among others, as follows:
a. Net senior debt of subsidiaries/ annualized adjusted EBITDA ratio shall not exceed 5 times;
b. Minimum top tier revenue ratio of 50.00%.

The lenders who participated in this facility are:
- *Oversea-Chinese Banking Corporation Limited*
- *DBS Bank Ltd*
- *CIMB Bank Berhad*
- *PT Bank UOB Indonesia*
- *MUFG Bank, Ltd*
- *PT Bank CIMB Niaga Tbk*
- *PT Bank HSBC Indonesia*
- *PT Bank ANZ Indonesia*
- *PT Bank BNP Paribas Indonesia*
- *PT Bank DBS Indonesia*

This facility bears interest margin of 2.00% above LIBOR per annum for onshore lenders, and 1.75% per annum for offshore lenders.

This Facility will mature in June 2022.

The outstanding balance as of 30 June 2021 and 31 December 2020 amounted to US$ 111.6 million and US$ 74 million, respectively.

22. **PINJAMAN JANGKA PANJANG – PIHAK KETIGA** (Lanjutan)

Pinjaman Sindikasi (Lanjutan)

c. **Fasilitas Pinjaman *Revolving* sebesar US$ 375 juta**

Pada tanggal 28 Juni 2019, entitas anak tertentu telah menandatangani perjanjian fasilitas pinjaman *revolving* ("Perjanjian RLF") sebesar US$ 375.000.000 untuk melunasi Fasilitas A (lihat huruf a.1).

Pinjaman ini tidak memiliki jaminan, dan entitas anak yang menjadi peserta RLF ini memberikan jaminan bersama (*cross guarantee*) atas Perjanjian RLF.

Dalam Perjanjian Fasilitas Pinjaman tersebut, entitas anak diharuskan untuk memenuhi beberapa kondisi, diantaranya:

a. *Net senior debt* dari entitas anak/ EBITDA yang disesuaikan dan dianualisasi maksimum sebesar 5 kali;
b. *Top tier revenue ratio* minimum sebesar 50,00%.

Kreditor yang berpartisipasi pada fasilitas ini adalah:
- Australia and New Zealand Banking Group Limited
- CIMB Bank Berhad
- Credit Agricole Corporate and Investment Bank
- DBS Bank, Ltd
- Mizuho Bank, Ltd
- Oversea-Chinese Banking Corporation Limited
- PT Bank BNP Paribas Indonesia
- PT Bank CIMB Niaga Tbk
- PT Bank DBS Indonesia
- PT Bank HSBC Indonesia
- PT Bank OCBC NISP Tbk
- The Hongkong and Shanghai Banking Corporation
- United Overseas Bank Limited

Fasilitas ini dikenakan marjin bunga sebesar 1,85% per tahun di atas LIBOR untuk kreditur dalam negeri, dan 1,75% per tahun untuk kreditur luar negeri.

Fasilitas ini akan jatuh tempo pada bulan Januari 2025.

Saldo pada tanggal 30 Juni 2021 dan 31 Desember 2020 masing-masing US$ 334 juta dan US$ 292,1 juta.

d. **Fasilitas Pinjaman *Revolving* sebesar US$ 275 juta**

Pada tanggal 20 Januari 2021, entitas anak tertentu telah menandatangani Perjanjian Fasilitas Pinjaman *Revolving* ("Perjanjian RLF") sebesar US$ 275.000.000 untuk menyediakan tambahan dana untuk modal kerja.

Pinjaman ini tidak memiliki jaminan, dan entitas anak yang menjadi peserta RLF ini memberikan jaminan bersama (*cross guarantee*) atas Perjanjian RLF.

22. ***LONG-TERM LOANS - THIRD PARTIES*** *(Continued)*

Syndication Loan *(Continued)*

c. ***US$ 375 million Revolving Loan Facility***

On 28 June 2019, certain subsidiaries have entered into a US$ 375,000,000 revolving loan facility agreement (the "RLF Agreement") to repay Facility A (see letter a.1).

These loans are unsecured, and the subsidiaries who participated in the RLF provide a cross guarantee to the Lenders under the RLF Agreement.

Under the RLF Agreement, the subsidiaries are required to adhere to the following covenants, among others, as follows:

a. Net senior debt of subsidiaries/ annualized adjusted EBITDA ratio shall not exceed 5 times;

b. Minimum top tier revenue ratio of 50.00%.

The lenders who participated in this facility are:
- *Australia and New Zealand Banking Group Limited*
- *CIMB Bank Berhad*
- *Credit Agricole Corporate and Investment Bank*
- *DBS Bank, Ltd*
- *Mizuho Bank, Ltd*
- *Oversea-Chinese Banking Corporation Limited*
- *PT Bank BNP Paribas Indonesia*
- *PT Bank CIMB Niaga Tbk*
- *PT Bank DBS Indonesia*
- *PT Bank HSBC Indonesia*
- *PT Bank OCBC NISP Tbk*
- *The Hongkong and Shanghai Banking Corporation*
- *United Overseas Bank Limited*

This facility bears interest margin of 1.85% above LIBOR per annum for onshore lenders, and 1.75% per annum for offshore lenders.

This Facility will mature in January 2025.

The outstanding balance as of 30 June 2021 and 31 December 2020 amounted US$ 334 million and US$ 292.1 million.

d. ***US$ 275 million Revolving Loan Facility***

On 20 January 2021, certain subsidiaries entered into a Revolving Loan Facility Agreement ("RLF Agreement") amounting to US$ 275,000,000 to provide additional funds for working capital.

This loan has no collateral, and the subsidiary that is a participant of the RLF provides a cross guarantee for the RLF Agreement.

22. **PINJAMAN JANGKA PANJANG – PIHAK KETIGA** (Lanjutan)

Pinjaman Sindikasi (Lanjutan)

d. **Fasilitas Pinjaman *Revolving* sebesar US$ 275 juta** (Lanjutan)

Dalam Perjanjian Fasilitas Pinjaman tersebut, entitas anak diharuskan untuk memenuhi beberapa kondisi, diantaranya:

a. *Net senior debt* dari entitas anak/ EBITDA yang disesuaikan dan dianualisasi maksimum sebesar 5 kali;
b. *Top tier revenue ratio* minimum sebesar 50,00%.

Kreditor yang berpartisipasi pada fasilitas ini adalah:

- Credit Agricole Corporate and Investment Bank
- DBS Bank Ltd
- Oversea-Chinese Banking Corporation Limited
- Sumitomo Mitsui Banking Corporation Singapore Branch
- United Overseas Bank Limited
- PT Bank BNP Paribas Indonesia
- PT Bank CIMB Niaga Tbk
- PT Bank HSBC Indonesia
- PT Bank Mizuho Indonesia
- PT Bank OCBC NISP Tbk

Fasilitas ini dikenakan marjin bunga sebesar 1,85% per tahun di atas LIBOR untuk kreditur dalam negeri, dan 1,75% per tahun untuk kreditur luar negeri.

Fasilitas ini akan jatuh tempo pada bulan Juni 2026.

Saldo pada tanggal 30 Juni 2021 dan 31 Desember 2020 masing-masing sebesar US$ 275 juta dan nihil.

*22. **LONG-TERM LOANS - THIRD PARTIES** (Continued)*

***Syndication Loan** (Continued)*

*d. **US$ 275 million Revolving Loan Facility** (Continued)*

In the Loan Facility Agreement, the subsidiary is required to comply with several conditions, including:

a. Net senior debt of subsidiaries/ annualized adjusted EBITDA ratio shall not exceed 5 times;
b. Minimum top tier revenue ratio of 50.00%.

Creditors who participate in this facility are:

- *Credit Agricole Corporate and Investment Bank*
- *DBS Bank Ltd*
- *Oversea-Chinese Banking Corporation Limited*
- *Sumitomo Mitsui Banking Corporation Singapore Branch*
- *United Overseas Bank Limited*
- *PT Bank BNP Paribas Indonesia*
- *PT Bank CIMB Niaga Tbk*
- *PT Bank HSBC Indonesia*
- *PT Bank Mizuho Indonesia*
- *PT Bank OCBC NISP Tbk*

This facility bears an interest margin of 1.85% per annum above LIBOR for domestic creditors and 1.75% per annum for foreign creditors.

This Facility will mature in June 2026.

The outstanding balance as of 30 June 2021 and 31 December 2020 amounted US$ 275 million and nil, respectively.

22. **PINJAMAN JANGKA PANJANG – PIHAK KETIGA** (Lanjutan)

Pinjaman Non-Sindikasi

PT Bank UOB Indonesia

Fasilitas Pinjaman *Revolving*

Pada tanggal 9 Maret 2021, PT Gihon Telekomunikasi Indonesia Tbk, entitas anak telah menandatangani perubahan perjanjian kredit fasilitas *revolving* sehingga fasilitas pinjaman menjadi:

a. Menaikkan fasilitas pinjaman *revolving* seri I dari Rp 50.000 menjadi Rp 100.000
b. Menurunkan fasilitas *revolving* seri II dari Rp 100.000 menjadi Rp 50.000, dan memperpanjang jangka waktu pinjaman menjadi sampai dengan Januari 2023.

Pinjaman ini tidak memiliki jaminan tetapi PT Gihon Telekomunikasi Indonesia Tbk, entitas anak, harus menyerahkan perjanjian pemegang saham yang di tandatangani oleh perusahaan dan pemegang saham lainnya dan memastikan laporan keuangan PT Gihon Telekomunikasi Indonesia Tbk, entitas anak, telah dikonsolidasi ke dalam laporan keuangan Perusahaan.

Dalam fasilitas pinjaman ini, PT Gihon Telekomunikasi Indonesia Tbk, entitas anak diharuskan memenuhi beberapa kondisi, diataranya:

a) *Debt to EBITDA* rasio maksimal 3,75 kali.
b) Rasio *top tier revenue* minimal 50%/

Fasilitas pinjaman ini terdiri dari 2 fasilitas yaitu:

a) **Fasilitas Pinjaman *Revolving* Seri I sebesar Rp 100.000 (Rp 50.000 pada 31 Desember 2020).**

Fasilitas ini bersifat *Uncommited*, dan dikenakan marjin bunga sebesar 1,75% per tahun diatas JIBOR untuk rasio *Debt/EBITDA* kurang dari 3 kali dan 2,25% per tahun diatas JIBOR untuk rasio *Debt/EBITDA* lebih dari 3 kali.

Pada tanggal 26 Oktober 2020, PT Gihon Telekomunikasi Indonesia Tbk, entitas anak telah memperpanjang jangka waktu peminjaman fasilitas *revolving* I menjadi 31 Oktober 2021.

Pada 30 Juni 2021 dan 31 Desember 2020, saldo Fasilitas fasilitas *Revolving* Seri I masing-masing sebesar Rp 9.000 dan nihil.

22. ***LONG-TERM LOANS - THIRD PARTIES*** *(Continued)*

Non-Syndication Loans

PT Bank UOB Indonesia

Revolving Loan Facility

On March 9, 2021, PT Gihon Telekomunikasi Indonesia, the subsidiary has signed the change of agreement to the revolving facility agreement so that the loan facility becomes:

a. Increased series I revolving loan facility from Rp 50,000 to Rp 100,000
b. Lowered the series II revolving facility from Rp 100,000, to Rp 50,000, and the loan period will mature in January 2023.

This loan is unsecured but PT Gihon Telekomunikasi Indonesia Tbk, the subsidiary had to submit shareholders agreement signed by the Company and other shareholders and ensure that PT Gihon Telekomunikasi Indonesia Tbk, the subsidiary, financial statements have been consolidated into the Company's financial statements.

Under the credit facility agreement, PT Gihon Telekomunikasi Indonesia Tbk, the subsidiary are required to adhere to the following conditions, among others, as follows:

a) Debt to EBITDA ratio maximum 3.75 times.
b) Top tier revenue ratio minimal 50%.

There are 2 facilities under this credit facilities:

*a) **Facility Series I of Rp 100,000 Revolving Loan Facility (Rp 50,000 as of 31 December 2020)**.*

The Uncommited facility bears interest margin of 1.75% per annum above JIBOR for Debt/EBITDA ratio less than 3 times and 2.25% per annum above JIBOR for Debt/EBITDA ratio more than 3 times.

As of 26 October 2020, PT Gihon Telekomunikasi Indonesia, the subsidiary has extend loan term to 31 October 2021.

As of 30 June 2021 and 31 December 2020, the balance of Revolving Loan Facility Series I are amounted to Rp 9,000 and nil, respectively.

22. **PINJAMAN JANGKA PANJANG – PIHAK KETIGA** (Lanjutan)

Pinjaman Non-Sindikasi (Lanjutan)

PT Bank UOB Indonesia (Lanjutan)

b) **Fasilitas Pinjaman *Revolving* Seri II sebesar Rp 50.000 (Rp 100.000 pada 31 Desember 2020).**

Fasilitas ini bersitat *Commited* dan dikenakan marjin bunga sebesar 2,50% per tahun diatas JIBOR untuk rasio *Debt/EBITDA* kurang dari 3 kali dan 3,00% per tahun diatas JIBOR untuk rasio Debt/EBITDA lebih dari 3 kali.

Pada 30 Juni 2021 dan 31 Desember 2020, saldo Fasilitas Pinjaman *Revolving* II masing-masing sebesar Rp 37.700 dan Rp 24.800.

Fasilitas ini akan jatuh tempo pada bulan Januari 2023.

PT Gihon Telekomunikasi Indonesia Tbk, entitas anak telah memenuhi semua persyaratan yang ditetapkan oleh kreditor atas seluruh pinjaman Kredit Investasi yang diberikan.

Pada tanggal 9 November 2020, PT Permata Karya Perdana, entitas anak telah menandatangani perjanjian fasilitas pinjaman ("Perjanjian Fasilitas Pinjaman *Revolving*") yang bersifat *uncommitted* sebesar Rp 200.000 untuk menyediakan tambahan dana modal kerja.

Pinjaman ini tidak memiliki jaminan tetapi PT Permata Karya Perdana, entitas anak, harus menyerahkan perjanjian pemegang saham yang di tandatangani oleh perusahaan dan pemegang saham lainnya dan laporan keuangan Perusahaan.

Dalam fasilitas pinjaman ini, PT Permata Karya Perdana, entitas anak diharuskan memenuhi beberapa kondisi, diataranya:

a) *Debt to EBITDA* yang disesuaikan dan di anualisasi maksimum sebesar 4 kali.
b) *Top tier revenue* minimum 30,00%.

Fasilitas ini bersitat *Uncommited* dan dikenakan marjin bunga sebesar 2% per tahun diatas JIBOR.

Fasilitas ini akan jatuh tempo pada bulan November 2021.

Pada 30 Juni 2021 dan 31 Desember 2020, saldo Fasilitas Pinjaman *Revolving* adalah nihil.

22. ***LONG-TERM LOANS - THIRD PARTIES*** *(Continued)*

Non-Syndication Loans *(Continued)*

PT Bank UOB Indonesia *(Continued)*

b) ***Facility II of Rp 50,000 Revolving Loan Facility (Rp 100,000 as of 31 December 2020).***

The Commited facility bears interest margin of 2.50% per annum above JIBOR for Debt/EBITDA ratio less than 3 times and 3.00% per annum above JIBOR for Debt/EBITDA ratio more than 3 times.

As of 30 June 2021 and 31 December 2020, the balance of Revolving Loan Facility II are amounted to Rp 37,700 and Rp 24,800, respectively.

This facility will mature in January 2023.

PT Gihon Telekomunikasi Indonesia Tbk, the subsidiary has complied with all the requirements assigned by the creditors on all the Investment Credits given.

On 9 November 2020, PT Permata Karya Perdana, the subsidiary has entered into a Rp 200,000 credit facility agreement ("the Revolving Credit Facilities Agreement") to provide additional funding for working capital.

This loan is unsecured but PT Permata Karya Perdana, the subsidiary had to submit shareholders agreement signed by the Company and other shareholders and financial statements of the Company.

Under the credit facility agreement, PT Permata Karya Perdana, the subsidiary are required to adhere to the following conditions, among others, as follows:

a) Debt to EBITDA adjusted and annualized a maximum of 4 times.
b) Minimum top tier revenue ratio of 30,00%.

The Uncommited facility bears interest margin of 2% per annum above JIBOR.

This facility will mature in November 2021.

As of 30 June 2021 and 31 December 2020, the balance of Revolving Loan Facility are nil.

22. **PINJAMAN JANGKA PANJANG – PIHAK KETIGA** (Lanjutan)

Pinjaman Non-Sindikasi (Lanjutan)

PT Bank QNB Indonesia Tbk

Fasilitas Pinjaman Berjangka

Pada tanggal 22 Desember 2020, PT Gihon Telekomunikasi Indonesia Tbk, entitas anak telah menandatangani perjanjian fasilitas pinjaman yang bersifat *committed* sebesar Rp 50.000 dengan dikenakan marjin bunga sebesar 2,75% di atas JIBOR.

Fasilitas ini akan jatuh tempo pada bulan Desember 2025.

Dalam fasilitas pinjaman ini, PT Gihon Telekomunikasi Indonesia Tbk, entitas anak diharuskan memenuhi beberapa kondisi, diataranya:

a) *Debt to equity* Rasio maksimal sebesar 2 kali.
b) *Debt service coverage Rasio* minimum sebesar 2 kali.

Pinjaman ini tidak memiliki jaminan.

Rincian fasilitas pinjaman jangka panjang – pihak ketiga yang belum dicairkan pada 30 Juni 2021 dan 31 Desember 2020 adalah sebagai berikut:

22. ***LONG-TERM LOANS - THIRD PARTIES*** *(Continued)*

Non-Syndication Loans *(Continued)*

PT Bank QNB Indonesia Tbk

Term Loan Facility

As of 22 December 2020, PT Gihon Telekomunikasi Indonesia Tbk, the subsidiary has entered into a Rp 50,000 with interest margin of 2.75% above JIBOR.

This facility will mature in December 2025.

Under the credit facility agreement, PT Gihon Telekomunikasi Indonesia Tbk, the subsidiary are required to adhere to the following conditions, among others, as follows:

a) Debt to equity Ratio maximum of 2 times.
b) Debt to service coverage Ratio minimum of 2 times.

This loan is unsecured.

Undrawn facility long term loans – third parties as of 30 June 2021 and 31 December 2020 is as follows:

	30 Juni/ *30 June* 2021			31 Desember/ *31 December* 2020			
	Jumlah Fasilitas/ *Total facility*	Fasilitas yang telah dicairkan/ *Drawn facility*	Fasilitas yang belum dicairkan/ *Undrawn facility*	Jumlah Fasilitas/ *Total facility*	Fasilitas yang telah dicairkan/ *Drawn facility*	Fasilitas yang belum dicairkan/ *Undrawn facility*	
Dolar AS - nilai penuh							***US Dollar - full amount***
Pinjaman sindikasi							***Syndication loans***
Fasilitas US$1 miliar							*US$1 billion facility*
Fasilitas B	100.000.000	95.000.000	5.000.000	100.000.000	91.900.000	8.100.000	*Facility B*
Fasilitas D	-	-	-	275.000.000	275.000.000	-	*Facility D*
Fasilitas US$ 200 juta	200.000.000	111.600.000	88.400.000	200.000.000	74.000.000	126.000.000	*US$ 200 million facility*
Fasilitas US$ 375 juta	375.000.000	334.000.000	41.000.000	375.000.000	292.100.000	82.900.000	*US$ 375 million facility*
Fasilitas US$ 275 juta	275.000.000	275.000.000	-	-	-	-	*US$ 275 million facility*
Jumlah	950.000.000	815.600.000	134.400.000	950.000.000	733.000.000	217.000.000	***Total***
Rupiah							***Rupiah***
Pinjaman non-sindikasi							***Non-syndication loans***
PT Bank UOB Indonesia							*PT Bank UOB Indonesia*
Uncommited	100.000	9.000	91.000	250.000	-	250.000	*Uncommited*
Commited	50.000	37.700	12.300	100.000	24.800	75.200	*Commited*
PT Bank QNB Indonesia Tbk							*PT Bank QNB Indonesia Tbk*
Commited	50.000	45.000	5.000	50.000	36.500	13.500	*Commited*
Jumlah	200.000	91.700	108.300	400.000	61.300	338.700	***Total***

22. **PINJAMAN JANGKA PANJANG - PIHAK KETIGA** (Lanjutan)

Jika bagian pinjaman dalam valuta asing yang telah dilindung nilai diukur dengan menggunakan kurs lindung nilainya, maka saldo pinjaman jangka panjang pada 30 Juni 2021 dan 31 Desember 2020 setelah dikurangi biaya pinjaman yang belum diamortisasi adalah sebagai berikut:

22. ***LONG-TERM LOANS - THIRD PARTIES*** *(Continued)*

If the hedged portion of foreign currency loans are valued using their hedged rate, the outstanding balance of long-term loans as of 30 June 2021 and 31 December 2020 net of unamortized borrowing cost are as follows:

	30 Juni/ *30 June* 2021		**31 Desember/ *31 December* 2020**		
	Saldo pinjaman / *The balance of loans*		**Saldo pinjaman / *The balance of loans***		
	Kurs laporan posisi keuangan / *Rate of consolidated statements of financial position date*	**Kurs lindung nilai / *Hedging rate***	**Kurs laporan posisi keuangan / *Rate of consolidated statements of financial position date***	**Kurs lindung nilai / *Hedging rate***	
Pinjaman sindikasi	11.822.938	11.356.573	10.338.965	9.905.205	*Syndication loans*
Pinjaman non-sindikasi	91.700	91.700	61.300	61.300	*Non-syndication loans*
Dikurangi:					***Less:***
Biaya pinjaman yang belum diamortisasi (Catatan 2f)	(158.565)	(158.565)	(121.418)	(121.418)	*Unamortized borrowing costs (Note 2f)*
Jumlah - Bersih	11.756.073	11.289.708	10.278.847	9.845.087	***Total - Net***

23. SURAT UTANG / *23. NOTES*

	30 Juni/ *30 June* 2021	31 December / *31 December* 2020		
Surat utang terdiri dari:				***Notes consist of:***
US Dolar				***US Dollar***
a. *5,25% Senior Unsecured Note* (saldo pada 30 Juni 2021 dan 31 Desember 2020 masing-masing sebesar nihil dan US$ 350 juta)	-	4.936.750	*a.*	*5.25% Senior Unsecured Notes (balance as of 30 June 2021 and 31 December 2020 amounted to nil and US$ 350 million, respectively)*
b. *4,25% Senior Unsecured Note* (saldo pada 30 Juni 2021 dan 31 Desember 2020 masing-masing sebesar US$ 350 juta)	5.073.600	4.936.750	*b.*	*4.25% Senior Unsecured Notes (balance as of 30 June 2021 and 31 December 2020 amounted to US$ 350 million, respectively)*
c. *2,75% Senior Unsecured Note* (saldo pada 30 Juni 2021 dan 31 Desember 2020 masing-masing sebesar US$ 300 juta dan nihil)	4.348.800	-	*c.*	*2.75% Senior Unsecured Notes (balance as of 30 June 2021 and 31 December 2020 amounted to US$ 300 million and nil, respectively)*
Jumlah	9.422.400	9.873.500		***Total***
Rupiah				***Rupiah***
a. Obligasi Berkelanjutan II Tahap I	-	230.000	*a.*	*Continuous Bonds II Phase I*
b. Obligasi Berkelanjutan III Tahap I	608.000	608.000	*b.*	*Continuous Bonds III Phase I*
c. Obligasi Berkelanjutan III Tahap IV	867.000	1.500.000	*c.*	*Continuous Bonds III Phase IV*
d. Obligasi Berkelanjutan IV Tahap I	700.000	700.000	*d.*	*Continuous Bonds IV Phase I*
e. Obligasi Berkelanjutan IV Tahap II	750.000	750.000	*e.*	*Continuous Bonds IV Phase II*
f. Obligasi Berkelanjutan IV Tahap III	2.915.000	-	*f.*	*Continuous Bonds IV Phase III*
g. Obligasi Berkelanjutan IV Tahap IV	970.000	-	*g.*	*Continuous Bonds IV Phase IV*
Jumlah	16.232.400	13.661.500		***Total***
Dikurangi:				***Less:***
Biaya pinjaman yang belum diamortisasi (Catatan 2f)	(126.689)	(93.018)		*Unamortized borrowing cost (Note 2f)*
Saldo yang jatuh tempo dalam satu tahun	(3.960.344)	(6.900.451)		*Balance due less than one year*
Saldo yang jatuh tempo lebih dari satu tahun	12.145.367	6.668.031		***Balance due more than one year***

a. **5,25% *Senior Unsecured Note* sebesar US$ 350 juta**

Pada tanggal 10 Februari 2015, TBG Global Pte Ltd (TBGG), entitas anak, menerbitkan 5,25% *Senior Unsecured Notes* ("Surat Utang") dengan nilai agregat sebesar US$ 350.000.000. Surat Utang ini dikenakan bunga sebesar 5,25% per tahun yang jatuh tempo pada tanggal 10 Februari dan 10 Agustus setiap tahun, dimulai pada tanggal 10 Agustus 2015. Surat Utang ini akan jatuh tempo pada tanggal 10 Februari 2022. Surat Utang ini dijamin oleh Perusahaan dan tidak dapat dibeli kembali sebelum 4 (empat) tahun.

a. ***5.25% Senior Unsecured Notes amounted to US$ 350 million***

On 10 February 2015, TBG Global Pte Ltd. (TBGG), a subsidiary, issued 5.25% Senior Unsecured Notes ("Notes") with an aggregate value of US$ 350,000,000. These notes bear interest at 5.25% per annum and pay interest on 10 February and 10 August each year, commencing on 10 August 2015. The Notes will mature on 10 February 2022. The Notes are guaranteed by the Company and have a 4 (four) years non-call provision.

23. **SURAT UTANG** (Lanjutan)

a. **5,25% *Senior Unsecured Note* sebesar US$ 350 juta** (Lanjutan)

Dana dari penerbitan Surat Utang tersebut digunakan untuk membiayai kembali (a) pinjaman sebesar US$ 300 juta berdasarkan Perjanjian Fasilitas Pinjaman *Revolving* (lihat Catatan 22), (b) sebagian pinjaman *revolving* seri C berdasarkan Perjanjian Fasilitas Pinjaman, dan (c) sisanya digunakan untuk mendukung kebutuhan lainnya.

Sesuai pembatasan-pembatasan yang mengatur tentang Surat Utang, Perusahaan dan entitas anak yang dibatasi, memiliki keterbatasan untuk melakukan tindakan-tindakan, antara lain, sebagai berikut:

1. Menambah pinjaman baru dan menerbitkan saham preferen, kecuali:

   Rasio Utang/Arus Kas Teranualisasi tidak lebih dari 6,25 kali.

2. Melakukan pembayaran yang dibatasi, seperti:
   a) menyatakan atau membayar dividen atau melakukan suatu pembayaran atau pembagian untuk kepentingan Penjamin Induk Perusahaan atau setiap Hak Kepemilikan Atas Ekuitas Entitas Anak Yang Dibatasi atau kepada para pemilik langsung atau tidak langsung dari Penjamin Induk Perusahaan atau setiap Hak Kepemilikan Atas Ekuitas dari Entitas Anak Yang Dibatasi;
   b) membeli, menebus atau dengan cara lain mendapatkan atau membebaskan untuk nilai setiap Hak Kepemilikan Atas Ekuitas dari Penjamin Induk Perusahaan atau setiap induk langsung atau tidak langsung dari Penjamin Induk Perusahaan;
   c) melakukan pembayaran atas atau sehubungan dengan, melakukan penebusan dengan tidak dapat dicabut kembali, atau membeli, menebus, melakukan penjaminan efek atau dengan cara lain mendapatkan atau membebaskan untuk nilai dari setiap utang dari TBGG sebagai penerbit atau setiap Surat Utang Penjamin yang secara kontraktual disubordinasikan kepada Surat Utang atau setiap Jaminan Surat Utang (tidak termasuk pinjaman antar Perusahaan dan utang antar Perusahaan), kecuali suatu pembayaran bunga atau pokok pada tanggal jatuh tempo; dan
   d) membuat setiap investasi yang dibatasi.

Perusahaan dapat melakukan Pembayaran Yang Dibatasi tersebut di atas, jika:

1. Tidak ada wanprestasi atau peristiwa wanprestasi telah terjadi dan berlanjut atau akan terjadi; dan
2. Rasio Arus Kas Teranualisasi tidak lebih dari 6,25 kali.

23. NOTES (Continued)

*a. **5.25% Senior Unsecured Notes amounted to US$ 350 million** (Continued)*

The proceeds from the issuance of the Notes were used to refinance (a) all outstanding loan amounting to US$ 300 million under Revolving Loan Facility Agreement (see Note 22), (b) part of outstanding loan facility C of revolving loan facility under the Credit Facility Agreement, and (c) the remaining amount to be used for general corporate purposes.

Under the covenants governing the Notes, the Company and its restricted subsidiaries are restricted from performing certain actions such as:

1. Incurrence of indebtedness and issuance of preferred stock, unless:

   Debt to Annualized Cash Flow Ratio would have been no greater than 6.25 times.

2. Making restricted payments, such as:
   a) declare and pay dividend or make any other payment or distribution on account of Parent Guarantor or any of its Restricted Subsidiaries Equity Interests or to the direct or indirect holders of Parent Guarantor or any of its Restricted Subsidiaries Equity Interests;
   b) purchase, redeem or otherwise acquire or retire for value any Equity Interest of Parent Guarantor or any direct or indirect parent of Parent Guarantor;
   c) make any payment on or with respect to, irrevocably call for redemption, or purchase, redeem, defease or otherwise acquire or retire for value any indebtedness of the Issuer or any Note Guarantor that is contractually subordinated to the Notes or to any Note Guarantee (excluding intercompany loans and Indebtedness), except for payment of interest and principal at maturity; and
   d) make any restricted investment.

The company can make Restricted Payments described above, if:

1. No Default or Event of Default has occurred and is continuing or would occur; and
2. Debt to Annualized Cash Flow Ratio would have been no greater than 6.25 times.

23. **SURAT UTANG** (Lanjutan)

a. **5,25% *Senior Unsecured Note* sebesar US$ 350 juta** (Lanjutan)

Transaksi ini telah memenuhi peraturan No. IX.E.2 tentang transaksi material, dan Perusahaan telah melaporkan penerbitan Surat Utang tersebut kepada Otoritas Jasa Keuangan (OJK) pada tanggal 12 Februari 2015. Surat Utang ini didaftarkan pada pasar modal Singapura.

5,25% Senior Unsecured Note sebesar US$ 350 juta telah dilunasi seluruhnya pada tanggal 22 Februari 2021.

b. **4,25% *Senior Unsecured Note* sebesar US$ 350 juta**

Pada tanggal 21 Januari 2020, Perusahaan, menerbitkan 4,25% *Senior Unsecured Notes* ("Surat Utang") dengan nilai agregat sebesar US$ 350.000.000. Surat Utang ini dikenakan bunga sebesar 4,25% per tahun yang jatuh tempo pada tanggal 21 Januari dan 21 Juli setiap tahun, dimulai pada tanggal 21 Juli 2020. Surat Utang ini akan jatuh tempo pada tanggal 21 Januari 2025. Surat Utang ini tidak dapat dibeli kembali sebelum 3 (tiga) tahun.

Dana dari penerbitan Surat Utang tersebut digunakan untuk membiayai kembali seluruh saldo pinjaman Perjanjian Fasilitas Pinjaman *Revolving* seri B dan sebagian Pinjaman *Revolving* US$ 200 juta.

Sesuai pembatasan-pembatasan yang mengatur tentang Surat Utang, Perusahaan dan entitas anak yang dibatasi, memiliki keterbatasan untuk melakukan tindakan-tindakan, antara lain, sebagai berikut:

1. Menambah pinjaman baru dan menerbitkan saham preferen, kecuali:

   Rasio Utang/Arus Kas Teranualisasi tidak lebih dari 6,25 kali.

2. Melakukan pembayaran yang dibatasi, seperti:

   a) menyatakan atau membayar dividen atau melakukan suatu pembayaran atau pembagian untuk kepentingan penerbit atau setiap Hak Kepemilikan Atas Ekuitas Entitas Anak Yang Dibatasi atau kepada para pemilik langsung atau tidak langsung dari penerbit atau setiap Hak Kepemilikan Atas Ekuitas dari Entitas Anak Yang Dibatasi;
   b) membeli, menebus atau dengan cara lain mendapatkan atau membebaskan untuk nilai setiap Hak Kepemilikan Atas Ekuitas dari penerbit atau setiap induk langsung atau tidak langsung dari penerbit;

*23. **NOTES** (Continued)*

*a. **5.25% Senior Unsecured Notes amounted to US$ 350 million** (Continued)*

This transaction has fulfilled the regulation No. IX.E.2 regarding material transactions, and the Company has reported the issuance of the Notes to the Indonesia Financial Service Authority (OJK) on 12 February 2015. The Notes are listed on the Singapore Exchange.

5.25% Senior Unsecured Notes amounted to US$ 350 million has been fully paid on 22 February 2021.

*b. **4.25% Senior Unsecured Notes amounted to US$ 350 million***

On 21 January 2020, the Company, issued 4.25% Senior Unsecured Notes ("Notes") with an aggregate value of US$ 350,000,000. These notes bear interest at 4.25% per annum and pay interest on 21 January and 21 July each year, commencing on 21 July 2020. The Notes will mature on 21 January 2025. These Notes have 3 (three) years non call provision.

The proceeds from the issuance of the Notes were used to refinance all outstanding loan of Facility B of the Revolving Loan Facility and part of outstanding loan facility US$ 200 million of Revolving loan facility.

Under the covenants governing the Notes, the Company and its restricted subsidiaries are restricted from performing certain actions such as:

1. Incurrence of indebtedness and issuance of preferred stock, unless:

   Debt to Annualized Cash Flow Ratio would have been no greater than 6.25 times.

2. Making restricted payments, such as:

   a) declare and pay dividend or make any other payment or distribution on account of issuer or any of its Restricted Subsidiaries Equity Interests or to the direct or indirect holders of issuer or any of its Restricted Subsidiaries Equity Interests;

   b) purchase, redeem or otherwise acquire or retire for value any Equity Interest of issuer or any direct or indirect parent of issuer;

23. **SURAT UTANG** (Lanjutan)

b. **4,25% *Senior Unsecured Note* sebesar US$ 350 juta** (Lanjutan)

2. Melakukan pembayaran yang dibatasi, seperti: (Lanjutan)

c) melakukan pembayaran atas atau sehubungan dengan, melakukan penebusan dengan tidak dapat dicabut kembali, atau membeli, menebus, melakukan penjaminan efek atau dengan cara lain mendapatkan atau membebaskan untuk nilai dari setiap utang dari penerbit atau setiap anak perusahaan yang secara kontraktual disubordinasikan kepada anak perusahaan atau setiap Jaminan Surat Utang (tidak termasuk pinjaman antar Perusahaan dan utang antar Perusahaan), kecuali suatu pembayaran bunga atau pokok pada tanggal jatuh tempo; dan

d) membuat setiap investasi yang dibatasi.

Perusahaan dapat melakukan Pembayaran Yang Dibatasi tersebut di atas, jika:

1. Tidak ada wanprestasi atau peristiwa wanprestasi telah terjadi dan berlanjut atau akan terjadi; dan
2. Rasio Arus Kas Teranualisasi tidak lebih dari 6,25 kali.

Transaksi ini telah memenuhi peraturan No. IX.E.2 tentang transaksi material, dan Perusahaan telah melaporkan penerbitan Surat Utang tersebut kepada Otoritas Jasa Keuangan (OJK) (dahulu Bapepam-LK) pada tanggal 23 Januari 2020. Surat Utang ini didaftarkan pada pasar modal Singapura.

c. **2,75% *Senior Unsecured Note* sebesar US$ 300 juta**

Pada tanggal 20 Januari 2021, Perusahaan menerbitkan 2,75% *Senior Unsecured Notes* ("Surat Utang") dengan nilai agregat sebesar US$ 300.000.000. Surat Utang ini dikenakan bunga sebesar 2,75% per tahun yang jatuh tempo pada tanggal 20 Januari dan 20 Juli setiap tahun, dimulai pada tanggal 20 Juli 2021. Surat Utang ini akan jatuh tempo pada tanggal 20 Januari 2026.

Dana dari penerbitan surat utang ini digunakan untuk membiayai kembali sebagian Fasilitas Pinjaman *Revolving* Seri B sebesar US$100.000.000 dalam US$ 1.000.000.000 *Facility agreement*, sebagian Fasilitas Pinjaman *Revolving* dalam US$ 200.000.000 *Facility Agreement* dan sebagian Fasilitas Pinjaman *Revolving* dalam US$ 375.000.000 *Facility Agreement*.

Transaksi ini telah memenuhi Peraturan Otoritas Jasa Keuangan (OJK) No. 17/POJK.04/2020 tentang Transaksi Material dan Perubahan Kegiatan Usaha, dan Perusahaan telah melaporkan penerbitan Surat Utang tersebut kepada Otoritas Jasa Keuangan (OJK) pada tanggal 22 Januari 2021. Surat Utang ini didaftarkan pada pasar modal Singapura.

*23. **NOTES** (Continued)*

*b. **4.25% Senior Unsecured Notes amounted to US$ 350 million** (Continued)*

2. Making restricted payments, such as: (Continued)

c) make any payment on or with respect to, irrevocably call for redemption, or purchase, redeem, defease or otherwise acquire or retire for value any indebtedness of the Issuer or any subsidiaries that is contractually subordinated to the Notes or to any subsidiaries (excluding intercompany loans and Indebtedness), except for payment of interest and principal at maturity; and

d) make any restricted investment.

The company can make Restricted Payments described above, if:

1. *No Default or Event of Default has occurred and is continuing or would occur; and*
2. *Debt to Annualized Cash Flow Ratio would have been no greater than 6.25 times.*

This transaction has fulfilled the regulation No. IX.E.2 regarding material transactions, and the Company has reported the issuance of the Notes to the Indonesia Financial Service Authority (OJK) (formerly Bapepam-LK) on 23 January 2020. The Notes are listed on the Singapore Exchange.

*c. **2.75% Senior Unsecured Notes amounted to US$ 300 million***

On 20 January 2021, the Company issued 2.75% Senior Unsecured Notes ("Notes") with an aggregate value of US$ 300,000,000. These notes bear interest at 2.75% per annum and pay interest on 20 January and 20 July each year, commencing on 20 July 2021. The Notes will mature on 20 January 2026.

The proceeds from the issuance of the Notes were used to refinance part of outstanding revolving B of US$ 100 million under US$ 1,000,000,000 Credit Facilities, part of outstanding revolving loan facility under US$ 200 million Revolving Loan Facility, and part of oustanding Revolving Loan Facility under US$ 375 million Revolving Loan Facility.

This transaction has fulfilled the Financial Service Authority (OJK) Regulation No. I7/POJK.04/2020 regarding Material Transactions and Change of Business Activities, and the Company has reported the issuance of the Notes to OJK on 22 January 2021. The Notes are listed on the Singapore Stock Exchange.

23. **SURAT UTANG** (Lanjutan)

Jika bagian utang yang telah dilindung nilai diukur dengan menggunakan kurs lindung nilainya, maka saldo surat utang jangka panjang pada 30 Juni 2021 dan 31 Desember 2020 setelah dikurangi biaya pinjaman yang belum diamortisasi adalah sebagai berikut:

*23. **NOTES** (Continued)*

If the hedged portion of the long-term notes are valued using their hedge rate, the outstanding balance of the Long-term notes as of 30 June 2021 and 31 December 2020 net of unamortized borrowing costs are as follow:

	30 Juni/ *30 June* 2021		**31 December / *31 December* 2020**		
	Saldo pinjaman / *The balance of loans*		**Saldo pinjaman / *The balance of loans***		
	Kurs laporan posisi keuangan / *Rate of consolidated statements of financial position date*	**Kurs lindung nilai / *Hedging rate***	**Kurs laporan posisi keuangan / *Rate of consolidated statements of financial position date***	**Kurs lindung nilai / *Hedging rate***	
Surat utang	16.232.400	15.348.263	13.661.500	12.940.051	*Notes*
Dikurangi:					***Less:***
Biaya pinjaman yang belum diamortisasi (Catatan 2f)	(126.689)	(126.689)	(93.018)	(93.018)	*Unamortized borrowing costs (Note 2f)*
Jumlah - Bersih	16.105.711	15.221.574	13.568.482	12.847.033	***Total - Net***

a. **Obligasi Berkelanjutan II Tahap I**

Pada tanggal 1 Juli 2016, Perusahaan menerbitkan Obligasi Berkelanjutan II Tower Bersama Infrastructure Tahap I Tahun 2016 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan II Tahap I") sebesar 9,25% per tahun. Nominal Obligasi Berkelanjutan II Tahap I ini adalah sebesar Rp 230.000.

Hasil bersih yang diperoleh dari penerbitan Obligasi Berkelanjutan II Tahap I telah digunakan seluruhnya untuk pembayaran kewajiban keuangan entitas anak.

Bunga Obligasi Berkelanjutan II Tahap I akan dibayarkan setiap kuartal sesuai dengan tanggal pembayaran bunga. Pembayaran pertama dari bunga adalah pada tanggal 1 Oktober 2016. Tanggal pembayaran bunga terakhir, yang juga merupakan tanggal jatuh tempo Obligasi Berkelanjutan II Tahap I, adalah pada tanggal 1 Juli 2021.

Obligasi Berkelanjutan II Tahap I ini tidak dijamin oleh suatu jaminan tertentu, namun dijamin dengan seluruh kekayaan Perusahaan, baik barang bergerak maupun tidak bergerak, dan yang telah ada maupun yang akan ada di kemudian hari.

*a. **Continuous Bonds II Phase I***

On 1 July 2016, the Company issued Continuous Bonds II Tower Bersama Infrastructure Phase I Year 2016 with Fixed Interest Rate ("Continuous Bonds II Phase I") amounted to 9.25% per year. The Continuous Bonds II Phase I have a total principal amount of Rp 230,000.

The net proceeds from the issuance of the Continuous Bonds II Phase I were used entirely for payments of financial liabilities of subsidiaries.

Interest for the Continuous Bonds II Phase I are payable on a quarterly basis on the interest payment dates. The first interest payment of Bonds was on 1 October 2016. The last interest payment dates, which are also the respective maturity dates of the Continuous Bonds II Phase I, will be on 1 July 2021.

The Continuous Bonds II Phase I is not secured by specific collateral, however it is guaranteed by all assets of the Company, for existing and future fixed or moveable assets.

23. **SURAT UTANG** (Lanjutan)

a. **Obligasi Berkelanjutan II Tahap I** (Lanjutan)

Penerbitan Obligasi Berkelanjutan II Tahap I ini dilakukan sesuai dengan Akta Adendum II dan Pernyataan Kembali Perjanjian Perwaliamanatan Obligasi Berkelanjutan II Tower Bersama Infrastructure Tahap I Tahun 2016 No. 42 tanggal 17 Juni 2016 yang dibuat di hadapan Notaris Jose Dima Satria, S.H. M.Kn. Bertindak sebagai wali amanat adalah PT Bank Rakyat Indonesia (Persero) Tbk ("Wali Amanat").

Sesuai persyaratan yang disepakati dalam penerbitan Obligasi Berkelanjutan II Tahap I ini, maka Perusahaan tanpa persetujuan tertulis dari Wali Amanat tidak diperkenankan untuk melakukan tindakan-tindakan, antara lain: melakukan penggabungan atau pengambilalihan usaha, merubah bidang usaha utama, mengurangi modal dasar dan modal disetor, menjual, mengalihkan atau melepaskan seluruh atau sebagian aset, memberikan opsi, waran, dan memberikan pinjaman kepada pihak ketiga, kecuali kepada entitas anak Perusahaan, di luar kegiatan usaha Perusahaan dan entitas anak.

Perusahaan juga disyaratkan untuk mempertahankan perbandingan antara jumlah pinjaman konsolidasian proforma dengan EBITDA proforma dari kuartal terakhir dikalikan 4 (empat) tidak melebihi 6,25 kali.

Pada 23 November 2020, Fitch Indonesia, lembaga pemeringkat efek independen, telah memberikan peringkat "AA+" (*Double A Plus*) untuk Obligasi Berkelanjutan II Tahap I ini.

Obligasi berkelanjutan II Tahap I ini telah dilunasi seluruhnya pada tanggal 30 Juni 2021.

*23. **NOTES** (Continued)*

*a. **Continuous Bonds II Phase I** (Continued)*

The issuance of Continuous Bonds II Phase I was covered in the Deed of Second Amendment and Restatement of Trusteeship Agreement of Continuous Bonds II Tower Bersama Infrastructure Phase I Year 2016 No. 42 dated 17 June 2016, of a Notary Jose Dima Satria, S.H., M.Kn. The bond trustee is PT Bank Rakyat Indonesia (Persero) Tbk (the "Trustee").

Under the covenants governing the Continuous Bonds II Phase I, the Company, without the written consent of the Trustee, shall not, among others: merge or acquire, change the scope of main activities, reduce the authorized and paid-up capital, sale, transfer or dispose all or part of asset by the Company's subsidiaries, sale, transfer, or giving options, warrants, and grant loans to third parties, except to the Company's subsidiaries, outside the Company's and Subsidiaries business activities.

In addition, the Company is required to maintain the comparative of total proforma consolidation loans with proforma EBITDA from last quarter multiplied by 4 (four) of no more than 6.25 times.

On 23 November 2020, Fitch Indonesia, an independent credit rating agency, rated the Continuous Bonds II Phase I "AA+" (Double A Plus).

This Continuous Bonds II Phase I has been fully paid on 30 Juni 2021.

23. **SURAT UTANG** (Lanjutan)

b. **Obligasi Berkelanjutan III Tahap I**

Pada tanggal 5 Juli 2018, Perusahaan menerbitkan Obligasi Berkelanjutan III Tower Bersama Infrastructure Tahap I Tahun 2018 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan III Tahap I") sebesar 8,5% per tahun. Nominal Obligasi Berkelanjutan III Tahap I ini adalah sebesar Rp 608.000. Obligasi ini dicatatkan pada bursa efek Indonesia pada tanggal 6 Juli 2018.

Hasil bersih yang diperoleh dari penerbitan Obligasi Berkelanjutan III Tahap I telah digunakan seluruhnya untuk pembayaran kewajiban keuangan entitas anak.

Bunga Obligasi Berkelanjutan III Tahap I akan dibayarkan setiap kuartal sesuai dengan tanggal pembayaran bunga. Pembayaran pertama dari bunga adalah pada tanggal 5 Oktober 2018. Tanggal pembayaran bunga terakhir, yang juga merupakan tanggal jatuh tempo Obligasi Berkelanjutan III Tahap I, adalah pada tanggal 5 Juli 2021.

Penerbitan Obligasi Berkelanjutan III Tahap I ini dilakukan sesuai Akta Addendum III dan pernyataan kembali Perjanjian Perwaliamanatan Obligasi Berkelanjutan III Tower Bersama Infrastructure Tahap I Tahun 2018 No. 27 tanggal 8 Juni 2018 yang dibuat di hadapan Notaris Jose Dima Satria, S.H. M.Kn. Bertindak sebagai wali amanat adalah PT Bank Rakyat Indonesia (Persero) Tbk ("Wali Amanat").

Sesuai persyaratan yang disepakati dalam penerbitan Obligasi Berkelanjutan III Tahap I ini, maka Perusahaan tanpa persetujuan tertulis dari Wali Amanat tidak diperkenankan untuk melakukan tindakan-tindakan, antara lain: melakukan penggabungan atau pengambilalihan usaha, merubah bidang usaha utama, mengurangi modal dasar dan modal disetor, menjual, mengalihkan atau melepaskan seluruh atau sebagian aset, memberikan opsi, waran, dan memberikan pinjaman kepada pihak ketiga, kecuali kepada entitas anak Perusahaan, di luar kegiatan usaha Perusahaan dan entitas anak.

Perusahaan juga disyaratkan untuk mempertahankan perbandingan antara jumlah pinjaman konsolidasian proforma dengan EBITDA proforma dari kuartal terakhir dikalikan 4 (empat) tidak melebihi 6,25 kali.

Pada 30 Juni 2021 dan 31 Desember 2020, Perusahaan telah memenuhi semua kondisi yang disyaratkan dalam perjanjian perwaliamanatan tersebut.

Pada 23 November 2020, Fitch Indonesia, lembaga pemeringkat efek independen, telah memberikan peringkat "AA+" (*Double A Plus*) untuk Obligasi Berkelanjutan III Tahap I ini.

Obligasi berkelanjutan III Tahap I ini telah dilunasi seluruhnya pada tanggal 5 Juli 2021.

*23. **NOTES** (Continued)*

*b. **Continuous Bonds III Phase I***

On 5 July 2018, the Company issued Continuous Bonds III Tower Bersama Infrastructure Phase I Year 2018 with Fixed Interest Rate ("Continuous Bonds III Phase I") amounted to 8.5% per year. The Continuous Bonds III Phase I have a total principal amount of Rp 608,000. These bonds are listed on the Indonesian stock exchange on 6 July 2018.

The net proceeds from the issuance of the Continuous Bonds III Phase I were used entirely for payments of financial liabilities of subsidiaries.

Interest for the Continuous Bonds III Phase I are payable on a quarterly basis on the interest payment dates. The first interest payment of Bonds was on 5 October 2018. The last interest payment dates, which are also the respective maturity dates of the Continuous Bonds III Phase I, will be on 5 July 2021.

The issuance of Continuous Bonds III Phase I was covered in the Deed of Third Amendment and Restatement of Trusteeship Agreement of Continuous Bonds III Tower Bersama Infrastructure Phase I Year 2018 No. 27 dated 8 June 2018, of a Notary Jose Dima Satria, S.H., M.Kn. The bond trustee is PT Bank Rakyat Indonesia (Persero) Tbk (the "Trustee").

Under the covenants governing the Continuous Bonds III Phase I, the Company, without the written consent of he Trustee, shall not, among others: merge or acquire, change the scope of main activities, reduce the authorized and paid up capital, sale, transfer or dispose all or part of asset by the Company's subsidiaries, sale, transfer, or giving options, warrants, and grant loans to third parties, except to the Company's subsidiaries, outside the Company's and Subsidiaries business activities.

In addition, the Company is required to maintain the comparative of total proforma consolidation loans with proforma EBITDA from last quarter multiplied by 4 (four) of no more than 6.25 times.

As of 30 June 2021 and 31 December 2020, the Company has complied with the restrictions set out in these trusteeship agreements.

On 23 November 2020, Fitch Indonesia, an independent credit rating agency, rated the Continuous Bonds III Phase I "AA+" (Double A Plus).

This Continuous Bonds III Phase I has been fully paid on 5 July 2021.

23. **SURAT UTANG** (Lanjutan)

c. **Obligasi Berkelanjutan III Tahap IV**

Pada tanggal 24 Maret 2020, Perusahaan menerbitkan Obligasi Berkelanjutan III Tower Bersama Tahap IV Tahun 2020 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan III Tahap IV"). Nominal Obligasi Berkelanjutan III Tahap IV ini adalah sebesar Rp 1.500.000. Obligasi ini dicatatkan pada Bursa Efek Indonesia pada tanggal 26 Maret 2020.

Hasil bersih yang diperoleh dari penerbitan Obligasi Berkelanjutan III Tahap IV telah digunakan seluruhnya untuk pembayaran kewajiban keuangan entitas anak.

Obligasi Berkelanjutan III Tahap IV ini diterbitkan dalam 2 (dua) seri sebagai berikut:
1. Obligasi seri A dengan nilai nominal sebesar Rp 633.000 dengan tingkat bunga tetap sebesar 6,25% per tahun. Jangka waktu obligasi seri A adalah 370 (tiga ratus tujuh puluh) Hari Kalender.
2. Obligasi seri B dengan nilai nominal sebesar Rp 867.000 dengan tingkat bunga tetap sebesar 7,75% per tahun, berjangka waktu 3 (tiga) tahun.

Bunga Obligasi dibayarkan setiap triwulan, dimana Bunga Obligasi pertama akan dibayarkan pada tanggal 24 Juni 2020, sedangkan Bunga Obligasi terakhir sekaligus dengan pelunasan Obligasi akan dibayarkan pada tanggal 4 April 2021 untuk Obligasi Seri A dan tanggal 24 Maret 2023 untuk Obligasi Seri B.

Penerbitan Obligasi Berkelanjutan III Tahap IV ini dilakukan sesuai Akta Perjanjian Perwaliamanatan Obligasi Berkelanjutan III Tower Bersama Infrastructure Tahap IV Tahun 2020 No. 9 tanggal 5 Maret 2020 yang dibuat di hadapan Notaris Jose Dima Satria, S.H. M.Kn. Bertindak sebagai wali amanat adalah PT Bank Rakyat Indonesia (Persero) Tbk ("Wali Amanat").

Sesuai persyaratan yang disepakati dalam penerbitan Obligasi Berkelanjutan III Tahap IV ini, maka Perusahaan tanpa persetujuan tertulis dari Wali Amanat tidak diperkenankan untuk melakukan tindakan-tindakan, antara lain: melakukan penggabungan atau pengambilalihan usaha, merubah bidang usaha utama, mengurangi modal dasar dan modal disetor, menjual, mengalihkan atau melepaskan seluruh atau sebagian aset, memberikan opsi, waran, dan memberikan pinjaman kepada pihak ketiga, kecuali kepada entitas anak Perusahaan, di luar kegiatan usaha Perusahaan dan entitas anak.

Perusahaan juga disyaratkan untuk mempertahankan perbandingan antara jumlah pinjaman konsolidasian proforma dengan EBITDA proforma dari kuartal terakhir dikalikan 4 (empat) tidak melebihi 6,25 kali.

Pada 30 Juni 2021, Perusahaan telah memenuhi semua kondisi yang disyaratkan dalam perjanjian perwaliamanatan tersebut.

23. ***NOTES*** *(Continued)*

c. ***Continuous Bonds III Phase IV***

On 24 March 2020, the Company issued Continous Bonds III phase IV Year 2020 with a Fixed Interest Rate ("Continuous Bonds III Phase IV"). The Continuous Bonds III Phase IV has a total principal of Rp 1,500,000. These bonds are listed on the Indonesia stock exchange on 26 March 2020.

The net proceeds obtained from the issuance of Continous Bonds III Phase IV have been used entirely for the payment of financial liabilities of subsidiaries.

These Continuous Bonds III Phase IV were issued in series consisting of:
1. *Series A Bonds with nominal value of Rp 633,000 at a fixed interest rate of 6.25% per year. The term of the Series A Bonds is 370 (three hundred and seventy) Calendar Days.*
2. *Series B Bonds with nominal value of Rp 867,000 at a fixed interest rate of 7.75% per year. The term of the Series B Bonds is 3 (three) years.*

Interest for Continous Bonds III Phase IV will be paid on a quarterly basis on the interest payment date. The first payment of interest is on 24 June 2020. The date of the last interest payment, which is also the due date of the Continous Bond III Phase IV, is on 4 April 2021 for Series A and 24 March 2023 for Series B.

The issuance of Continuous Bonds III Phase IV was covered in the Deed of Trusteeship Agreement of Continuous Bonds III Tower Bersama Infrastructure Phase IV Year 2020 No. 9 dated 5 March 2020, of a Notary Jose Dima Satria, S.H., M.Kn. The bond trustee is PT Bank Rakyat Indonesia (Persero) Tbk (the "Trustee").

Under the covenants governing the Continuous Bonds III Phase IV, the Company, without the written consent of the Trustee, shall not, among others: merge or acquire, change the scope of main activities, reduce the authorized and paid up capital, sale, transfer or dispose all or part of asset by the Company's subsidiaries, sale, transfer, or giving options, warrants, and grant loans to third parties, except to the Company's subsidiaries, outside the Company's and Subsidiaries business activities.

In addition, the Company is required to maintain the comparative of total proforma consolidation loans with proforma EBITDA from last quarter multiplied by 4 (four) of no more than 6.25 times.

As of 30 June 2021, the Company has complied with the restrictions set out in these trusteeship agreements.

23. **SURAT UTANG** (Lanjutan)

c. **Obligasi Berkelanjutan III Tahap IV** (Lanjutan)

Pada 23 November 2020, Fitch Indonesia, lembaga pemeringkat efek independen, telah memberikan peringkat "AA+" (*Double A Plus*) untuk Obligasi Berkelanjutan III Tahap IV ini.

Obligasi berkelanjutan III Tahap IV seri A ini telah dilunasi seluruhnya pada tanggal 4 April 2021.

d. **Obligasi Berkelanjutan IV Tahap I**

Pada tanggal 8 September 2020, Perusahaan menerbitkan Obligasi Berkelanjutan IV Tower Bersama Infrastructure Tahap I Tahun 2020 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan IV Tahap I"). Nominal Obligasi Berkelanjutan IV Tahap I ini adalah sebesar Rp 700.000. Obligasi ini dicatatkan pada Bursa Efek Indonesia pada tanggal 9 September 2020.

Hasil bersih yang diperoleh dari penerbitan Obligasi Berkelanjutan IV Tahap I telah digunakan seluruhnya untuk melunasi sebagian utang pokok Obligasi Berkelanjutan II Tahap III.

Obligasi Berkelanjutan IV Tahap I ini diterbitkan dalam 2 (dua) seri sebagai berikut:

1. Obligasi seri A dengan nilai nominal sebesar Rp 231.000 dengan tingkat bunga tetap sebesar 6,30% per tahun. Jangka waktu obligasi seri A adalah 370 (tiga ratus tujuh puluh) Hari Kalender.
2. Obligasi seri B dengan nilai nominal sebesar Rp 469.000 dengan tingkat bunga tetap sebesar 8,00% per tahun, berjangka waktu 3 (tiga) tahun.

Bunga Obligasi dibayarkan setiap triwulan, dimana Bunga Obligasi pertama akan dibayarkan pada tanggal 8 Desember 2020, sedangkan Bunga Obligasi terakhir sekaligus dengan pelunasan Obligasi akan dibayarkan pada tanggal 18 September 2021 untuk Obligasi Seri A dan tanggal 8 September 2023 untuk Obligasi seri B.

Penerbitan Obligasi Berkelanjutan IV Tahap I ini dilakukan sesuai Akta Perjanjian Perwaliamanatan Obligasi Berkelanjutan IV Tower Bersama Infrastructure Tahap I Tahun 2020 No. 129 tanggal 27 Agustus 2020 yang dibuat di hadapan Notaris Jose Dima Satria, S.H. M.Kn. Bertindak sebagai wali amanat adalah PT Bank Rakyat Indonesia (Persero) Tbk ("Wali Amanat").

Sesuai persyaratan yang disepakati dalam penerbitan Obligasi Berkelanjutan IV Tahap I ini, maka Perusahaan tanpa persetujuan tertulis dari Wali Amanat tidak diperkenankan untuk melakukan tindakan-tindakan, antara lain: melakukan penggabungan atau pengambilalihan usaha, merubah bidang usaha utama, mengurangi modal dasar dan modal disetor, menjual, mengalihkan atau melepaskan seluruh atau sebagian aset, memberikan opsi, waran, dan memberikan pinjaman kepada pihak ketiga, kecuali kepada entitas anak Perusahaan, di luar kegiatan usaha Perusahaan dan entitas anak.

*23. **NOTES** (Continued)*

*c. **Continuous Bonds III Phase IV** (Continued)*

On 23 November 2020, Fitch Indonesia, an independent credit rating agency, rated the Continuous Bonds III Phase IV "AA+" (Double A Plus).

This Continuous Bonds III Phase IV series A has been fully paid on 4 April 2021.

*d. **Continuous Bonds IV Phase I***

On 8 September 2020, the Company issued Continuous Bonds IV phase I Year 2020 with a Fixed Interest Rate ("Continuous Bonds IV Phase I"). The Continuous Bonds IV Phase I has a total principal of Rp 700,000. These bonds are listed on the Indonesia stock exchange on 9 September 2020.

The net proceeds from the issuance of the Continuous Bonds IV Phase I were used entirely for payments of the Continuous Bonds II Phase III.

These Continuous Bonds IV Phase I were issued in 2 (two) series consisting of:

1. *Series A Bonds with nominal value of Rp 231,000 at a fixed interest rate of 6.30% per year. The term of the Series A Bonds is 370 (three hundred and seventy) Calendar Days.*
2. *Series B Bonds with nominal value of Rp 469,000 at a fixed interest rate of 8.00% per year. The term of the Series B Bonds is 3 (three) years.*

Interest for Continuous Bonds IV Phase I will be paid on a quarterly basis on the interest payment date. The first payment of interest is on 8 December 2020. The date of the last interest payment, which is also the due date of Continuous Bond IV phase I, is on 18 September 2021 for series A and 8 September 2023 for series B.

The issuance of Continuous Bonds IV Phase I was covered in the Deed of Trusteeship Agreement of Continuous Bonds IV Tower Bersama Infrastructure Phase I Year 2020 No. 129 dated 27 August 2020, of a Notary Jose Dima Satria, S.H., M.Kn. The bond trustee is PT Bank Rakyat Indonesia (Persero) Tbk (the "Trustee").

Under the covenants governing the Continuous Bonds IV Phase I, the Company, without the written consent of the Trustee, shall not, among others: merge or acquire, change the scope of main activities, reduce the authorized and paid up capital, sale, transfer or dispose all or part of asset by the Company's subsidiaries, sale, transfer, or giving options, warrants, and grant loans to third parties, except to the Company's subsidiaries, outside the Company's and Subsidiaries business activities.

23. **SURAT UTANG** (Lanjutan)

d. **Obligasi Berkelanjutan IV Tahap I** (Lanjutan)

Perusahaan juga disyaratkan untuk mempertahankan perbandingan antara jumlah pinjaman konsolidasian proforma dengan EBITDA proforma dari kuartal terakhir dikalikan 4 (empat) tidak melebihi 6,25 kali.

Pada 30 Juni 2021, Perusahaan telah memenuhi semua kondisi yang disyaratkan dalam perjanjian perwaliamanatan tersebut.

Pada 23 November 2020, Fitch Indonesia, lembaga pemeringkat efek independen, telah memberikan peringkat "AA+" (*Double A Plus*) untuk Obligasi Berkelanjutan IV Tahap I ini.

e. **Obligasi Berkelanjutan IV Tahap II**

Pada tanggal 2 Desember 2020, Perusahaan menerbitkan Obligasi Berkelanjutan IV Tower Bersama Infrastructure Tahap II Tahun 2020 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan IV Tahap II"). Nominal Obligasi Berkelanjutan IV Tahap II ini adalah sebesar Rp 750.000. Obligasi ini dicatatkan pada Bursa Efek Indonesia pada tanggal 3 Desember 2020.

Hasil bersih yang diperoleh dari penerbitan Obligasi Berkelanjutan IV Tahap II telah digunakan seluruhnya untuk pembayaran kewajiban keuangan entitas anak.

Obligasi Berkelanjutan IV Tahap II ini diterbitkan dalam 2 (dua) seri sebagai berikut:

1. Obligasi seri A dengan nilai nominal sebesar Rp 295.000 dengan tingkat bunga tetap sebesar 5,75% per tahun. Jangka waktu obligasi seri A adalah 370 (tiga ratus tujuh puluh) Hari Kalender.
2. Obligasi seri B dengan nilai nominal sebesar Rp 455.000 dengan tingkat bunga tetap sebesar 7,25% per tahun, berjangka waktu 3 (tiga) tahun.

Bunga Obligasi dibayarkan setiap triwulan, dimana Bunga Obligasi pertama akan dibayarkan pada tanggal 2 Maret 2021, sedangkan Bunga Obligasi terakhir sekaligus dengan pelunasan Obligasi akan dibayarkan pada tanggal 12 Desember 2021 untuk Obligasi Seri A dan tanggal 2 Desember 2023 untuk Obligasi seri B.

Penerbitan Obligasi Berkelanjutan IV Tahap II ini dilakukan sesuai Akta Perjanjian Perwaliamanatan Obligasi Berkelanjutan IV Tower Bersama Infrastructure Tahap II Tahun 2020 No. 115 tanggal 24 November 2020 yang dibuat di hadapan Notaris Jose Dima Satria, S.H. M.Kn. Bertindak sebagai wali amanat adalah PT Bank Rakyat Indonesia (Persero) Tbk ("Wali Amanat").

*23. **NOTES** (Continued)*

*d. **Continuous Bonds IV Phase I** (Continued)*

In addition, the Company is required to maintain the comparative of total proforma consolidation loans with proforma EBITDA from last quarter multiplied by 4 (four) of no more than 6.25 times.

As of 30 June 2021, the Company has complied with the restrictions set out in these trusteeship agreements.

On 23 November 2020, Fitch Indonesia, an independent credit rating agency, rated the Continuous Bonds IV Phase I "AA+" (Double A Plus).

*e. **Continuous Bonds IV Phase II***

On 2 December 2020, the Company issued Continuous Bonds IV phase II Year 2020 with a Fixed Interest Rate ("Continuous Bonds IV Phase II"). The Continuous Bonds IV Phase II has a total principal of Rp 750,000. These bonds are listed on the Indonesia stock exchange on 3 December 2020.

The net proceeds from the issuance of the Continuous Bonds IV Phase II were used entirely for payments of financial liabilities of subsidiaries.

These Continuous Bonds IV Phase II were issued in 2 (two) series consisting of:

1. *Series A Bonds with nominal value of Rp 295,000 at a fixed interest rate of 5.75% per year. The term of the Series A Bonds is 370 (three hundred and seventy) Calendar Days.*
2. *Series B Bonds with nominal value of Rp 455,000 at a fixed interest rate of 7.25% per year. The term of the Series B Bonds is 3 (three) years.*

Interest for Continuous Bonds IV Phase II will be paid on a quarterly basis on the interest payment date. The first payment of interest is on 2 March 2021. The date of the last interest payment, which is also the due date of Continuous Bond IV phase II, is on 12 December 2021 for series A and 2 December 2023 for series B.

The issuance of Continuous Bonds IV Phase II was covered in the Deed of Trusteeship Agreement of Continuous Bonds IV Tower Bersama Infrastructure Phase II Year 2020 No. 115 dated 24 November 2020, of a Notary Jose Dima Satria, S.H., M.Kn. The bond trustee is PT Bank Rakyat Indonesia (Persero) Tbk (the "Trustee").

23. **SURAT UTANG** (Lanjutan)

e. **Obligasi Berkelanjutan IV Tahap II** (Lanjutan)

Sesuai persyaratan yang disepakati dalam penerbitan Obligasi Berkelanjutan IV Tahap II ini, maka Perusahaan tanpa persetujuan tertulis dari Wali Amanat tidak diperkenankan untuk melakukan tindakan-tindakan, antara lain: melakukan penggabungan atau pengambilalihan usaha, merubah bidang usaha utama, mengurangi modal dasar dan modal disetor, menjual, mengalihkan atau melepaskan seluruh atau sebagian aset, memberikan opsi, waran, dan memberikan pinjaman kepada pihak ketiga, kecuali kepada entitas anak Perusahaan, di luar kegiatan usaha Perusahaan dan entitas anak.

Perusahaan juga disyaratkan untuk mempertahankan perbandingan antara jumlah pinjaman konsolidasian proforma dengan EBITDA proforma dari kuartal terakhir dikalikan 4 (empat) tidak melebihi 6,25 kali.

Pada 30 Juni 2021, Perusahaan telah memenuhi semua kondisi yang disyaratkan dalam perjanjian perwaliamanatan tersebut.

Pada 23 November 2020, Fitch Indonesia, Lembaga pemeringkat efek independen, telah memberikan peringkat "AA+" (Double A Plus) untuk Obligasi Berkelanjutan IV Tahap II ini.

f. **Obligasi Berkelanjutan IV Tahap III**

Pada tanggal 17 Februari 2021, Perusahaan menerbitkan Obligasi Berkelanjutan IV Tower Bersama Infrastructure Tahap III Tahun 2021 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan IV Tahap III"). Nominal Obligasi Berkelanjutan IV Tahap III ini adalah sebesar Rp 2.915.000. Obligasi ini dicatatkan pada Bursa Efek Indonesia pada tanggal 18 Februari 2021.

Hasil bersih yang diperoleh dari penerbitan Obligasi Berkelanjutan IV Tahap III telah digunakan seluruhnya untuk pembayaran kewajiban keuangan entitas anak.

Obligasi Berkelanjutan IV Tahap III ini diterbitkan dalam 2 (dua) seri sebagai berikut:

a. Obligasi seri A dengan nilai nominal sebesar Rp 1.898.000 dengan tingkat bunga tetap sebesar 5,50% per tahun. Jangka waktu obligasi seri A adalah 370 (tiga ratus tujuh puluh) Hari Kalender.

b. Obligasi seri B dengan nilai nominal sebesar Rp 1.017.000 dengan tingkat bunga tetap sebesar 6,75% per tahun berjangka waktu 3 (tiga) tahun.

*23. **NOTES** (Continued)*

*e. **Continuous Bonds IV Phase II** (Continued)*

Under the covenants governing the Continuous Bonds IV Phase II, the Company, without the written consent of the Trustee, shall not, among others: merge or acquire, change the scope of main activities, reduce the authorized and paid up capital, sale, transfer or dispose all or part of asset by the Company's subsidiaries, sale, transfer, or giving options, warrants, and grant loans to third parties, except to the Company's subsidiaries, outside the Company's and Subsidiaries business activities.

In addition, the Company is required to maintain the comparative of total proforma consolidation loans with proforma EBITDA from last quarter multiplied by 4 (four) of no more than 6.25 times.

As of 30 June 2021, the Company has complied with the restrictions set out in these trusteeship agreements.

On 23 November 2020, Fitch Indonesia, an independent credit rating agency, rated the Continuous Bonds IV Phase II "AA+" (Double A Plus).

*f. **Continuous Bonds IV Phase III***

On 17 Februari 2021, The Company issued Continous Bonds IV Tower Bersama Infrastructure phase III Year 2021 with a Fixed Interest Rate ("Continuous Bonds IVPhase III"). The Continuous Bonds IV Phase III has a total principal of Rp 2,915,000. These bonds are listed on the Indonesia stock exchange on 18 February 2021.

The net proceeds obtained from the issuance of Continuous Bonds IV Phase III were used entirely for the payment of financial liabilities of subsidiaries.

These Continuous Bonds IV Phase III were issued inseries consisting of:

a. Series A Bonds with nominal value of Rp 1,898,000 at a fixed interest rate of 5.50% per year. The term of the Series A Bonds is 370 (three hundred and seventy) Calendar Days.

b. Series B Bonds with nominal value of Rp 1,017,000 at a fixed interest rate of 7.25% per year. The term of the Series B Bonds is 3 (three) years.

23. **SURAT UTANG** (Lanjutan)

f. **Obligasi Berkelanjutan IV Tahap III** (Lanjutan)

Bunga Obligasi dibayarkan setiap triwulan, dimana Bunga Obligasi pertama akan dibayarkan pada tanggal 17 Mei 2021, sedangkan Bunga Obligasi terakhir sekaligus dengan pelunasan Obligasi akan dibayarkan pada tanggal 27 Februari 2022 untuk Obligasi Seri A dan tanggal 17 Februari 2024 untuk Obligasi seri B.

Penerbitan Obligasi Berkelanjutan IV Tahap III ini dilakukan sesuai Akta Perjanjian Perwaliamanatan Obligasi Berkelanjutan IV Tower Bersama Infrastructure Tahap III Tahun 2021 No. 114 tanggal 28 Januari 2021 yang dibuat di hadapan Notaris Jose Dima Satria, S.H. M.Kn. Bertindak sebagai wali amanat adalah PT Bank Rakyat Indonesia (Persero) Tbk ("Wali Amanat").

Sesuai persyaratan yang disepakati dalam penerbitan Obligasi Berkelanjutan IV Tahap III ini, maka Perusahaan tanpa persetujuan tertulis dari Wali Amanat tidak diperkenankan untuk melakukan tindakan-tindakan, antara lain: melakukan penggabungan atau pengambilalihan usaha, merubah bidang usaha utama, mengurangi modal dasar dan modal disetor, menjual, mengalihkan atau melepaskan seluruh atau sebagian aset, memberikan opsi, waran, dan memberikan pinjaman kepada pihak ketiga, kecuali kepada entitas anak Perusahaan, di luar kegiatan usaha Perusahaan dan entitas anak.

Perusahaan juga disyaratkan untuk mempertahankan perbandingan antara jumlah pinjaman konsolidasian proforma dengan EBITDA proforma dari kuartal terakhir dikalikan 4 (empat) tidak melebihi 6,25 kali.

Pada 30 Juni 2021, Perusahaan telah memenuhi semua kondisi yang disyaratkan dalam perjanjian perwaliamanatan tersebut.

Pada 27 Januari 2021, Fitch Indonesia, lembaga pemeringkat efek independen, telah memberikan peringkat "AA+" (Double A Plus) untuk Obligasi Berkelanjutan IV Tahap III ini.

g. **Obligasi Berkelanjutan IV Tahap IV**

Pada tanggal 9 April 2021, Perusahaan menerbitkan Obligasi Berkelanjutan IV Tower Bersama Infrastructure Tahap IV Tahun 2021 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan IV Tahap IV") sebesar 5,5% per tahun. Nominal Obligasi Berkelanjutan IV Tahap IV ini adalah sebesar Rp 970.000. Obligasi ini dicatatkan pada Bursa Efek Indonesia pada tanggal 12 April 2021.

*23. **NOTES** (Continued)*

*f. **Continuous Bonds IV Phase III** (Continued)*

Interest for Continuous Bonds IV Phase III will be paid on a quarterly basis on the interest payment date. The first payment of interest is on 17 May 2021. The date of the last interest payment, which is also the due date of Continuous Bond IV phase III, is on 27 February 2022 for series A and 217 February 2024 for series B.

The issuance of Continuous Bonds IV Phase III was covered in the Deed of Trusteeship Agreement of Continuous Bonds IV Tower Bersama Infrastructure Phase III Year 2021 No. 114 dated 28 January 2021, of a Notary Jose Dima Satria, S.H., M.Kn. The bond trustee is PT Bank Rakyat Indonesia (Persero) Tbk (the "Trustee").

Under the covenants governing the Continuous Bonds IV Phase III, the Company, without the written consent of the Trustee, shall not, among others: merge or acquire, change the scope of main activities, reduce the authorized and paid up capital, sale, transfer or dispose all or part of asset by the Company's subsidiaries, sale, transfer, or giving options, warrants, and grant loans to third parties, except to the Company's subsidiaries, outside the Company's and Subsidiaries business activities.

In addition, the Company is required to maintain the comparative of total proforma consolidation loans with proforma EBITDA from last quarter multiplied by 4 (four) of no more than 6.25 times.

As of 30 June 2021, the Company has complied with the restrictions set out in these trusteeship agreements.

On 27 January 2021, Fitch Indonesia, an independent credit rating agency, rated the Continuous Bonds IV Phase III "AA+" (Double A Plus).

*g. **Continuous Bonds IV Phase IV***

On 9 April 2021, The Company issued Continous Bonds IV Tower Bersama infrastructure Phase IV Year 2021 with a Fixed Interest Rate ("Continuous Bonds IV Phase IV") of 5.5% per annum. The Continuous Bonds IV Phase IV has a total principal of Rp 970,000. These bonds are listed on the Indonesia stock exchange on 12 April 2021.

23. **SURAT UTANG** (Lanjutan)

g. **Obligasi Berkelanjutan IV Tahap IV** (Lanjutan)

Hasil bersih yang diperoleh dari penerbitan Obligasi Berkelanjutan IV Tahap IV telah digunakan seluruhnya untuk pembayaran kewajiban keuangan entitas anak.

Bunga Obligasi dibayarkan setiap triwulan, dimana Bunga Obligasi pertama akan dibayarkan pada tanggal 9 Juli 2021, sedangkan Bunga Obligasi terakhir sekaligus dengan pelunasan Obligasi akan dibayarkan pada tanggal 19 April 2022.

Penerbitan Obligasi Berkelanjutan IV Tahap IV ini dilakukan sesuai Akta Perjanjian Perwaliamanatan Obligasi Berkelanjutan IV Tower Bersama Infrastructure Tahap IV Tahun 2021 No. 102 tanggal 22 Maret 2021 yang dibuat di hadapan Notaris Jose Dima Satria, S.H. M.Kn. Bertindak sebagai wali amanat adalah PT Bank Rakyat Indonesia (Persero) Tbk ("Wali Amanat").

Sesuai persyaratan yang disepakati dalam penerbitan Obligasi Berkelanjutan IV Tahap IV ini, maka Perusahaan tanpa persetujuan tertulis dari Wali Amanat tidak diperkenankan untuk melakukan tindakan-tindakan, antara lain: melakukan penggabungan atau pengambilalihan usaha, merubah bidang usaha utama, mengurangi modal dasar dan modal disetor, menjual, mengalihkan atau melepaskan seluruh atau sebagian aset, memberikan opsi, waran, dan memberikan pinjaman kepada pihak ketiga, kecuali kepada entitas anak Perusahaan, di luar kegiatan usaha Perusahaan dan entitas anak.

Perusahaan juga disyaratkan untuk mempertahankan perbandingan antara jumlah pinjaman konsolidasian proforma dengan EBITDA proforma dari kuartal terakhir dikalikan 4 (empat) tidak melebihi 6,25 kali.

Pada 30 Juni 2021, Perusahaan telah memenuhi semua kondisi yang disyaratkan dalam perjanjian perwaliamanatan tersebut.

Pada 22 Maret 2021, Fitch Indonesia, Lembaga pemeringkat efek independen, telah memberikan peringkat "AA+" (Double A Plus) untuk Obligasi Berkelanjutan IV Tahap IV ini.

Pada 30 Juni 2021 dan 31 Desember 2020, beban bunga masih harus dibayar untuk Surat Utang adalah sebesar Rp 325.754 dan Rp 304.627 dan disajikan sebagai bagian dari akun "Beban Masih Harus Dibayar" pada laporan posisi keuangan konsolidasian (Catatan 21). Beban bunga disajikan sebagai bagian dari akun "Beban Keuangan" pada laporan laba rugi dan penghasilan komprehensif lain konsolidasian.

*23. **NOTES** (Continued)*

*g. **Continuous Bonds IV Phase IV** (Continued)*

The net proceeds obtained from the issuance of Continuous Bonds IV Phase IV were used entirely for the payment of financial liabilities of subsidiaries.

Interest for Continuous Bonds IV Phase IV will be paid on a quarterly basis on the interest payment date. The first payment of interest is on 9 July 2021. The date of the last interest payment, which is also the due date of Continuous Bond IV phase IV, is on 19 April 2021.

The issuance of Continuous Bonds IV Phase IV was covered in the Deed of Trusteeship Agreement of Continuous Bonds IV Tower Bersama Infrastructure Phase IV Year 2021 No. 102 dated 22 March 2021, of a Notary Jose Dima Satria, S.H., M.Kn. The bond trustee is PT Bank Rakyat Indonesia (Persero) Tbk (the "Trustee").

Under the covenants governing the Continuous Bonds IV Phase IV, the Company, without the written consent of the Trustee, shall not, among others: merge or acquire, change the scope of main activities, reduce the authorized and paid up capital, sale, transfer or dispose all or part of asset by the Company's subsidiaries, sale, transfer, or giving options, warrants, and grant loans to third parties, except to the Company's subsidiaries, outside the Company's and Subsidiaries business activities.

In addition, the Company is required to maintain the comparative of total proforma consolidation loans with proforma EBITDA from last quarter multiplied by 4 (four) of no more than 6.25 times.

As of 30 June 2021, the Company has complied with the restrictions set out in these trusteeship agreements.

On 22 March 2021, Fitch Indonesia, an independent credit rating agency, rated the Continuous Bonds IV Phase IV "AA+" (Double A Plus).

As of 30 June 2021 and 31 December 2020, the accrued interest for Notes amounts to Rp 325,754 and Rp 304,627 and is presented as part of "Accrued Expenses" in the consolidated statement of financial position (Note 21). The related interest expense is presented as part of "Financial Expenses" in the consolidated statements of profit or loss and other comprehensive income.

24. LIABILITAS SEWA / *LEASE LIABILITIES*

Akun ini terdiri dari: / *This account consists of:*

	30 Juni/ *30 June* 2021	31 Desember/ *31 December* 2020	
a. Aset hak guna	629.106	450.430	*a. Right of use asset*
b. Kendaraan	14.151	16.082	*b. Vehicles*
Jumlah	**643.257**	**466.512**	***Total***
Bagian yang jatuh tempo dalam satu tahun	167.402	152.617	***Current portion less than one year***
Bagian yang jatuh tempo lebih dari satu tahun	475.855	313.895	***Due more than one year***

a. Aset hak guna / *a. Rights of use assets*

Sesuai dengan penerapan PSAK 73 "Sewa", Perusahaan dan entitas anak mulai melakukan penerapan awal dan mengakui liabilitas sewa aset hak guna dari estimasi nilai perpanjangan sewa lahan untuk mencakup jangka waktu kolokasi, dengan rincian sebagai berikut:

Based on PSAK 73 "Leases", the Company and subsidiaries start to apply initial application and recognized the estimation of land lease extension to cover the collocation period as right of use assets lease liabilities, with details as follows:

	30 Juni/ *30 June* 2021	31 Desember/ *31 December* 2020	
Saldo awal	450.430	318.453	*Beginning balance*
Ditambah:			*Add:*
Penambahan sewa lahan	176.473	60.572	*Additional landlease*
Beban keuangan	25.170	93.604	*Financial expenses*
Dikurangi:			*Less:*
Pembayaran sewa lahan	(22.967)	(22.199)	*Payment of landlease*
Jumlah	**629.106**	**450.430**	***Total***
Bagian yang jatuh tempo dalam satu tahun	162.759	147.976	*Current portion less than one year*
Bagian yang jatuh tempo lebih dari satu tahun	466.347	302.454	*Due more than one year*

b. Kendaraan / *b. Vehicles*

	30 Juni/ *30 June* 2021	31 Desember/ *31 December* 2020	
PT Mitra Pinasthika Mustika Finance	13.178	14.310	*PT Mitra Pinasthika Mustika Finance*
PT Toyota Astra Financial Services	973	1.772	*PT Toyota Astra Financial Services*
Jumlah	**14.151**	**16.082**	***Total***
Bagian yang jatuh tempo dalam satu tahun	4.643	4.641	*Current portion less than one year*
Bagian yang jatuh tempo lebih dari satu tahun	9.508	11.441	*Due more than one year*

24. **LIABILITAS SEWA** (Lanjutan)

b. Kendaraan (Lanjutan)

Pembayaran sewa minimum di masa mendatang, serta nilai kini atas pembayaran sewa minimum pada tanggal 30 Juni 2021 dan 31 Desember 2020 adalah sebagai berikut:

*24. **LEASE LIABILITIES** (Continued)*

b. Vehicles (Continued)

Future minimum lease payments under finance leases together with the present value of the minimum lease payments as at 30 June 2021 and 31 December 2020 were as follows:

	30 Juni/ *30 June* 2021	**31 Desember/ *31 December* 2020**	
Bagian yang jatuh tempo dalam satu tahun	9.161	6.954	*Current portion less than one year*
Bagian yang jatuh tempo lebih dari satu tahun	13.686	14.147	*Due more than one year*
	22.847	21.101	
Dikurangi:			*Less:*
Beban bunga yang belum jatuh tempo	(8.696)	(5.019)	*Future financing charges*
Nilai kini pembayaran minimun utang sewa pembiayaan	14.151	16.082	*Present value of minimum finance lease payable*
Bagian yang jatuh tempo dalam satu tahun	4.643	4.641	*Current portion less than one year*
Bagian yang jatuh tempo lebih dari satu tahun	9.508	11.441	*Due more than one year*
Nilai kini pembayaran minimun utang sewa pembiayaan	**14.151**	**16.082**	***Present value of minimum finance lease payable***

Pada tanggal 30 Juni 2021, sewa pembiayaan ini dikenakan bunga berkisar antara 5,50% sampai dengan 15,22% per tahun dan akan jatuh tempo antara tahun 2021 sampai dengan tahun 2026.

As of 30 June 2021, this finance lease bears interest ranging from 5.50% to 15.22% per annum and will be due between 2021 to 2026.

Sewa pembiayaan ini dijamin dengan aset kendaraan yang menjadi obyek pembiayaan (lihat Catatan 13).

The finance lease is secured by the respective vehicle assets (see Note 13).

25. MODAL SAHAM / *SHARE CAPITAL*

Pada tanggal 30 Juni 2021 dan 31 Desember 2020, susunan pemegang saham dan kepemilikannya adalah sebagai berikut:

As of 30 June 2021 and 31 December 2020, the structure of shareholders and their respective shareholdings are as follows:

	30 Juni 2021/ 30 *June* 2021			
Pemegang saham	**% hak suara/ *% Voting right***	***Lembar saham* (nilai penuh)/ *No of shares (full amount)***	**Jumlah/ *Amount (Rp)***	
PT Wahana Anugerah Sejahtera	35,85	7.755.471.093	155.109	*PT Wahana Anugerah Sejahtera*
PT Provident Capital Indonesia	23,28	5.036.352.510	100.727	*PT Provident Capital Indonesia*
Winato Kartono	2,28	490.159.500	9.803	*Winato Kartono*
Edwin Soeryadjaya	0,33	71.481.830	1.430	*Edwin Soeryadjaya*
Hardi Wijaya Liong	1,33	287.803.863	5.756	*Hardi Wijaya Liong*
Budianto Purwahjo	0,02	5.025.000	101	*Budianto Purwahjo*
Herman Setya Budi	0,02	4.625.000	93	*Herman Setya Budi*
Helmy Yusman Santoso	0,01	3.125.000	63	*Helmy Yusman Santoso*
Gusandi Sjamsudin	0,01	1.950.000	39	*Gusandi Sjamsudin*
Masyarakat	36,87	7.975.060.149	159.500	*Public*
Jumlah	100,00	21.631.053.945	432.621	***Total***
Saham treasuri		1.025.945.500	20.519	
Jumlah		**22.656.999.445**	**453.140**	

	31 Desember 2020/ 31 *December* 2020			
Pemegang saham	**% hak suara/ *% Voting right***	***Lembar saham* (nilai penuh)/ *No of shares (full amount)***	**Jumlah/ *Amount (Rp)***	
PT Wahana Anugerah Sejahtera	35,85	7.755.471.093	155.109	*PT Wahana Anugerah Sejahtera*
PT Provident Capital Indonesia	26,73	5.782.760.530	115.655	*PT Provident Capital Indonesia*
Winato Kartono	0,63	136.719.815	2.734	*Winato Kartono*
Edwin Soeryadjaya	0,33	71.481.830	1.430	*Edwin Soeryadjaya*
Hardi Wijaya Liong	0,32	68.359.905	1.367	*Hardi Wijaya Liong*
Budianto Purwahjo	0,02	5.025.000	101	*Budianto Purwahjo*
Herman Setya Budi	0,02	4.625.000	93	*Herman Setya Budi*
Helmy Yusman Santoso	0,01	3.125.000	63	*Helmy Yusman Santoso*
Gusandi Sjamsudin	0,01	1.950.000	39	*Gusandi Sjamsudin*
Masyarakat	36,08	7.801.535.772	156.031	*Public*
Jumlah	100,00	21.631.053.945	432.621	***Total***
Saham treasuri		1.025.945.500	20.519	
Jumlah		**22.656.999.445**	**453.140**	

Pada 30 Juni 2021 dan 31 Desember 2020, Komisaris dan Direksi Perusahaan yang memiliki langsung saham Perusahaan masing-masing adalah sebanyak 864.170.193 saham dan 291.286.550 saham, jumlah tersebut masing-masing mencerminkan hak suara sebesar 4,00% dan 1,34% dari jumlah saham beredar.

As of 30 June 2021 and 31 December 2020, there are Commissioners and Directors who directly owned 864,170,193 shares and 291,286,550 shares of the Company, respectively. Those shares represent 4.00% and 1.34% voting rights of total outstanding shares, respectively.

26. SAHAM TREASURI

a. Pada tanggal 27 April 2018, Perusahaan mengadakan Rapat Umum Pemegang Saham Tahunan (RUPST). RUPST ini memberikan persetujuan kepada Perusahaan untuk membeli kembali sebesar maksimum 4,5% saham beredarnya atau sebanyak 204.000.000 saham melalui Bursa Efek Indonesia.

Sesuai peraturan OJK, pembelian kembali saham tersebut harus dilakukan melalui bursa saham dan persetujuan tersebut berlaku selama 18 (delapan belas) bulan. Maksimum dana yang akan digunakan untuk membeli kembali saham tersebut adalah sebesar Rp 1,2 trilyun (nilai penuh) termasuk biaya transaksi, perantara pedagang efek dan biaya terkait lainnya.

Sesuai surat Perusahaan No. 534/TBG-TBI 001/FIN/05/IX/2019 tangal 4 September 2019, Perusahaan telah menyampaikan kepada OJK bahwa Perusahaan menghentikan pelaksanaan pembelian kembali saham.

Dengan demikian, pelaksanaan pembelian kembali saham tersebut dinyatakan telah selesai dilaksanakan seluruhnya dan selanjutnya pengalihan saham hasil pembelian kembali tersebut akan dilakukan sesuai peraturan yang berlaku, khususnya Peraturan Otoritas Jasa Keuangan No. 30/POJK.04/2017 tentang Pembelian Kembali Saham Yang Dikeluarkan Oleh Perusahaan Terbuka.
Sejak tanggal RUPST sampai dengan 4 September 2019, Perusahaan telah membeli kembali saham beredarnya dari bursa saham sebanyak 110.944.200 saham dengan biaya perolehan sebesar Rp 513.160. Setelah *stock split* di bulan November 2019, jumlah saham tersebut menjadi 554.721.000 saham, yang mencerminkan 2,45% dari seluruh saham beredar Perusahaan.

b. Pada tanggal 24 Oktober 2016, Perusahaan mengadakan Rapat Umum Pemegang Saham Luar Biasa (RUPSLB). RUPSLB ini memberikan persetujuan kepada Perusahaan untuk membeli kembali sebesar maksimum 5% saham beredarnya atau sebanyak 236.000.000 saham melalui Bursa Efek Indonesia.

Sesuai peraturan OJK, pembelian kembali saham tersebut harus dilakukan melalui bursa saham dan persetujuan tersebut berlaku selama 18 (delapan belas) bulan. Maksimum dana yang akan digunakan untuk membeli kembali saham tersebut adalah sebesar Rp 1,5 trilyun (nilai penuh) termasuk biaya transaksi, perantara pedagang efek dan biaya terkait lainnya.

Sejak tanggal RUPSLB sampai dengan 25 April 2018, Perusahaan telah membeli kembali saham beredarnya dari bursa saham sebanyak 85.810.400 saham dengan biaya perolehan sebesar Rp 463.847. Setelah stock split di bulan November 2019, jumlah saham tersebut menjadi 429.052.000 saham, yang mencerminkan 1,89% dari seluruh saham beredar Perusahaan.

26. TREASURY STOCK

a. On 27 April 2018, the Company held the Annual General Meeting of Shareholders (AGMS). The AGMS approved plans to buyback a maximum of 4.5% of the issued shares or 204,000,000 shares of the Company on the Indonesia Stock Exchange.

According to the OJK's regulation, these shares will be boughtback through the stock exchange and the approval is valid for 18 (eighteen) months. The maximum fund to be used for the share buyback is amounting to Rp 1.2 trillion (full amount), including transaction, brokerage and other costs to be incurred.

According to the Company's letter No. 534/TBG-TBI-001/FIN/05/IX/2019 dated 4 September 2019, the Company has informed OJK that the Company has stopped the buyback of its outstanding shares.

Accordingly, the shares repurchase has been completed, and those shares will be transferred in accordance with the applicable regulations, particularly to OJK's regulation No. 30 / POJK.04 / 2017 concerning Buyback of Shares Issued by a Public Company.

From the AGMS until 4 September 2019, the Company has bought back 110,944,200 of its outstanding shares from the stock exchange as a cost of Rp 513,160. Post the stock-split in November 2019, the number of shares is now 554,721,000 shares, representing 2.45% of the Company's outstanding shares.

b. On 24 October 2016, the Company held the Extraordinary General Meeting of Shareholders (EGMS). The EGMS approved plans to buyback a maximum of 5% of the issued shares or 236,000,000 shares of the Company on the Indonesia Stock Exchange.

According to the OJK's regulation, these shares will be boughtback through the stock exchange and the approval is valid for 18 (eighteen) months. The maximum fund to be used for the share buyback is amounting to Rp 1.5 trillion (full amount), including transaction, brokerage and other costs to be incurred.

Since the EGMS up to 25 April 2018, the Company had boughtback 85,810,400 of its outstanding shares from the stock exchange at a cost of Rp 463,847. Post the stock-split in November 2019, the number of shares is now 429,052,000 shares, representing 1.89% of the Company's outstanding shares.

26. **SAHAM TREASURI** (Lanjutan)

c. Pada tanggal 27 Mei 2015, Perusahaan mengadakan Rapat Umum Pemegang Saham Tahunan (RUPST). RUPST ini memberikan persetujuan kepada Perusahaan untuk membeli kembali sebesar maksimum 5% saham beredarnya atau sebanyak 236.000.000 saham melalui Bursa Efek Indonesia.

Sesuai peraturan OJK, pembelian kembali saham tersebut harus dilakukan melalui bursa saham dan persetujuan tersebut berlaku selama 18 (delapan belas) bulan. Maksimum dana yang akan digunakan untuk membeli kembali saham tersebut adalah sebesar Rp 2,2 trilyun (nilai penuh) termasuk biaya transaksi, perantara pedagang efek dan biaya terkait lainnya.

Sejak tanggal RUPST sampai dengan tanggal 24 Oktober 2016, Perusahaan telah membeli kembali saham beredarnya dari bursa saham sebanyak 194.855.500 saham dengan biaya perolehan sebesar Rp 1.195.828. 186.421.000 dari jumlah 194.855.500 saham treasuri ini telah ditarik kembali pada saat pengurangan modal pada 28 Desember 2016. Setelah *stock split* di bulan November 2019, jumlah saham tersebut menjadi 42.172.500 saham, yang mencerminkan 0,04% dari seluruh saham beredar Perusahaan.

d. Pada tanggal 24 Juli 2013, Perusahaan mengadakan Rapat Umum Pemegang Saham Luar Biasa (RUPSLB). RUPSLB ini memberikan persetujuan kepada Perusahaan untuk membeli kembali sebesar maksimum 5% saham beredarnya atau sebanyak 239.800.000 saham melalui Bursa Efek Indonesia.

Sesuai peraturan OJK, pembelian kembali saham tersebut harus dilakukan melalui bursa saham dan persetujuan tersebut berlaku selama 18 (delapan belas) bulan. Maksimum dana yang akan digunakan untuk membeli kembali saham tersebut adalah sebesar Rp 1,44 trilyun (nilai penuh) termasuk biaya transaksi, perantara pedagang efek dan biaya terkait lainnya.

Sejak tanggal RUPSLB sampai dengan bulan Maret 2014, Perusahaan telah membeli kembali saham beredarnya dari bursa saham sebanyak 78.705.310 saham dengan biaya perolehan sebesar Rp 459.254. Jumlah saham tersebut mencerminkan 1,64% dari seluruh saham beredar Perusahaan. Saham treasuri ini termasuk dalam saham treasuri yang ditarik kembali melalui pengurangan modal pada tanggal 28 Desember 2016.

Sesuai surat Perusahaan No. 0478/TBG-TBI-001/FAL/05/IV/2014 tangal 28 April 2014, Perusahaan telah menyampaikan kepada OJK untuk menghentikan pelaksanaan pembelian kembali saham.

*26. **TREASURY STOCK** (Continued)*

c. On 27 May 2015, the Company held the Annual General Meeting of Shareholders (AGMS). The AGMS approved plans to buyback a maximum of 5% of the issued shares or 236,000,000 shares of the Company on the Indonesia Stock Exchange.

According to the OJK's regulation, these shares will be boughtback through the stock exchange and the approval is valid for 18 (eighteen) months. The maximum fund to be used for the share buyback is amounting to Rp 2.2 trillion (full amount), including transaction, brokerage and other costs to be incurred.

Since the AGMS up to 24 October 2016, the Company has bought back circulated shares from the stock exchange totaling 194,855,500 shares with a acquisition cost of Rp 1,195,828. 186,421,000 of the total 194,855,500 treasury shares were withdrawn at the time of capital reduction on 28 December 2016. After the stock split in November 2019, the number of shares became 42,172,500 shares, representing 0.04% of all outstanding shares the Company.

d. On 24 July 2013, the Company held the Extraordinary General Meeting of Shareholders (EGMS). The EGMS approved plans to repurchase a maximum of 5% of the issued shares or 239,800,000 shares of the Company on the Indonesia Stock Exchange.

According to the OJK's regulation, these shares will be repurchased through the stock exchange and the approval is valid for 18 (eighteen) months. The maximum fund to be used for the shares repurchase is amounting to Rp 1.44 trillion (full amount), including transaction, brokerage and other costs to be incurred.

Since the EGMS up to March 2014, the Company had repurchased its 78,705,310 outstanding shares from the stock exchange at cost of Rp 459,254. Those number of shares represents 1.64% of the Company's outstanding shares. There shares were included in the Compnay's treasury shares and have subsequently been cancelled on 28 December 2016.

According to the Company's letter No. 0478/TBG-TBI-001/FAL/05/IV/2014 dated 28 April 2014, the Company has advised to OJK to suspend the execution of repurchase of its outstanding shares.

26. **SAHAM TREASURI** (Lanjutan)

Dengan demikian, pelaksanaan pembelian kembali saham tersebut dinyatakan telah selesai dan selanjutnya pengalihan saham hasil pembelian kembali tersebut akan dilakukan sesuai peraturan yang berlaku, khususnya peraturan OJK No. XI.B2 lampiran keputusan No. Kep-105/BL/2010 tanggal 13 April 2010.

Berdasarkan pengesahan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dalam surat keputusan No. AHU-0022051.AH.01.02. Tahun 2016 tanggal 22 November 2016 tentang Persetujuan Perubahan Anggaran Dasar Perseroan Terbatas, Perusahaan memutuskan untuk melakukan pengurangan modal dengan cara menghentikan peredaran 265.126.310 saham treasuri dan merubah Pasal 4 Anggaran Dasar Perusahaan terkait dengan modal ditempatkan dan disetor sehingga menjadi sebanyak 4.531.399.889 saham dengan nilai nominal saham Rp 100 (nilai penuh) per saham. Setelah perubahan modal tersebut, maka jumlah modal disetor Perusahaan menjadi sebesar Rp 453.140.

Dengan demikian, jumlah saham beredar yang telah dibeli kembali oleh Perusahaan pada tanggal 30 Juni 2021 dan 31 Desember 2020 masing-masing sebanyak 1.025.945.500 saham atau 4,53% dari seluruh jumlah saham beredar dengan biaya perolehan masing-masing sebesar Rp 1.028.268.

*26. **TREASURY STOCK** (Continued)*

Accordingly, the shares repurchase has been completed, and those shares will be transferred in accordance with the applicable regulations, particularly to OJK's regulation No. XI.B2 attachment to the decision No. Kep-105/BL/2010 dated 13 April 2010.

Based on approval from the Ministry of Law and Human Rights of the Republic of Indonesia in his Decree No. AHU-0022051.AH.01.02. Tahun 2016 dated 22 November 2016 regarding Approval of Changing in the Company's Article of Association, the Company has decided to reduce its capital by retiring the circulation of 265,126,310 treasury stocks, and to amend Article 4 of the Company's Articles of Association related to the issued and paid for becoming of 4,531,399,889 shares at a nominal value of Rp 100 (full amount) per share. Subsequently, the Company's fully paid in capital is now becoming to Rp 453,140.

Accordingly, the numbers of outstanding shares that have been boughtback by the Company as of 30 June 2021 and 31 December 2020 amounted to 1,025,945,500 shares, respectively or 4.53% of the total number of shares outstanding at a cost of Rp 1,028,268, respectively.

27. **TAMBAHAN MODAL DISETOR - BERSIH**

Akun ini terdiri dari:

*27. **ADDITIONAL PAID-IN CAPITAL - NET***

This account consists of:

	30 Juni/ *30 June* 2021	31 Desember/ *31 December* 2020	
Agio saham:			***Premium of paid-in capital:***
Penawaran Umum Perdana	1.060.888	1.060.888	*Initial Public Offering*
PT Indosat Tbk	733.101	733.101	*PT Indosat Tbk*
PT Saratoga Infrastruktur	185.244	185.244	*PT Saratoga Infrastruktur*
Biaya emisi efek ekuitas:			***Share issuance costs:***
Penawaran Umum Perdana	(62.275)	(62.275)	*Initial Public Offering*
Selisih transaksi dengan pihak non-pengendali	(1.870.286)	(1.870.286)	***Difference arising from transaction with non-controlling interest***
Selisih nilai transaksi restrukturisasi entitas sepengendali (Catatan 2s)	(198.137)	(140.620)	***Difference arising from restructuring transaction of entities under common control*** *(Note 2s)*
Penarikan kembali saham dari saham treasuri (Catatan 26)	(426.552)	(426.552)	***Shares retired from treasury stock*** *(Note 26)*
Jumlah - Bersih	**(578.017)**	**(520.500)**	***Total - Net***

27. **TAMBAHAN MODAL DISETOR – BERSIH** (Lanjutan)

27. ***ADDITIONAL PAID-IN CAPITAL – NET*** *(Continued)*

Selisih transaksi dengan pihak non-pengendali

Difference in arising from transactions with non-controlling parties

Akun ini terdiri dari beberapa transaksi pembelian kembali saham sebagai berikut:

This account consists of several share buyback transactions as follows:

Perusahaan	30 Juni/ *30 June* 2021	31 Desember/ *31 December* 2020		*the Company*
a. PT Solu Sindo Kreasi Pratama	(1.850.931)	(1.850.931)	*a.*	*PT Solu Sindo Kreasi Pratama*
b. PT Jaringan Pintar Indonesia	(98)	(98)	*b.*	*PT Jaringan Pintar Indonesia*
c. PT Gihon Telekomunikasi Indonesia Tbk	(1.091)	(1.091)	*c.*	*PT Gihon Telekomunikasi Indonesia Tbk*
d. PT Visi Telekomunikasi Infrastruktur Tbk	(18.166)	(18.166)	*d.*	*PT Visi Telekomunikasi Infrastruktur Tbk*
Jumlah	**(1.870.286)**	**(1.870.286)**		***Total***

a. Pada berbagai tanggal selama tahun 2014 sampai dengan tahun 2018 (terakhir dilakukan pada tanggal 9 Agustus 2018), berdasarkan Perjanjian Pengikatan Jual beli Kembali Saham SKP, pemegang saham non-pengendali SKP menyetujui untuk mengalihkan 587.345 saham miliknya kepada SKP dengan harga sebesar Rp 2.113.880.

Jumlah saham tersebut merepresentasikan 32,66% dari seluruh saham beredar SKP. Dengan demikian, SKP menjadi memiliki sahamnya sendiri sebanyak 587.345 saham atau 32,66% dari seluruh saham yang beredar. Setelah transaksi pembelian saham tersebut, selanjutnya SKP menghentikan peredaran saham yang dibelinya kembali tersebut.

Selanjutnya, SKP telah melaporkan penghentian peredaran saham tersebut dan perubahan susunan pemegang saham kepada Menteri Hukum dan Hak Asasi Manusia. Perubahan anggaran dasar tersebut telah disetujui oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dalam Surat Keputusan No. AHU-21014.AH.01.02.Tahun 2013 tanggal 19 April 2013, No. AHU-57070.AH.01.02.Tahun 2013 tanggal 8 November 2013, No. AHU-05606.AH.01.02.Tahun 2014 tanggal 10 Februari 2014, No. AHU- 04548.40.20.2014 tanggal 16 Mei 2014, No. AHU-0000371.AH.01.02.Tahun 2015 tanggal 12 Januari 2015, No. AHU-0938197.AH.01.02.Tahun 2015 tanggal 26 Juni 2015, No. AHU-0949402.AH.01.02.Tahun 2015 tanggal 15 Februari 2016 dan NO. AHU-0021798.AH.01.02.Tahun 2018 tanggal 14 Oktober 2018.

Setelah pelaksanaan pembelian kembali saham, kepemilikan efektif MSI atas SKP pada 30 Juni 2021 dan 31 Desember 2020 berubah menjadi 99,71%.

a. On a number of dates in and between 2014 and 2018 (the last on 9 August 2018), based on the SKP Shares Purchase Agreement, the non-controlling shareholders of SKP agreed to transfer their 587,345 shares to SKP at a price of Rp 2,113,880.

The number of shares represents 32.66% of total shares outstanding of SKP. Accordingly, SKP now has as many as 587.345 shares of its own or 32.66% of the total shares outstanding. After the transaction of share repurchase, SKP terminated all the shares purchased as the outstanding shares.

Subsequently, SKP has reported the terminated all the shares purchased and changes in shareholding structure to the Ministry of Law and Human Rights. The changes of articles of association have been approved by the Minister of Law and Human Rights through its Decree Letter No. AHU-21014.AH.01.02.Tahun 2013 dated 19 April 2013, No. AHU-57070.AH.01.02.Tahun 2013 dated 8 November 2013, No. AHU-05606.AH.01.02.Tahun 2014 dated 10 February 2014, No. AHU-04548.40.20.2014 dated 16 May 2014, No. AHU-0000371.AH.01.02.Tahun 2015 dated 12 January 2015, No. AHU-0938197.AH.01.02.Tahun 2015 dated 26 June 2015, No. AHU-0949402.AH.01.02.Tahun 2015 dated 15 February 2016, and NO. AHU-0021798.AH.01.02.Tahun 2018 dated 14 October 2018.

Subsequent to the share repurchase execution, the effective ownership of MSI over SKP as of 30 June 2021 and 31 December 2020 has changed to 99.71%, respectively.

27. **TAMBAHAN MODAL DISETOR – BERSIH (**Lanjutan**)**

Selisih transaksi dengan pihak non-pengendali (Lanjutan**)**

Rincian dari perhitungan akun tersebut adalah sebagai berikut:

	30 Juni/ *30 June* 2021	31 Desember/ *31 December* 2020	
Nilai tercatat investasi MSI pada SKP pada saat pelaksanaan pembelian kembali saham	2.563.512	2.563.512	*MSI investment at SKP on the date of treasury stock executed*
Nilai tercatat investasi MSI pada SKP setelah pelaksanaan pembelian kembali saham dengan kepemilikan efektif 99,71% masing-masing pada 30 Juni 2021 dan 31 Desember 2020	712.483	712.483	*MSI investment at SKP after the date treasury stock executed with ownership effective 99.71% as of 30 June 2021 and 31 December 2020, respectively*
Penurunan bagian investasi yang dicatat MSI sebagai selisih perubahan ekuitas entitas anak	(1.850.931)	(1.850.931)	*Decrease of investment obtained by MSI and recorded as the change of the shareholders' equity in subsidiary*
Kepemilikan Perusahaan di MSI	100,00%	100,00%	*The ownership of the Company in MSI*
Selisih transaksi dengan pihak non-pengendali yang dicatat Perusahaan	(1.850.931)	(1.850.931)	***Difference arising from transactions with with non-controlling parties as recorded by the Company***

27. ***ADDITIONAL PAID-IN CAPITAL – NET (****Continued****)***

Difference in arising from transactions with non-controlling parties (*Continued****)***

Details of the calculation of these accounts are as follows:

b. Pada bulan September 2018, PT Tower Bersama (TB) entitas anak, melakukan pembelian saham PT Jaringan Pintar Indonesia (JPI) sebanyak 374 saham dari PT Moga Capital, pihak berelasi. Setelah pelaksanaan pembelian kembali saham, kepemilikan efektif TB atas JPI pada 30 September 2018 berubah menjadi 100%.

Pada bulan November 2018, PT Tower Bersama (TB) entitas anak, mengalihkan saham PT Jaringan Pintar Indonesia (JPI) sebanyak 207 saham kepada pihak non-pengendali. Setelah pengalihan kembali saham, kepemilikan efektif TB atas JPI pada 30 November 2018 berubah menjadi 83,44 %. Selisih transaksi dengan pihak non-pengendali yang dicatat Perusahaan adalah sebesar Rp 98.

c. Pada tanggal 25 Januari 2019, Perusahaan melakukan pembelian saham PT Gihon Telekomunikasi Indonesia Tbk ("GHON") sebanyak 1.695.700 saham dari pemegang saham GHON lainnya. Setelah pembelian saham tersebut kepemilikan efektif Perusahaan atas GHON pada 31 Januari 2019 berubah menjadi 50,43%. Selisih transaksi dengan pihak non-pengendali yang dicatat Perusahaan adalah sebesar Rp 1.091.

b. In September 2018, PT Tower Bersama (TB) subsidiary, purchased 374 shares of PT Jaringan Pintar Indonesia (JPI) from PT Moga Capital, a related party. After the stock repurchase, effective ownership of TB on JPI at 30 September 2018 changed to 100%.

In November 2018, PT Tower Bersama (TB) entitas anak, transfer 207 shares PT Jaringan Pintar Indonesia (JPI) to non-controlling shareholders. After the transfer of shares execution, the effective ownership of TB to JPI on 30 November 2018 has changed to 83.44%. Difference in arising from transaction with non-controlling parties as recorded by the Company is Rp 98.

c. On 25 January 2019, the Company acquired 1,695,700 shares from other GHON shareholder of PT Gihon Telekomunikasi Indonesia Tbk ("GHON"). After the acquired of shares execution, the effective ownership of 31 January 2019 has changed to 50.43%. Difference in arising from transaction with non-controlling parties as recorded by the Company is Rp 1,091.

27. **TAMBAHAN MODAL DISETOR – BERSIH (**Lanjutan**)**

Selisih transaksi dengan pihak non-pengendali (Lanjutan**)**

d. Pada tanggal 14 Maret 2019, Perusahaan melakukan pembelian saham PT Visi Telekomunikasi Infrastruktur Tbk ("GOLD") sebanyak 15.798.850 saham dari pemegang saham GOLD lainnya. Setelah pembelian saham tersebut kepemilikan efektif Perusahaan atas GOLD pada 30 Juni 2019 berubah menjadi 56,02%. Selisih transaksi dengan pihak non-pengendali yang dicatat Perusahaan adalah sebesar Rp 4.062.

Pada tanggal 10 Juli 2019, Perusahaan melakukan pembelian saham PT Visi Telekomunikasi Infrastruktur Tbk ("GOLD") sebanyak 476.330.959 saham untuk tujuan Pelaksanaan HMETD milik Perusahaan terkait dengan penambahan modal dengan memberikan HMETD ("*Right Issue*") GOLD. Setelah pembelian saham tersebut kepemilikan efektif Perusahaan atas GOLD pada 31 Juli 2019 berubah menjadi 51,09%. Selisih transaksi dengan pihak non pengendali yang dicatat Perusahaan adalah sebesar Rp 14.104.

Tidak terdapat selisih transaksi dengan pihak non-pengendali yang direalisasi ke laba rugi atas pelepasan investasi untuk periode 6 (enam) bulan dan tahun yang berakhir pada 30 Juni 2021 dan 31 Desember 2020.

Selisih Nilai Transaksi Restrukturisasi Entitas Sepengendali

- Pada tanggal 7 Januari 2009, PT Tower Bersama (TB), entitas anak, melakukan pembelian saham PT Prima Media Selaras sebanyak 15.000 saham dari PT Prime Asia Capital, pihak hubungan berelasi. Selisih antara nilai perolehan dan nilai wajar aset bersih yang diperoleh sebesar Rp 2.008 disajikan sebagai "Selisih Nilai Transaksi Restrukturisasi Entitas Sepengendali" sebagai bagian dari ekuitas (catatan 2s).

- Pada bulan Januari 2013, TBG Global Pte Ltd (TBGG), entitas anak, memperoleh 100% kepemilikan saham Tower Bersama Singapore Pte Ltd, dari Perusahaan. Selisih antara nilai perolehan dan nilai wajar aset bersih yang diperoleh sebesar Rp 386 disajikan sebagai "Selisih Nilai Transaksi Restrukturisasi Entitas Sepengendali" sebagai bagian dari ekuitas (Catatan 2s).

27. ADDITIONAL PAID-IN CAPITAL – NET (Continued)

Difference in arising from transactions with non-controlling parties (Continued)

d. On 14 March 2019, the Company acquired 15,798,850 shares from other GOLD shareholder of PT Visi Telekomunikasi Infrastruktur Tbk ("GOLD"). After the acquired of shares execution, the effective ownership of 30 June 2019 has changed to 56.02%. Difference in arising from transaction with non-controlling parties as recorded by the Company is Rp 4,062.

On 10 July 2019, the Company acquired 476,330,959 shares from other GOLD shareholder of PT Visi Telekomunikasi Infrastruktur Tbk ("GOLD") for the purpose of exercise the Company's rights related to the Rights issues GOLD. After the acquired of shares execution, the effective ownership of 31 July 2019 has changed to 51.09%. Difference in arising from transaction with non-controlling parties as recorded by the Company is Rp 14,104.

There are no difference arising from transactions with non-controlling parties derived from disposal of investment which realized to profit or loss for the period of 6 (six) months and years ended 30 June 2021 and 31 December 2020.

Difference Arising From Restructuring Transactions of Entities Under Common Control

- *On 7 January 2009, PT Tower Bersama (TB), a subsidiary, purchased 15,000 shares of PT Prima Media Selaras from PT Prime Asia Capital, a related party. The difference between the acquisition value and the fair value of the net assets acquired amounting to Rp 2,008 is presented as "Difference Arising from Restructuring Transactions of Entities Under Common Control" as part of equity (note 2s).*

- *On January 2013, TBG Global Pte Ltd (TBGG), a subsidiary, acquired 100% ownership Tower Bersama Singapore Pte Ltd., from the Company. The difference between the acquisition cost and the fair value of net assets acquired amounted to Rp 386 is presented as the "Difference Arising from Restructuring Transactions of Entities Under Common Control" as part of the equity (Note 2s).*

27. **TAMBAHAN MODAL DISETOR – BERSIH (**Lanjutan**)**

Selisih Nilai Transaksi Restrukturisasi Entitas Sepengendali (Lanjutan)

- Pada tanggal 21 Desember 2018, Perusahaan melakukan pembelian saham PT Gihon Telekomunikasi Indonesia Tbk ("GHON") sebanyak 166.760.000 saham dari pemegang saham GHON lainnya. Selisih antara nilai perolehan dan nilai wajar aset bersih yang diperoleh sebesar Rp 138.226 disajikan sebagai "Selisih Nilai Transaksi Restrukturisasi Entitas Sepengendali" sebagai bagian dari ekuitas.

- Pada tanggal 25 Juni 2021, Perusahaan melakukan pembelian saham PT Tower Bersama sebanyak 2.780 saham dari PT Povident Capital Indonesia, pihak berelasi. Selisih antara nilai perolehan dan nilai wajar aset bersih yang diperoleh sebesar Rp 57.517 disajikan sebagai "Selisih Nilai Transaksi Restrukturisasi Entitas Sepengendali" sebagai bagian dari ekuitas (catatan 2s).

*27. **ADDITIONAL PAID-IN CAPITAL – NET (**Continued**)***

***Difference Arising From Restructuring Transactions of Entities Under Common Control** (Continued)*

- *On 21 December 2018, the Company acquired 166,760,000 shares from other GHON shareholder of PT Gihon Telekomunikasi Indonesia Tbk ("GHON"). The difference between the cost and the fair value of net assets acquired amounting to Rp 138,226 is presented as "Difference Arising from Restructuring Transactions of Entities Under Common Control" as part of equity.*

- *On 25 June 2021, The Company, purchased 2,781 shares of PT Tower Bersama from PT Provident Capital Indonesia, a related party. The difference between the acquisition value and the fair value of the net assets acquired amounting to Rp 57,517 is presented as "Difference Arising from Restructuring Transactions of Entities Under Common Control" as part of equity (note 2s).*

28. **PENGHASILAN KOMPREHENSIF LAIN**

Akun ini merupakan selisih transaksi perubahan ekuitas entitas anak dan penghasilan komprehensif lain dengan rincian sebagai berikut:

*28. **OTHER COMPREHENSIVE INCOME***

This account represents differences arising from change in subsidiaries equity and other comprehensive income with details as follows:

	30 Juni/ *30 June* 2021	**31 Desember/ *31 December* 2020**	
Surplus revaluasi	7.575.258	7.768.171	*Revaluation surplus*
Cadangan lindung nilai arus kas	47.416	(110.819)	*Cash flows hedging reserves*
Keuntungan aktuaria yang diakui dalam penghasilan komprehensif lain	5.933	5.845	*Actuarial gain recognized in other comprehensive income*
Selisih translasi atas mata uang asing	(62.400)	(62.309)	*Difference translation of foreign currency*
Jumlah	**7.566.207**	**7.600.888**	***Total***

a. **Cadangan lindung nilai arus kas**

Perusahaan dan entitas anak melakukan kontrak lindung nilai dalam rangka mengantisipasi risiko fluktuasi tingkat bunga dan nilai tukar mata uang asing atas pinjaman bank dalam mata uang asing. Nilai wajar aset keuangan derivatif pada tanggal 30 Juni 2021 dan 31 Desember 2020 masing-masing adalah sebesar Rp 1.397.984 dan Rp 1.084.975.

*a. **Cash flows hedging reserves***

The Company and subsidiaries entered into hedging contracts in order to mitigate the fluctuations in interest rates and exchange rates from bank loans in foreign currency. Fair value of derivatives financial assets as of 30 June 2021 and 31 December 2020 amounted to Rp 1,397,984 and Rp 1,084,975, respectively.

28. **PENGHASILAN KOMPREHENSIF LAIN** (Lanjutan)

a. **Cadangan lindung nilai arus kas** (Lanjutan)

Instrumen derivatif ini telah memenuhi kriteria akuntansi lindung nilai berdasarkan PSAK 55 (Revisi 2014). Oleh karena itu, nilai wajar bersih dari aset keuangan derivatif pada tanggal 30 Juni 2021 dan 31 Desember 2020 sesudah memperhitungkan perubahan kurs pinjaman yang dilindung nilai sebesar Rp 47.482 dan Rp (112.124) diakui sebagai bagian efektif atas laba (rugi) instrumen lindung nilai pada entitas anak dan dicatat pada akun "Cadangan Lindung Nilai Arus Kas" dan "Selisih Transaksi Perubahan Ekuitas Entitas Anak" pada Ekuitas Perusahaan masing-masing sebesar Rp 47.416 dan Rp (110.819).

Rincian dari masing-masing komponen tersebut diatas adalah sebagai berikut:

*28. **OTHER COMPREHENSIVE INCOME** (Continued)*

*a. **Cash flows hedging reserves** (Continued)*

These derivative instruments qualified the criteria of hedge accounting based on PSAK 55 (Revised 2014). Therefore, the net fair value of derivative financial assets as of 30 June 2021 and 31 December 2020 after considering the foreign exchange translation of related hedged loans of Rp 47,482 and Rp (112,124), are recognized as effective portion of gains (losses) on hedging instruments at the subsidiaries level and presented as "Cash Flows Hedging Reserves" and "Difference Arising from Changes in Subsidiaries Equity" in the Company shareholders' equity section of Rp 47,416 and Rp (110,819), respectively.

Details of each component above are as follows:

30 Juni 2021/ 30 June 2021	**Cadangan lindung nilai arus kas / *Cash flows hedging reserves***	**Persentase kepemilikan / *Percentage of ownership***	**Cadangan lindung nilai arus kas dicatat Perusahaan / *Cash flows hedging reserves recorded by the Company***
Perusahaan / *The Company*	(7.828)		(7.828)
Entitas anak / *Subsidiaries*:			
PT Tower Bersama	42.544	100,00%	42.544
PT Solusi Menara Indonesia	(18.445)	70,03%	(12.917)
Entitas yang berada dibawah pengendalian bersama antara Perusahaan dan entitas anak sebagai berikut / *Entity controlled directly or indirectly between the Company and the following subsidiaries*:			
PT Metric Solusi Integrasi	23.117	100,00%	23.117
PT Tower Bersama	2.500	100,00%	2.500
Jumlah / *Total*	**41.888**		**47.416**

28. **PENGHASILAN KOMPREHENSIF LAIN** (Lanjutan)

a. **Cadangan lindung nilai arus kas** (Lanjutan)

28. ***OTHER COMPREHENSIVE INCOME*** *(Continued)*

a. ***Cash flows hedging reserves*** *(Continued)*

31 Desember 2020/ ***31 December 2020***	**Cadangan lindung nilai arus kas /** ***Cash flows hedging reserves***	**Persentase kepemilikan /** ***Percentage of ownership***	**Cadangan lindung nilai arus kas dicatat Perusahaan /** ***Cash flows hedging reserves recorded by the Company***
Perusahaan / The Company	(116.402)		(116.402)
Entitas anak / Subsidiaries:			
PT Tower Bersama	(81.793)	98,00%	(80.157)
PT Solusi Menara Indonesia	(41.721)	70,03%	(29.217)
Entitas yang berada dibawah pengendalian bersama antara Perusahaan dan entitas anak sebagai berikut / Entity *controlled directly or indirectly between the Company and the following subsidiaries:*			
PT Metric Solusi Integrasi	114.923	100,00%	114.923
PT Tower Bersama	35	98,00%	34
Jumlah / Total	**(124.958)**		**(110.819)**

b. **Selisih translasi atas mata uang asing**

Transaksi ini merupakan selisih translasi atas mata uang asing TBG Global Pte Ltd., entitas anak (lihat Catatan 1c dan 2e).

b. ***Difference translation of foreign currency***

This transaction represents difference translation of foreign currency of TBG Global Pte Ltd., a subsidiary (see Notes 1c and 2e).

29. **PENDAPATAN**

Rincian pelanggan pihak ketiga untuk periode 6 (enam) bulan yang berakhir pada 30 Juni 2021 dan 2020 adalah sebagai berikut:

29. ***REVENUE***

Details of third-party customers for the period of 6 (six) months ended 30 June 2021 and 2020 are as follows:

	Pendapatan/ ***Revenue***		**Persentase dari pendapatan /** ***Percentage of total revenue***		
	30 Juni/ ***30 June*** **2021**	**30 Juni/** ***30 June*** **2020**	**30 Juni/** ***30 June*** **2021**	**30 Juni/** ***30 June*** **2020**	
PT Telekomunikasi Selular	1.085.382	1.024.702	36,53%	39,76%	*PT Telekomunikasi Selular*
PT Indosat Tbk	641.453	550.878	21,59%	21,37%	*PT Indosat Tbk*
PT XL Axiata Tbk	479.195	442.298	16,13%	17,16%	*PT XL Axiata Tbk*
PT Hutchison 3 Indonesia	453.662	370.156	15,27%	14,36%	*PT Hutchison 3 Indonesia*
PT Smartfren Telecom Tbk	288.614	172.361	9,71%	6,69%	*PT Smartfren Telecom Tbk*
Lainnya	23.073	16.957	0.77%	0.66%	*Others*
Jumlah	**2.971.379**	**2.577.352**	**100,00%**	**100,00%**	***Total***

Seluruh penghasilan merupakan penghasilan sewa dari menara telekomunikasi dan properti investasi.

The revenues are earned from rental of telecommunication towers and investment properties.

30. BEBAN POKOK PENDAPATAN / *COST OF REVENUE*

Rincian beban pokok pendapatan untuk periode 6 (enam) bulan yang berakhir pada 30 Juni 2021 dan 2020 adalah sebagai berikut:

Details of cost of revenue for the period of 6 (six) months ended 30 June 2021 and 2020 are as follows:

	30 Juni/ *30 June* 2021	30 Juni/ *30 June* 2020	
Penyusutan menara (Catatan 11)	342.645	152.880	*Depreciation of tower (Note 11)*
Penyusutan aset hak guna (Catatan 13)	177.946	148.560	*Depreciation of right of use assets (Note 13)*
Perbaikan dan pemeliharaan	122.001	101.982	*Repairs and maintenance*
Keamanan	24.522	22.543	*Security*
Amortisasi perizinan	18.345	13.428	*Amortization of licences*
Asuransi	14.258	12.788	*Insurance*
Listrik	13.799	13.647	*Electricity*
Penyusutan menara bergerak (Catatan 11)	6.553	8.507	*Depreciation of transportable towers (Note 11)*
Lainnya	9.020	8.626	*Others*
Jumlah	729.089	482.961	***Total***

Tidak terdapat pihak penjual/ pemasok yang memiliki nilai transaksi atau nilai pembelian yang melebihi 10% dari pendapatan.

There is no subcontractor/ supplier that has a transaction value exceeding 10% of the revenue.

31. BEBAN USAHA / *OPERATING EXPENSES*

Rincian beban usaha untuk periode 6 (enam) bulan yang berakhir pada 30 Juni 2021 dan 2020 adalah sebagai berikut:

Details of operating expenses for the period of 6 (six) months ended 30 June 2021 and 2020 are as follows:

	30 Juni/ *30 June* 2021	30 Juni/ *30 June* 2020	
Gaji dan tunjangan	140.141	134.573	*Salaries, wages and allowance*
Penyusutan (Catatan 11)	15.067	14.721	*Depreciation (Note 11)*
Beban manfaat karyawan (Catatan 32)	10.829	7.936	*Employee benefits expense (Note 32)*
Beban kantor	10.136	10.766	*Office expenses*
Jasa profesional	8.797	7.147	*Professional fees*
Sponsor dan representasi	6.936	5.312	*Sponsorship and representation*
Sewa kantor	5.780	5.384	*Office rent*
Donasi dan tanggung jawab sosial	3.663	12.070	*Donation and social responsibility*
Penyusutan aset hak guna (Catatan 13)	3.519	3.301	*Depreciation of right of use assets (Note 13)*
Transportasi	2.967	3.798	*Transportation*
Perjalanan dinas	1.039	1.761	*Travel duty*
Telekomunikasi	252	346	*Telecommunication*
Lainnya	4.358	4.405	*Others*
Jumlah	213.484	211.520	***Total***

Donasi dan tanggung jawab sosial merupakan kontribusi Perusahaan untuk membantu masyarakat dan Pemerintah dalam menghadapi kondisi pandemi virus Covid-19, penanggulangan bencana, serta meningkatkan kegiatan sosial dan ekonomi masyarakat di wilayah operasional Perusahaan.

Donations and social responsibility are the Company's contributions to support the community and the Government in dealing with the conditions of the Covid-19 virus pandemic, disaster management, and increasing social and economic activities for the community in the Company's operational areas.

32. CADANGAN IMBALAN PASCA-KERJA / *32. PROVISION FOR POST-EMPLOYMENT BENEFITS*

Perusahaan dan entitas anak menyiapkan pencadangan imbalan untuk karyawannya sesuai dengan Undang-Undang No. 11 Tahun 2020 tentang Cipta Kerja. Perusahaan dan entitas anak melakukan pendanaan untuk program ini.

The Company and subsidiaries provide benefits for its employees in accordance with Labor Law No. 11/2020. The Company and subsidiaries sets up fund for this program.

Perhitungan cadangan imbalan pasca-kerja pada 31 Desember 2020 adalah berdasarkan perhitungan yang dilakukan oleh PT Padma Radya Aktuaria dan PT Dian Artha Tama, aktuaris independen, sesuai laporannya tanggal 29 Januari dan 15 Februari 2021.

The calculation of provision for post-employment benefits as of 31 December 2020 are based on calculations performed independent actuary PT Padma Radya Aktuaria and PT Dian Artha Tama according to its report dated 29 January and 15 February 2021.

Asumsi signifikan yang digunakan: / *Major assumptions are used as follows:*

Tingkat diskonto per tahun	:	6,8%	:	*Discount rate per annum*
Tingkat kenaikan gaji per tahun	:	8,8%	:	*Wages and salaries increase per annum*
Tingkat kematian	:	100% TMI4	:	*Mortality rate*
Tingkat cacat	:	5% TMI4	:	*Morbidity rate*
Tingkat pengunduran diri	:	8% per tahun sampai dengan usia 30 tahun, kemudian menurun secara linear hingga 0% pada usia 55 tahun/ *8% p.a. until age 30, then decrease linearly into 0% at age 55*	:	*Resignation rate*
Usia pensiun normal	:	Staff: 55 tahun/*years* Direktur/*Director:* 60 tahun/*years*	:	*Normal retirement age*
Metode	:	*Projected Unit Credit*	:	*Method*

Rekonsiliasi untuk mutasi cadangan imbalan pasca-kerja adalah sebagai berikut: / *Reconciliation of mutation of provision for post-employment benefits are as follows:*

	30 Juni/ *30 June* 2021	31 Desember/ *31 December* 2020	
Saldo awal	24.850	14.352	***Balance at the beginning of the period***
Biaya jasa kini	10.829	17.605	*Current service cost*
Biaya jasa lalu	-	5.562	*Past service cost*
Beban bunga bersih	-	1.206	*Net interest cost*
Keuntungan aktuaria	-	(1.080)	*Actuarial gain*
Diakui pada laba rugi (Catatan 31)	10.829	23.293	*Charged to profit or loss (Note 31)*
Pengukuran kembali atas imbal hasil atas aset program			*Remeasurements on return on plan asset*
Keuntungan aktuaria	(280)	4.889	*Actuarial gain*
Diakui pada penghasilan komprehensif lain	(280)	4.889	*Charged to other comprehensive income*
Iuran perusahaan ke aset program	(8.843)	(12.919)	*Employer contribution to plan assets*
Pembayaran imbalan (di luar aset program)	-	(2.911)	*Benefits paid (not plan assets)*
Dicatat sebagai aset	-	(1.854)	*Recognized as asset*
Saldo akhir tahun	26.556	24.850	***Balance at the end of the year***

32. CADANGAN IMBALAN PASCA-KERJA (Lanjutan) / *PROVISION FOR POST-EMPLOYMENT BENEFITS (Continued)*

Program imbalan pasca-kerja / ***Post-employment benefit program***

Perusahaan dan entitas anak tertentu juga melakukan pendanaan untuk program ini. Dana tersebut dikelola dalam kontrak asuransi dengan PT Asuransi Allianz Life Indonesia.

The Company and certain subsidiaries set-up fund for this program. The fund is managed in insurance contract with PT Asuransi Allianz Life Indonesia.

Pembayaran berikut merupakan kontribusi yang diharapkan atas nilai kini dari kewajiban imbalan di tahun-tahun mendatang:

The following payments are expected contributions to present value of benefit obligation in future years:

	30 Juni/ *30 June* 2021	31 Desember / *31 December* 2020	
Kurang dari 1 tahun	2.419	2.419	*Less than 1 year*
Antara tahun ke-1 sampai tahun ke-2	6.095	6.095	*Between Year 1 - Year 2*
Antara tahun ke-2 sampai tahun ke-5	87.565	87.565	*Between Year 2 - Year 5*
Antara tahun ke-5 sampai tahun ke-10	570.659	570.659	*Between Year 5 - Year 10*
Setelah tahun ke-10	1.348.215	1.348.215	*Over Year 10*

Analisis sensitivitas pada asumsi-asumsi aktuarial utama / ***Sensitivity analysis on significant actuarial assumptions***

Asumsi aktuaria/ *Actuarial assumption*	Perubahan/ *Change*	Saldo akhir PVDBO/ *PVDBO ending* Kenaikan/ *Increase*	Penurunan/ *Decrease*
Tingkat diskonto / *Discount rate*	(+/- 1%)	911.898	1.189.075
Tingkat kenaikan gaji / *Salary increase rate*	(+/- 1%)	1.185.104	912.704

Program imbalan jangka panjang lainnya / ***Other long-term employee benefit program***

Perusahaan dan entitas anak tertentu memberikan imbalan jangka panjang lainnya dalam bentuk cuti besar selama 22 hari kerja dan tunjangan cuti besar sejumlah satu bulan gaji pokok kepada karyawan staf permanen yang mempunyai masa kerja 5 tahun dan kelipatannya.

The Company and certain subsidiaries provide other long-term employee benefit in form of long leave amounting to 22 workdays and long leaves allowance amounting to one month basic salary for permanent staff employee with 5 years of service and its multiplication.

33. BEBAN KEUANGAN - LAINNYA / *FINANCIAL EXPENSES - OTHERS*

Rincian beban keuangan - lainnya untuk periode 6 (enam) bulan yang berakhir pada 30 Juni 2021 dan 2020 adalah sebagai berikut:

Details of financial expenses - others for the period of 6 (six) months ended 30 June 2021 and 2020 are as follows:

	30 Juni/ *30 June* 2021	30 Juni/ *30 June* 2020	
Amortisasi biaya surat utang (Catatan 23)	35.954	16.269	*Amortization of cost of notes (Note 23)*
Amortisasi biaya pinjaman jangka panjang - pihak ketiga (Catatan 22)	35.050	34.166	*Amortization of cost of long term loan - third parties (Note 22)*
Beban bunga liabilitas sewa aset hak guna (Catatan 24)	25.170	69.568	*Interest expenses of right of use assets lease liabilities (Note 24)*
Jumlah	**96.174**	**120.003**	***Total***

34. DISTRIBUSI SALDO LABA

Tahun buku 2020

Pada tanggal 28 Mei 2021, Perusahaan menyelenggarakan Rapat Umum Pemegang Saham Tahunan (RUPST) yang hasilnya antara lain menyetujui dan mengesahkan laporan keuangan Perusahaan untuk Tahun Buku 2020 dengan pencapaian laba bersih yang dapat diatribusikan kepada pemegang saham biasa entitas induk (laba bersih) sebesar Rp 1.009.625.

Dari laba bersih tersebut, sebesar Rp 500 dari laba bersih tahun 2020 dijadikan sebagai cadangan wajib untuk memenuhi ketentuan Pasal 70 Undang-Undang Peseroan Terbatas No. 40 Tahun 2007.

Tahun buku 2019

Pada tanggal 18 Mei 2020, Perusahaan menyelenggarakan Rapat Umum Pemegang Saham Tahunan (RUPST) yang hasilnya antara lain menyetujui dan mengesahkan laporan keuangan Perusahaan untuk Tahun Buku 2019 dengan pencapaian laba bersih yang dapat diatribusikan kepada pemegang saham biasa entitas induk (laba bersih) sebesar Rp 819.454.

Dari laba bersih tersebut, sebesar Rp 605.670 atau 73,90% dari laba bersih tahun 2019 ditetapkan sebagai dividen tunai tahun buku 2019, pembayaran dividen final tersebut dilaksanakan dengan memperhitungkan saham treasuri pada tanggal pengumuman penerimaan dividen (*recording date*) 3 Juni 2020 sehingga pembayaran dividen per saham adalah sebesar Rp 28 (dua puluh delapan Rupiah). Perusahaan telah membayar dividen tersebut pada tanggal 19 Juni 2020.

Kemudian sebesar Rp 500 dari laba bersih tahun 2019 dijadikan sebagai cadangan wajib untuk memenuhi ketentuan Pasal 70 Undang-Undang Peseroan Terbatas No. 40 Tahun 2007.

Pada tanggal 30 Maret 2021, Perusahaan menyelenggarakan Rapat Umum Pemegang Saham Luar Biasa (RUPSLB) yang hasilnya antara lain memberikan persetujuan kepada Perusahaan untuk pembagian dividen tunai yang berasal dari saldo laba yang belum dtentukan penggunaannya per 31 Desember 2019. Pembayaran dividen final tersebut dilaksanakan dengan memperhitungkan saham treasuri pada tanggal pengumuman penerimaan dividen (*recording date*) 12 April 2021 sehingga pembayaran dividen per saham adalah sebesar Rp 32 (tiga puluh dua Rupiah). Perusahaan telah membayar dividen tersebut pada tanggal 29 April 2021.

34. DISTRIBUTION OF RETAINED EARNINGS

Year 2020

On 28 May 2021, the Company held the Annual General Shareholders Meeting (AGMS). The result of the AGMS, among others, was to approve and endorse the financial statements for the year 2020 with achievement of net income attributable to common shareholders of the Parent Company (net income) amounting to Rp 1,009,625.

From the net income, amounting to Rp 500 of net income of year 2020 was provided for statutory reserves to fulfill the article 70 of the Limited Liability Company Law No. 40 of 2007.

Year 2019

On 18 May 2020, the Company held the Annual General Shareholders Meeting (AGMS). The result of the AGMS, among others, was to approve and endorse the financial statements for the year 2019 with achievement of net income attributable to common shareholders of the Parent Company (net income) amounting to Rp 819,454.

From the net income, amounting to Rp 605,670 or 73.90% of the net income in 2019 is determined as cash dividend for the financial year 2019, the final dividend payment is carried out by calculating treasury shares on the date of announcement of dividend receipt (recording date) 3 June 2020 so that dividend payments per share is Rp 28 (twenty eigth Rupiah). The company has paid the dividend on 19 June 2020.

In addition, Rp 500 of net income of year 2019 was provided for statutory reserves to fulfill the article 70 of the Limited Liability Company Law No. 40 of 2007.

On 30 March 2021, the Company held a Extraordinary General Shareholders Meeting (EGMS) and obtained approval, among others, was to approve distribution of cash dividend which comes from Unappropriated Retained Earnings balance as of 31 December 2019. The final dividend payment is carried out by calculating treasury shares on the date of announcement of dividend receipt (recording date) 12 April 2021 so that dividend payments per share is Rp 32 (thirty two Rupiah). The company has paid the dividend on 29 April 2021.

35. ***GOODWILL***

Sehubungan dengan penerapan PSAK 48 (Revisi 2009) "Penurunan Nilai Aset", Perusahaan dan entitas anak melakukan uji penurunan nilai wajar atas *goodwill*.

Nilai wajar *goodwill* pada 31 Desember 2020 ditentukan berdasarkan penilaian dari penilai independen KJPP Yufrizal, Deny Kamal dan Rekan dalam laporannya pada tanggal 30 Maret 2021, dan telah sesuai dengan peraturan No. VIII.C.5 mengenai pedoman penilaian dan penyajian laporan penilaian aset tak berwujud.

Dalam menentukan nilai wajar, Penilai Independen menggunakan metode penilaian dengan mengkombinasikan dua pendekatan, yaitu pendekatan pendapatan yang mendiskontokan penerimaan kas di masa depan dan pendekatan aset.

Asumsi utama yang digunakan oleh Penilai Independen adalah sebagai berikut:
a) Sewa menara yang akan jatuh tempo akan diperpanjang kembali selama tahun sewa yang sama;
b) Kenaikan harga sewa menara pada saat jatuh tempo adalah sebesar 5,00%;
c) Tingkat inflasi sebesar 3,00% per tahun;
d) Tingkat diskonto sebesar 10,14%.

Hal ini telah sesuai dengan peraturan No. VIII.C.5 mengenai pedoman penilaian dan penyajian laporan penilaian aset tak berwujud di pasar modal.

Pada bulan September 2018, Perusahaan memperoleh 19,80% kepemilikan saham di PT Gihon Telekomunikasi Indonesia Tbk (GHON). *Goodwill* yang timbul atas transaksi ini adalah sebesar Rp 31.444. Untuk tahun yang berakhir pada 31 Desember 2020, berdasarkan perhitungan penilai independen, tidak terdapat penurunan nilai *goodwill*. Nilai tercatat goodwill pada 31 Maret 2021 dan 31 December 2020 masing-masing sebesar Rp 31.444.

Pada bulan Oktober 2016, PT Tower Bersama memperoleh 70% kepemilikan saham di PT Jaringan Pintar Indonesia. *Goodwill* yang timbul atas transaksi ini adalah sebesar Rp 607. Nilai tercatat *goodwill* pada 31 Maret 2021 dan 31 Desember 2020 masing-masing sebesar nihil.

Pada bulan Agustus 2011, Perusahaan melalui entitas anak memperoleh 100% kepemilikan saham di PT Mitrayasa Sarana Informasi.

35. GOODWILL

Regarding the implementation of PSAK 48 (Revised 2009) "Impairment of Assets", the Company and subsidiaries have done an impairment test of goodwill.

The fair value of goodwill as of 31 December 2020 was determined based on a valuation from KJPP Yufrizal, Deny Kamal and Partners in their report dated 30 March 2021, respectively, and was in accordance No. VIII.C.5 guidelines regarding assessment and presentation of intangible asset valuation.

To determine the fair value, the Independent Appraiser utilizes a combination of two approaches as the appraisal method, the income approach which discounts future cash flows, and the assets approach.

The Independent Appraiser uses the following key assumptions:
a) Rent of towers will be renewed for the same rental year;
b) Price of renewed rent of towers increases by 5.00%;

c) Inflation is 3.00% per year;
d) Discount rate is amounted to 10.14%.

It incorporates the regulation of No. VIII.C.5 regarding the guidelines of appraisal and presentation of intangible assets valuation report to capitals market.

In September 2018, The Company acquired 19.80% shares ownership in PT Gihon Telekomunikasi Indonesia Tbk (GHON). Goodwill arising from the transaction was Rp 31,444. For the year ended 31 December 2020, based on the independent appraiser's calculation, there was no an impairment of goodwill. The carrying amount of goodwill as of 31 March 2021 and 31 December 2020 was and Rp 31,444, respectively.

In October 2016, PT Tower Bersama acquired 70% shares ownership in PT Jaringan Pintar Indonesia. Goodwill arising from this transaction was Rp 607. The carrying value of goodwill as of 31 March 2021 and 31 December 2020 amounted to nil, respectively.

In August 2011, the Company through its subsidiaries acquired 100% shares ownership in PT Mitrayasa Sarana Informasi.

35. ***GOODWILL*** (Lanjutan) / *35. **GOODWILL** (Continued)*

Posisi Keuangan	Nilai wajar/ Fair value	Nilai tercatat/ Carrying value	*Financial Position*
ASET LANCAR	351.152	351.152	*CURRENT ASSETS*
ASET TIDAK LANCAR	353.940	353.940	*NON-CURRENT ASSETS*
JUMLAH ASET	705.092	705.092	*TOTAL ASSETS*
LIABILITAS JANGKA PENDEK	395.712	395.712	*CURRENT LIABILITIES*
LIABILITAS JANGKA PANJANG	333.474	333.474	*NON-CURRENT LIABILITIES*
JUMLAH LIABILITAS	729.186	729.186	*TOTAL LIABILITIES*
NILAI WAJAR DARI ASET BERSIH YANG DAPAT DIIDENTIFIKASI	24.094	24.094	*FAIR VALUE OF IDENTIFIABLE NET ASSETS*
HARGA PEMBELIAN SAHAM		200.000	*SHARE PURCHASE PRICE*
JUMLAH		224.094	*TOTAL*
ASET TIDAK BERWUJUD YANG DICATAT SEBAGAI ASET LAINNYA		5.474	*INTANGIBLE ASSET THAT RECORDED AS OTHER ASSETS*
GOODWILL		218.620	*GOODWILL*

Untuk tahun yang berakhir pada 31 Desember 2020, berdasarkan perhitungan penilai independen, tidak terdapat penurunan nilai *goodwill*. Nilai tercatat *goodwill* pada 30 Juni 2021 dan 31 Desember 2020 masing-masing sebesar Rp 173.613.

For the years ended 31 December 2020, based on independent appraisal calculations, there was no impairment of goodwill. The carrying amount of goodwill as of 30 June 2021 and 31 December 2020 was Rp 173,613, respectively.

Pada bulan April 2010, PT Metric Solusi Integrasi memperoleh 70% kepemilikan saham di PT Solu Sindo Kreasi Pratama. *Goodwill* yang timbul atas transaksi ini adalah sebesar Rp 133.840. Untuk tahun yang berakhir pada 31 Desember 2020, berdasarkan perhitungan penilai independen, tidak terdapat penurunan nilai *goodwill*. Nilai tercatat *goodwill* pada 30 Juni 2021 dan 31 December 2020 masing-masing sebesar Rp 126.347.

In April 2010, PT Metric Solusi Integrasi acquired a 70% ownership in PT Solu Sindo Kreasi Pratama. Goodwill arising from this transaction amounted to Rp 133,840. For the year ended 31 March 2021 and 31 December 2020, based on independent appraisal calculations, there was no impairment in goodwill. The carrying amount of goodwill as at 30 June 2021 and 31 December 2020 amounted to Rp 126,347, respectively.

35. ***GOODWILL*** (Lanjutan)

Pada bulan Juni 2008, PT Prima Media Selaras (PMS) menerbitkan hak memesan efek terlebih dahulu (*subscription rights* (SR)) kepada pemegang saham pendiri. SR tersebut memberikan hak kepada pemiliknya untuk dapat memesan terlebih dahulu saham-saham baru yang akan diterbitkan PMS sebanyak 60.000 (nilai penuh) saham.

Jika SR tersebut dilaksanakan, maka kepemilikan PT Tower Bersama (TB) pada PMS akan terdilusi hingga hanya menjadi sebesar 20%. Untuk mempertahankan kepemilikannya tersebut pada bulan Agustus 2009, TB telah membeli SR tersebut dari HKDN Investment Ltd. sebagai pemilik akhir, sebesar US$ 25.900.000. Nilai akuisisi dari pembelian SR tersebut serta biaya transaksi lainnya adalah sebesar Rp 255.391 dicatat sebagai *goodwill*.

Untuk periode 6 (enam) bulan yang berakhir pada 30 Juni 2021 dan 31 Desember 2020 berdasarkan perhitungan manajemen dan penilai independen, terdapat penurunan nilai *goodwill* sebesar Rp 8.279 dan nihil. Nilai tercatat *goodwill* pada 30 Juni 2021 dan 31 Desember 2020 masing-masing sebesar Rp 41.506 dan Rp 49.785.

Penurunan nilai atas *goodwill* tersebut dicatat pada kerugian atas penurunan nilai *goodwill* pada laporan laba rugi dan penghasilan komprehensif lain konsolidasian.

*35. **GOODWILL** (Continued)*

In June 2008, PT Prima Media Selaras (PMS) issued subscription rights *(SR) to its former shareholders, providing rights to subscribe 60,000 (full amount) new PMS shares.*

If SR is implemented, then the ownership PT Tower Bersama (TB) in the PMS will be diluted to only 20%. To maintain the ownership in August 2009, TB has purchased the SR of HKDN Investment Ltd. as the final owner, for US$ 25,900,000. Acquisition value of the SR purchase and other transaction costs are Rp 255,391 was recorded as goodwill.

For the period of 6 (six) months ended 30 June 2021 and 31 December 2020 based on the calculation of management and independent appraisal, there was an impairment of goodwill of Rp 8.279 and nil, respectively. The carrying amount of goodwill as of 30 June 2021 and 31 December 2020 was Rp 41,506 and Rp 49,785, respectively.

Impairment of goodwill is recorded in loss on impairment of goodwill in the consolidated statements of profit or loss and other comprehensive income.

30 Juni 2021	**Saldo awal/ *Beginning balance***	**Penurunan/ *Impairment***	**Saldo akhir/ *Ending balance***	***30 June 2021***
PT Metric Solusi Integrasi	178.430	-	178.430	*PT Metric Solusi Integrasi*
PT Tower Bersama	171.315	(8.279)	163.036	*PT Tower Bersama*
PT Tower Bersama Infrastructure Tbk	31.444	-	31.444	*PT Tower Bersama Infrastructure Tbk*
Jumlah	**381.189**	**(8.279)**	**372.910**	***Total***

31 Desember 2020	**Saldo awal/ *Beginning balance***	**Penurunan/ *Impairment***	**Saldo akhir/ *Ending balance***	***31 December 2020***
PT Metric Solusi Integrasi	178.430	-	178.430	*PT Metric Solusi Integrasi*
PT Tower Bersama	171.315	-	171.315	*PT Tower Bersama*
PT Tower Bersama Infrastructure Tbk	31.444	-	31.444	*PT Tower Bersama Infrastructure Tbk*
Jumlah	**381.189**	**-**	**381.189**	***Total***

36. KEPENTINGAN NON-PENGENDALI / *36. NON-CONTROLLING INTEREST*

30 Juni 2021

Entitas anak / *Subsidiaries*	Saldo awal / *Beginning balance*	Porsi non-pengendali atas laba entitas anak / *Non-controlling portion on net profit of subsidiaries*	Surplus revaluasi / *Revaluation Surplus*	Porsi non-pengendali dari instrumen derivatif / *Non-controlling portion from derivative instrument*	Porsi non-pengendali dari selisih nilai transaksi restrukturisasi entitas sepengendali / *Non-controlling portion from difference arising from restructuring transaction of entities under common control*	Porsi non-pengendali *dari pembagian* deviden tunai entitas anak / Non-controlling *portion from cash dividens subsidiaries*	Porsi non-pengendali dari keuntungan *aktuaria / Non-controlling portion from actuarial gain*	Saldo akhir / *Ending balance*
PT United Towerindo	25.494	654	2.931	-	-	-	-	29.079
PT Tower Bersama	146.805	(354)	-	-	(177.230)	-	-	(30.779)
PT Tower One	(111)	7	-	-	-	-	-	(104)
PT Metric Solusi Integrasi	(142.208)	(68)	1.233	(207)	-	(613)	-	(141.863)
PT Telenet Internusa	1.030	40	152	-	-	-	-	1.222
PT Triaka Bersama	1.334	-	-	-	-	-	-	1.334
PT Solusi Menara Indonesia	107.216	181	(1.550)	20	-	-	-	105.867
PT Visi Telekomunikasi Infrastruktur Tbk	185.322	3.996	87	-	-	-	-	189.405
PT Gihon Telekomunikasi Indonesia Tbk	269.274	22.113	455	-	-	(13.633)	160	278.369
Jumlah / *Total*	**594.156**	**26.569**	**3.308**	**(187)**	**(177.230)**	**(14.246)**	**160**	**432.530**

31 Desember 2020

Entitas anak / *Subsidiaries*	Saldo awal / *Beginning balance*	Porsi non-pengendali atas laba entitas anak / *Non-controlling portion on net profit of subsidiaries*	Surplus revaluasi / *Revaluation Surplus*	Porsi non-pengendali dari instrumen derivatif / *Non-controlling portion from derivative instrument*	Porsi non-pengendali dari aset pengampunan pajak / Non-*controlling portion from Difference of tax amnesty assets*	Porsi non-pengendali *dari pembagian* deviden tunai entitas anak / Non-controlling *portion from cash dividens subsidiaries*	Porsi non-pengendali dari keuntungan *aktuaria / Non-controlling portion from actuarial gain*	Saldo akhir / *Ending balance*
PT United Towerindo	25.303	621	(432)	-	(6)	-	8	25.494
PT Tower Bersama	126.624	10.555	15.804	(862)	(14)	(5.320)	18	146.805
PT Tower One	(123)	12	-	-	-	-	-	(111)
PT Metric Solusi Integrasi	(144.176)	386	1.751	84	(2)	(232)	(19)	(142.208)
PT Telenet Internusa	846	125	110	-	(1)	(50)	-	1.030
PT Triaka Bersama	1.334	-	-	-	-	-	-	1.334
PT Solusi Menara Indonesia	105.659	270	1.307	(20)	-	-	-	107.216
PT Visi Telekomunikasi Infrastruktur Tbk	178.946	6.439	(697)	-	-	-	634	185.322
PT Gihon Telekomunikasi Indonesia Tbk	235.299	38.543	911	-	-	(5.453)	(26)	269.274
Jumlah / *Total*	**529.712**	**56.951**	**18.754**	**(798)**	**(23)**	**(11.055)**	**615**	**594.156**

37. LABA BERSIH PER SAHAM DASAR YANG DAPAT DIATRIBUSIKAN KEPADA PEMEGANG SAHAM BIASA ENTITAS INDUK

Laba bersih yang dapat diatribusikan kepada pemegang saham biasa entitas induk yang digunakan untuk perhitungan laba per saham dasar untuk periode 6 (enam) bulan yang berakhir 30 Juni 2021 dan 2020 masing-masing adalah Rp 663.267 dan Rp 510.483. Jumlah rata-rata tertimbang saham (dalam nilai penuh) untuk periode 6 (enam) bulan yang berakhir 30 Juni 2021 dan 2020, masing-masing sebanyak 20.860.674.895 dan 20.860.808.397 saham setelah dikurangi dengan saham treasuri (Catatan 26).

37. BASIC EARNINGS PER SHARE ATTRIBUTABLE TO COMMON SHAREHOLDERS OF THE PARENT COMPANY

Net income attributable to common shareholders of Parent Company which are used to calculate the basic earnings per share for the period of 6 (six) months ended 30 June 2021 and 2020 were Rp 663,267 and Rp 510,483, respectively. Total weighted average shares issued for the period of 6 (six) months ended 30 June 2021 and 2020, are 20,860,674,895 shares and 20,860,808,397, respectively, after deducted by the treasury stock (Note 26).

38. PERJANJIAN PENTING

a. **PERJANJIAN SEWA MENARA *BASE TRANSCEIVER STATION* (BTS) DAN SISTEM TELEKOMUNIKASI DALAM GEDUNG**

Entitas anak (PT Tower Bersama, PT Telenet Internusa, PT Gihon Telekomunikasi Indonesia Tbk, PT Permata Karya Perdana, PT United Towerindo, PT Batavia Towerindo, PT Bali Telekom, PT Prima Media Selaras, PT Solusi Menara Indonesia, PT Solu Sindo Kreasi Pratama, PT Mitrayasa Sarana Informasi, PT Towerindo Konvergensi, dan PT Triaka Bersama) memiliki perjanjian sewa dengan para operator sebagai berikut:

1. **PT Hutchison 3 Indonesia**

Pada berbagai tanggal antara tahun 2007 sampai dengan 30 Juni 2021, entitas anak dan Hutchison menandatangani Perjanjian Sewa Induk ("MLA"), mengenai sewa pemanfaatan lokasi yang diperlukan untuk pengoperasian peralatan komunikasi. Jangka waktu perjanjian ini adalah 12 tahun, dan dapat diperpanjang untuk jangka waktu 6 tahun.

2. **PT XL Axiata Tbk (XL)**

Pada berbagai tanggal antara tahun 2007 sampai dengan 30 Juni 2021, entitas anak dan XL menandatangani Perjanjian Sewa Induk ("MLA"), sebagaimana telah diubah beberapa kali dalam bentuk amandemen, mengenai sewa pemanfaatan infrastruktur menara untuk penempatan peralatan telekomunikasi. Jangka waktu perjanjian ini adalah 10 tahun, dan dapat diperpanjang dengan menginformasikan secara tertulis kepada entitas anak. Jangka waktu sewa dimulai sejak tanggal sertifikat siap instalasi ("RFI") di masing-masing lokasi.

38. SIGNIFICANT AGREEMENTS

*a. **RENTAL AGREEMENT TOWER BASE TRANSCEIVER STATION (BTS) AND TELECOMMUNICATIONS SYSTEMS IN BUILDINGS***

Subsidiaries (PT Tower Bersama, PT Telenet Internusa, PT Gihon Telekomunikasi Indonesia Tbk, PT Permata Karya Perdana, PT United Towerindo, PT Batavia Towerindo, PT Bali Telekom, PT Prima Media Selaras, PT Solusi Menara Indonesia, PT Solu Sindo Kreasi Pratama, PT Mitrayasa Sarana Informasi, PT Towerindo Konvergensi, and PT Triaka Bersama) have lease agreements with operators as follows:

*1. **PT Hutchison 3 Indonesia***

On a number of dates in and between 2007 to 30 June 2021, the subsidiaries and Hutchison signed Master Lease Agreements ("MLA") to lease telecommunication infrastructure space for installation of telecommunication equipment. The agreements are for lease years of 12 years and can be extended for 6 years.

*2. **PT XL Axiata Tbk (XL)***

On a number of dates in and between 2007 to 30 June 2021, the subsidiaries and XL signed the Master Lease Agreement ("MLA"), as amended several times, regarding lease of telecommunication infrastructure space for installation of telecommunication equipment. The lease year is for 10 years and can be extended by agreement. The lease years start from the date of installation ("RFI") on each location.

38. **PERJANJIAN PENTING** (Lanjutan)

a. **PERJANJIAN SEWA MENARA *BASE TRANSCEIVER STATION* (BTS) DAN SISTEM TELEKOMUNIKASI DALAM GEDUNG** (Lanjutan)

3. **PT Indosat Tbk (Indosat)**

Pada berbagai tanggal antara tahun 2008 sampai dengan 30 Juni 2021, entitas anak dan Indosat telah menandatangani beberapa Perjanjian Sewa Induk ("MLA"), mengenai sewa pemanfaatan lokasi yang diperlukan untuk pengoperasiaan peralatan telekomunikasi. Jangka waktu perjanjian ini adalah 10 tahun, dan dapat diperpanjang untuk jangka waktu 10 tahun, kecuali apabila Indosat tidak ingin memperpanjang masa sewa dan menginformasikan secara tertulis kepada entitas anak. Jangka waktu sewa dimulai sejak tanggal sertifikat siap instalasi ("RFI") di masing-masing lokasi.

4. **PT Telekomunikasi Selular (Telkomsel)**

Pada berbagai tanggal di tahun 2004 sampai dengan 30 Juni 2021, entitas anak telah menandatangani sejumlah Perjanjian Sewa Induk ("MLA") dengan Telkomsel mengenai pemanfaatan infrastruktur menara untuk penempatan peralatan telekomunikasi. Jangka waktu perjanjian adalah 10 tahun sejak tanggal penandatanganan Berita Acara Penggunaan Site (BAPS) untuk masing-masing lokasi menara.

5. **PT Smartfren Telecom Tbk (Smartfren)**

Pada berbagai tanggal di tahun 2005 sampai dengan 30 Juni 2021, entitas anak dan Smartfren, telah menandatangani beberapa Perjanjian Sewa Induk ("MLA"), sebagaimana telah beberapa kali diubah dalam bentuk amandemen, mengenai pemanfaatan infrastruktur menara untuk penempatan peralatan telekomunikasi. Jangka waktu awal sewa adalah 10 tahun dan dapat diperpanjang berdasarkan kesepakatan tertulis dari masing-masing pihak.

Jumlah estimasi pembayaran sewa minimum di masa depan untuk perjanjian-perjanjian sewa induk di atas adalah sebagai berikut:

*38. **SIGNIFICANT AGREEMENTS** (Continued)*

*a. **RENTAL AGREEMENT TOWER BASE TRANSCEIVER STATION (BTS) AND TELECOMMUNICATIONS SYSTEMS IN BUILDINGS** (Continued)*

*3. **PT Indosat Tbk (Indosat)***

On a number of dates in and between 2008 to 30 June 2021, the subsidiaries and Indosat signed a number of Master Lease Agreements ("MLA") regarding lease of telecommunication infrastructure space for installation of telecommunication equipment. The lease year is for 10 years and can be extended for another 10 years, unless Indosat does not intend to extend by informing the subsidiaries in writing. The lease year starts from the date of installation ("RFI") on each location.

*4. **PT Telekomunikasi Selular (Telkomsel)***

On a number of dates in and between 2004 to 30 June 2021, the subsidiaries and Telkomsel signed a number of Master Lease Agreement ("MLA") regarding lease telecommunication infrastructure space for installation of telecommunication equipment. The lease year is for 10 years, starting from when the Minutes of Site Utilisation (BAPS) has been signed.

*5. **PT Smartfren Telecom Tbk (Smartfren)***

On a number of dates in and between 2005 to 30 June 2021, the subsidiaries and Smartfren signed a number of Master Lease Agreements ("MLA"), as amended several times, regarding lease of telecommunication infrastructure space for installation of telecommunication equipment. The lease year is for 10 years and can be extended by agreement.

Total estimated future minimum lease payments for the above master lease agreements are as follows:

	30 Juni/ *30 June* 2021	**31 Desember/ *31 December* 2020**	
Kurang dari satu tahun	5.851.543	5.117.594	*Less than one year*
Dari satu tahun sampai dengan lima tahun	14.883.135	12.859.263	*From one year to five years*
Lebih dari lima tahun	8.721.054	6.780.980	*More than five years*
Jumlah	**29.455.732**	**24.757.837**	***Total***

38. **PERJANJIAN PENTING** (Lanjutan)

b. **Pembelian 3.000 menara telekomunikasi dari PT Inti Bangun Sejahtera Tbk (IBST)**

Pada tanggal 21 Desember 2020, PT Tower Bersama (TB), entitas anak, dan IBST telah menandatangani Perjanjian Jual Beli Aset Bersyarat untuk pembelian sebanyak-banyaknya 3.000 menara milik IBST, dengan nilai keseluruhan sebesar Rp 3.975.000. Transaksi ini telah memperoleh persetujuan dari pemegang saham sesuai hasil Rapat Umum Pemegang Saham Luar Biasa (RUPSLB) pada tanggal 30 Mei 2021. Pada tanggal 7 April 2021, transaksi penjualan 3.000 menara telekomunikasi milik IBST tersebut telah diselesaikan melalui penandatanganan Akta Pengalihan dan Akta Perjanjian Pengalihan dan Pengambilalihan.

*38. **SIGNIFICANT AGREEMENTS** (Continued)*

*b. **Purchase of 3,000 telecommunication towers from PT Inti Bangun Sejahtera Tbk (IBST)***

On 21 December 2020, PT Tower Bersama, a subsidiary, and IBST have entered into a Conditional Asset Sale and Purchase Agreement for the purchase of up to 3,000 towers owned by IBST, for a consideration price of Rp 3,975,000. The transaction has obtained an approval from the shareholders as confirmed in the result of the Extraordinary General Meeting of Shareholders (EGMS) dated 30 May 2021. On 7 April 2021, the purchase of IBST's 3,000 telecommunication towers has been completed through the signing of Deed of Transfer and Deed of Assignment and Assumption.

39. **ASET DAN LIABILITAS MONETER DALAM MATA UANG ASING**

Pada tanggal 30 Juni 2021 dan 31 Desember 2020, Perusahaan dan entitas anak memiliki aset dan liabilitas moneter dalam mata uang asing sebagai berikut:

*39. **MONETARY ASSETS AND LIABILITIES DENOMINATED IN FOREIGN CURRENCIES***

As of 30 June 2021 and 31 December 2020, the Company and subsidiaries have assets and liabilities dominated in foreign currency as follows:

	30 Juni/ *30 June* 2021		**31 Desember/ *31 December* 2020**		
	US$ (nilai penuh)/ *(full amount)*	**Ekuivalen rupiah/ *Rupiah equivalent***	**US$ (nilai penuh)/ *(full amount)***	**Ekuivalen rupiah/ *Rupiah equivalent***	
Aset					***Assets***
Kas dan setara kas	35.634.244	516.554	22.580.007	318.491	*Cash and cash equivalent*
Piutang usaha	2.103.291	30.489	11.335.767	159.891	*Account receivables*
Aset keuangan derivatif	96.439.294	1.397.984	76.921.314	1.084.975	*Derivative financial assets*
Jumlah aset	134.176.829	1.945.027	110.837.089	1.563.357	***Total assets***
Liabilitas					***Liabilities***
Pinjaman sindikasi	815.600.000	7.836.538	733.000.000	10.338.966	*Syndication loan*
Surat utang	650.000.000	9.422.400	700.000.000	9.873.500	*Notes*
Utang usaha	-	-	5.790.543	81.676	*Trade payables*
Utang bunga :					*Interest payables :*
Surat utang	18.836.922	273.060	22.136.657	312.238	*Notes*
Pinjaman sindikasi	1.758.508	25.491	1.810.649	25.539	*Syndication loan*
Jumlah liabilitas	**1.486.195.430**	**17.557.489**	**1.462.737.850**	**20.631.919**	***Total liabilities***
Liabilitas - Bersih	**1.352.018.601**	**15.612.462**	**1.351.900.761**	**19.068.562**	***Liabilities - Net***

Pada tanggal 30 Juni 2021 dan 31 Desember 2020, Perusahaan dan entitas anak telah melakukan lindung nilai untuk pinjaman jangka panjang dan surat utang atas risiko perubahan nilai mata uang asing dan suku bunga pinjaman masing-masing sebesar US$ 1.630.445.028 dan US$ 1.619.500.000.

As of 30 June 2021 and 31 December 2020, the Company and subsidiaries have hedged their loan facility and notes of US$ 1,630,445,028 and US$ 1,619,500,000, respectively, over the risks from the volatility of foreign exchange and interest rate.

40. MANAJEMEN RISIKO KEUANGAN

Aktivitas Perusahaan dan entitas anak mengandung berbagai macam risiko-risiko keuangan: risiko pasar, risiko kredit, risiko likuiditas dan risiko operasional. Secara keseluruhan, program manajemen risiko keuangan Perusahaan dan entitas anak terfokus untuk menghadapi ketidakpastian pasar uang dan meminimalisasi potensi kerugian yang berdampak pada kinerja keuangan Perusahaan dan entitas anak.

a. **Risiko pasar**

Perusahaan dan entitas anak menyadari adanya risiko pasar yang terjadi akibat fluktuasi mata uang Rupiah terhadap US Dolar, serta fluktuasi suku bunga pinjaman, sehingga entitas anak melakukan kontrak lindung nilai dengan tujuan melakukan aktivitas lindung nilai atas ketidakpastian fluktuasi suku bunga dan fluktuasi mata uang asing yang timbul dari arus kas pokok dan bunga pinjaman dari entitas anak.

Risiko Nilai Tukar Mata Uang Asing

Perubahan nilai tukar telah, dan diperkirakan akan terus, memberikan pengaruh terhadap hasil usaha dan arus kas Perusahaan dan entitas anak. Beberapa pinjaman dan belanja modal Perusahaan adalah, dan diperkirakan akan terus, didenominasi dengan mata uang US Dolar. Sebagian besar pendapatan Perusahaan dan entitas anak adalah dalam mata uang Rupiah.

Pada saat ini, Perusahaan dan entitas anak melakukan aktivitas lindung nilai terhadap sebagian besar dari eksposur atas mata uang asing dikarenakan penerimaan dari pendapatan usaha tahunan dalam mata uang Dolar Amerika Serikat lebih sedikit dibandingkan dengan jumlah pembayaran belanja modal, pinjaman dan bunga dalam mata uang Dolar Amerika Serikat.

Sebagai bagian dari usaha Perusahaan dan entitas anak untuk mengelola eksposur atas mata uang asing, Perusahaan melakukan kontrak berjangka dan kontrak swap valuta asing dengan lembaga-lembaga keuangan internasional. Untuk kontrak berjangka, pada umumnya Perusahaan dan entitas anak membayar sejumlah premi dengan jumlah yang tetap.

40. FINANCIAL RISK MANAGEMENT

The Company and subsidiaries activities are exposed to few financial risks: market risk, credit risk, liquidity risk and operational risk. The Company and subsidiaries overall risk management program focuses to mitigate the volatility of financial markets and to minimize potential adverse effects on the Company and subsidiaries financial performance.

a. Market risk

The Company and subsidiaries are aware of market risk due to foreign exchange fluctuation of Rupiah against US Dollar and interest rate fluctuation, hence, the subsidiaries have entered into hedging contracts to hedge the uncertainty of interest rate and foreign exchange fluctuations arising from the loan principal and interest payments from each subsidiaries.

Foreign Exchange Rate

Changes in exchange rates have affected and may continue to affect the Company's and subsidiaries results of operations and cash flows. Some of the Company's debts and capital expenditures are, and expected will continue to be, denominated in US Dollars. Most of the Company's and subsidiaries revenues are denominated in Rupiah.

Currently, the Company and subsidiaries hedges a large portion of its foreign currency exposure principally because the receipts of annual USD-denominated operating revenue are less than the sum of payments of USD-denominated capital expenditures.

In an effort to manage foreign currency exposure, the Company and subsidiaries enters into forward foreign currency contracts with international financial institutions. For the forward foreign currency contracts, the Company and subsidiaries typically pays a fixed rate premium.

40. **MANAJEMEN RISIKO KEUANGAN** (Lanjutan) / *40. **FINANCIAL RISK MANAGEMENT** (Continued)*

a. **Risiko pasar** (Lanjutan) / *a. **Market risk** (Continued)*

Risiko Nilai Tukar Mata Uang Asing (Lanjutan) / ***Foreign Exchange Rate** (Continued)*

Sebagai hasil dari kontrak tersebut, Perusahaan dan entitas anak yakin bahwa Perusahaan dan entitas anak telah mengurangi beberapa risiko nilai tukar mata uang asing, meskipun aktivitas lindung nilai yang dilakukan oleh Perusahaan dan entitas anak tidak mencakup seluruh eksposur mata uang asing dan terdapat kemungkinan bahwa perjanjian pengganti atas aktivitas lindung nilai tersebut tidak tersedia pada saat kontrak lindung nilai tersebut telah selesai.

As a result of these contracts, the Company and subsidiaries believe that the Company and subsidiaries have reduced some of the risk of foreign currency exchange rates, although hedging activity undertaken by the Company and subsidiaries do not include all foreign currency exposure and there is the possibility that a replacement agreement over the hedges are not available at the time of the hedge contract has been completed.

Pada tanggal 30 Juni 2021, jika Rupiah menguat 1% terhadap Dolar Amerika Serikat namun seluruh variabel lainnya tetap, maka laba tahun berjalan lebih rendah (tinggi) sebesar Rp (2.612) (31 Desember 2020: Rp (1.314)) terutama yang timbul sebagai akibat keuntungan selisih kurs atas penjabaran aset dan liabilitas moneter dalam mata uang asing.

On 30 June 2021, if the Rupiah had strengthened by 1% against the US Dollar with all other variables held constant, profit for the year would have been Rp (2,612) (31 December 2020: Rp (1,314)) lower (higher), mainly as a result of foreign exchange gains on translation of monetary assets and liabilities denominated in foreign currency.

Jika bagian utang berbunga dalam valuta asing (Catatan 22, 23 dan 24.b) yang telah dilindung nilai diukur dengan menggunakan kurs lindung nilainya, maka saldo utang berbunga pada 30 Juni 2021 dan 31 Desember 2020 setelah dikurangi biaya pinjaman yang belum diamortisasi masing-masing adalah sebagai berikut:

If the hedged portion of foreign-currency interest-bearing-debt (Notes 22, 23 and 24.b) is valued using it's hedge rate, the balance of interest-bearing debt on 30 June 2021 and 31 December 2020, net of unamortized borrowing costs are as follow:

	30 Juni/ *30 June* 2021		31 Desember/ *31 December* 2020		
	Saldo pinjaman / *The balance of loans*		Saldo pinjaman / *The balance of loans*		
	Kurs laporan posisi keuangan / *Rate of consolidated statements of financial position date*	Kurs lindung nilai / *Hedging rate*	Kurs laporan posisi keuangan / *Rate of consolidated statements of financial position date*	Kurs lindung nilai / *Hedging rate*	
Pinjaman sindikasi	11.822.938	11.356.573	10.338.965	9.905.205	*Syndication loans*
Pinjaman non-sindikasi	91.700	91.700	61.300	61.300	*Non-syndication loans*
Surat utang	16.232.400	15.348.263	13.661.500	12.940.051	*Notes*
Liabilitas sewa - kendaraan (Catatan 24.b)	14.151	14.151	16.082	16.082	*Lease liabilities - vehicle (Note 24.b)*
Dikurangi :					***Less:***
Biaya pinjaman yang belum diamortisasi (Catatan 2f)	(285.254)	(285.254)	(214.436)	(214.436)	*Unamortized borrowing costs (Note 2f)*
Jumlah - Bersih	**27.875.935**	**26.525.433**	**23.863.411**	**22.708.202**	***Total - Net***

40. **MANAJEMEN RISIKO KEUANGAN** (Lanjutan)

a. **Risiko pasar** (Lanjutan)

Risiko Tingkat Suku Bunga

Perusahaan dan entitas anak menghadapi risiko tingkat suku bunga yang disebabkan oleh perubahan tingkat suku bunga pinjaman yang dikenakan bunga. Suku bunga atas pinjaman jangka pendek dan jangka panjang dapat berfluktuasi sepanjang tahun pinjaman. Kebijakan keuangan memberikan panduan bahwa eksposur tingkat bunga harus diidentifikasi dan diminimalisasi/ dinetralisasi secara tepat waktu.

Untuk mengukur risiko pasar atas pergerakan suku bunga, Perusahaan dan entitas anak melakukan analisa marjin dan pergerakan suku bunga, dan melakukan transaksi kontrak swap tingkat bunga untuk melindungi suku bunga pinjaman dalam mata uang asing terhadap risiko ketidakpastian tingkat suku bunga.

Profil liabilitas jangka panjang Perusahaan dan entitas anak adalah sebagai berikut:

*40. **FINANCIAL RISK MANAGEMENT** (Continued)*

*a. **Market risk** (Continued)*

Interest Rate Risk

The Company and subsidiaries are exposed to interest rate risk through the impact of rate changes on interest-bearing liabilities. Interest rate for short and long-term borrowing can fluctuate over the borrowing year. The treasury policy sets the guideline that the interest rate exposure shall be identified and minimised/ neutralised promptly.

To measure market risk of interest rate fluctuation, the Company and subsidiaries primarily uses interest margin and spread analysis, and enters into interest rate swap contracts to hedge the foreign currency interest loans from interest rate uncertainty.

The Company and subsidiaries long-term liabilities profile are as follows:

	30 Juni/ *30 June* 2021	**31 Desember/ *31 December* 2020**	
Pinjaman jangka panjang - setelah dikurangi bagian yang jatuh tempo dalam satu tahun			*Long-term loans - net of current portion*
Pihak ketiga	8.743.721	6.421.402	*Third parties*

b. **Risiko kredit**

Perusahaan memiliki risiko kredit yang terutama berasal dari simpanan di bank, piutang usaha, piutang lain-lain, piutang derivatif dan aset lain-lain-investasi bersih dalam sewa pembiayaan.

Entitas anak menghadapi risiko kredit, yaitu ketidakmampuan pelanggan untuk membayar sewa dari menara ataupun pemancar milik entitas anak.

Kualitas Kredit Aset Keuangan

Perusahaan dan entitas anak mengelola risiko kredit yang terkait dengan simpanan di bank dan piutang derivatif dengan memonitor reputasi, peringkat kredit, dan membatasi risiko agregat dari masing-masing pihak dalam kontrak.

Terkait dengan kredit yang diberikan kepada pelanggan, Perusahaan dan entitas anak menetapkan syarat dan ketentuan fasilitas kredit kepada pelanggan selular dan pelanggan lainnya, seperti dealer, distributor, operator lainnya terkait interkoneksi dan jelajah internasional. Jaminan tambahan juga disyaratkan dalam kondisi tertentu. Umumnya jaminan yang digunakan adalah bank garansi.

*b. **Credit risk***

The Company is exposed to credit risk primarily from deposits with banks, trade receivables, other receivables, derivatives receivables and other assets-net investment in finance lease.

The subsidiaries are exposed to credit risk from the customer's inability to pay the tower or in building system rental fees owed to the Company's subsidiaries.

Credit Quality of Financial assets

The Company and subsidiaries manages credit risk exposed from its deposits with banks and derivatives receivables by monitoring reputation, credit ratings and limiting the aggregate risk to any individual counterparty.

In respect of credit exposures given to customers, the Company and subsidiaries established general terms and conditions of credit facility to subscribers and non-subscribers such as dealers, distributors, interconnection and roaming partners. On a case by case basis, additional security is required. Common type used is bank guarantee.

40. **MANAJEMEN RISIKO KEUANGAN** (Lanjutan)

b. **Risiko kredit** (Lanjutan)

Kualitas Kredit Aset Keuangan (Lanjutan)

Penyewaan jasa menara telekomunikasi kepada operator selular dilakukan secara tunai. Kelayakan kredit dan prosedur penagihan ditelaah secara baik dan tepat waktu. Tidak terdapat konsentrasi risiko kredit yang signifikan terkait dengan piutang usaha, hal ini disebabkan keragaman pelanggan.

Manajemen yakin terhadap kemampuan untuk mengendalikan dan menjaga eksposur risiko kredit pada tingkat yang minimal. Eksposur maksimum risiko kredit pada tanggal pelaporan adalah sebagai berikut:

*40. **FINANCIAL RISK MANAGEMENT** (Continued)*

*b. **Credit risk** (Continued)*

***Credit Quality of Financial assets** (Continued)*

Rental of telecommunication tower to the operators is required to be settled in cash. Credit worthiness and collection procedures are reviewed properly and promptly. There are no significant concentrations of credit risk with respect to trade receivables due to its diverse customer base.

Management is confident in its ability to control and sustain minimal exposure of credit risk. The maximum credit risk exposure at the reporting date is as follows:

	30 Juni/ *30 June* 2021	31 Desember/ *31 December* 2020	
Kas dan setara kas	894.447	947.341	*Cash and cash equivalent*
Piutang usaha - pihak ketiga	904.096	710.722	*Trade receivables - third parties*
Piutang lain-lain	74.575	262.885	*Other receivables*
Pendapatan yang masih harus diterima	583.131	491.190	*Accrued revenue*
Uang jaminan	1.883	1.708	*Refundable deposits*
Jumlah	**2.458.132**	**2.413.846**	***Total***

c. **Risiko likuiditas**

Risiko likuiditas timbul apabila Perusahaan dan entitas anak mengalami kesulitan dalam mendapatkan sumber pendanaan untuk membiayai modal kerja dan belanja modal. Risiko likuiditas juga dapat timbul akibat ketidaksesuaian atas sumber dana yang dimiliki dengan pembayaran liabilitas yang telah jatuh tempo.

Perusahaan dan entitas anak melakukan mitigasi risiko likuiditas dengan cara menganalisa ketersediaan arus kas dan struktur pendanaan sesuai dengan Pedoman Pengendalian Intern Perusahaan.

Risiko likuiditas timbul dalam keadaan di mana Perusahaan dan entitas anak mengalami kesulitan dalam mendapatkan sumber pendanaan. Manajemen risiko likuiditas berarti menjaga kecukupan saldo kas dan setara kas. Perusahaan dan entitas anak mengelola risiko likuiditas dengan mengawasi arus kas aktual dan proyeksi secara terus menerus dan mengawasi profil tanggal jatuh tempo aset dan liabilitas keuangan.

Perusahaan dan entitas anak memonitor proyeksi persyaratan likuiditas untuk memastikan bahwa Perusahaan dan entitas anak memiliki saldo kecukupan kas untuk memenuhi keperluan operasi serta menjaga kecukupan dalam fasilitas pinjaman yang belum ditarik sepanjang waktu sehingga Perusahaan dan entitas anak memenuhi semua batas atau persyaratan fasilitas pinjaman.

*c. **Liquidity risk***

Liquidity risk arises in situations where the Company and subsidiaries have difficulties in obtaining funding sources to fund their working capital and capital expenditure. Liquidity risk also arises in situations where there is a mismatch between the funding sources and any obligations that have matured.

The Company and subsidiaries mitigate liquidity risk by analyzing the cashflow availability as well as their funding structure in accordance with the Company's Internal Control Manual.

Liquidity risk arises in situations where the Company and subsidiaries has difficulties in obtaining funding. Prudent liquidity risk management implies maintaining sufficient cash and cash equivalents. The Company and subsidiaries manages liquidity risk by continuously monitoring forecast and actual cash flows and monitor the maturity profiles of financial assets and liabilities.

The Company and subsidiaries monitors forecasts of the liquidity requirements to ensure that it has sufficient cash to meet operational needs while maintaining sufficient headroom on its undrawn committed borrowing facilities at all times so that the Company and subsidiaries does not breach the borrowing limits or covenants on any of its borrowing facilities.

40. **MANAJEMEN RISIKO KEUANGAN** (Lanjutan)

c. **Risiko likuiditas** (Lanjutan)

Proyeksi tersebut mempertimbangkan rencana pembiayaan utang Perusahaan dan kepatuhan persyaratan pinjaman. Manajemen percaya bahwa strategi melakukan *cash sweeping* dan *pooling of funds* dari sejumlah rekening bank ke dalam rekening bank operasional utama dapat memastikan pendanaan yang terkonsentrasi dan optimalisasi likuiditas yang lebih baik.

Tabel berikut ini menunjukkan analisis jatuh tempo liabilitas keuangan Perusahaan dan entitas anak dalam rentang waktu yang menunjukkan jatuh tempo kontraktual untuk semua liabilitas keuangan non-derivatif dan derivatif di mana jatuh tempo kontraktual sangat penting untuk pemahaman terhadap arus kas. Jumlah yang diungkapkan dalam tabel adalah arus kas kontraktual yang tidak terdiskonto (termasuk pembayaran pokok dan bunga).

*40. **FINANCIAL RISK MANAGEMENT** (Continued)*

*c. **Liquidity risk** (Continued)*

Such forecasting takes into consideration the Company's debt financing plans and covenant compliance. Management believes that the strategy to manage cash sweeping and pooling of funds across accounts in main operating banks can ensure the better concentration of funds and optimisation of liquidity.

The following table analyse the Company and subsidiaries financial liabilities into relevant maturity groupings based on their contractual maturities for all non-derivative financial liabilities and derivative financial instruments for which the contractual maturities are essential for an understanding of the timing of the cash flows. The amounts disclosed in the table are the contractual undiscounted cash flows (including principal and interest payment).

	30 Juni/ *30 June* 2021					
	Jumlah tercatat/ *Carrying amount*	Arus kas kontraktual/ *Contractual cash flow*	Kurang dari setahun/*Less than one year*	Antara satu dan tiga tahun/ *Between one and three years*	Lebih dari tiga tahun/*More than three years*	
Utang usaha - pihak ketiga dan utang lain-lain	165.422	165.422	165.422	-	-	*Trade payables - third parties and other payable*
Beban masih harus dibayar	1.103.104	1.103.104	1.103.104	-	-	*Accrued expenses*
Liabilitas sewa	643.257	529.937	84.164	127.868	317.905	*Lease liabilities*
Pinjaman jangka panjang	11.756.073	11.914.638	3.051.574	-	8.863.064	*Long-term loans*
Surat utang	16.105.711	16.232.400	4.002.000	2.808.000	9.422.400	*Notes payable*
Jumlah	**29.773.567**	**29.945.501**	**8.406.264**	**2.935.868**	**18.603.369**	***Total***

	31 Desember/ *31 December* 2020					
	Jumlah tercatat/ *Carrying amount*	Arus kas kontraktual/ *Contractual cash flow*	Kurang dari setahun/*Less than one year*	Antara satu dan tiga tahun/ *Between one and three years*	Lebih dari tiga tahun/*More than three years*	
Utang usaha - pihak ketiga dan utang lain-lain	592.057	592.057	592.057	-	-	*Trade payables - third parties and other payable*
Beban masih harus dibayar	1.156.790	1.156.790	1.156.790	-	-	*Accrued expenses*
Liabilitas sewa	466.512	379.276	55.153	84.914	239.209	*Lease liabilities*
Pinjaman jangka panjang	10.278.847	10.400.265	3.910.974	2.340.020	4.149.271	*Long-term loans*
Surat utang	13.568.482	13.661.500	6.933.750	1.791.000	4.936.750	*Notes payable*
Jumlah	**26.062.688**	**26.189.888**	**12.648.724**	**4.215.934**	**9.325.230**	***Total***

40. **MANAJEMEN RISIKO KEUANGAN** (Lanjutan)

c. **Risiko likuiditas** (Lanjutan)

Berikut rincian pinjaman jangka panjang dan surat utang jangka panjang sesuai dengan jadwal jatuh tempo:

40. ***FINANCIAL RISK MANAGEMENT*** *(Continued)*

c. ***Liquidity risk*** *(Continued)*

Details of the long-term loans and long-term notes according to the maturity schedule are as follow:

	30 Juni/ *30 June* 2021		31 Desember/ *31 December* 2020		
	Jumlah tercatat/ *Carrying amount*	Arus kas kontraktual *Contractual cash flows*	Jumlah tercatat/ *Carrying amount*	Arus kas kontraktual *Contractual cash flows*	
Kurang dari setahun	6.972.695	7.053.574	10.755.692	10.844.724	*Less than one year*
Antara satu dan tiga tahun	2.798.317	2.808.000	4.054.598	4.131.020	*Between one and three years*
Lebih dari tiga tahun	18.090.772	18.285.464	9.037.039	9.086.021	*More than three years*
Jumlah	**27.861.784**	**28.147.038**	**23.847.329**	**24.061.765**	*Total*

d. **Estimasi nilai wajar**

Nilai wajar aset dan liabillitas keuangan di estimasi untuk keperluan pengakuan dan pengukuran atau untuk keperluan pengungkapan.

PSAK 68 "Pengukuran Nilai Wajar" mensyaratkan pengungkapan atas pengukuran nilai wajar dengan tingkat hirarki nilai wajar sebagai berikut:

a) harga kuotasian (tidak disesuaikan) dalam pasar aktif untuk aset atau liabilitas yang identik (tingkat 1);

b) input selain harga kuotasian yang termasuk dalam tingkat 1 yang dapat diobservasi untuk aset atau liabilitas, baik secara langsung (misalnya harga) atau secara tidak langsung (misalnya derivasi dari harga) (tingkat 2); dan

c) input untuk aset atau liabilitas yang bukan berdasarkan data pasar yang dapat diobservasi (input yang tidak dapat diobservasi) (tingkat 3).

Aset dan liabilitas keuangan Perusahaan yang diukur dan diakui pada nilai wajar (tingkat 2) adalah piutang dan utang derivatif.

d. ***Fair value estimation***

The fair value of financial assets and financial liabilities must be estimated for recognition and measurement or for disclosure purposes.

PSAK 68 "Fair Value Measurements" requires disclosure of fair value measurements by level of the following fair value measurement hierarchy:

a) quoted prices (unadjusted) in active markets for identical assets or liabilities (level 1);

b) inputs other than quoted prices included within level 1 that are observable for the asset or liability, either directly (as prices) or indirectly (derived from prices) (level 2); and

c) inputs for the asset or liability that are not based on observable market data (unobservable inputs) (level 3).

The Company's financial assets and liabilities that are measured and recognized at fair value (level 2) are derivative receivables and payables.

40. **MANAJEMEN RISIKO KEUANGAN** (Lanjutan)

d. **Estimasi nilai wajar** (Lanjutan)

Nilai wajar instrumen keuangan yang tidak diperdagangkan di pasar aktif ditentukan dengan menggunakan teknik penilaian tertentu. Teknik tersebut menggunakan data pasar yang dapat diobservasi sepanjang tersedia, dan seminimal mungkin mengacu pada estimasi. Apabila seluruh input signifikan atas nilai wajar dapat diobservasi, instrumen keuangan ini termasuk dalam tingkat 2.

Jika satu atau lebih input yang signifikan tidak berdasarkan data pasar yang dapat diobservasi, maka instrumen tersebut masuk ke dalam tingkat 3.

Teknik penilaian tertentu digunakan untuk menentukan nilai instrumen keuangan mencakup:

- penggunaan harga yang diperoleh dari bursa atau pedagang efek untuk instrumen sejenis dan;
- teknik lain seperti analisis arus kas yang didiskonto digunakan untuk menentukan nilai instrumen keuangan lainnya.

Tabel di bawah ini menggambarkan nilai tercatat dan nilai wajar dari aset dan liabilitas keuangan:

*40. **FINANCIAL RISK MANAGEMENT** (Continued)*

*d. **Fair value estimation** (Continued)*

The fair value of financial instruments that are not traded in an active market is determined using valuation techniques. These valuation techniques maximise the use of observable market data where it is available and rely as little as possible on estimates. If all significant inputs required to fair value an instrument are observable, the instrument is included in level 2.

If one or more of the significant inputs is not based on observable market data, the instrument is included in level 3.

Specific valuation techniques used to value financial instruments include:

- *the use of quoted market prices or dealer quotes for similar instruments and;*
- *other techniques, such as discounted cash flows analysis, are used to determine fair value for the remaining financial instruments.*

The following table shows the fair values of financial assets and liabilities, together with the carrying amounts, are as follow:

	30 Juni/ *30 June* 2021		31 Desember/ *31 December* 2020		
	Nilai tercatat/ *Carrying amount*	Nilai wajar/ *Fair Value*	Nilai tercatat/ *Carrying amount*	Nilai wajar/ *Fair Value*	
Aset keuangan					***Financial assets***
Kas dan setara kas	894.447	894.447	947.341	947.341	*Cash and cash equivalents*
Piutang usaha - pihak ketiga	904.096	904.096	710.722	710.722	*Trade receivables - third parties*
Piutang lain-lain	74.575	74.575	262.885	262.885	*Other receivables*
Pendapatan yang masih harus diterima	583.131	583.131	491.190	491.190	*Accrued revenue*
Uang jaminan	1.883	1.883	1.708	1.708	*Refundable deposits*
Jumlah	**2.458.132**	**2.458.132**	**2.413.846**	**2.413.846**	***Total***

40. **MANAJEMEN RISIKO KEUANGAN** (Lanjutan)

d. **Estimasi nilai wajar** (Lanjutan)

*40. **FINANCIAL RISK MANAGEMENT** (Continued)*

*d. **Fair value estimation** (Continued)*

	30 Juni/ *30 June* 2021		31 Desember/ *31 December* 2020		
	Nilai tercatat/ *Carrying amount*	**Nilai wajar/ *Fair Value***	**Nilai tercatat/ *Carrying amount***	**Nilai wajar/ *Fair Value***	
Liabilitas keuangan					***Financial liabilities***
Utang usaha - pihak ketiga	136.233	136.233	571.000	571.000	*Trade payables - third parties*
Utang lain-lain	29.189	29.189	21.057	21.057	*Other payables*
Beban masih harus dibayar	969.474	969.474	1.156.790	1.156.790	*Accrued expenses*
Liabilitas sewa - kendaraan (Catatan 24.b)	14.151	14.151	16.082	16.082	*Lease liabilities - vehicles (Note 24.b)*
Pinjaman jangka panjang : pihak ketiga	11.756.073	11.756.073	10.278.847	10.278.847	*Long - term loan : third parties*
Surat utang	16.105.711	16.105.711	13.568.482	13.568.482	*Notes*
Jumlah	**29.010.831**	**29.010.831**	**25.612.258**	**25.612.258**	***Total***

Nilai wajar atas sebagian besar aset dan liabilitas keuangan mendekati nilai tercatat karena dampak pendiskontoan yang tidak signifikan.

Nilai wajar dari pinjaman jangka panjang dinilai menggunakan *discounted cash flows* berdasarkan tingkat suku bunga efektif terakhir yang berlaku untuk masing-masing pinjaman yang diutilisasi.

The fair value of most of the financial assets and liabilities approximates their carrying amount, as the impact of discounting is not significant.

The fair value of long-term loans are estimated by using discounted cash flows applying the effective interest rate charged by the lenders for the last utilisation in each currency borrowings.

e. **Risiko operasional**

Risiko operasional adalah risiko kerugian yang diakibatkan oleh kurang memadainya atau kegagalan dari proses internal, faktor manusia dan sistem atau dari kejadian-kejadian eksternal. Risiko ini melekat dalam semua proses bisnis, kegiatan operasional, sistem dan layanan Perusahaan dan entitas anak.

*e. **Operational risk***

Operational risk is the risk of losses resulting from inadequate internal processes or a failure of such processes, human factors and systems or from external events. This risk is inherent in all business processes, operations and services of the Company and subsidiaries.

f. **Manajemen risiko permodalan**

Tujuan Perusahaan dan entitas anak dalam mengelola permodalan adalah untuk melindungi kemampuan Perusahaan dan entitas anak dalam mempertahankan kelangsungan usaha, sehingga entitas dapat tetap memberikan imbal hasil bagi pemegang saham dan manfaat bagi pemangku kepentingan lainnya dan untuk mengelola struktur modal yang optimal untuk meminimalisasi biaya modal yang efektif. Dalam rangka mengelola struktur modal, Perusahaan dan entitas anak mungkin menyesuaikan jumlah dividen, menerbitkan saham baru atau menambah/mengurangi jumlah utang.

Strategi Perusahaan selama 30 Juni 2021 dan 31 Desember 2020 adalah mempertahankan rasio utang senior bersih terhadap EBITDA yang disesuaikan dan disetahunkan kurang dari 5 kali (Catatan 22).

*f. **Capital risk management***

The objectives of the Company and subsidiaries when managing capital are to safeguard the ability of the Company and subsidiaries to continue as a going concern in order to provide returns for shareholders and benefits for other stakeholders and to maintain an optimal capital structure to minimize the effective cost of capital. In order to maintain the capital structure, the Company and subsidiaries may from time to time adjust the amount of dividends, issue new shares or increase/reduce debt levels.

The Company's strategy for 30 June 2021 and 31 December 2020 was to maintain the ratio of net senior debt to annualized adjusted EBITDA to be less than 5 times (Note 22).

41. TRANSAKSI NON-KAS / *41. NON-CASH TRANSACTIONS*

Transaksi non-kas Perusahaan dan entitas anaknya adalah sebagai berikut:

Non-cash transactions of the Company and it subsidiaries are as follows:

	30 Juni/ *30 June* 2021	30 Juni/ *30 June* 2020	
Liabilitas sewa aset hak guna	629.106	385.571	*Right of use assets lease liabilities*
Aset hak guna	136.052	309.088	*Right of use assets*
Surplus revaluasi	(59.289)	349.141	*Revaluation surplus*
Jumlah	**705.869**	**1.043.800**	***Total***

Tabel berikut menjelaskan perubahan pada liabilitas Perusahaan dan entitas anak yang timbul dari aktivitas pendanaan, yang meliputi perubahan terkait kas dan non kas:

The following table describes changes in the Company and subsidiaries liabilities arising from financing activities, which include changes related to cash and non-cash:

	1 Januari 2021/ *1 January 2021*	Penambahan/ *Additions*	Pengurangan/ *Deductions*	Perubahan non kas/ *Non-cash changes* – Pergerakan kurs/ *Exchange rate movements*	Perubahan non kas/ *Non-cash changes* – Perubahan lainnya/ *Other changes*	30 Juni 2021/ *30 June 2021*	
Surat Utang	13.661.500	8.109.000	(5.744.100)	206.000	-	16.232.400	*Notes payable*
Pinjaman jangka panjang							*Long-term loans*
Pihak ketiga	10.400.265	16.158.498	(14.885.568)	241.443	-	11.914.638	*Third parties*
Liabilitas sewa							*Lease liabilities -*
Aset hak guna	450.430	176.473	(22.967)	-	25.170	629.106	*Right of use assets*
kendaraan (Catatan 24.b)	16.082	-	(2.938)	-	1.007	14.151	*vehicle (Note 24.b)*
Jumlah	**24.528.277**	**24.443.971**	**(20.655.573)**	**447.443**	**26.177**	**28.790.295**	***Total***

	1 Januari 2020/ *1 January 2020*	Penambahan/ *Additions*	Pengurangan/ *Deductions*	Perubahan non kas/ *Non-cash changes* – Pergerakan kurs/ *Exchange rate movements*	Perubahan non kas/ *Non-cash changes* – Perubahan lainnya/ *Other changes*	30 Juni 2020/ *30 June 2020*	
Surat Utang	7.853.350	6.278.900	(1.450.000)	367.150	-	13.049.400	*Notes payable*
Pinjaman jangka panjang							*Long-term loans*
Pihak ketiga	15.269.643	3.804.406	(8.334.024)	174.160	-	10.914.185	*Third parties*
Liabilitas sewa							*Lease liabilities -*
Aset hak guna	270.018	-	(6.915)	-	122.468	385.571	*Right of use assets*
kendaraan (Catatan 24.b)	18.891	-	(3.782)	-	3.631	18.740	*vehicle (Note 24.b)*
Jumlah	**23.411.902**	**10.083.306**	**(9.794.721)**	**541.310**	**126.099**	**24.367.896**	***Total***

42. PERISTIWA SETELAH PERIODE PELAPORAN

a. Pencairan pinjaman

Fasilitas Pinjaman *Revolving* PT Bank UOB Indonesia ("UOB")

Pada berbagai tanggal dibulan Juli sampai dengan 28 September 2021, GHON, entitas anak, telah menarik sebagian Fasilitas Pinjaman Revolving dari UOB sebesar Rp 162.900 (lihat catatan 22).

Fasilitas Pinjaman *Revolving* sebesar US$ 200 juta

Pada tanggal 1 Juli, 22 Juli, 6 Agustus dan 29 September 2021, entitas anak telah menarik sebagian Fasilitas Pinjaman Revolving sebesar US$ 200 juta dalam US$ 200 juta Facility Agreement sebesar US$ 43.000.000, US$ 10.000.000, US$ 15.000.000 dan US$ 17.600.000 (lihat catatan 22.b).

Fasilitas Pinjaman *Revolving* Seri B sebesar US$ 100 juta

Pada tanggal 10 Agustus 2021, entitas anak, telah menarik sebagian Fasilitas pinjaman *Revolving* Seri B sebesar US$ 100 juta dalam US$ 1.000.000.000 *Facility agreement* sebesar US$ 10.000.000 (lihat catatan 22.a.2).

Fasilitas Pinjaman *Revolving* sebesar US$ 275 juta

Pada tanggal 18 Agustus 2021, entitas anak, telah menarik sebagian Fasilitas pinjaman *Revolving* sebesar US$ 275 juta dalam US$ 275 million *Revolving Loan Facility* sebesar US$ 10.000.000 (lihat catatan 22.d).

Fasilitas Pinjaman *Revolving* sebesar US$ 375 juta

Pada tanggal 15 September 2021, entitas anak, telah menarik sebagian Fasilitas pinjaman Revolving sebesar US$ 375 juta dalam US$ 375 million Revolving Loan Facility sebesar US$ 16.300.000 (lihat catatan 22.c).

Obligasi Berkelanjutan V Tahap I

Pada tanggal 19 Agustus 2021, Perusahaan menerbitkan Obligasi Berkelanjutan V Tower Bersama Infrastructure Tahap I Tahun 2021 dengan Tingkat Bunga Tetap ("Obligasi Berkelanjutan V Tahap I") sebesar 4,25% per tahun. Nominal Obligasi Berkelanjutan V Tahap I ini adalah sebesar Rp 1.200.000. Obligasi ini dicatatkan pada Bursa Efek Indonesia pada tanggal 20 Agustus 2021.

Hasil bersih yang diperoleh dari penerbitan Obligasi Berkelanjutan V Tahap I telah digunakan seluruhnya untuk pembayaran kewajiban keuangan entitas anak.

Bunga Obligasi dibayarkan setiap triwulan, dimana Bunga Obligasi pertama akan dibayarkan pada tanggal 19 November 2021, sedangkan Bunga Obligasi terakhir sekaligus dengan pelunasan Obligasi Berkelanjutan V Tahap I akan dibayarkan pada tanggal 29 Agustus 2022.

42. EVENTS AFTER THE REPORTING PERIOD

a. Loan withdrawal

PT Bank UOB Indonesia Revolving Credit Facility ("UOB")

On several dates in July to 28 September 2021, GHON, the Subsidiary, has partially withdrawn a revolving loan facility from UOB amounting to Rp 162,900 (see note 22).

US$ 200 million Revolving Loan Facility

On 1 July, 22 July, 6 August and 29 September 2021, the subsidiary, has partially withdrawn the US$ 200 million revolving loan facility under US$ 200 million Revolving Loan Facility amounting to US$ 43,000,000, US$ 10,000,000, US$ 15,000,000 and US$ 17,600,000 (see note 22.b).

Facility B of US$ 100 million Revolving Loan Facility

On 10 August 2021, the Subsidiary has partially withdrawn the facility B of US$ 100 million revolving loan facility under US$ 1,000,000,000 Credit Facilities amounting to US$ 10,000,000 (see note 22.a.2).

US$ 275 million Revolving Loan Facility

On 18 August 2021, the Subsidiary has partially withdrawn US$ 275 million Revolving Loan Facility under US$ 275 million Revolving Loan Facility amounting to US$ 10,000,000 (see note 22.d).

US$ 375 million Revolving Loan Facility

On 15 September 2021, the Subsidiary has partially withdrawn US$ 375 million Revolving Loan Facility under US$ 375 million Revolving Loan Facility amounting to US$ 16,300,000 (see note 22.c).

Continuous Bonds V Phase I

On 19 August 2021, The Company issued Continous Bonds V Tower Bersama infrastructure Phase I Year 2021 with a Fixed Interest Rate ("Continuous Bonds V Phase I") of 4.25% per annum. The Continuous Bonds V Phase I has a total principal of Rp 1,200,000. These bonds are listed on the Indonesia stock exchange on 20 August 2021.

The net proceeds obtained from the issuance of Continuous Bonds V Phase I were used entirely for the payment of financial liabilities of subsidiaries.

Interest for Continuous Bonds IV Phase IV will be paid on a quarterly basis on the interest payment date. The first payment of interest is on 19 November 2021. The date of the last interest payment, which is also the due date of Continuous Bond V phase I, is on 29 August 2022.

42. **PERISTIWA SETELAH PERIODE PELAPORAN** (Lanjutan)

b. Pembayaran pinjaman

Fasilitas Pinjaman *Revolving* PT Bank UOB Indonesia ("UOB")

Pada berbagai tanggal dibulan Juli sampai dengan 27 September 2021, GHON, entitas anak, telah melunasi sebagian Fasilitas Pinjaman Revolving dari UOB sebesar Rp 141.900 (lihat catatan 22).

Fasilitas Pinjaman PT Bank QNB Indonesia Tbk ("QNB")

Pada tanggal 28 Juli, 28 Agustus dan 28 September 2021, GHON, entitas anak, telah melunasi sebagian Fasilitas Pinjaman dari QNB sebesar Rp 2.500 (lihat catatan 22).

Fasilitas pinjaman *Revolving* Seri B sebesar US$ 100 juta

Pada tanggal 7 Juli 2021, entitas anak, telah melunasi sebagian Fasilitas pinjaman *Revolving* Seri B sebesar US$ 100 juta dalam US$ 1.000.000.000 *Facility agreement* sebesar US$ 20.000.000 (lihat catatan 22.a.2).

Obligasi Berkelanjutan III Tahap I

Pada tanggal 5 Juli 2021, Perusahaan telah melunasi Obligasi berkelanjutan III Tahap I sebesar Rp 608.000 (lihat catatan 23.b).

Fasilitas Pinjaman *Revolving* sebesar US$ 275 juta

Pada tanggal 12 Agustus 2021, entitas anak, telah melunasi sebagian Fasilitas pinjaman *Revolving* sebesar US$ 275 juta dalam US$ 275 million *Revolving Loan Facility* sebesar US$ 10.000.000 (lihat catatan 22.d).

Fasilitas Pinjaman *Revolving* sebesar US$ 200 juta

Pada tanggal 19 Agustus 2021, entitas anak telah melunasi sebagian Fasilitas Pinjaman *Revolving* sebesar US$ 200 juta dalam US$ 200 juta *Facility Agreement* sebesar US$ 10.000.000 (lihat catatan 22.b).

Fasilitas Pinjaman *Revolving* sebesar US$ 375 juta

Pada tanggal 31 Agustus 2021, entitas anak telah melunasi sebagian Fasilitas Pinjaman *Revolving* sebesar US$ 375 juta dalam US$ 375 juta *Facility Agreement* sebesar US$ 82.000.000 (lihat catatan 22.c).

*42. **EVENTS AFTER THE REPORTING PERIOD** (Continued)*

b. Loan repayment

PT Bank UOB Indonesia Revolving Credit Facility ("UOB")

On several dates in July to 27 September 2021, GHON, the Subsidiary, has partially repaid a revolving loan facility from UOB amounting to Rp 141,900 (see note 22).

PT Bank QNB Indonesia Tbk Credit Facility ("QNB")

On 28 July, 28 August and 28 September 2021, GHON, the Subsidiary, has partially repaid a loan facility from QNB amounting to Rp 2,500 (see note 22).

Facility B of US$ 100 million Revolving Loan Facility

On 7 July 2021, the Subsidiary has partially repaid the facility B of US$ 100 million revolving loan facility under US$ 1,000,000,000 Credit Facilities amounting to US$ 20,000,000 (see note 22.a.2).

Continuous Bonds III Phase I

On 5 July 2021, The Company, has fully paid Continuous Bonds III Phase I amounting to Rp 608.000 (see note 23.b).

US$ 275 million Revolving Loan Facility

On 12 August 2021, the Subsidiary has partially repaid US$ 275 million Revolving Loan Facility under US$ 275 million Revolving Loan Facility amounting to US$ 10,000,000 (see note 22.d).

US$ 200 million Revolving Loan Facility

On 19 August 2021, the subsidiary, has partially repaid the US$ 200 million revolving loan facility under US$ 200 million Revolving Loan Facility amounting to US$ 10,000,000 (see note 22.b).

US$ 375 million Revolving Loan Facility

On 31 August 2021, the subsidiary, has partially repaid the US$ 375 million revolving loan facility under US$ 375 million Revolving Loan Facility amounting to US$ 82,000,000 (see note 22.c).

42. **PERISTIWA SETELAH PERIODE PELAPORAN** (Lanjutan)

b. Pembayaran pinjaman (Lanjutan)

Obligasi Berkelanjutan IV Tahap I Seri A

Pada tanggal 17 September 2021, Perusahaan telah melunasi Obligasi berkelanjutan IV Tahap I seri A sebesar Rp 231.000 (lihat catatan 23.d).

*43. **EVENTS AFTER THE REPORTING PERIOD** (Continued)*

***b. Loan repayment** (Continued)*

Continuous Bonds IV Phase I Serie A

On 17 September 2021, The Company, has fully paid Continuous Bonds IV Phase I serie A amounting to Rp 231,000 (see note 23.d).

43. DAMPAK PANDEMI VIRUS KORONA (COVID-19)

Sejak 1 Januari 2020, pandemi virus korona (Covid-19) telah menyebar ke beberapa negara, termasuk Indonesia. Dalam rangka mencegah virus ini, banyak negara telah mengambil langkah-langkah pencegahan dan strategi antara lain, seperti membatasi perjalanan masuk dan keluar dari suatu negara, karantina kewilayahan area tertentu, menunda acara dan pertemuan, mempersempit pergerakan orang. Inisiatif ini telah memperlambat ekonomi secara umum dan berdampak buruk terhadap operasi banyak perusahaan.

Manajemen Perusahaan menyadari permasalahan ini dan telah mengambil langkah-langkah untuk mengelola sumber daya dan operasi Perusahaan secara hati-hati *(prudent)* dengan meninjau kembali dan memitigasi semaksimal mungkin dampak terhadap keberlanjutan usaha, kepatuhan terhadap kontrak, rantai pasokan, kesehatan dan keselamatan dan teknologi.

Manajemen berpendapat bahwa pandemi ini tidak bersifat permanen dan pada tanggal penerbitan laporan keuangan, dampak pandemi Covid-19 belum mengakibatkan peningkatan signifikan dalam risiko kredit. Pelanggan Perusahaan masih dapat melaksanakan kewajibannya kepada Perusahaan secara normal, demikian juga Perusahaan tetap dapat memenuhi kewajiban kepada para krediturnya.

43. IMPACT OF THE CORONA VIRUS PANDEMIC (COVID-19)

Since 1 January 2020, the outbreak of corona virus (Covid-19) has spread to several countries including Indonesia. In order to contain the virus, many countries have adopted precautionary measures and strategies among others, such as limiting travels in and out of the countries, lock down of selected areas, postponing events and gatherings and discouraging movements of people. These initiatives have slowed down the economy in general and adversely affected the operations of many companies.

The Company's management is aware of this issue and have taken steps to address this by managing its resources and operations prudently by reviewing and mitigating as much as possible impact on sustainability, contract compliance, supply chain, health and safety and technology.

Management believes that this pandemic is not permanent, and at the issuance date of the financial statements, the impact of the Covid-19 pandemic has not resulted in a significant increase in credit risk. The Company's customers can still carry out their obligations to the Company normally, as well as the Company can still fulfill obligations to its creditors.

44. KONTINJENSI

Saat ini, salah satu entitas anak sedang menghadapi beberapa perkara hukum dengan beberapa pihak penggugat terkait sewa lahan di sebagian kecil lokasi menara telekomunikasi milik entitas anak tersebut berdiri. Total nilai gugatan materil yang diajukan adalah sebesar Rp 700. Sampai dengan tanggal penerbitan laporan keuangan konsolidasian ini, status perkara-perkara tersebut telah ada yang dimenangkan oleh Perusahaan dan masih ada yang dalam proses persidangan. Selain perkara tersebut di atas, salah satu entitas anak yang lain juga sedang dalam proses berperkara untuk menggugat Pemerintah Kabupaten Badung untuk (i) membangunkan kembali 5 menara telekomunikasi yang dibongkar sebelumnya oleh Pemerintah Kabupaten Badung; (ii) membayar ganti rugi materiil senilai Rp 23.957 ditambah bunga 4%; dan (iii) membayar ganti rugi immateriil senilai Rp 100.

44. CONTINGENCIES

Currently, one of the subsidiary is facing several legal cases with several plaintiffs regarding the lease of land where a small portion of location the telecommunication tower owned by the subsidiary is built. The total value of the material claims filled is Rp 700. As of the issuance date of this consolidated financial statements, some cases have been won by the Company and some are still in the trial process. In addition to the cases mentioned above, another subsidiary is also in the process of litigation to sue the Badung Regency Government for (i) rebuilding 5 telecommunications towers previously demolished by the Badung Regency Government; (ii) pay material compensation in the amount of Rp 23,957 plus 4% interest; and (iii) pay immaterial compensation of Rp 100.

44. **KONTINJENSI** (Lanjutan)

Setelah berkonsultasi dengan konsultan hukum yang menjadi kuasa hukum entitas-entitas anak dalam menangani perkara-perkara tersebut, manajemen berkeyakinan akan dapat memenangkan seluruh perkara tersebut, baik pada pengadilan tingkat pertama, tingkat banding, dan tingkat kasasi. Menurut manajemen, perkara hukum tersebut tidak berdampak signifikan terhadap laporan keuangan konsolidasian Perusahaan dan entitas anak dan tidak memberikan pengaruh secara berarti dan tidak berdampak material terhadap kedudukan, peranan dan/atau kelangsungan usaha Perusahaan dan entitas anak, sehingga tidak diperlukan adanya provisi atas perkara-perkara tersebut.

*44. **CONTINGENCIES** (Continued)*

After consulting with the attorney who is in the legal representative of the subsidiaries in handling the case, the management believes that they will be able to win the case, both at the court of the first instance, the level of appeal, and the level of cassation. According to management, the legal case has no significant impact on the Company and subsidiaries's consolidated financial statements and does not have a significant and no material impact on the position, role and/or business continuity of the Company and subsidiaries, so there is no need for provisions for these cases.

45. **PENERBITAN KEMBALI LAPORAN KEUANGAN KONSOLIDASIAN**

Dalam rangka penerbitan surat utang berdenominasi mata uang asing, Perusahaan telah menerbitkan kembali laporan keuangan konsolidasian untuk periode yang berakhir 30 Juni 2021 dan 2020 dengan beberapa perubahan penyajian dan pengungkapan pada laporan arus kas konsolidasian dan Catatan 31 dan 37 atas laporan keuangan konsolidasian terdahulu.

*45. **REISSUANCE OF CONSOLIDATED FINANCIAL STATEMENTS***

In order to issue debt securities denominated in foreign currencies, the Company has reissued the consolidated financial statements for the period ended 30 June 2021 and the 2020 with several changes in presentation and disclosure in the consolidated cash flows and Notes 31 and 37 to the previous consolidated financial statements.

46. **OTORISASI LAPORAN KEUANGAN**

Manajemen Perusahaan telah mengotorisasi laporan keuangan konsolidasian untuk diterbitkan pada tanggal 29 September 2021.

*46. **AUTHORIZATION OF FINANCIAL STATEMENTS***

The Company's management has authorized to issue these consolidated financial statements on 29 September 2021.

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