ASEAN CORPORATE GOVERNANCE SCORECARD PT BUKIT ASAM Tbk 2018

A. RIGHT OF SHAREHOLDERS

Part	ltem	PTBA Year of 2018	Source Information
A.1. Basi	c Shareholders Rights		
	Does the company pay (interim and final/annual) dividends in an equitable and timely manner; that is, all shareholders are treated equally and paid within 30 days after being (i) declared for interim dividends and (ii) approved by shareholders at general meetings for final dividends? In case the company has offered Scrip dividend, did the company paid the dividend within 60 days.	 Interim Dividend PTBA did not distribute interim dividend in 2018. Script Dividend PTBA did not distribute script dividend. Final Dividend PTBA distributes final dividend in accordance with AGMS 2018 as follow schedule: Date of AGMS: April 25th 2019 Payment Date: May, 29th 2019 As mentioned on Summary of Minutes of AGMS 2019. 	AGMS 2019 http://www.ptba.co.id/en/news/detail/811/ the-minutes-summary-of-annual-general- meeting-of-shareholders-for-financial-year- 2018

A.2 Rigl	ht to Participate		
A.2.1	Amendments to the company's constitution?	Shareholders have the right to participate in amends to company constitution through to GMS as stated on Article 25 paragraph (4) and Article 28 Article of Association PTBA. To strengthen the Shareholders participation on amendment of company's constitution also stated on latest amendment of Article of Association on Summary of AGM 2019 on column 6.	Article of Association PTBA http://www.ptba.co.id/pdf- files/PTBA%20Anggaran%20Dasar.pdf Summary of Minutes of AGMS http://www.ptba.co.id/en/news/detail/680/ pengumuman-ringkasan-risalah-rapat- umum-pemegang-saham-tahunan-pt-bukit- asam-tbk
A.2.2	The authorization of additional shares?	Shareholders through GMS are allowed to participate in authorization of additional shares of company as stated on Article 4 Paragraph (7) Article of Association PTBA.	Article of Association http://www.ptba.co.id/pdf-files/PTBA%20Anggaran%20Dasar.pdf
A.2.3	The transfer of all or substantially all assets, which in effect results in the sale of the company?	The shareholders through GMS may have to participate in the transfers and or encumber substantial assets of company. As stated on Article 12 Paragraph (9) Article Association of PTBA and quorum of GMS as stipulated on Article 25 Paragraph (2) Article of Association PTBA.	Article of Association http://www.ptba.co.id/pdf-files/PTBA%20Anggaran%20Dasar.pdf
_	nt to participate effectively in and vote in vern general shareholder meetings.	general shareholder meetings and should be informed	of the rules, including voting procedures,
A.3.1	Do shareholders have the opportunity, evidenced by an agenda item, to approve remuneration (fees, allowances, benefit-in-kind and other emoluments) or any increases in remuneration for the non-executive directors/commissioners?	GMS PTBA provides the opportunity to shareholders to approve the remuneration of Board of Commissioners and Board of Directors PTBA for 2019 including tantiem (bonus) for 2018 as stipulated on: - AGMS Invitation on April 2 nd 2019 (4 th Agenda) - Summary of Minutes AGMS (minute of summary) 2019 on column 4 (4 th agenda and decision)	AGMS 2019 Invitation http://www.ptba.co.id/en/news/detail/806/ invitation-to-shareholders AGMS 2019 (Minute of Summary) http://www.ptba.co.id/en/news/detail/811/ the-minutes-summary-of-annual-general- meeting-of-shareholders-for-financial-year-

	T		
			2018
A.3.2 A.3.3	Does the company provide non-controlling shareholders a right to nominate candidates for board of directors/commissioners? Does the company allow	According to Article of Association, Article 5 Paragraph (4) the nomination of Board of Commissioners and Board of Directors is Series A Dwiwarna (State Republic Indonesia or its representative/proxy) right, but non-controlling shareholders are provide a right in participation on GMS regarding to nomination of Board of Commissioners and Board of Directors. Shareholders may elect both of Board of	Article of Association http://www.ptba.co.id/pdf-files/PTBA%20Anggaran%20Dasar.pdf Article of Association
	shareholders to elect directors/commissioners individually?	Commissioners or Board of Directors individually, as stipulated for: - Board of Directors on Article 11 Paragraph (10) Article of Association. - Board of Commissioner on Article 14 Paragraph (12) Article of Association. In AGMS 2019 in April 25 th 2019, there was not any changing of Board of Commissioners or Board of Directors, but as the evidence the participation of Shareholders on the election of a member of Board of Directors and/or Board of Commissioners it may be viewed on Summary of Minutes of AGMS 2018 (7 th Agenda) and EGMS 2018 (2 nd Agenda).	http://www.ptba.co.id/pdf- files/PTBA%20Anggaran%20Dasar.pdf Summary of AGMS 2018 http://www.ptba.co.id/en/news/detail/680/ pengumuman-ringkasan-risalah-rapat- umum-pemegang-saham-tahunan-pt-bukit- asam-tbk Summary of EGMS 2018 http://www.ptba.co.id/en/news/detail/782/ pengumuman-ringkasan-risalah-rapat- umum-pemegang-saham-luar-biasa-pt- bukit-asam-tbk
A.3.4	Does the company disclose the voting procedures used before the start of meeting?	The disclosure for voting procedure also be provided by PTBA before starting of GMS, the voting procedure also be disclosed by PTBA as mentioned on Summary of Minutes of AGMS 2019 (Code of Conduct).	AGMS 2019 http://www.ptba.co.id/en/news/detail/811/ the-minutes-summary-of-annual-general- meeting-of-shareholders-for-financial-year- 2018
A.3.5	Do the minutes of the most recent AGM record that the shareholders	The shareholders are given the opportunity to ask the question. The right of Shareholders to ask question	Summary of Minutes of Meeting AGMS 2019 http://www.ptba.co.id/en/news/detail/811/

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	were given the opportunity to ask questions and the questions raised by	and be answered is regulated under the POJK No. 32/POJK.04/2014 and POJK No. 10/POJK.04/2017 and	the-minutes-summary-of-annual-general- meeting-of-shareholders-for-financial-year-
	shareholders and answers given	Company Article Association. As the evidence the	2018
	recorded?	providing the opportunity to ask and answered is	2020
	Tessiaea.	stipulated on Summary of Minutes of Meeting AGMS	
		2019.	
A.3.6	Does the company disclose the voting	PTBA has disclosed to public through PTBA's website,	Summary of Minutes of Meeting AGMS 2019
	results including approving,	national newspaper and Indonesia Stock Exchange	http://www.ptba.co.id/en/news/detail/811/
	dissenting, and abstaining votes for	Website the result of GMS (including approving,	the-minutes-summary-of-annual-general-
	all resolutions/each agenda item for	dissenting and abstain vote for every GMS's agenda)	meeting-of-shareholders-for-financial-year-
	the most recent AGM?	after 2 business days of GMS.	<u>2018</u>
		The disclosure may be viewed on Summary of	
		Minutes of AGMS 2019.	
A.3.7	Does the company disclose the list of	PTBA has disclosed to public through PTBA's website,	Summary of Minutes of Meeting AGMS 2019
	board members who attended the	national newspaper and Indonesia Stock Exchange	http://www.ptba.co.id/en/news/detail/811/
	most recent AGM?	Website the result of GMS (including the Board	the-minutes-summary-of-annual-general-
		Member who attended GMS) after 2 business days of	meeting-of-shareholders-for-financial-year-
		GMS.	<u>2018</u>
		The disclosure of may be viewed on Summary of	
		Minutes of AGMS 2019.	
A.3.8	Does the company disclose that all	The AGMS on April 29 th 2019, was attended by all	Summary of Minutes of Meeting AGMS 2019
	board members and the CEO (if he is	Board Commissioners and Board of Directors of PTBA	http://www.ptba.co.id/en/news/detail/811/
	not a board member) attended the	and Mr. Agus Suharto President Commissioner as the	the-minutes-summary-of-annual-general-
	most recent AGM?	Charmain of Meeting. The disclosure of the attending	meeting-of-shareholders-for-financial-year-
		of all members of Board may be viewed on Summary	<u>2018</u>
		of Minutes of Meeting AGMS 2019.	
A.3.9	Does the company allow for voting in	The shareholder either personally or several of	Article of Association
	absentia?	shareholders may appoint his/her/their proxy to	http://www.ptba.co.id/pdf-
		represent his/her/their voting in GMS of PTBA.	files/PTBA%20Anggaran%20Dasar.pdf
		The disclosure may be viewed on :	
		- Article 25 Paragraph (9) and (12), unless the	Invitation of AGMS 2019
		Board of Commissioner, Board of Directors and	http://www.ptba.co.id/en/news/detail/806/
		Company's employees are prohibited to	<u>invitation-to-shareholders</u>
		represent voting in absentia in GMS.	

		- Invitation of AGMS 2019 on its note.	
A.3.10	Did the company vote by poll (as opposed to by show of hands) for all resolutions at the most recent AGM?	The Company implement one share one vote, as mentioned on: - Article 25 Paragraph (10) Article of Association's PTBA Code of Conduct of AGMS PTBA	Article of Association http://www.ptba.co.id/pdf-files/PTBA%20Anggaran%20Dasar.pdf
A.3.11	Does the company disclose that it has appointed an independent party (scrutineers/inspectors) to count and/or validate the votes at the AGMS	PTBA has appoint independent parties to count the validation the vote at AGMS they are: - PT Datindo Entrycom (as Share Register), the appointment of PT Datindo Entrycom may be viewed the disclosure on PTBA's Annual Report Page 105. - Notary Jose Dima Satria, SH. Mkn as the Disclosure of on Minutes of AGMS made by Notary (Cover Notes).	Annual Report PTBA http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf Cover Notes Notary https://www.idx.co.id/StaticData/NewsAnd Announcement/ANNOUNCEMENTSTOCK/Fr om_EREP/201904/ef27fcb4c9_9a0f26d026. pdf
A.3.12	Does the company make publicly available by the next working day the result of the votes taken during the most recent AGM for all resolutions?	PTBA has announced and publish through National News Paper (Kontan Indonesia), Indonesia Stock Exchange Website, and PTBA Website the result of AGMS 2019 two business days after AGMS dated April 29 th 2019.	Newspaper and Indonesia Stock Exchange https://www.idx.co.id/StaticData/NewsAnd Announcement/ANNOUNCEMENTSTOCK/Fr om_EREP/201904/0618153151_365f589335 .pdf PTBA Website http://www.ptba.co.id/en/news/detail/811/ the-minutes-summary-of-annual-general- meeting-of-shareholders-for-financial-year- 2018
A.3.13	Do companies provide at least 21 days notice for all AGMs and EGMs?	PTBA AGMS 2019 dated 25 April 2019, the invitation of AGSM on April 2 nd 2019, and the Notice of AGMS (Announcement) on March 18 th 2019. According to abovementioned, the therefore the Notice of AGMS is 14 Days before Invitation of AGMS,	Invitation of AGMS http://www.ptba.co.id/en/news/detail/806/ invitation-to-shareholders Notice of AGMS (Announcement)

		and Invitation of AGMS is 21 Days before AGMS 2019.	http://www.ptba.co.id/en/news/detail/803/announcement-to-shareholders-mar-2019
A.3.14	Does the company provide the rationale and explanation for each agenda item which require shareholders' approval in the notice of AGM/circulars and/or the accompanying statement?	agenda of AGMS as stated on AGMS Invitation. Whereby in this AGMS, 5 Agenda is routine agendas and latest agenda (agenda 6 th) is additional agenda	Invitation of AGMS http://www.ptba.co.id/en/news/detail/806/ invitation-to-shareholders
A.3.15	Does the company give the opportunity for shareholder to place item/s on the agenda of AGM?	According to PTBA's Article Association Article 20 Paragraph (4), the shareholders either personally or in in group represent 1/10 or more total PTBA's shares are provided right to propose or place item/agenda of AGMS.	Article of Association http://www.ptba.co.id/pdf-files/PTBA%20Anggaran%20Dasar.pdf
A.4 Mar	kets for corporate control should be allo	wed to function in an efficient and transparent manner	
A.4.1	In cases of mergers, acquisitions and/or takeovers requiring shareholders approval, does the board of directors/commissioners of the offeree company appoint an independent party to evaluate the fairness of the transaction price	material transaction such as Investment Expansion, Divestment, Merger/Consolidation, Acquisition, Debt Restructuring ("Transaction"), whereby in 2018, there	Annual Report PTBA http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf
A.5 The	exercise of ownership rights by all share	holders, including institutional investors, should be facil	itated
A.5.1	Does the company disclose its practices to encourage shareholders to engage with the company beyond AGM?	PTBA has disclosed the best practice to encourage shareholders to engage to PTBA (excluded GMS), through such events: - Release (Analyst meeting and press conference Q-I	Release PTBA Performance 2018 http://www.ptba.co.id/en/investor/info-memo

 Release (Analyst meeting and press conference Q-II, dated July 25th 2018. Release (Analyst meeting and press conference Q-III, dated November 14th 2019) Release (Analyst meeting and press conference Final Year 2018, March 11th 2019). The information are disclosed on website menu Investor Relation: Info Memo. Beside those, PTBA also involve and active on several event that held by Indonesia Stock Exchange to engage the investor such as Public Expose in 2018 in 3 (three) cities in Indonesia 	hadiri-investor-summit-ptba-paparkan-
(three) cities in Indonesia. Also for frequency of One on One Meeting, Overseas NDR, Investor Gathering, Analyst Meeting, Public Expose, Info Memo, and Site Visit may be viewed on PTBA's Annual Report Page 342.	•

B. EQUITABLE TREATMENT OF SHAREHOLDERS

Part	Item	PTBA Year of 2018	Source Information		
A.1. Sha	A.1. Shares and Voting Rights				
B.1.1	Do the company's ordinary or common shares have one vote for	The Company implement one share one vote, as mentioned on:	Article of Association http://www.ptba.co.id/pdf-		
	one share?	 Article 25 Paragraph (10) Article of Association's PTBA. Code of Conduct of AGMS PTBA 	files/PTBA%20Anggaran%20Dasar.pdf		
B.1.2	Where the company has more than	PTBA's shares are classified into two shares	Article of Association		

	one class of shares, does the company publicise the voting rights attached to each class of shares (e.g. through the company website /	classification. They are (i) Series A Dwiwarna Shares within 5 shares, this shares is owned by founder of company or State of Republic of Indonesia represented by Minister of State Owned Enterprise	http://www.ptba.co.id/pdf-files/PTBA%20Anggaran%20Dasar.pdf
	reports/ the stock exchange/ the regulator's website)?	and (ii) Series B shares owned by 65,93% by PT Indonesia Asahan Aluminium (Persero) and around 30% of series B owned by public and 3,4% owned by PTBA (buy back).	
		According to PTBA's Article Association on Article 25, there are several agenda that shall be attend and be decided by Series A Dwiarna or its representative such as: (a) GMS to transfer or encumber company assets in or more 50% of total assets of company (b) GMS to change Board of Directors and Board of Commissioners, and change of Article of Association needed or not approval of Minister of Law and Human Rights, and to be decided by other Series B Shareholders. Other excluded agendas is equally treatment with other Series B.	
B.2 Notic	ce of AGM		
B.2.1	Does each resolution in the most recent AGM deal with only one item, i.e., there is no bundling of several items into the same resolution?	Each agenda and determination of each agenda is not related to other agenda. Each agenda and approval (determination) of each agenda may be viewed on PTBA's Summary of Minutes of Meeting AGMS 2019.	Summary of Minutes of AGMS http://www.ptba.co.id/id/berita/detail/680/ pengumuman-ringkasan-risalah-rapat- umum-pemegang-saham-tahunan-pt-bukit- asam-tbk
B.2.2	Are the company's notice of the most recent AGM/circulars fully translated into English and published on the same date as the local-language	The notice and invitation of AGMS in 2019 is fully translated in English and Indonesia Version. The Notice and Invitation are published in 3 medias as follow: (i) National News Paper (Kontan), (ii) Website	Invitation of AGMS English & Indonesia Version http://www.ptba.co.id/en/news/detail/806/ invitation-to-shareholders

	version?	PTBA, website PTBA. The Notice of AGMS on March 18 th 2019 while the Invitation of AGMS on April 2 nd 2019.	Notice of AGMS (Announcement) & Indonesia Version http://www.ptba.co.id/en/news/detail/803/announcement-to-shareholders-mar-2019
B.2.3	Are the profiles of directors/commissioners (at least age, academic qualification, date of first appointment, experience, and directorships in other listed companies) in seeking election/re-election included?	Enterprise (Minister of SoE) Number PER-03/MBU/02/2015 the Profile of Candidate of member of Board of Directors and/or Board of Commissioner is	
B.2.4	Are the auditors seeking appointment/re-appointment clearly identified?	• •	http://www.ptba.co.id/id/berita/detail/680/pengumuman-ringkasan-risalah-rapat-umum-pemegang-saham-tahunan-pt-bukit-asam-tbk

B.2.5	Were the proxy documents made	The proxy document or power of attorney ("POA")	Invitation of AGMS
	easily available?	format is provided by company that might be obtain	http://www.ptba.co.id/en/news/detail/806/
		by shareholders who name/share is registered until	<u>invitation-to-shareholders</u>
		recording date April 2 nd 2019. The disclosure of the	
		availability of proxy document or POA has been	
		disclosed by company on Invitation of AGMS through	
		to national newspaper (Kontan Newspaper),	
		Indonesia stock exchange website and website PTBA.	
B.3 Insi	der trading and abusive self-dealing shou	ld be prohibited	
B.3.1	Does the company have policies	PTBA has policies to prohibit every party in company	GCG Code
	and/or rules prohibiting	or related to company ("Insider Person") not to	http://www.ptba.co.id/pdf-
	directors/commissioners and	disclose any information that not available for public.	files/2panduantatakelolaperusahaanyangba
	employees to benefit from	Those policies are rules on some polies in PTBA such	kgcgcodeptba.pdf
	knowledge which is not generally	as:	
	available to the market?		Code of Conduct
		a. Good Corporate Governance ("GCG Code") page 37	http://www.ptba.co.id/pdf-
		to 38.	files/Code%20of%20Conduct%20PTBA%202
		b. Code of Conduct ("CoC") page 22.	<u>018.pdf</u>
		The disclosure of such policies also be disclosed in	Annual Report
		Annual Report PTBA Page 358 on disclosure of code	http://www.ptba.co.id/laporan_tahunan/an
		of conduct policy that stated Insider Perseroan shall	nual-report-2018.pdf
		procure the insider information.	
B.3.2	Are the directors / commissioners	According to PTBA Board Manual, any change of share	Report to BEI, Change of Share Ownership
	required to report their dealings in	ownership by member of Board of Directors and/or	https://www.idx.co.id/StaticData/NewsAnd
	company shares within 3 business	Board of Commissioner shall be reported to Financial	Announcement/ANNOUNCEMENTSTOCK/Fr
	days?	Service Authority ("OJK") and Indonesia Stock	om_EREP/201904/7837942dbc_7ac6030051
		1	16
		Exchange ("BEI"). The disclosure of mandatory	<u>.pdf</u>
		Exchange ("BEI"). The disclosure of mandatory disclosure of change of share ownership may be viewed on our report to BEI.	<u>.pdf</u>

B.4.1	Does the company have a policy requiring directors /commissioners to disclose their interest in transactions and any other conflicts of interest?	PTBA has policy that stipulate the mandatory disclosure for member of Board of Directors and/or Board of Commissioner regarding to conflict of interest, the policy may be viewed on Good Corporate Governance Code ("GCG Code") Page 36 and on Annual Report Page 395.	GCG Code http://www.ptba.co.id/pdf- files/2panduantatakelolaperusahaanyangbai kgcgcodeptba.pdf Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf
B.4.2	Does the company have a policy requiring a committee of independent directors/commissioners to review material/significant RPTs to determine whether they are in the best interests of the company and shareholders?	PTBA has Audit Committee under the Board of Commissioners to review material/significant RPTS to determine whether or not conflict of interest, the Policy is stipulated under Board of Commissioner Decree No. 08/SK/PTBA.DEKOM/XII/2012 (Audit Committee Charter), such disclosure may be viewed on PTBA's Annual Report Page 310.	Annual Report http://www.ptba.co.id/laporan_tahunan/an_nual-report-2018.pdf
B.4.3	Does the company have a policy requiring board members (directors/commissioners) to abstain from participating in the board discussion on a particular agenda when they are conflicted?	PTBA prohibits of every member of Board of Directors to participate and/or take the decision on the agenda regarding to conflict of interest of member of Board of Director its self. If there is any of Conflict of Interest, therefore the action shall be taken by (i) other member of Board of Directors that has no conflict of interest, (ii) if all Board of Directors are having conflict of interest so the action shall be taken by a member of Board of Commissioner appointed and has not conflict of interest and or (iii) all member of Board of Director and/or Board of Commissioner are having conflict of interest, therefore the GMS shall be taken an action for such transaction on behalf of company. The disclosure may be viewed on Article of	Article of Association http://www.ptba.co.id/pdf-files/PTBA%20Anggaran%20Dasar.pdf

		Association Anticle 12 Pages on the (24) and (22)	
		Association Article 12 Paragraph (21) and (22).	
B.4.4	Does the company have policies on	PTBA has policy regarding to transaction in between	GCG Code
	loans to directors and commissioners	the company and member of Board of Director and/or	http://www.ptba.co.id/pdf-
	either forbidding this practice or	Commissioner. The policies that are stipulated on	files/2panduantatakelolaperusahaanyangbai
	ensuring that they are being	conflict of interest policy that may be viewed on Good	kgcgcodeptba.pdf
	conducted at arm's length basis and	Corporate Governance Code ("GCG Code") Page 36	
	at market rates?	and on Annual Report Page 395.	Annual Report
			http://www.ptba.co.id/laporan_tahunan/an
			nual-report-2018.pdf
B.5 Prote	ecting minority shareholders from abusiv	ve actions	
	,		
B.5.1	Does the company disclose that RPTs	PTBA has disclosed the transactions with RPTs are	Code of Conduct
	are conducted in such a way to	conducted with fair and arm's length basis as stated	http://www.ptba.co.id/pdf-
	ensure that they are fair and at arms'	on Code of Conduct of PTBA Page 20 and page 36 for	files/Code%20of%20Conduct%20PTBA%202
	length?	GCG Code and for procurement goods and services in	<u>018.pdf</u>
		PTBA has disclosed, PTBA has the policy to prohibit	
		conflict of interest with related parties on Annual	GCG Code
		Report Page 378.	http://www.ptba.co.id/pdf-
			files/2panduantatakelolaperusahaanyangbai
			kgcgcodeptba.pdf
			Annual Report
			http://www.ptba.co.id/laporan_tahunan/an
			nual-report-2018.pdf
B.5.2	In case of related party transactions	According to PTBA's Article Association and	Annual Report
	requiring shareholders approval, is	Regulation X.E.1 Concerning on Material and Conflict	http://www.ptba.co.id/laporan_tahunan/an
	the decision made by disinterested	of Interest Transaction every transaction contained	nual-report-2018.pdf
	shareholders?	conflict of interest needs prior approval of GMS, but	
		along 2018 there was not material transaction	
		contained conflict of interest with company that	
		needs the approval of shareholder (general meeting	

PTBA's Annual Report Page 212.		of shareholders). The disclosure no material transaction and conflict interest may be viewed on PTBA's Annual Report Page 212.	
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C. ROLE OF STAKEHOLDERS

Part	ltem	PTBA Year of 2018	Source Information
	ACTICES that ADDRESS)	ed by law or through mutual agreements are to be respe	ected. (Does the company disclose a policy
C.1.1	The existence and scope of the company's efforts to address customers' welfare?	PTBA believes that costumers is key the future development of business company, therefore the PTBA sees the costumer's satisfaction is one fundamental part. To maintenance the costumer's satisfaction, PTBA has issued some policies as stipulated on Annual Report Page 462-465 as following policies: - Coal Sale Guideline - SOP of Costumer Communication - SOP of Maintenance of Costumer's Satisfaction - SOP of Non-Compliance Control.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf
C.1.2	Supplier/contractor selection procedures?	Supplier selection procedure or procurement procedure in PTBA is governed under Board of Directors Decree Number 123/KEP/Int-0100/2017 dated May 5 th 2019. This procedure conducted based on the Minister of State Owned Enterprise Number PER-05/MBU/2018 and its amendment, therefore all	Annual Report http://www.ptba.co.id/laporan_tahunan/an_nual-report-2018.pdf

		procurement goods and/or services according to such	
		of procedure. The disclosure of procurement	
		procedure is disclosed by PTBA on Annual Report	
		Page 377-378.	
C.1.3	The company's efforts to ensure that	Inline to PTBA's vision "to become world class energy	Annual Report
	its value chain is environmentally	company who responsible to environment", therefore	http://www.ptba.co.id/laporan_tahunan/an
	friendly or is consistent with	the environment be one of PTBA's aspect in every	nual-report-2018.pdf
	promoting sustainable development?	decision-making and company's policies. PTBA	
		believes that environment is one of key point to	Sustainability Report
		promoting sustainability development of company.	http://www.ptba.co.id/laporan_keberlanjut
		The disclosure against the responsibility and	an/laporan-keberlanjutan-2018.pdf
		commitment of Company against environment may	
		be viewed on:	
		- Annual Report of 2018 on Page 419- 439.	
		- Sustainability Report of 2018 on Page 103-135.	
C.1.4	The company's efforts to interact	PTBA believes the Stakeholders is one of key success	Annual Report
	with the communities in which they	of company. PTBA always interacts with local	http://www.ptba.co.id/laporan_tahunan/an
	operate?	Stakeholders annually. The disclosure of frequency of	nual-report-2018.pdf
		interaction with PTBA's Stakeholders may be viewed	
		on PTBA's Annual Report Page 413-14 and also PTBA's	Sustainability Report
		Sustainability Report on Page 10-11.	http://www.ptba.co.id/laporan_keberlanjut
			an/laporan-keberlanjutan-2018.pdf

C.1.5	The company's anti-corruption program and procedures?	Gratification as stipulated under Collective Decree of Board of Commissioners and Board of Director Number 16/SK/PTBA-KOM/XII/2013 and Number 337/KEP/Int-0100/PW.01/2013. Any party including person and/or legal entity are welcome to report to Company if any indication or knows the Bribery and Gratification is did or be given by PTBA's member of Board of Directors and/or Board of Commissioner and/or Employee (s) through to Whistle Blowing System that may be accessed on PTBA's website. The disclosure of Anti Bribery and Gratification is	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf Whistle Blowing System PTBA http://www.ptba.co.id/en/good-corporate- governance/whistle-blowing-system
C.1.6	How creditors' rights are safeguarded?	disclosed on PTBA's Annual Report Page 390-394. PTBA has not procedure on creditor rights because PTBA is not financial institution or bank that having business on financing, the disclosure may be viewed on PTBA's Annual Report Page 239 column 7.5, however PTBA respects to creditor's rights that may be viewed on PTBA's Annual Report Page 192-197.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf
C.1.7	Does the company have a separate report/section that discusses its efforts on environment/economy and social issues?	To comply with Circular Letter of Financial Services Authority No. 30/SEOJK.04/2016 concerning the Form and Content of Annual Report of issuers or Public Companies. PTBA also had made separate report on effort on environment/economy and social issues as in PTBA's Sustainability Report. y law, stakeholders should have the opportunity to obta	Sustainability Report http://www.ptba.co.id/laporan_keberlanjut an/laporan-keberlanjutan-2018.pdf ain effective redress for violation of their
rights.		, , , , , , , , , , , , , , , , , , , ,	
C.2.1	Does the company provide contact details via the company's website or Annual Report which stakeholders (e.g. customers, suppliers, general public etc.) can use to voice their	or annual Report to submit the critics from Stakeholders that may be viewed on:	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf Contact Us

	concerns and/or complaints for possible violation of their rights?	Company, and Page 462 for Costumer Complain Contact us on PTBA's Website.	http://www.ptba.co.id/en/contact- us/contact-us
C.3 Perf	 formance-enhancing mechanisms for emp	ployee participation should be permitted to develop.	
C.3.1	Does the company explicitly disclose the policies and practices on health, safety and welfare for its employees?	As mining company and subsidiary of SoE, Health and Safety (HSE) and also employee welfare is priority of company. The disclosure may be viewed for: - Health and Safety on PTBA's Annual Report Page 443-451. - Disclosure of policies and welfare for employees on PTBA's Annual Report Page 440-443.	Annual Report http://www.ptba.co.id/laporan_tahunan/annual-report-2018.pdf
C.3.2	Does the company explicitly disclose the policies and practices on training and development programmes for its employees?	As commitment of PTBA to develop skill of all employees PTBA created Training Need Analyst (TNA) Policy that functioned to fulfill the need of training or development of each employee in PTBA. PTBA also provides special fund that purposed to develop employees. The consistently commitment to develop all employee and practice may be viewed on PTBA's Annual Report Page 169-172.	Annual Report http://www.ptba.co.id/laporan_tahunan/annual-report-2018.pdf
C.3.3	Does the company have a reward/compensation policy that accounts for the performance of the company beyond short-term financial measures?	PTBA has policy to provide reward/compensation to	Annual Report http://www.ptba.co.id/laporan_tahunan/annual-report-2018.pdf

C.4.1	Does the company have a whistleblowing policy which include procedures for complaints by employees and other stakeholders concerning illegal and unethical behaviour and provide contact details via the company's website or annual	PTBA has policy on Whistle Blowing System (WBS) as procedure to complaint against illegal and unethical behavior of PTBA's each member of Board of Commissioners and/or Board of Directors and also for PTBA's Employee under Collective Decree of Board of Commissioners and Board of Directors Number 03/SK/PTBA-KOM/II/2019 and Number 043/KEP/Int-	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf Website PTBA (WBS) http://www.ptba.co.id/en/good-corporate- governance/whistle-blowing-system
	report?	0100/KEP/Int-0100/PW.01/2012. The disclosure against WBS may be viewed on: - PTBA's Annual Report Page 396-403; - Company Website on CGC Menu-Whistle Blowing System.	
C.4.2	Does the company have a policy or procedures to protect an employee/person who reveals illegal/unethical behaviour from retaliation?	member of Board of Directors, Board of	http://www.ptba.co.id/laporan_tahunan/an

D. DISLOSURE AND TRANSPARENCY

Part	ltem	PTBA Year of 2018	Source Information
D.1 Trans	sparent Ownership Structure		
D.1.1	Does the information on	PTBA has disclosed the information regarding the	Annual Report
	shareholdings reveal the identity of	ownership of shares holding 5% or more on PTBA's	http://www.ptba.co.id/laporan_tahunan/an
	beneficial owners, holding 5%	Annual Report Structure and Composition of	nual-report-2018.pdf
		Shareholders Page 91.	

	shareholding or more?		
D.1.2	Does the company disclose the direct and indirect (deemed) shareholdings of major and/or substantial shareholders?	PTBA has disclosed the information regarding the ownership on Annual Report Structure and Composition of Shareholders Page 90-92.	· · · · · · · · · · · · · · · · · · ·
D.1.3	Does the company disclose the direct and indirect (deemed) shareholdings of directors (commissioners)?	According to Law Number 40/2007 on Limited Liability Company, Financial Service Authority Regulation Number 11/POJK.04/2017, Company Article Association and Board Manual PTBA (Board of Directors and Boards of Commissioner Charter), PTBA shall disclose the shares owned by each member of Board of Directors and Board of Commissioner of PTBA. The disclosure may be viewed as following: - Shares owned by Board of Directors and Board of Commissioner on PTBA's Annual Report Page 91-92. - Incidental report is reported to Financial Service Authority and Indonesia Stock Exchange may be viewed for every change of shares of Board of Commissioner and/or Board of Directors, as stipulated on Indonesia Stock Exchange Website.	
D.1.4	Does the company disclose the direct and indirect (deemed) shareholdings of senior management?	As organization PTBA has not senior executive management, therefore no information provided by PTBA.	-

D.1.5	Does the company disclose details of the parent/holding company, subsidiaries, associates, joint ventures and special purpose enterprises/ vehicles (SPEs)/ (SPVs	company on PTBA's website and detail of PTBA's Group (vertically) including PTBA's Direct and Indirect	Indonesia Mining Industry's Structure (Website)/Holding Structure http://www.ptba.co.id/en/about- us/organization Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf
	ity of Annual Report		
D.2.1	company's annual report disclose the force of the company's annual report disclose the company's annu	To achieve the purpose of Company and key success of business of company PTBA has stipulated its objectives on its Vision and Mission and also Corporate Cultures that disclosed by Company on PTBA's Website and Annual Report PTBA's Page 68-69.	PTBA Website (Vision & Mission) http://www.ptba.co.id/en/about- us/company-profile Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf
D.2.2	Financial performance indicators	PTBA has performance indicator for financial, the disclosure may be viewed on Annual Report PTBA "Financial Highlights" Page 10-13.	Annual Report http://www.ptba.co.id/laporan_tahunan/an_nual-report-2018.pdf
D.2.3	Non-financial performance indicators	PTBA also has the indicator to measure the non-financial matters, the indicator is based on the approaching of "Operational Highlights" that contain the information about Production, Purchasing, Railway Capacity, and Selling. The disclosure may be	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf

		viewed on PTBA's Annual Report Page 13-14.	
D.2.4	Dividend policy	As listed company that already gain profit more the its	Annual Report
	, ,	reserved, according to Law Number 40 of 2017 on	http://www.ptba.co.id/laporan_tahunan/an
		Limited Liability Company is compulsory to pay	nual-report-2018.pdf
		dividend to its shareholders. The dividend policy is	
		disclosed by PTBA on PTBA's Annual Report Page 211	PTBA Website
		and PTBA website.	http://www.ptba.co.id/en/investor/dividend
D.2.5	Biographical details (at least age,	Biographical Detail of PTBA's Board of Directors and	Annual Report
	qualifications, date of first	Board of Commissioner are disclosed on PTBA's	http://www.ptba.co.id/laporan_tahunan/an_
	appointment, relevant experience,	Annual Report Page 70 – 89 and PTBA's Website on	nual-report-2018.pdf
	and any other directorships of listed	menu About Us-Organization.	
	companies) of		PTBA Website
	directors/commissioners		http://www.ptba.co.id/en/about-
			<u>us/organization</u>
D.2.6	Attendance details of each	During 2018, PTBA had 2 (two) GMS, AGMS in April	Summary Minutes of AGMS
D.2.0	director/commissioner in all	11, 2018 and EGMS in December, 28 2018. During the	Summary Minutes of Activity
	directors/commissoners meetings	AGMS all Board of Commissioner and Board of	http://www.ptba.co.id/en/news/detail/680/
	held during the year	Director were attended, and During EGMS, there are	pengumuman-ringkasan-risalah-rapat-
	,	only one of member of Board of Commissioners was	umum-pemegang-saham-tahunan-pt-bukit-
		not attend the meeting name "Mr. Purnomo	asam-tbk
		Sinarhadi" due of Hajj (religion reason). The disclosure	
		of Attending of Boards may be viewed on Summary	
		Minutes AGSM and EGMS.	Summary Minutes of EGMS
			http://www.ptba.co.id/en/news/detail/782/
			pengumuman-ringkasan-risalah-rapat-
			umum-pemegang-saham-luar-biasa-pt-
			<u>bukit-asam-tbk</u>
D.2.7	Total remuneration of each member	Total and breakdown remuneration of each member	Annual Report
	of the board of	of Board of Directors and Board Commissioner are	http://www.ptba.co.id/laporan_tahunan/an
		disclosed on PTBA's Annual Report Page 282.	nual-report-2018.pdf

D.2.8 Does the Annual Report contain a statement confirming the company's full compliance with the code of corporate governance and where there is non-compliance, identify and explain reasons for each such issue? D.3. Disclosure of Related Party Transaction (RPTs)	oran tahunan/an
D.2.8 Does the Annual Report contain a statement confirming the company's full compliance with the code of corporate governance and where there is non-compliance, identify and explain reasons for each such issue? D.3. Disclosure of Related Party Transaction (RPTs) D.3.1 Does the Annual Report contain a statement confirming the company's full compliance with the code of corporate governance and where there is non-compliance, identify and explain reasons for each such issue? D.3. Disclosure of Related Party Transaction (RPTs) D.3.1 Does the Annual Report contain a statement confirming the company's full compliance and non-compliance may be viewed on Annual Report PTBA Page 379-380 and also the checklist of Fully Comply and Non Compliance as Appendix of Circular Letter of Financial Service Authority Number 32/SEOJK03/2015 as mentioned on Annual Report Page 236-240. D.3. Disclosure of Related Party Transaction (RPTs) D.3.1 Does the Company disclose its policy covering the review and approval of material/significant RPTs? D.3.1 Disclosure of Related Party Transaction (RPTs) D.3.2 Disclosure of Related Party Transaction (RPTs) D.3.3 Disclosure of Related Party Transaction (RPTs) D.3.4 Disclosure of Related Party Transaction (RPTs) D.3.5 Disclosure of Related Party Transaction (RPTs) D.3.6 Disclosure of Related Party Transaction (RPTs) D.3.7 Disclosure of Related Party Transaction (RPTs) D.3.6 Disclosure of Related Party Transaction (RPTs) Does the company disclose its policy regarding to transaction with related party (affiliation of company) as stated on Good Corporate Governance Code Page 36 and Code of Code http://www.ptba.co.id/pdf files/2panduantatakelolape kgcgcodeptba.pdf Code of Conduct http://www.ptba.co.id/pdf files/Code%20of%20Conduct	oran tahunan/an
statement confirming the company's full compliance with the code of corporate governance and where there is non-compliance, identify and explain reasons for each such issue? D.3. Disclosure of Related Party Transaction (RPTs) D.3.1 Does the company disclose its policy covering the review and approval of material/significant RPTs? D.3.1 Conduct Code Page 20. PTBA has policy regarding to transaction with related party (affiliation of company) as stated on Good Corporate Governance Code Page 36 and Code of Conduct Code Page 20. http://www.ptba.co.id/laps.nual-report-2018.pdf http://www.ptba.co.id/laps.nual-report-2018.pdf nual-report-2018.pdf nual-	oran tahunan/an
full compliance with the code of corporate governance and where there is non-compliance, identify and explain reasons for each such issue? D.3. Disclosure of Related Party Transaction (RPTs) D.3.1 Does the company disclose its policy covering the review and approval of material/significant RPTs? D.3.1 Compliance and non-compliance may be viewed on Annual Report PTBA Page 379-380 and also the checklist of Fully Comply and Non Compliance as Appendix of Circular Letter of Financial Service Authority Number 32/SEOJK03/2015 as mentioned on Annual Report Page 236-240. PTBA has policy regarding to transaction with related party (affiliation of company) as stated on Good Corporate Governance Code Page 36 and Code of Conduct Code Page 20. Code of Conduct http://www.ptba.co.id/pdf files/Code%20of%20Conduct http://www.ptba.co.id/pdf files/Code%	oran tahunan/an
corporate governance and where there is non-compliance, identify and explain reasons for each such issue? D.3. Disclosure of Related Party Transaction (RPTs) D.3.1 Does the company disclose its policy covering the review and approval of material/significant RPTs? D.3.1 Does the company disclose its policy covering the review and approval of material/significant RPTs? Annual Report PTBA Page 379-380 and also the checklist of Fully Comply and Non Compliance as Appendix of Circular Letter of Financial Service Authority Number 32/SEOJK03/2015 as mentioned on Annual Report Page 236-240. D.3.1 Does the company disclose its policy covering the review and approval of material/significant RPTs? Does the company disclose its policy covering the review and approval of material/significant RPTs? Corporate Governance Code Page 36 and Code of Conduct Apple Mittp://www.ptba.co.id/pdf files/Code%20of%20Conduct Apple M	
there is non-compliance, identify and explain reasons for each such issue? Appendix of Circular Letter of Financial Service Authority Number 32/SEOJK03/2015 as mentioned on Annual Report Page 236-240. D.3. Disclosure of Related Party Transaction (RPTs) D.3.1 Does the company disclose its policy covering the review and approval of material/significant RPTs? PTBA has policy regarding to transaction with related party (affiliation of company) as stated on Good Corporate Governance Code Page 36 and Code of Conduct Code Page 20. GCG Code http://www.ptba.co.id/pdf files/2panduantatakelolapekgcgcodeptba.pdf Code of Conduct http://www.ptba.co.id/pdf files/Code%20conduct http:/	
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Authority Number 32/SEOJK03/2015 as mentioned on Annual Report Page 236-240. D.3. Disclosure of Related Party Transaction (RPTs) Does the company disclose its policy covering the review and approval of material/significant RPTs? PTBA has policy regarding to transaction with related party (affiliation of company) as stated on Good Corporate Governance Code Page 36 and Code of Conduct Code Page 20. Code of Conduct http://www.ptba.co.id/pdf files/Code%20of%20Conduct files/Code%20of%20Conduct http://www.ptba.co.id/pdf files/Code%20o	
Annual Report Page 236-240. D.3. Disclosure of Related Party Transaction (RPTs) Does the company disclose its policy covering the review and approval of material/significant RPTs? Does the company disclose its policy covering the review and approval of material/significant RPTs? PTBA has policy regarding to transaction with related party (affiliation of company) as stated on Good Corporate Governance Code Page 36 and Code of Conduct Code Page 20. Code of Conduct Code of Conduct http://www.ptba.co.id/pdf files/Code%20of%20Conduct http://www.ptba.co.id/pdf files/Code%20of%20Conduc	
D.3. Disclosure of Related Party Transaction (RPTs) Does the company disclose its policy covering the review and approval of material/significant RPTs? PTBA has policy regarding to transaction with related party (affiliation of company) as stated on Good Corporate Governance Code Page 36 and Code of Conduct Code Page 20. Code of Conduct http://www.ptba.co.id/pdf_files/Code%20of%20Conduct_http://www.ptba.co.id/pdf_files/Code%20o	
D.3.1 Does the company disclose its policy covering the review and approval of material/significant RPTs? PTBA has policy regarding to transaction with related party (affiliation of company) as stated on Good Corporate Governance Code Page 36 and Code of Conduct Code Page 20.	
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material/significant RPTs? Corporate Governance Code Page 36 and Code of Conduct Code Page 20. files/2panduantatakelolapekgcgcodeptba.pdf Code of Conduct http://www.ptba.co.id/pdffiles/Code%20of%20Conduct	
Conduct Code Page 20. kgcgcodeptba.pdf Code of Conduct http://www.ptba.co.id/pdf files/Code%20of%20Condu	<u>-</u>
Code of Conduct http://www.ptba.co.id/pdf files/Code%20of%20Condu	rusahaanyangbai
http://www.ptba.co.id/pdf- files/Code%20of%20Condu	
http://www.ptba.co.id/pdf- files/Code%20of%20Condu	
files/Code%20of%20Condu	
	_
018.pdf	ct%20PTBA%202
D.3.2 Does the company disclose the name, During 2018, PTBA has not material transaction Annual Report	
relationship, nature and value for Contains of Conflict of Interest and/or Transaction http://www.ptba.co.id/lapo	oran_tahunan/an
each significant/material RPTs? with Related Party. The disclosure of such statement nual-report-2018.pdf	
may be viewed on PTBA's Annual Report Page 212.	
D.4 Does the company disclose trading in the company's shares by insiders?	
D.4.1 Does the company disclose trading in The company always discloses the company's share Annual Report	
the company's shares by insiders? transaction by insider, it governed under Financial http://www.ptba.co.id/lapo	
Service Regulation No. 11/POJK.04/2017, Article of nual-report-2018.pdf	oran tahunan/an

D.5 Exte	rnal auditor and Auditor Report	Association, Board Manual (Boards Charters). Every change of share of member of Boards is reported also to Financial Service Authority and Indonesia Stock Exchange Web. The disclosure of share's company transaction by insider is disclosed on PTBA's Annual Report Page 91-92 and Indonesia Stock Exchange Website.	Indonesia Stock Exchange Website (Change of Board's Shares) https://www.idx.co.id/StaticData/NewsAnd Announcement/ANNOUNCEMENTSTOCK/Fr om_EREP/201904/7837942dbc_7ac6030051 .pdf
	he same audit firm is engaged for both a		<u></u>
D.5.1	Are the audit and non-audit fees disclosed? Does the non-audit fee exceed the audit fees?	The audit (Financial Statement Consolidated) (PKBL Financial Statement) are disclosed on Annual Report For Five years from 2014 – 2018. In 2018 the Fee Audit is Rp1.408.000.000 is done by Public Accounting Office Purwantono Sungkoro & Surja Member of Ernts & Young/EY The disclosure of audit fee may be viewed on Annual Report Page 351-353. During 2018, there is non-audit work by PTBA's auditor (Public Accounting Office Purwantono	Annual Report http://www.ptba.co.id/laporan_tahunan/an_nual-report-2018.pdf
		Sungkoro & Surja Member of Ernts & Young/EY).	
D.6 Med	lium of communications		
D.6.1	Quarterly reporting	As the Regulation Indonesia Stock Exchange Number I-E of 2004, PTBA as public listed company has an obligation to release the Quarterly Report to public. The Company had released Financial Statement Quarterly. The Disclosure through National Newspaper, Indonesia Stock Exchange Website, and PTBA Website one of the example may be viewed on	PTBA Website (Quarterly Report) http://www.ptba.co.id/en/company- report/quarterly-financial-report

		PTBA Website.	
D.6.2	Company website	PTBA has used website as one of media to	PTBA Website
		communicate with PTBA's Stakeholders. The PTBA	http://www.ptba.co.id/en
D. C. O.	A 1 11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	website may be accessed on ptba.co.id	
D.6.3	Analyst's briefing	As one of tool to communicate with analyst PTBA	Annual Report
		used the Analyst Meeting every Quarterly. The disclosure may be viewed on PTBA's Annual Report	http://www.ptba.co.id/laporan_tahunan/an_nual-report-2018.pdf
		Page 342 and PTBA Website regarding PTBA	<u>Indal-report-2018.pdf</u>
		Corporate Presentation.	PTBA Website
		·	http://www.ptba.co.id/en/company-
			report/company-presentation
D.6.4	Media briefings /press conferences	PTBA also use press conference as medium of	Annual Report
	5 /1	communication to public. During 2018, PTBA has done	http://www.ptba.co.id/laporan_tahunan/an
		press conference regarding PTBA's Performance	nual-report-2018.pdf
		Quarterly (4 times). The disclosure may be viewed on	
		PTBA's Annual Report Page 342 and Info Memo.	
			Website PTBA (Info Memo)
			http://www.ptba.co.id/en/investor/info-
			<u>memo</u>
D.7 Tin	nely filing/release of annual/financial rep	orts	
D.7.1	Are the audited annual financial	According to Regulation BAPEPAM LK Number X.K.2	Indonesia Stock Exchange Website (Evidence
	report / statement released within	and Indonesia Stock Exchange Regulation Number I-E	of News Paper Audited Financial Statement)
	120 days from the financial year end?	of 2004, The Annual Audited Financial Statement shall	
		be filling and disclose to after the months of closing of	https://www.idx.co.id/perusahaan-
		year (meaning end of March on next year). PTBA had filled Annual Audit Financial Statement for 2018 on	tercatat/keterbukaan-informasi/
		March 12 th 2019 that disclosed on Two National	Indonesia Stock Exchange Website (Audited
		Newspaper (Bisnis Indonesia and Kontan), Indonesia	Financial Statement)
		Stock Exchange and PTBA's Website.	
		Stock exchange and PTBA's Website.	

			tercatat/keterbukaan-informasi/ PTBA Website (Audited Financial Statement) http://www.ptba.co.id/en/company-report/quarterly-financial-report
D.7.2	Is the annual report released within 120 days from the financial year end?	According to Financial Service Authority Regulation Number 29/POJK.04/2019 on Annual Report Issuer or Public Company, a public listed company is obligated to submit its Annual Report no more than end of April after the end of financial year. PTBA has disclosed its Annual Report on April 2 nd 2019 as reported and disclosed to Financial Service Authority, Indonesia Stock Exchange and PTBA's Website.	Website Indonesia Stock Exchange (Disclosure Annual Report) www.idx.co.id/StaticData/NewsAndAnnounc ement/ANNOUNCEMENTSTOCK/From EREP /201904/009e8ff21d 7489f9a2f0.pdf PTBA Website (Annual Report Disclosure) http://www.ptba.co.id/en/company-report/annual-report
D.7.3	Is the true and fairness/fair representation of the annual financial statement/reports affirmed by the board of directors/commissioners and/or the relevant officers of the company?	According to Financial Service Authority Number 29/POJK.04/2019 on Annual Report Issuer or Public Company, public listed company is obligate to disclose its statement of truth from Board related to Annual Report, and according to Financial Service Authority Regulation Number 75/POJK.04/2017 on Responsibility of Board of Directors on Financial Statement, the Financial Statement shall be signed by President Director and Director of Finance. The disclosure may be viewed: - For statement of truth of Boards on Standalone Page of Latest Page of Annual Report.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf Financial Statement Audited http://www.ptba.co.id/en/company- report/audit-financial-report

		- For Financial Statement may be viewed on statement of truth on Financial Statement.	
D.8 Con	npany website (Does the company have	a website disclosing up-to-date information on the follow	wing:)
Does th	e company have a website disclosing up	-to-date information on the following:	
D.8.1	Financial statements/reports (latest quarterly)	PTBA has disclose Financial Statement Quarterly in 2018, according to applicable law and regulation. The The Disclosure of Financial Statement may be viewed on PTBA's Website.	PTBA Website (Quarterly Financial Statement) http://www.ptba.co.id/en/company-report/quarterly-financial-report
D.8.2	Materials provided in briefings to analysts and media	PTBA has disclosed the material briefing to analyst and media on Corporate Presentation and Info Memo (Press Release), the disclosure may be viewed on PTBA's Website	Website PTBA (Corporate Presentation) http://www.ptba.co.id/en/company- report/company-presentation Website PTBA (Press Release/Info Memo) http://www.ptba.co.id/en/investor/info- memo
D.8.2	Downloadable annual report	PTBA has disclosed Annual Report PTBA from 2012-2018 Fiscal Year that available to access and download on PTBA's Website.	Website PTBA (Downloadable Annual Report) http://www.ptba.co.id/en/company-report/annual-report
D.8.3	Notice of AGM and/or EGM	According to Financial Service Authority Number 32/POJK.04/2012 on AGMS Public Company and its amendment, public listed company shall inform Notice of GMS available to public trough one Indonesia News Paper, Indonesia Stock Exchange Website PTBA. The Notice of AGMS may be viewed one, on PTBA Website (Investor Relation-GMS)	PTBA Website (Notice of GMS or Announcement and Invitation) http://www.ptba.co.id/en/investor/general-meeting-of-shareholders
D.8.4	Minutes of AGM and/or EGM	Minutes of GMS also may be viewed on PTBA's Website (Investor Relation-GMS)	PTBA Website (Minute Summary of GMS) http://www.ptba.co.id/en/investor/general-

			meeting-of-shareholders
D.8.6	Company's constitution (company's	According to Financial Service Authority Number	Website PTBA (Article of Association)
	by-laws, memorandum and articles of	8/POJK.04/2015 on Website of Issuer or Public	
	association)	Company, a public listed company shall provide	http://www.ptba.co.id/en/good-corporate-
		information of Article of Association on its Website.	<pre>governance/good-corporate-governance</pre>
		PTBA has disclose its Article Association on its	
		Website (GCG-Good Corporate Governance-Article of	
		Association)	
D.9 Inve	estor relations		
D.9.1	Does the company disclose the	The information of contact detail for investor may be	Annual Report
	contact details (e.g. telephone, fax,	contact to Corporate Secretary or Investor Relation	http://www.ptba.co.id/en/company-
	and email) of the officer / office	Manager on Annual Report 2018 Page 53 and Contact	report/annual-report
	responsible for investor relations?	Us Menu on PTBA's Website.	
			Contact Us
			http://www.ptba.co.id/en/contact-
			<u>us/contact-us</u>

E. RESPOSIBILITIES OF THE BOARD

Part	ltem	PTBA Year of 2018	Source Information		
E.1 Board	E.1 Board Duties and Responsibilities				
Clearly defined board responsibilities and corporate governance policy					
E.1.1	Does the company disclose its	PTBA has disclosed corporate governance policy	Website PTBA (GCG Disclosure)		
	corporate governance policy / board	(Good Corporate Governance Code) and Board	http://www.ptba.co.id/id/tata-kelola/tata-		

	charter?	Manual (Board Charter) on PTBA's website on Menu GCG-Good Corporate Governance.	kelola-perusahaan
E.1.2	Are the types of decisions requiring board of directors/commissioners' approval disclosed ?	According to Article 12 Paragraph (7) (8) (9) (1) of Article of Association PTBA, there are several decision of Board of Director need approval of Board of Commissioners and/or GMS. The disclosure of Board of Directors that need for approval of Board of Commissioners may be viewed on PTBA's Annual Report Page 258-262.	Article of Association http://www.ptba.co.id/en/good-corporate- governance/good-corporate-governance Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf
E.1.3	Are the roles and responsibilities of the board of directors/commissioners clearly stated ?	The role and responsibility of Board of Commissioners and Board of Directors are clearly disclosed by PTBA on - Board of Commissioners roles and responsibilities may be viewed on Annual Report Page 257-263. - Board of Directors roles and responsibilities may be viewed on Annual Report Page 268-275.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf
Corporat	e Vision/Mission		
E.1.4	Does the company have an updated vision and mission statement?	PTBA has updated new vision and mission and also corporate value by 2013. The disclosure of vision and mission of PTBA may be viewed on PTBA website and Annual Report Page 68-69.	PTBA's Website (Vision and Mission) http://www.ptba.co.id/en/about- us/company-profile Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf

E.1.5	Does the board directors play a leading role in the process of developing and reviewing the company's strategy at least annually?	In PTBA Board of Directors create Work Plan and Budget and be evaluated and review together with Board of Commissioners as stated on Article 17 of PTBA's Article of Association, beside that Board of Commissioners on several Board of Directors Decision shall give the approval. The disclosure also may be viewed on Annual Report Page 33.	Article of Association http://www.ptba.co.id/en/good-corporate-governance Annual Report http://www.ptba.co.id/laporan_tahunan/an_nual-report-2018.pdf
E.1.6	Does the board of directors have a process to review, monitor and oversee the implementation of the corporate strategy? rd Structure Code of Ethics or Conduct	Board of Directors has a vital role review of target and its implementation. The Board of Director evaluated the Work Plan and Budget and be advised by Board of Commissioner accordingly, It is stated on Article 17 of PTBA's Article of Association, beside that Board of Commissioners on several Board of Directors Decision shall give the approval. The disclosure also may be viewed on Annual Report Page 33.	Article of Association http://www.ptba.co.id/en/good-corporate-governance Annual Report http://www.ptba.co.id/laporan_tahunan/an_nual-report-2018.pdf
Door th	o company's appual report disclose the f	allowing itom	
E.2.1	Are the details of the code of ethics or conduct disclosed?	PTBA has disclosed detail of Code of Conduct on: - PTBA Website (Menu GCG-Good Corporate Governance-Code of Conduct) PTBA's Annual Report Page 386-390	PTBA Website (Code of Conduct) http://www.ptba.co.id/en/good-corporate- governance/good-corporate-governance Annual Report (Code of Conduct) http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf
E.2.2	Are all the directors/commissioners, senior management and employees required to comply with the code/s?	All member of Board of Commissioners, Board of Directors, management, and employee shall sign the statement of conduct to Code of Conduct for 2 Years and shall be renewed. The Disclosure may be viewed	Annual Report http://www.ptba.co.id/laporan_tahunan/an_nual-report-2018.pdf

		the key toward of focused development GCG" year 2018 Page 231-233.	
E.2.3	Does the company have a process to implement and monitor compliance with the code/s of ethics or conduct?	PTBA has the procedure to implement and monitoring the compliance of Code of Conduct, the Board of Directors appointed Risk Management System and Management System of Company unit to control the compliance of Code of Conduct and socialize the Code of Conduct Regularly to all parties in PTBA. The disclosure may be viewed on PTBA's Annual Report Page 389-390 (Dissemination & Enforcement of The Code of Conduct).	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf
Board St	ructure & Composition		
E.2.4	Do Independent directors/commissioners make up at least 50% of the board of directors/commissioners?	As public listed company PTBA shall has Commissioner Independent. According to Financial Service Authority Regulation Number 33 PTBA has 2 (two) independent commissioners, compared with all member of Board of Commissioner in totally 6 (six), therefore the Independent Commissioner in percentage 33,33% of Board The Disclosure may be viewed on Annual Report Page 303. While according to PTBA disclosure on Indonesia Stock Exchange all member of Board of Directors is independent directors.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf PTBA Profile (Indonesia Stock Exchange Website) https://www.idx.co.id/en-us/listed- companies/company-profiles/company- profile-detail/?kodeEmiten=PTBA
E.2.5	Does the company have a term limit of nine years or less or 2 terms of five years ¹ each for its independent directors/commissioners? ¹ The five years term must be required by legislation which preexisted the introduction of the ASEAN Corporate Governance	According to PTBA's Article of Association, either independent or not of Board of Director has term of office for 5 (five years) and be appointed in second period within term of office 5 (five) years. The disclosure may be viewed on Article of Association Article 14 Paragraph (4) for Board of Commissioners and Article 11 Paragraph (12).	Article of Association www.ptba.co.id/pdf- files/PTBA%20Anggaran%20Dasar.pdf

	Scorecard in 2011		
E.2.6	Has the company set a limit of five board seats that an individual independent/ non-executive director/commissioner may hold simultaneously	According to Article 14 Paragraph (26) the term of office of member of Board of Commissioner (including independent commissioner) may expire in condition of resignation, dead, dismissed by GMS, bankruptcy, not meet with requirement of Article of Association and applicable law, and also according to Article 14 Paragraph (29) any double position that prohibit to be doubled. The disclosure may be viewed on Article 14 Paragraph (26) and (29) Article of Association.	www.ptba.co.id/pdf- files/PTBA%20Anggaran%20Dasar.pdf
E.2.7	Does the company have the executive directors who serve more than two boards of listed companies outside of the group?	There is no Board of Director and or Board of Commissioner hold other position either as Director and/or Commissioner in other public listed company.	Annual Report http://www.ptba.co.id/laporan_tahunan/an_nual-report-2018.pdf
E.2.8	Does the company have a Nominating Committee (NC)?	PTBA had Nomination Committee under Board of Commissioner, the committee name "Business Risk, Nomination, Remuneration and Human Resources Development". The disclosure may be viewed on Annual Report Page 321 an PTBA's Website GCG-Audit Committee and Business Risk.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf PTBA Website http://www.ptba.co.id/en/good-corporate- governance/the-audit-committee

E.2.9	Is the Nominating Committee comprised of a majority of Independent directors/commissioners?	The Nomination Committee (Business Risk, Nomination, Remuneration and Human Resources Development Committee) consist of 6 person, 1 independent commissioner, 3 commissioner and 2 other person (out of Board) are independent. The disclosure may be viewed on PTBA's Annual Report Page 323.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf
E.2.10	Is the chairman of the Nominating Committee an independent director/commissioner?	The chairman of Nomination Committee (Business Risk, Nomination, Remuneration and Human Resources Development Committee) is Mr. Agus Suhartono as President of Commissioner and Independent Commissioner. The disclosure may be viewed on Annual Report Page 323 and Website PTBA.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf PTBA Website http://www.ptba.co.id/en/good-corporate- governance/the-audit-committee
E.2.11	Does the company disclose the terms of reference/governance structure/charter of the Nominating Committee?	PTBA has disclosed Charter of Nomination (Business Risk, Nomination, Remuneration and Human Resources Development Committee) on PTBA Website.	http://www.ptba.co.id/en/good-corporate- governance/the-audit-committee
E.2.12	Is in the meeting attendance of the Nominating Committee disclosed and if so, did the Nominating Committee meet at least twice during the year?	The Meeting attendance of Nomination Committee of PTBA Business Risk, Nomination, Remuneration and Human Resources Development Committee) is disclosed on Annual Report, the meeting is did at least one a month, during 2018 there are 12 meetings. The disclosure may be viewed on PTBA's Annual Report Page 336.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf
E.2.13	Does the company have a Remuneration Committee?	PTBA has Remuneration Committee under Board of Commissioner that be one committee on Business Risk, Nomination, Remuneration and Human Resources Development Committee.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf

		The disclosure may be viewed on Annual Report Page 321 an PTBA's Website GCG-Audit Committee and Business Risk.	PTBA Website http://www.ptba.co.id/en/good-corporate- governance/the-audit-committee
E.2.14	Is the Remuneration Committee comprised of a majority of Independent Directors/ Commissioners?	The Remuneration Committee (Business Risk, Nomination, Remuneration and Human Resources Development Committee) consist of 6 person, 1 independent commissioner, 3 commissioner and 2 other person (out of Board) are independent. The disclosure may be viewed on PTBA's Annual Report Page 323.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf
E.2.15	Is the chairman of the Remuneration Committee an independent director/commissioner?	According to Article 3 Financial Service Authority Number 34/POJK.04/2014, the Chairman of Committee of Nomination and Remuneration Issuer or Public Company shall be independent commissioner. Therefore in PTBA, the chairman of remuneration committee Mr Agus Suhartono is President Commissioner and Independent Commissioner. The disclosure may be viewed on Annual Report page 323 and PTBA Website.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf PTBA Website http://www.ptba.co.id/en/good-corporate- governance/the-audit-committee
E.2.16	Does the company disclose the terms of reference/governance structure/charter of the Remunerations Committee?	PTBA has disclosed Charter for Remuneration Committee (Business Risk, Nomination, Remuneration and Human Resources Development Committee) on PTBA's Website.	Website PTBA http://www.ptba.co.id/en/good-corporate-governance/the-audit-committee
E.2.17	In the meeting attendance of the Remuneration Committee disclosed and if so, did the Remuneration Committee meet at least twice during the year?	The Meeting attendance of Remuneration Committee of PTBA (Business Risk, Nomination, Remuneration and Human Resources Development Committee) is disclosed on Annual Report, the meeting is did at least one a month, during 2018 there are 12 meetings.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf

Audit Co		The disclosure may be viewed on PTBA's Annual Report Page 336.	
	mmittee		T
E.2.18	Does the company have an Audit Committee?	As mandatory of Financial Service Authority Regulation Number 55/POJK.04/2015, PTBA as public listed company shall has Audit Committee. The committed under Board of Commissioner, as the disclosed on PTBA Annual Report Page 302 and PTBA Webste-GCG-Audit Committee and Business Risk.	Annual Report http://www.ptba.co.id/laporan_tahunan/an_nual-report-2018.pdf PTBA Website http://www.ptba.co.id/en/good-corporate-governance/the-audit-committee
E.2.19	Is the Audit Committee comprised entirely of non-executive directors/commissioners with majority of independent directors/commissioners?	PTBA's Audit Committee consist of 4 members,1 (one) is independent commissioner, 1 commissioner, and 2 independent person (out of Board of Commissioner). Therefore the audit committee comprised by independent person. The disclosure may be viewed on PTBA's Annual Report Page 304.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf
E.2.20	Is the chairman of the Audit Committee an Independent Director/Commissioner?	According to Financial Service Authority Regulation Number 55/POJK.04/2015 the chairman of audit committee shall independent commissioner. In PTBA the chairman of Audit Committee is Mr. Soenggoel Padamean Sitorus. The disclosure may be viewed on PTBA Website and Annual Report Page 304-305.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf PTBA Website http://www.ptba.co.id/en/good-corporate- governance/the-audit-committee
E.2.21	Does the company disclose the terms of reference/ governance structure/charter of the Audit Committee?	, , , , , , , , , , , , , , , , , , , ,	PTBA Website http://www.ptba.co.id/en/good-corporate- governance/the-audit-committee

E.22	Does at least one of the independent directors/ commissioners of the committee have accounting expertise (accounting qualification or experience)?	Number 55/POJK.04/2015, the independent commissioner shall be independent commissioner. In	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf
E.23	Is the meeting attendance of the Audit Committee disclosed and, if so, did the Audit Committee meet at least four during the year	The Audit Committee has meet for meeting in 2018 is 12 times is disclosed on PTBA's Annual Report Meeting Frequency and attendion of Audit Committee on PTBA Annual Report Page 319.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf
	Does the Audit Committee have primary responsibility for recommendation on the appointment, and removal of the external auditor?	According to Financial Service Regulation Number 13/POJK.03/2019, the Audit Committee has role to provide recommendation appointment. The disclosure may be viewed on PTBA's Annual Report Page 314 (Process Selection of Public Accountant)	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf
	rd Process Neeting and Attendance		
E.3.1	Are the board of directors meeting scheduled before the start of financial	According to Article of Association the Board Meeting is scheduled by previous meeting decree.	Article of Association www.ptba.co.id/pdf-
	year?	is somedica by previous meeting decree.	files/PTBA%20Anggaran%20Dasar.pdf
E.3.2	Does the board of directors/commissioners meet at least six times during the year?	According to Annual Report the meeting has conducted as follows: - Board of Commissioner Meeting: 12 times (annual Report Page 284). - Board of Directors Meeting: 30 times (Annual Report Page 286). - Board Commissioners and Board of Director	Annual Report http://www.ptba.co.id/laporan_tahunan/an_nual-report-2018.pdf

		Meeting: 12 times (Annual Report Page 296)	
E.3.3	Has each of the directors/commissioners attended at least 75% of all the board meetings held during the year?	From table of frequency of either Board of Director Meeting, Board of Director Meeting, and joint meeting (Board of Directors and Board of Commissioner Meeting), the attendance of each member is/or more than 75%. The disclosure may be viewed on Annual Report Page 286-298.	Annual Report http://www.ptba.co.id/laporan_tahunan/an_nual-report-2018.pdf
E.3.4	Does the company require a minimum quorum of at least 2/3 for board decisions?	According to Article of Association PTBA, the meeting either Board of Director, Board of Commissioners and/or Joint meeting may valid if approved by ½ of Board members.	Article of Association www.ptba.co.id/pdf- files/PTBA%20Anggaran%20Dasar.pdf
E.3.5	Did the non-executive directors/commissioners of the company meet separately at least once during the year without any Executives present?	The Board of Commissioner had meeting internally is 12 times during 2018. The disclosure may be viewed on PTBA's Annual Report Page 284.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf
Access to	o Information		
E.3.6	Are board papers for board of directors/commissioners meetings provided to the board at least five business days in advance of the board meeting?	According to Article 16 Paragraph (7) and Article 13 Paragraph (13), at least 5 (five) business days before Meeting of Board of Commissioner and Board of Director, there is an invitation of meeting with attached the agenda, date, place, and material of Meeting available for each Board member.	Article of Association www.ptba.co.id/pdf- files/PTBA%20Anggaran%20Dasar.pdf
E.3.7	Does the company secretary play a significant role in supporting the board in discharging its	The Corporate Secretary has the important role to assist Board of Director responsibilities. The disclosure may be viewed on PTBA's Annual Report "Corporate Secretary" Page 339-342".	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf

	responsibilities?		
	responsibilities:		
E.3.8	Is the company secretary trained in legal, accountancy or company secretarial practices and has kept abreast on relevant developments?	PTBA's corporate secretary and its division always be trained in various segment such as legal, accountancy, and other secretarial practice. The disclosure of training of Corporate Secretary and its division may be viewed on Annual Report Page 120-122.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf
Board Ap	ppointments and Re-Elect		
E.3.9	Does the company disclose the criteria used in selecting new directors/commissioners?	According to Article of Association PTBA, PTBA has disclosed the criteria of new Director on Article 11 Paragraph (2) (3) while for new commissioner on Article 14 Paragraph (3) and (4). The disclosure also can be viewed on Annual Report Page 276-227.	Article of Association www.ptba.co.id/pdf- files/PTBA%20Anggaran%20Dasar.pdf
E.3.10	Did the company describe the process followed in appointing new directors/commissioners?	The nomination of new director and commissioner is disclosed by PTBA on Annual Report The disclosure of process may be viewed: - Board of Director on Annual Report Page 276-227.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf -
E.3.11	Are all the directors/commissioners subject to re-election every 3 years; or 5 years for listed companies in countries whose legislation prescribes a term of 5 years2 each? 2 The five years term must be required by legislation which preexisted the introduction of the ASEAN Corporate Governance Scorecard in 2011	The term of office Board of Directors and Board of Commissioners According to Article of Association PTBA is 5 years and may be appoint for second period for 5 years again by GMS. The disclosure may be viewed on PTBA's Article of Association and Annual Report (Dismissal-Page 278).	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf

Remune	Remuneration Matters			
E.3.12	Does the company disclose its remuneration (fees, allowances, benefit-in-kind and other emoluments) policy/practices (i.e. the use of short term and long term incentives and performance measures) for its executive directors and CEO?	of Director and breakdown of each remuneration each Board of Directors as stipulated on Annual	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf	
E.3.13	Is there disclosure of the fee structure for non- executive directors/commissioners?	PTBA has disclose the policy of remuneration of Board of Commissioners and breakdown of each remuneration each Board of Commissioners as stipulated on Annual Report. The disclosure may be viewed on PTBA's Annual Report Page 281-282.	Annual Report http://www.ptba.co.id/laporan_tahunan/an_nual-report-2018.pdf	
E.3.14	Do the shareholders or the Board of Directors approve the remuneration of the executive directors and/or the senior executives?	According to Law Number 40 of 2007 on Limited Liability Company and PTBA's Article of Association the remuneration of Board shall prior approval of GMS. The disclosure may be viewed on GMS invitation agenda and Summary of Minute of Meeting of GMS 4 th Agenda on PTBA's Website (Menu Investor Relation-GMS)	Website PTBA (GMS) http://www.ptba.co.id/en/investor/general-meeting-of-shareholders	
E.3.15	Does the company have measurable standards to align performance-based remuneration of the executive directors and senior executived with long-term interests of the company, such as claw back provision and deferred bonuses?	PTBA has the standard as the formula of remuneration of Board, it according Key Performance Indicator, peer to peer industry, comparing with previous remuneration, the company performance its self. The disclosure may be viewed on Annual Report Page 281 (Remuneration Policy of Board of Commissioners and Board of Directors)	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf	
Internal	Audit			

E.3.16	Does the company have a separate internal audit function?	PTBA has separate internal audit function named "Internal Audit Unit/SPI". The disclosure may be viewed on PTBA's Annual Report Page 344 and PTBA Website.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf PTBA Website (Internal Audit) http://www.ptba.co.id/en/good-corporate- governance/internal-audit
E.3.17	Is the head of internal audit identified or, if outsourced, is the name of the external firm disclosed?	Head of Internal Audit PTBA is Mr. Muhammad Bagir he is the PTBA's employee. The detail disclosure of his profile may be viewed on PTBA's Annual Report Page 383.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf
E.3.18	Does the appointment and removal of the internal auditor require the approval of the Audit Committee?	According to Article of Association, The chief /head of internal audit is appointed and dismissed by President Director within prior approval of Board of Commissioner. The disclosure may be viewed on PTBA's Annual "Appointment and Dismissal of Senior Manager SPI" Page 347.	Annual Report http://www.ptba.co.id/laporan_tahunan/an_nual-report-2018.pdf
E.3.19	Does the company establish a sound internal control procedures/risk management framework and periodically review the effectiveness of that framework? (AS REPHRASED BY INDONESIA)	PTBA controlling is did by Audit Internal Unit "SPI" and Risk Management Unit as disclosed on PTBA annual Report Page 365-370 (Risk Management) and 370-371 (Internal Audit/SPI).	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf
E.3.20	Does the Annual Report disclose that the board of directors/commissioners has conducted a review of the company's material controls (including operational, financial and compliance controls) and risk management systems? Does the company disclose the key	PTBA' Annual Report has disclosed the review of risk and compliance against regulation. The disclosure may be viewed as following: - Risk review: Page 365-370 - Legal and Compliance: Page 372-374. PTBA' Annual Report has disclosed the review of risk,	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf Annual Report

	risks to which the company is materially exposed to (i.e. financial, operational including IT, environmental, social, economic)? (AS REPHRASED BY INDONESIA)	the disclosure may be viewed on PTBA's Annual Report Page 365-370.	http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf
E.3.22	Does the Annual Report contain a statement from the board of directors/commissioners or Audit Committee commenting on the adequacy of the company's internal controls/risk management systems	The evaluation and commenting against internal control and risk management system is did by Audit Committee under Board of Commissioner. The disclosure may be viewed on PTBA annual Report 311-318.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf
	ple on the Board		
E.4.1	Do different persons assume the roles of chairman and CEO?	Position of COE (President Director) is Mr. Arviyan Arifin, while the Chairman of Board of Commissioner is Mr. Agus Suhartono. The profile of Board member may be viewed on PTBA's Annual Report Page 70-89.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf
E.4.2	Is the chairman an independent director/commissioner?	The Chairman of Board of Commissioner is Independent Commissioner. The disclosure may be viewed on Annual Report Page 72.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf
E.4.3	Is any of the directors a former CEO of the company in the past 2 years?	No one of Director is a former of COE of company in past 2 years. The disclosure may be viewed on PTBA's Annual Report Page 83-89.	Annual Report http://www.ptba.co.id/laporan_tahunan/annual-report-2018.pdf

E.4.4	Are the role and responsibilities of the chairman disclosed?	The Role of Chairman is disclosed on PTBA's Annual Report Page 261-263.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf
Lead Inc	lependent Director		
E.4.5	If the Chairman is not independent, has the Board appointed a Lead/Senior independent Director and has his/her role been defined?	The Chairman of Board of Commissioner is independent commissioner. The disclosure may be viewed on PTBA's Annual Report "Composition of Board of Commissioners" Page 255.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf
Skill and	Competencies		
E.4.6	Does at least one non-executive director/commissioner have prior working experience in the major sector that the company is operating in?	1 (one) of Commissioner is Head of Province Mineral and Coal Department, while 3 (three) of Director is former of employees of PTBA. The disclosure may be viewed on PTBA Annual Report Page 303 and his profile on Page 70-89.	Annual Report http://www.ptba.co.id/laporan_tahunan/an_nual-report-2018.pdf
	d Performance		
	tor Development		
E.5.1	Does the company have orientation programmes for new directors/commissioners?	PTBA has disclosed for orientation program for new member of Board of Director and Board of Commissioner. the disclosure may viewed on following: - Orientation Program of Board of Commissioners and Board of Director on Annual Report Page 263.	Annual Report http://www.ptba.co.id/laporan_tahunan/an_nual-report-2018.pdf
E.5.2	Does the company disclose the process on how the board of directors/commissioners plans for the succession of the CEO/Managing Director/President and key	PTBA has disclosed the succession plan of Board of Directors on PTBA annual Report Page 276-278.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf

	management ?				
CEO/Exe	CEO/Executive Management Appointment and Performance				
E.5.3	Does the company disclose the process on how the board of directors/commissioners plans for the succession of the CEO/Managing Director/President and key management?	PTBA has disclosed the succession plan of appointment COE and also Board of Director as well. This may be viewed on PTBA 's Annual Report Page 276-278.	Website PTBA (Article of Association) http://www.ptba.co.id/en/good-corporate-governance governance/good-corporate-governance		
E.5.4	Does the board of directors/commissioners conduct an annual performance assessment of the CEO/Managing Director/President?	All Board of Director and or CEO before proposed to GMS shall prior be assessed by independent institution. The disclosure may be viewed on PTBA's Annual Report Page 277 (Fit and Proper Test)	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf		
Board Ap	opraisal				
E.5.5	Did the company conduct an annual performance assessment of the board of directors/commissioners and disclose the criteria and process followed for the assessment? (ORIGINAL E.5.6 and E.5.7 MERGED INTO THIS QUESTION - THAILAND IN CHARGE OF MARKING GUIDELINES)	PTBA has conducted Board of Commissioners and Board of Director assessment especially on Board Performance. The disclosure of assessment of Board may be viewed on Annual Report Page 279-280.	Annual Report http://www.ptba.co.id/en/company- report/annual-report		
	Apparaisal				
E.5.6	Did the company conduct an annual performance assessment of the individual directors/commissioners and disclose the criteria and process followed for the assessment? (ORIGINAL E.5.8 and E.5.9 MERGED INTO THIS QUESTION - THAILAND IN	PTBA also conduct the Board of Director individually assess Board of Director as stipulated on Annual Report Page 279-280.	Annual Report http://www.ptba.co.id/en/company-report/annual-report		

	CHARGE OF MARKING GUIDELINES)		
Committ	ee Appraisal		
E.5.7	Did the company conduct an annual performance assessment of the board committees and disclose the criteria and process followed for the assessment? (REPHRASED ORIGINAL E.5.10 - THAILAND IN CHARGE OF MARKING GUIDELINES)	Board of Commissioner had conducted evaluation and assessment of performance Committee Under Board of Commissioner either Audit Committee or Business Risk, Nomination, Remuneration and Human Resources Development Committee. The disclosure may be viewed on PTBA's Annual Report Page 263.	Annual Report http://www.ptba.co.id/en/company- report/annual-report

F. Bonus

Part	ltem	PTBA Year of 2018	Source Information		
(B) A. Rig	B) A. Right of Shareholer				
	B)A.1 Right to participate effectively in and vote in general shareholders meeting and should be informed of the rules, including voting procedures, hat govern general shareholders meeting				
(B)A.1.1	Does the company practice secure electronic voting in absentia at the general meetings of shareholders?	The disclosure may viewed on PTBA's Summary of Minute of Meeting AGMS.	Website PTBA http://www.ptba.co.id/en/news/detail/811/ the-minutes-summary-of-annual-general- meeting-of-shareholders-for-financial-year- 2018		
(B) B. Equ	uitable treatment of shareholders	1			

(B) B.1. N	otice of AGM		
(B) B.1.1	Does the company release its notice of AGM (with detailed agendas and explanatory circulars), as announced to the Exchange, at least 28 days before the date of the meeting?	PTBA has released the information of notice of AGMS (invitation) with detail explanation of each agenda as may viewed on AGMS Invitation 2019 dated April 2 nd 2019 on PTBA Website.	Website PTBA http://www.ptba.co.id/en/news/detail/806/ invitation-to-shareholders
(B). C. Ro	les of Stakeholders		
E.1.4	Does the company adopt an internationally recognized reporting framework for sustainability (i.e. GRI, Integrated Reporting, SASB)?	PTBA adopted Global Standard Report (GRI) as used on disclosure of Sustainability Report of PTBA. The disclosure may viewed on PTBA Sustainability Report.	Sustainability Report PTBA http://www.ptba.co.id/laporan_keberlanjut an/laporan-keberlanjutan-2018.pdf
(B) D. Dis	l closure and Transparency		
(B)D.1.1	Are the audited annual financial report /statement released within 60 days from the financial year end?	Audited Financial Statement of 2018 is released to public on March 11 2019. Bisnis Indonesia Page 18, March 11 th 2019.	https://www.idx.co.id/StaticData/NewsAnd Announcement/ANNOUNCEMENTSTOCK/Fr om EREP/201903/2d6f5aac51 fe306056bf. pdf
(B)D.1.2	Does the company disclose details of remuneration of the CEO?	PTBA has disclosed the details of remuneration of CEO on PTBA Annual Report Page 282.	Annual Report http://www.ptba.co.id/laporan_tahunan/an_nual-report-2018.pdf
	ponsibilities of the Board oard Competencies and Diversities		
(D). L.I D	oara competencies and Diversities		

(B)E.1.1	Does the company have at least one female independent director/commissioner?	For now, PTBA has not female independent director/commissioner, but all members are diverse such as in educational background and experience.		
(B)E.1.2	Does the company have a policy and disclose measurable objectives for implementing its board diversity and report on progress in achieving its objectives?	PTBA has policy to measure of diversity of Board member. The disclosure may be viewed in PTBA's Annual Report Page 302-303.	Annual Report http://www.ptba.co.id/laporan_tahunan/annual-report-2018.pdf	
(B). E.2. Board Structure				
(B)E.2.1	Does the Nominating Committee comprise entirely of independent directors/ commissioners?	The disclosure may be viewed in PTBA's Annual Report Page 328-335.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf	
(B)E.2.1	Does the Nominating Committee un dertake the process of identifying the quality of directors aligned with the company's strategic directions?	According to duties and responsibilities of Nomination Committee (Business Risk, Nomination, Remuneration and Human Resources Development Committee) provides the independent recommendation again the quality of Board with company's business and strategic. Information in PTBA's annual Report page 327.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf	
(B) E.3 Board Appointments and Re-Election				
(B)E.3.1	Does the company use professional search firms or other external sources of candidates (such as director databases set up by director or shareholder bodies) when searching for candidates to the	PTBA also used independent consultant to assess board member and board of director before purposing to GMS. The disclosure may be viewed in PTBA's Annual Report Page 276-277.	Annual Report http://www.ptba.co.id/laporan_tahunan/an_nual-report-2018.pdf	

(B) E.4. Be	e board of directors/commissioners? Doard Structure & Composition Do independent non-executive directors/ commissioners make up more than 50% of the board of directors/commissioners for a company with independent chairman?	PTBA only has 2 independent commissioner of 6 , or 33,3%. The disclosure may be viewed in PTBA's Annual Report Page 255.	Annual Report http://www.ptba.co.id/laporan_tahunan/an nual-report-2018.pdf		
(R) F 5 Pi	sk Oversight				
(B)E.5.1	Does the board describe its governance process around IT issues including disruption, cyber security, disaster recovery, to ensure that all key risks are identified, managed and reported to the board?	PTBA has identified the risk of IT that relevant to PTBA's Business and how to manage the risk its self. The disclosure may be viewed in PTBA's Annual Report Page 365-370.	Annual Report http://www.ptba.co.id/laporan_tahunan/an_nual-report-2018.pdf		
(B). E.6 Board Performance					
(B)E.6.1	Does the company have a separate board level Risk Committee?	PTBA's Board of Commissioner has Risk Committee (Business Risk, Nomination, Remuneration and Human Resources Development Committee) while Board of Director has a Risk Management Unit. The disclosure may be viewed in: Risk Committee: Annual Report Page 362-370. Risk Management Unit: Annual Report Page 321-339.	http://www.ptba.co.id/en/good-corporate-governance/the-audit-committee		