

SUMMARY OF INTEGRATED COMMUNICATION POLICY PT XL AXIATA TBK.

Disclaimer:

This document explains the basics of policy which related with the Integrated Communication of PT XL Axiata Tbk. (the “Company”), especially to communicate with Shareholders and Investors.

1. PURPOSE

The Integrated Communication Policy aims to outline the principles, practice and process of delivering a consistent and effective Communication so as the same understanding will be achieved by targeted Recipient.

2. SCOPE

This Policy is endorsed by the Company’s Board of Director to be implemented as well reviewed and improved on a regular basis according to the Company’s needs and development

This guideline applies to all Employees working for the Company in all layers of organization.

3. POLICY COMPONENTS

A. INTRODUCTION

The Company believes that effective and appropriate Communication is important for the Company in achieving its objectives and to maintain its credibility as a public listed company. The Integrated Communication Policy is a guideline for all types of Communication on the Company’s Information to Recipient. This Policy outlines structures and principles for managing Communication with regards to the Company Information, as well as responsibilities of respective Authorized Spokespersons to implementation of communication to respective Recipient.

B. STATEMENT OF PRINCIPLES

The Company perceives communications as one of tools to achieve business objective. All Communication conveyed to Recipient through Communication Facilities must comply with prevailing laws and regulation.

C. DISTRIBUTION OF COMMUNICATION

Information of the Company may be disseminated to Recipient in a form of the following:

- **Internal Communication**
Internal Communication shall mean distribution of information to The Company’s Employee through any internal Communication Facilities to one or all Company’s Employee;
- **External Communication**
External Communication shall mean distribution of any kind and form of information to all recipient of Company’s information through any communication facilities among others website, social media, press and/or Investor release or conference, and public disclosure through Financial Services Authority and/or Indonesian Stock Exchange.

D. AUTHORIZED SPOKESPERSON(S)

Members of the Board of Directors are designated as the primary spokespersons for the Company to distribute the communication either to the internal or external Recipients. In addition, Company's Employee(s) may act as Authorized Spokesperson(s) based on each respective roles and scope of responsibilities provided that such information has been properly coordinated with related function or business unit and approved by related members of the Board of Directors according to this policy.

The followings are key guideline on how the Authorized Spokesperson(s) should represent the Company:

1. **Be mindful of representing the Company** by conveying the positive, optimistic message and taking into account on the abovementioned Communication Principles. The Authorized Spokesperson(s) must be respectful of all individuals, ethnicity, races, religions, cultures and inter-group relations.
2. **Fully disclose affiliation with the Company.** The Company requires all Authorized Spokesperson(s) who are communicating on behalf of the Company to always disclose their name and their affiliation. It is never acceptable to use aliases or otherwise deceive people.
3. **Speak as Necessary.** Authorized Spokesperson(s) must ensure on accurate, not misleading as well as not revealing any non-public Company Information. In the event on uncertainty, the Authorized Spokesperson(s) are encouraged NOT TO PUBLISH such information.
4. **Be responsible.** The Company encourages all Authorized Spokesperson(s) to exercise sound judgment and common sense on publishing Communication to Information Recipients.
5. **Coordination.** In delivering informations to public, Authorized Spokesperson must coordinate with respective unit to ensure the accuracy and validity of those informations.
6. **Speaking for the Company's interest.** All Company's Spokesperson shall eliminate any interest or any other matters which intended to their personal benefit when conveying information to the public. All information shall convey with responsibilities.

Employees, other than the Authorized Spokesperson(s), are not allowed to respond under any circumstances to inquiries from information Recipient, unless specifically asked to do so by the Authorized Spokesperson(s). These situations will generally occur after a news release has been issued on information related with the Company.

INVESTORS AND SHAREHOLDERS COMMUNICATION'S PROCEDURE

A. PURPOSE AND SCOPE OF PROCEDURE

This Procedure aims to describe how the Company's Authorized Spokesperson(s) may communicate with third parties, in particular to this Procedure all hereby referred to as External Parties are amongst others securities market professionals, Shareholders and others who may own or trade in the Company's shares.

This Procedure also aims to ensure that the External Parties have sufficient and updated financial information about the Company in addition to periodic investors and analysts' meetings.

B. KEY RULE

All Communication made with External Parties must comply with prevailing laws and regulation in Indonesia. Any material and non-confidential information of the Company shall be publicly disseminated in a timely, non-exclusive and non-selective way. Only an Authorized Spokesperson(s) may engage in discussions about the Company's Financial Performance and/or Strategic Direction with Third Parties.

C. FORWARD LOOKING INFORMATION

All parties in the Company are required to protect the data confidentiality of the Company as stipulated in Point 3.0 letter B of this Policy that includes the provision of future-oriented information for all Shareholders and Stakeholders which describe the future condition of the company including performance, business prospect, strategy, business plan or Company's milestones of achievement ("Forward Looking Information").

However, to build and maintain the trust of the shareholders and stakeholders especially for the investor community, the Forward-looking Statements may arise either verbally or nonverbally in relation to the Forward-Looking Information. Therefore, these following provisions shall apply for any party who issuing the Forward-looking Statements:

1. Shall explain the Information Recipient that the addressed information is still predictive by mentioned its basis of assumption;
2. Underline that the projection result may materially vary;
3. Has carefully considered the Company condition;
4. Prioritizing the interest of the Company.

D. EARNINGS RELEASE AND CONFERENCE CALLS

The Company will regularly engage from time-to-time with securities market professionals and those who may own or trade in the Company's shares through the quarterly investor earnings call; one-on-one meetings and group meetings which will be attended to by the Authorized Spokesperson(s) of the Company

E. DISCLOSURE PROCESS

Any financial information as stipulated in the Company's quarterly Investor Memo and/or Corporate Presentation as well as the Company's Annual Report are posted in the Company's website.

Enquiries from the public for general and routine information can be answered by the Company's Investor Relations Team if the information requested is contained in records/publications previously released for public distribution.

Enquiries from the public cannot be answered if the enquiry is regarding Company activities that constitute confidential material information. If such an enquiry is made, the Investor Relations Team will respectfully decline the request as containing confidential or proprietary information.

F. RUMOURS OR ARTICLES THAT ARE SPECULATIVE IN NATURE

Authorized Spokesperson(s) of the company will not comment on rumors or news articles that are speculative in nature.

G. ENGAGEMENT WITH SHAREHOLDERS

Direct engagement with will create awareness of the expectations as well concerns of the Company's shareholders. In this regard, the General Meeting of Shareholders ("GMS") shall act as proper forum for Shareholders to use their rights to discuss and approve strategic matters based on threshold as regulated under the prevailing laws and regulation. The Corporate Secretary shall be responsible to convene an end-to-end GMS with coordination with related Unit/Division within the Company.

J. AUTHORIZED SPOKESPERSON(S).

The Investor Relation of the Company may act as the Authorized Spokesperson to respond inquiries made to the Company by External Parties.

Especially for the Primary/Majority Shareholder of the Company, the Corporate Secretary may act as the Authorized Spokesperson to respond to questions and data as requested by by the Primary/Majority Shareholder except for questions concerning the activities of the Company which constitute confidential material information an /or are not contained in notes / publications that are not for public distribution.