Laporan Keberlanjutan
Sustainability Report 2021

balitower
a network and infrastructure company



BETTER JOURNEY AHEAD



Laporan Keberlanjutan

Sustainability Report 2021

BETTER JOURNEY AHEAD

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01.

SAMBUTAN **DIREKSI** [102-14] [POJK No. 4a]

FOREWORD BY BOARD OF DIRECTORS [102-14] [POJK No. 4a]



Para Pemangku Kepentingan yang terhormat,

Puji syukur kehadirat Tuhan Yang Maha Esa karena berkat limpahan rahmat dan karunia-Nya, Perseroan dapat melewati tahun 2021 yang penuh tantangan dan mampu menghadirkan kinerja yang terus berkelanjutan. Perkenankan kami untuk menyampaikan laporan terkait kinerja keberlanjutan yang telah kami capai di tahun 2021.

Selaku Direksi yang memiliki peran menjalankan pengelolaan dan pengurusan perusahaan, kami senantiasa berupaya untuk memastikan kinerja keberlanjutan Perseroan telah tercapai dengan baik sesuai harapan. Komitmen untuk selalu mengedepankan pemenuhan aspek-aspek keberlanjutan di bidang ekonomi, sosial, dan lingkungan dipegang teguh tidak hanya oleh Direksi dan Manajemen, namun juga oleh seluruh insan Perseroan.

Seiring dengan proses transformasi digital yang dipercepat selama pandemi, Perseroan yakin bahwa industri telekomunikasi merupakan industri masa depan. Hal ini didorong oleh pertumbuhan konsumsi data yang luar biasa, masyarakat yang termasuk pengguna media sosial paling aktif di dunia, pasar *e-commerce* yang bertumbuh sangat pesat, serta ekosistem *start-up* yang bertumbuh sangat pesat.

Dear Stakeholders,

Praise and gratitude for the presence of God Almighty because of His graces and blessings, the Company can pass through 2021 that was full of challenges and is able to deliver the sustainable performance. Please allow us to submit the report regarding the sustainability performance that we have achieved in 2021.

As the Board of Directors who has the role of carrying out the management of the company, we always strive to ensure that the Company's sustainability performance has been achieved properly as expected. The commitment to always prioritize the fulfillment of sustainability aspects in the economic, social, and environmental fields is firmly held not only by the Board of Directors and Management, but also by all The Company's employees.

Along with the accelerated digital transformation process during the pandemic, the Company believes that the telecommunications industry is the future industry. This is driven by the tremendous growth in data consumption, the community who are among the most active social media users in the world, the e-commerce market and the start-up ecosystem are growing very rapidly.

SAMBUTAN **DIREKSI**

FOREWORD BY BOARD OF DIRECTORS

Untuk itu Perseroan telah menetapkan program jangka panjang yaitu membuat ekosistem digital komprehensif yang mencakup seluruh aspek pendukung kehidupan masyarakat digital di masa depan dengan mengoptimalkan aset Perseroan yang ada. Program jangka pendek, yaitu terkait penyediaan infrastruktur dan konektivitas yang sudah dilakukan pada periode sebelum 2020, dilanjutkan dengan langkah berikutnya yaitu penyempurnaan Pusat Data dan *Cloud* sebagai program jangka menengah. Hal ini akan menunjang program jangka panjang yaitu penyediaan aplikasi dan komersialisasinya agar bisa menunjang ekosistem digital.

For this reason, the Company has established a long-term program, namely creating a comprehensive digital ecosystem that covers all aspects of supporting the digital community life in the future by optimizing the Company's existing assets. The short-term program, which is related to the provision of infrastructure and connectivity that has been carried out in the period before 2020, is continued with the next step, namely the improvement of the Data Center and Cloud as a medium-term program. This will support a long-term program, namely the provision of applications and commercialization in order to support the digital ecosystem.

Bertumpu pada kenyataan bahwa sektor telekomunikasi merupakan sektor yang sangat dibutuhkan selama masa pandemi, Perseroan berhasil membukukan kinerja yang sangat baik. Di tahun 2021, Perseroan mencatat pertumbuhan dari sisi pendapatan sebesar 21,54%, sementara EBITDA bertumbuh sebesar 24,82%. Dengan tetap berfokus pada pertumbuhan, Perseroan memiliki 2.640 menara telekomunikasi, yang semuanya telah terintegrasi dengan jaringan transmisi, baik berupa kabel serat optik maupun antena *microwave* berkapasitas tinggi.

Relying on the fact that the telecommunications sector is a sector that is desperately needed during the pandemic, the Company managed to record an excellent performance. In 2021, the Company recorded revenue growth of 21.54%, while EBITDA grew by 24.82%. While stay focused on growth, the Company has 2,640 telecommunication towers, all of which have been integrated with the transmission network, both in fiber optic cables and high capacity microwave antennas.

Dalam penyelenggaraan kegiatan usaha *Fiber-to-the-X* ("FTTx"), Perseroan mencatat jumlah *homepass* terpasang di tahun 2021 sebanyak 195.664, dengan jumlah pelanggan sebanyak 44.350.

In the impelementation of Fiber-to-the-X ("FTTx") business activities, the Company recorded the number of homepasses installed in 2021 are 195,664, with a total of 44,350 customers.

Melalui laporan berkelanjutan ini, Perseroan ingin menyampaikan beberapa inisiatif Perseroan terhadap ESG di sepanjang tahun 2021. Dari aspek lingkungan, tantangan bagi perusahaan adalah melanjutkan strategi bisnis dengan memastikan tetap berjalannya efisiensi dan pengelolaan yang baik atas material, energi, emisi, air serta pengelolaan limbah. Mulai pada tahun 2019, Perseroan telah mencatat penggunaan energi dan emisi dari kegiatan operasional perusahaan. Diharapkan dengan dilakukannya kegiatan tersebut, Perseroan dapat bertumbuh secara berkelanjutan dari segala aspek baik ekonomi, sosial, lingkungan dan tata kelola.

Through this sustainability report, the Company would like to convey the Company's initiatives towards ESG throughout 2021. From the environmental aspect, the challenge for the company is to continue its business strategy by ensuring the continuity of efficiency and proper materials management, energy, emissions, water and waste management. Starting in 2019, the Company has recorded energy use and emissions from the company's operational activities. It is hoped the implementation of these activities, the Company can grow sustainably from economic, social, environmental and governance aspects.

Sehubungan dengan aspek sosial, sepanjang tahun 2021, Perseroan memiliki karyawan sejumlah 618 orang yang terdiri dari 451 karyawan pria dan 167 karyawan wanita. Terkait dengan hal tersebut, Perseroan memiliki program pengembangan SDM, dimana Perseroan berhasil merealisasikan perolehan jam pelatihan sebesar 5,9 jam per tahun per orang. Sementara untuk program kemasyarakatan, Perseroan melakukan beragam inisiatif terkait pemberdayaan masyarakat antara lain seperti memberikan bantuan hazmat kepada Dinas Kesehatan dan Pemerintah Kota, pemberian tabung oksigen kepada Dinas Kesehatan dan Pemerintah Kota dan pengadaan regulator oksigen di Balai Kota.

In connection with social aspects, throughout 2021, the Company has 618 employees consisting of 451 male employees and 167 female employees. Related to this matter, the Company has HR development program, where the Company managed the acquisition of training hours of 5.9 hours per year per person. Meanwhile, for community programs, the Company carried out various initiatives related to community empowerment, such as providing hazmat assistance to the Public Health Office and Government, providing oxygen cylinders to the Public Health Office and City Government and providing oxygen regulators at City Hall.

SAMBUTAN **DIREKSI**

FOREWORD BY BOARD OF DIRECTORS

Dari aspek tata kelola, Perseroan memastikan aspek kepatuhan sesuai dengan peraturan perundang-undangan yang berlaku. Perseroan senantiasa menerapkan tata kelola perusahaan yang baik atau *Good Corporate Governance* (GCG) sesuai dengan prinsip transparansi *(transparency)*, akuntabilitas *(accountability)*, responsibilitas *(responsibility)*, kemandirian *(independency)* serta kesetaraan dan kewajaran *(fairness)*. Perseroan memiliki Kebijakan Anti-Suap dan Anti- Korupsi – berlaku untuk semua karyawan dan anak perusahaan Perseroan dan Pihak Ketiga baik individu atau organisasi yang bekerja dengan Perseroan. Tentunya penerapan GCG ini akan memberikan nilai tambah Perseroan dalam memberikan produk dan layanan terbaik.

From the aspect of governance, the Company ensures compliance aspects in accordance with the applicable laws and regulations. The Company always implements Good Corporate Governance (GCG) in accordance with the principles of transparency, accountability, responsibility, independence and fairness. The Company has an Anti-Bribery and Anti-Corruption Policy – applicable to all employees and subsidiaries of the Company and Third Parties, both individuals and organizations working with the Company. Definitely, the implementation of GCG will provide added value for the Company to provide the best products and services.

Perseroan percaya bahwa dengan melakukan pengelolaan aspek ESG, Perseroan dapat terus meningkatkan kinerja berkeberlanjutannya di masa mendatang. Laporan ini merupakan bagian dari perjalanan berkelanjutan Perseroan dan berkomitmen untuk terus melakukan perbaikan pada laporan-laporan berikutnya, sehingga dapat menyampaikan data yang lebih komprehensif dalam mengevaluasi kinerja berkelanjutan Perseroan.

The Company believes that by managing the ESG aspect, the Company continue to improve its sustainable performance in the future. This report is part of the Company's sustainable process and is committed to improve the subsequent reports, to convey more comprehensive data in evaluating the Company's sustainable performance.

Akhir kata, kami dari jajaran Direksi mengucapkan terima kasih atas dukungan dari seluruh pihak sepanjang tahun 2021 sehingga Perseroan dapat melewati tahun penuh tantangan tersebut dengan performa baik serta dapat menjaga dan menghasilkan kinerja yang berkelanjutan di bidang ekonomi, lingkungan, dan sosial. Seluruh kontribusi, partisipasi dari seluruh pihak, termasuk para pemangku kepentingan yang telah membantu Perseroan mempertahankan posisi dan terus bergerak mencapai pertumbuhan yang optimal dan berkelanjutan.

Finally, the Board of Directors would like to express the gratitude for the support from all parties throughout 2021 so that the Company can pass this challenging year with good performance and can maintain as well as create sustainable performance in the economic, environmental and social. All contributions, participation from all parties, including stakeholders helped the Company maintain its position and continue to move towards optimal and sustainable growth.

Besar harapan kami, segenap Direksi dan seluruh insan Perseroan, bahwa tahun-tahun mendatang akan menjadi masa yang lebih baik bagi Perseroan serta seluruh pihak. Kami pun akan terus berupaya untuk meningkatkan kualitas produk dan pelayanan sehingga keberadaan Perseroan dapat membawa semakin banyak manfaat dan nilai tambah yang berdampak besar bagi kehidupan yang berkelanjutan.

We hope that all the Board of Directors and Company's personnel, that the coming years will be better years for the Company and all parties. We will also continue to strive to improve the quality of products and services so that the Company's existence can provide many benefits and added values that have a big impact on sustainable living.

Atas Nama Direksi
On behalf of the Board of Directors,



Jap Owen Ronadhi
Direktur Utama
President Director

02.

TENTANG **LAPORAN**
ABOUT THE REPORT

Laporan Keberlanjutan tahun 2021 ini merupakan laporan tahunan yang kedua, melanjutkan komitmen BTS untuk menjaga agar Para Pemangku Kepentingan mengikuti upaya dan kinerja kami di lingkup Lingkungan, Sosial, dan Tata Kelola (ESG).

The 2021 Sustainability Report is the second annual report, continuing BTS commitment to keep Stakeholders following our efforts and performance in the Environmental, Social, and Governance (ESG).

Laporan ini disusun sesuai dengan standar *Global Reporting Initiative* (GRI) mengikuti standar GRI tahun 2016 dengan Core Option, dengan pengungkapan standar sebagaimana terlampir dalam indeks konten GRI. Dalam laporan ini terdapat perubahan pada nilai konsumsi energi cakupan 1 (*scope 1*) dikarenakan adanya pemisahan nilai solar dan biosolar, namun tidak ada perubahan signifikan pada topik material, batasan, lokasi, dan sifat bisnis Perseroan ,serta tidak ada penyajian kembali informasi dari laporan sebelumnya [102-10][102-48]

The report is prepared in accordance with the Global Reporting Initiative (GRI) based on 2016 GRI standards using Core Option, with standard disclosures as attached in the GRI content index. In this report there are changes in the value of energy consumption in scope 1 due to the separation of the value of diesel and biodiesel, but there is no significant change in the material topics, boundaries, location, and nature of the Company's business, and there is no restatement of information from the previous report. [102-10][102-48]

Laporan terakhir yang diterbitkan oleh Perseroan adalah Laporan Keberlanjutan Tahun Buku 2020 yang melaporkan keberlanjutan dari periode 1 Januari 2020 sampai dengan 31 Desember 2020. Adapun laporan saat ini berdasarkan periode 1 Januari 2021 hinggal 31 Desember 2021 yang mencakup seluruh anak perusahaan sebagai persyaratan *Boundaries GRI Standard*.[102-50][102-51][102-52][102-54]

The latest report published by the Company was the Sustainability Report for the Fiscal Year 2020 which reported sustainability from the period of 1 January 2020 to 31 December 2020. The current report is based on the period 1 January 2021 to 31 December 2021 which includes all subsidiaries as requirement of Boundaries GRI Standard.[102-50] [102-51] [102-52] [102-54]

GRI merekomendasikan penggunaan *external assurance* oleh pihak ketiga yang independen untuk memastikan kualitas dan kehandalan informasi yang disampaikan dalam laporan ini. Penjaminan atas Laporan Keberlanjutan oleh pihak eksternal juga dinilai mampu meningkatkan kredibilitas laporan. Guna menjamin akurasi data yang disajikan dalam Laporan Keberlanjutan 2021, Perusahaan melakukan *assurance* terhadap Laporan Keberlanjutan Tahun 2021 yang dilakukan oleh pihak independen yaitu PT. SGS Indonesia yang tidak memiliki *conflict interest* dengan perusahaan. [102-54] [102-56]

GRI recommends the use of external assurance by independent third party to ensure the quality and reliability of the information presented in this report. The assurance of the Sustainability Report by external parties is also considered capable of increasing the credibility of the report. In order to ensure the accuracy of the data presented in the 2021 Sustainability Report, the Company performs assurance on the 2021 Sustainability Report conducted by an independent party, namely PT. SGS Indonesia which has no conflict of interest with the company. [102-54] [102-56]

Penentuan konten dan batasan yang dilaporkan berdasarkan pemetaan sosial, isu-isu strategis dan pemangku kepentingan. Topik-topik material yakni tema yang merefleksikan dampak ekonomi, lingkungan dan sosial signifikan perusahaan yang mempengaruhi evaluasi dan pengambilan keputusan para pemangku kepentingan kemudian diolah secara internal dengan pendekatan manajemen risiko.

Determination of reported content and boundaries based on social mapping, strategic issues and stakeholders. Material topics, are themes that reflect the significant economic, environmental and social impacts that affect the stakeholders evaluation and decision making of stakeholders and then processed internally using a risk management approach.

Untuk saran, masukan dan informasi lebih lanjut terkait laporan keberlanjutan, dapat menghubungi Perseroan melalui: [102-53]

For advice, suggestions and further information regarding the sustainability report, please contact the Company through: [102-53]

Corporate Secretary PT Bali Towerindo Sentra Tbk
corporate.secretary@balitower.co.id

03.

PROFIL **BALI TOWER**

PROFILE OF BALI TOWER



Balitower Office

Kantor Pusat Bali
Menara Telekomunikasi Terpadu
Jl. Sunset Road, Lingkaran
Abianbase Kuta Bali 80361
Indonesia
Telp : +62361767629
Fax : +62361766059

Kantor Perwakilan Jakarta
Wisma KEIAI, Lantai 22
Jl. Jend. Sudirman Kav.3 Jakarta
10220 Indonesia
Telp : +622157905788
Fax : +622157905789

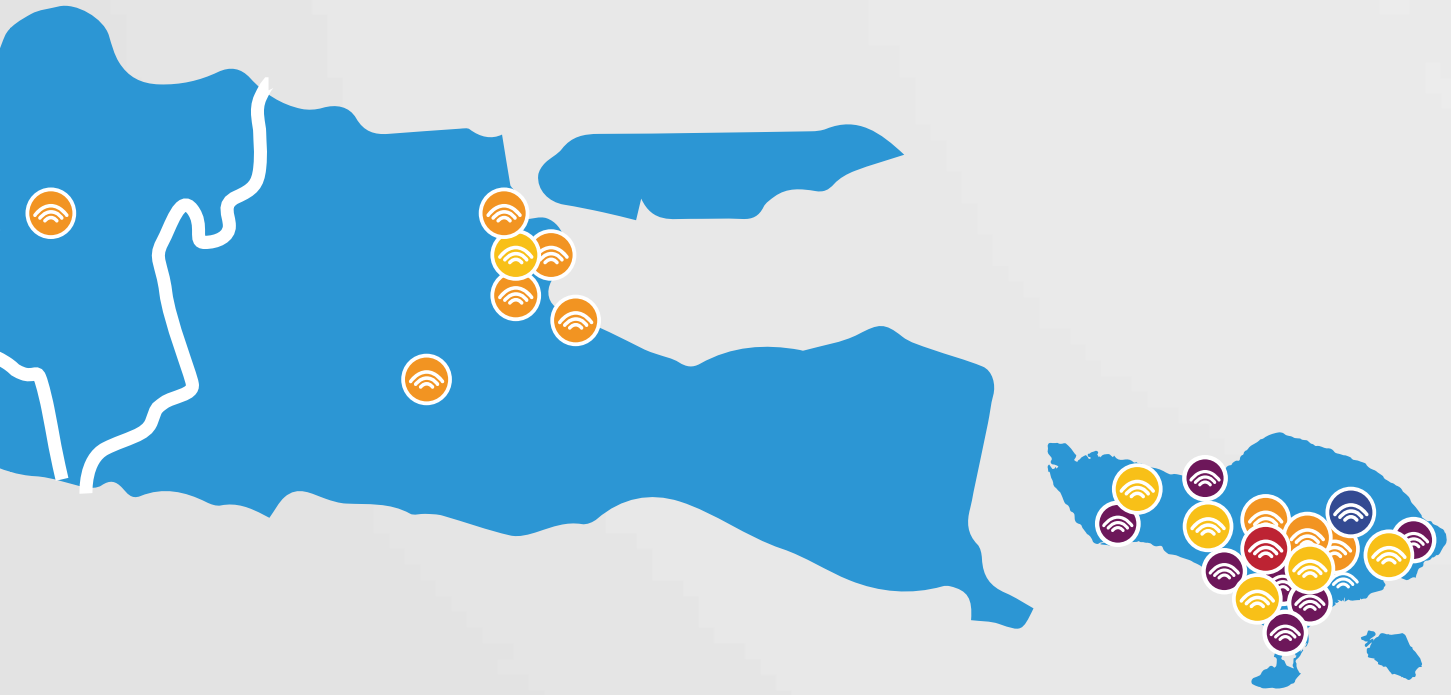
Tower Makro
Macro Tower

- Kota Denpasar
- Kab. Gianyar
- Kab. Klungkung
- Kab. Karang Asem
- Kab. Buleleng
- Kab. Tabanan
- Jembrana
- Kab. Badung
- Kab. Tangerang

Microcell Pole
Microcell Pole

Telah Berdiri :
Already Established :

- DKI Jakarta
- Kota Tangerang
- Kab. Tangerang
- Kota Bekasi
- Kab. Bekasi
- Kota Bogor
- Kab. Bogor
- Kota Depok
- Kota Sukabumi
- Kota Cimahi
- Kota Purwakarta
- Kota Bandung
- Kota Cirebon
- Kota Yogyakarta
- Kab. Sleman



- » Kab. Bantul
- » Kota Tegal
- » Kab. Pemalang
- » Kota Pekalongan
- » Kota Magelang
- » Kota Semarang
- » Kota Surakarta
- » Kota Surabaya
- » Kab. Gresik
- » Kab. Sidoarjo
- » Kota Pasuruan
- » Kota Denpasar
- » Kab. Badung
- » Kab. Gianyar
- » Kota Malang

Microcell Pole
Microcell Pole

Dalam Proses :
On Process :

- » Kota Salatiga
- » Tangerang Selatan
- » Kab. Bandung
- » Kab. Semarang
- » Kab. Bangli

FTTH & Corporate Non-Selular
FTTH & Corporate Non-Cellular

FTTH
FTTH

- » DKI Jakarta
- » Kota Tangerang
- » Kab. Tangerang
- » Tangerang Selatan
- » Kota Bekasi
- » Kab. Bekasi
- » Kota Depok
- » Kab. Karawang
- » Kota Surabaya
- » Kota Denpasar
- » Kab. Badung

Corporate
Corporate

- » DKI Jakarta
- » Kota Tangerang
- » Kab. Tangerang
- » Kota Bekasi
- » Kota Bandung
- » Kab. Purwakarta
- » Kab. Karawang
- » Kota Surabaya
- » Kab. Badung
- » Kab. Buleleng
- » Kab. Gianyar
- » Kab. Tabanan

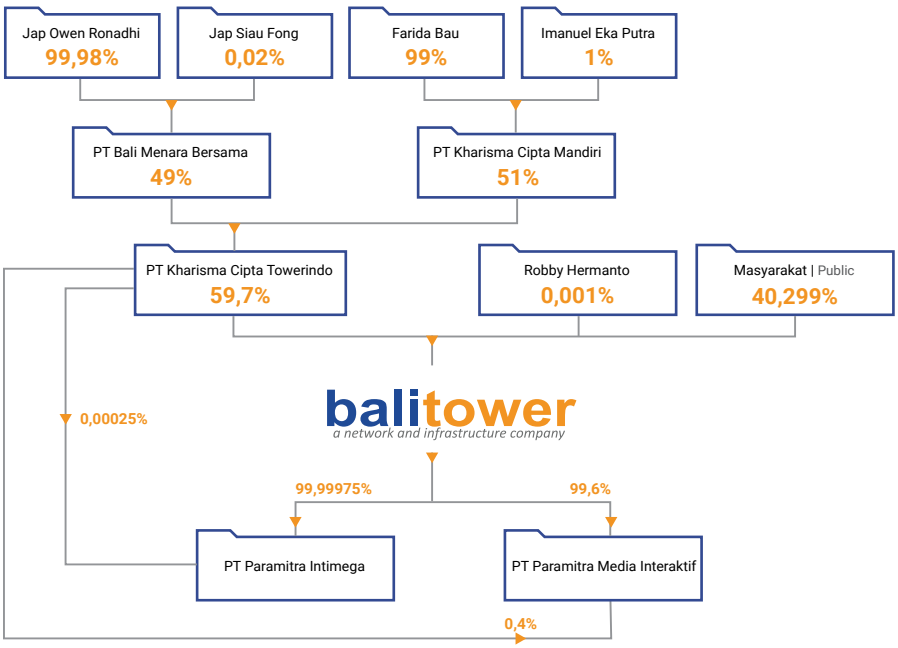
Profil Bali Tower

Profile of Bali Tower

Nama 102-1][POJK No. 3b] Name	**PT Bali Towerindo Sentra Tbk**
Alamat Address [102-3] [102-4] [POJK No. 3b]	**Kantor Pusat Bali :** Head Office Bali Menara Telekomunikasi Terpadu Jl. Sunset Road, Lingk. Abianbase Kuta, Bali 80361. Indonesia Telp : +62 361 767 629 Fax : +62 361 766 059 **Kantor Perwakilan Jakarta :** Representative Office Jakarta Wisma KEIAI, Lantai 22 Jl. Jend. Sudirman Kav. 3 Jakarta 10220. Indonesia Telp : +62 21 5790 5788 Fax : +62 21 5790 5789
Sektor Industri / Sub Sektor Industry Sector / Sub-Sector [102-2] [POJK No. 3d]	***Celullar Business:*** Infrastruktur/ Penyewaan Menara dan Jaringan Telekomunikasi Infrastructure/Lease of Telecommunication ***Non Celullar Business:*** *Layanan Internet (Balifiber Home dan Balifiber Bussiness),* *Data Center (Balitower Data Center)* Internet Services (Balifiber Home dan Balifiber Bussiness), Data Center (Balitower Data Center)
Sektor Pelanggan Customer Sector	Operator untuk Bisnis Seluler, Pemerintah, Perusahaan, Sektor residensial untuk Seluler Non-Bisnis. Operator for Cellular Business, Government, Corporate, Residential Sector for Cellular non Business.
Pendirian Perusahaan Company Establishment	6 Juli 2006 d/h PT Bali Towerindo Sentra July 6, 2006 d/h PT Bali Towerindo Sentra
Penawaran Umum Perdana Initial Public Offering	13 Maret 2014 March 13, 2014
Kode Saham Stock Code	BALI
Tempat Saham Dicatatkan Place of Share Listing	Bursa Efek Indonesia (BEI) Indonesia Stock Exchange
Sekretaris Perusahaan Corporate Secretary	Lily Hidayat
Alamat Surat Elektronik E-mail Address [POJK No. 3b]	corporate.secretary@balitower.co.id
Alamat Situs Website Website Address [POJK No. 3b]	www.balitower.co.id

Bali Tower terdaftar di Bursa Efek Indonesia pada 13 Maret 2014 dengan kode saham BALI. Struktur kepemilikan saham per 31 Desember 2021 adalah sebagai berikut. [102-5] [102-6] [POJK No. 3c.3]

Bali Tower was listed on the Indonesia Stock Exchange on 13 March 2014 with the stock code BALI. The shareholding structure as of 31 December 2021 is as follows. [102-5] [102-6] [POJK No. 3c.3]



Struktur Kepemilikan Saham Perseroan
The Company's Shareholding Structure

Pada akhir tahun 2021, total karyawan Bali Tower berjumlah 618 karyawan dengan 71% karyawan tetap dan 29% karyawan kontrak. Jumlah Karyawan kontrak meningkat dibandingkan dengan tahun sebelumnya sebesar 10% di tahun 2021. Perseroan juga tidak memiliki karyawan *part time*, semua karyawan bekerja secara *full time*. [102-7] [102-8]

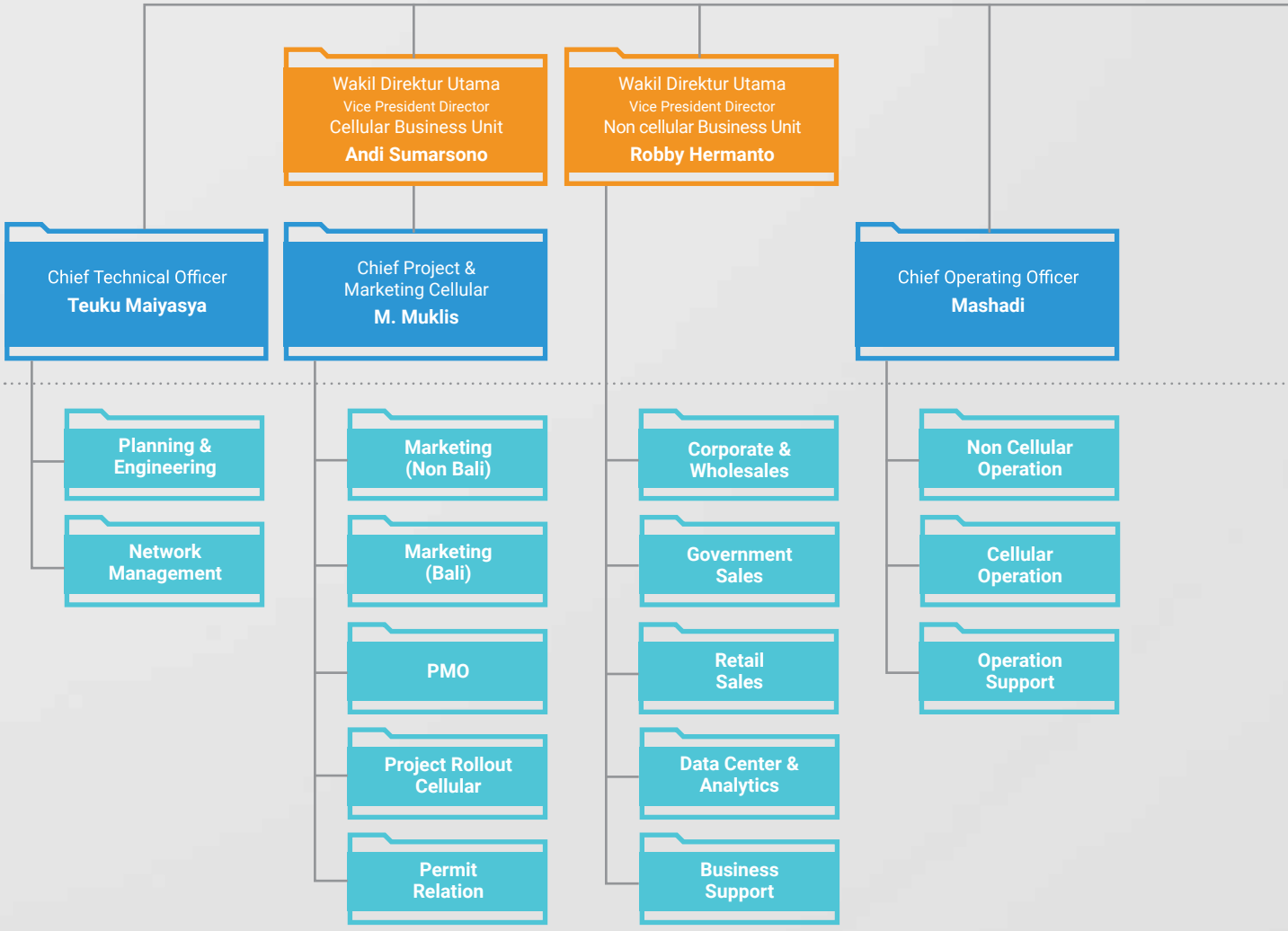
At the end of 2021, the total employees of Bali Tower were 618 employees with 71% permanent employees and 29% contract employees. The number of contract employees increased compared to the previous year by 10% in 2021. The Company also does not have part time employees, all employees work full time. [102-7] [102-8]

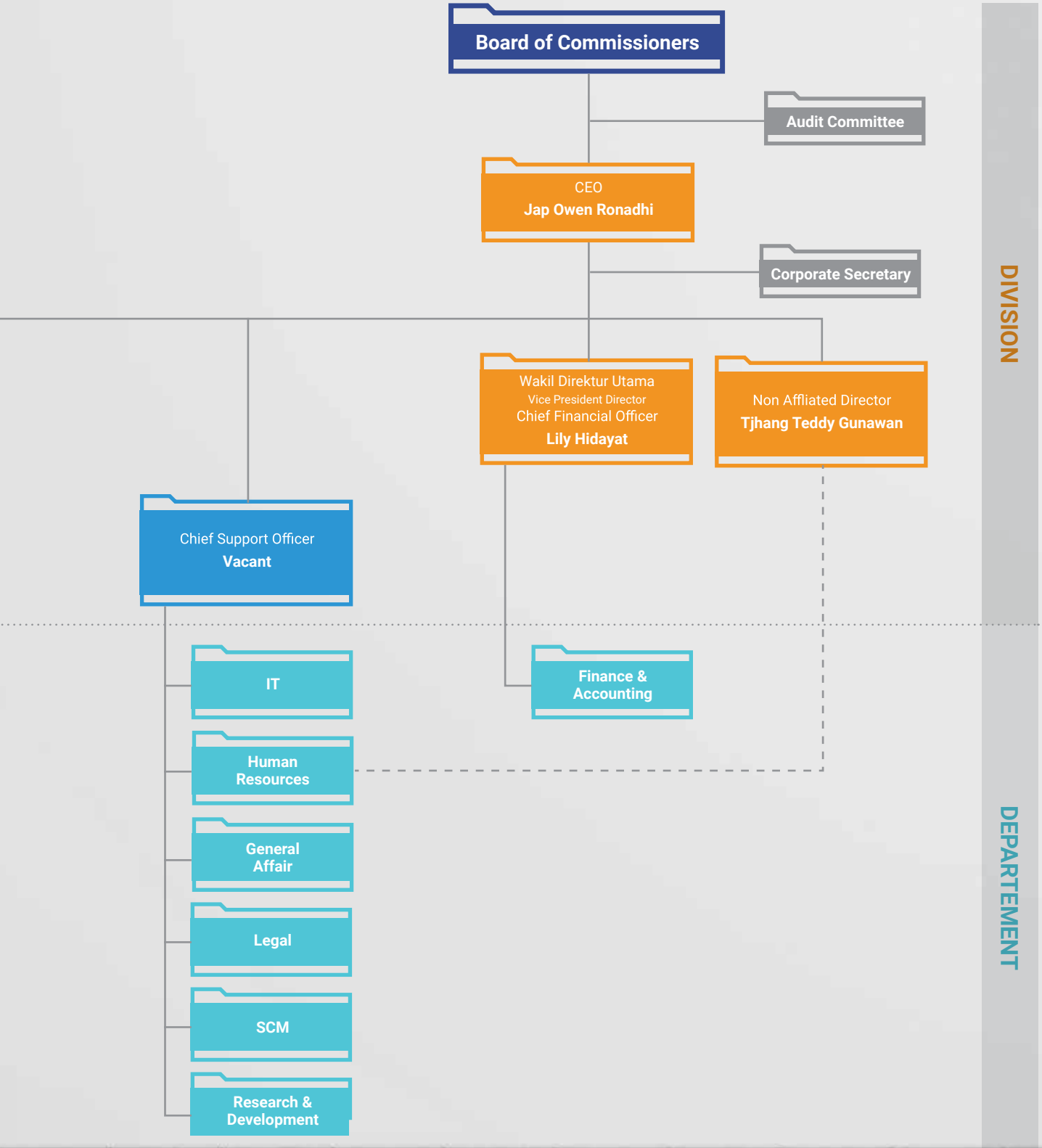
Bali Tower memiliki kebijakan perusahaan yang tidak melakukan diskriminasi dalam rekrutmen pekerja berdasarkan suku, agama, ras, antar golongan dan jenis *gender*. Hal ini dibuktikan dengan perusahaan mengatur kesetaraan ini dalam Kode Etik dan Peraturan Perusahaan. Selain itu, Perseroan tidak memiliki perjanjian kolektif bersama (PKB) dikarenakan tidak ada serikat pekerja meskipun kebijakan perusahaan tidak melarang berdirinya serikat pekerja. Untuk menangani hal tersebut, Perusahaan memiliki peraturan yang mengatur hubungan industrial yang tertuang di dalam Peraturan Perusahaan, namun hingga saat ini belum ada kebutuhan akan Serikat Pekerja dimana aspirasi karyawan dikelola dan ditindaklanjuti oleh *Human Resources Department (HRD)* bagian *Employee Relation*. [102-41]

Bali Tower has a company policy that does not discriminate in the employee recruitment based on ethnicity, religion, race, class and gender. This is evidenced by the company stipulating this equality in the Code of Ethics and Company Regulations. In addition, the Company does not have collective work agreement (PKB) because there is no labor union even though the company's policy does not prohibit the establishment of labor unions. To deal with this, the Company has regulations governing industrial relations contained in the Company Regulations, but until now there is no need for the Labor Union where employee aspirations are managed and followed up by the Human Resources Department (HRD) in Employee Relations section. [102-41]

Struktur Organisasi PT Bali Towerindo Sentra

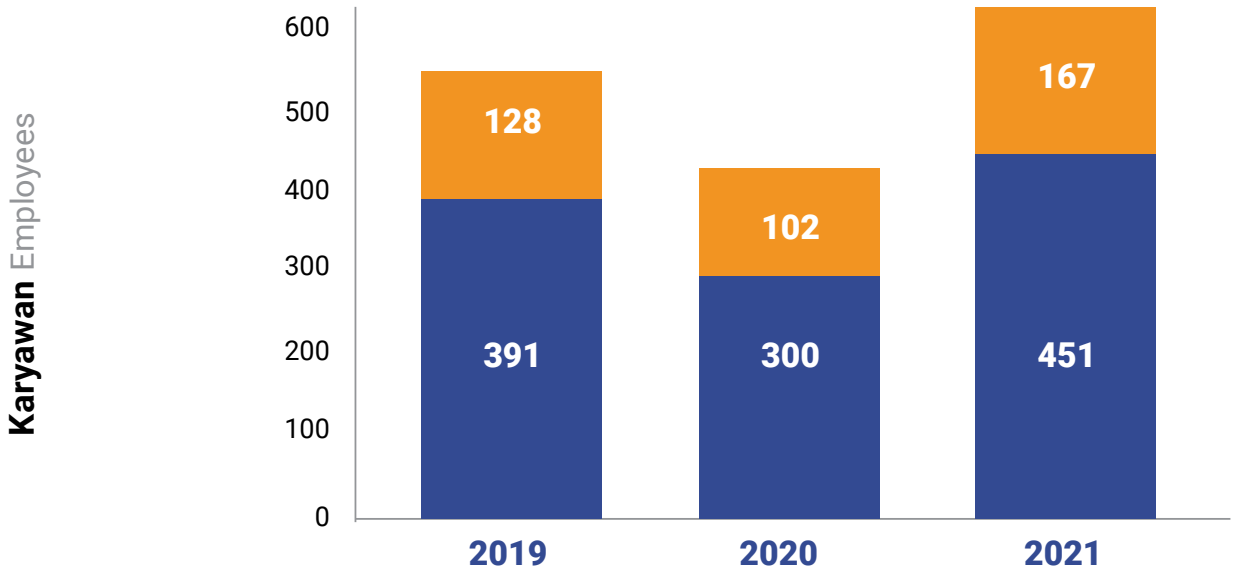
Organizational Structure of PT Bali Towerindo Sentra




Board of Commissioners
Audit Committee
CEO
Jap Owen Ronadhi
Corporate Secretary
Wakil Direktur Utama
Vice President Director
Chief Financial Officer
Lily Hidayat
Non Affliated Director
Tjhang Teddy Gunawan
Chief Support Officer
Vacant
IT
Human Resources
General Affair
Legal
SCM
Research & Development
Finance & Accounting
DIVISION
DEPARTEMENT

Jumlah Karyawan berdasarkan Jenis Kelamin [102-7] [102-8] [POJK No. 3c.2]

Total Employee Based on Gender [102-7] [102-8] [POJK No. 3c.2]

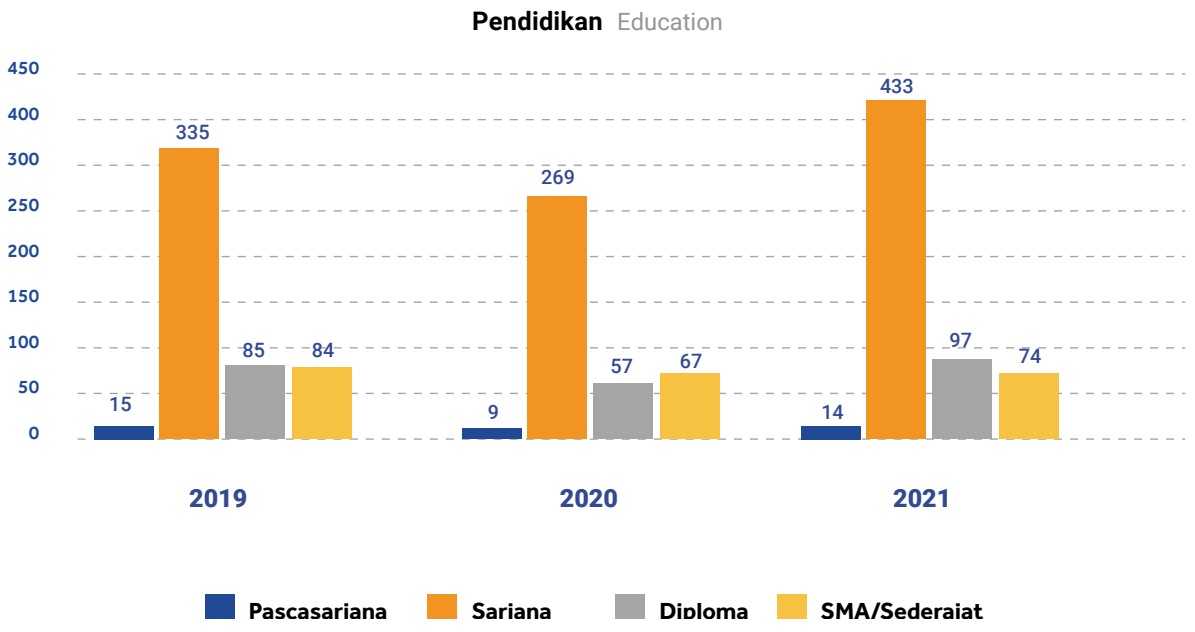


Karyawan Employees	2019	2020	2021
Laki-laki Male	391 Orang / People	300 Orang / People	451 Orang / People
Perempuan Female	128 Orang / People	102 Orang / People	167 Orang / People
JUMLAH / Total	**519** Orang / People	**402** Orang / People	**618** Orang / People

Jumlah Karyawan Berdasarkan Jenjang Pendidikan [102-7] [102-8] [POJK No. 3c.2]

Total Employee Based on Education Level [102-7] [102-8] [POJK No. 3c.2]

Pendidikan *Education*	2019			2020			2021		
	Laki-laki *male*	Perempuan *female*	Total	Laki-laki *male*	Perempuan *female*	Total	Laki-laki *male*	Perempuan *female*	Total
Pascasarjana *Postgraduate*	11	4	15	6	3	9	6	8	14
Sarjana *Graduate*	240	95	335	188	81	269	300	133	433
Diploma *Diploma*	57	28	85	42	15	57	73	24	97
SMA/sederajat *Highschool*	83	1	84	64	3	67	72	2	74
TOTAL	391	128	519	300	102	402	451	167	618

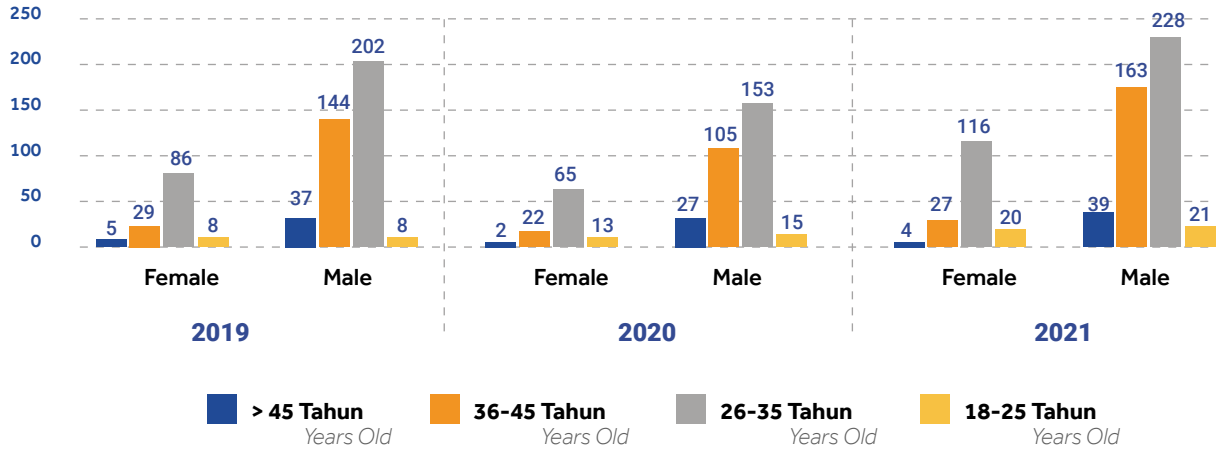


Jumlah Karyawan Berdasarkan Rentang Usia [102-7] [102-8] [POJK No. 3c.2]

Total Employee Based on Age Range [102-7] [102-8] [POJK No. 3c.2]

Umur *Age*	2019			2020			2021		
	Laki-laki *male*	Perempuan *female*	Total	Laki-laki *male*	Perempuan *female*	Total	Laki-laki *male*	Perempuan *female*	Total
> 45 Tahun *Years Old*	37	5	42	27	2	29	39	4	43
36-45 Tahun *Years Old*	144	29	173	105	22	127	163	27	190
26-35 Tahun *Years Old*	202	86	288	153	65	218	228	116	344
18-25 Tahun *Years Old*	8	8	16	15	13	28	21	20	41
TOTAL	391	128	519	300	102	402	451	167	618

Rentang Usia *Age*

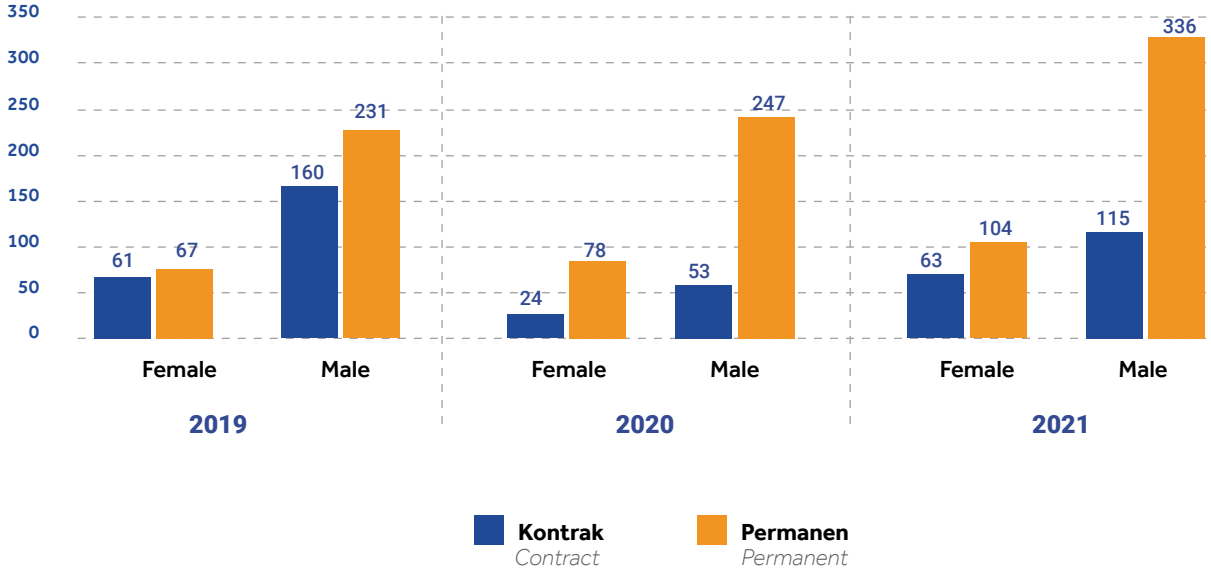


Status Karyawan Perseroan [102-7] [102-8] [POJK No. 3c.2]

Total Employee Based on Employee Status [102-7] [102-8] [POJK No. 3c.2]

Status *Status*	2019			2020			2021		
	Laki-laki *male*	Perempuan *female*	Total	Laki-laki *male*	Perempuan *female*	Total	Laki-laki *male*	Perempuan *female*	Total
Kontrak *Contract*	160	61	221	53	24	77	115	63	178
Permanen *Permanent*	231	67	298	247	78	325	336	104	440
TOTAL	391	128	519	300	102	402	451	167	618

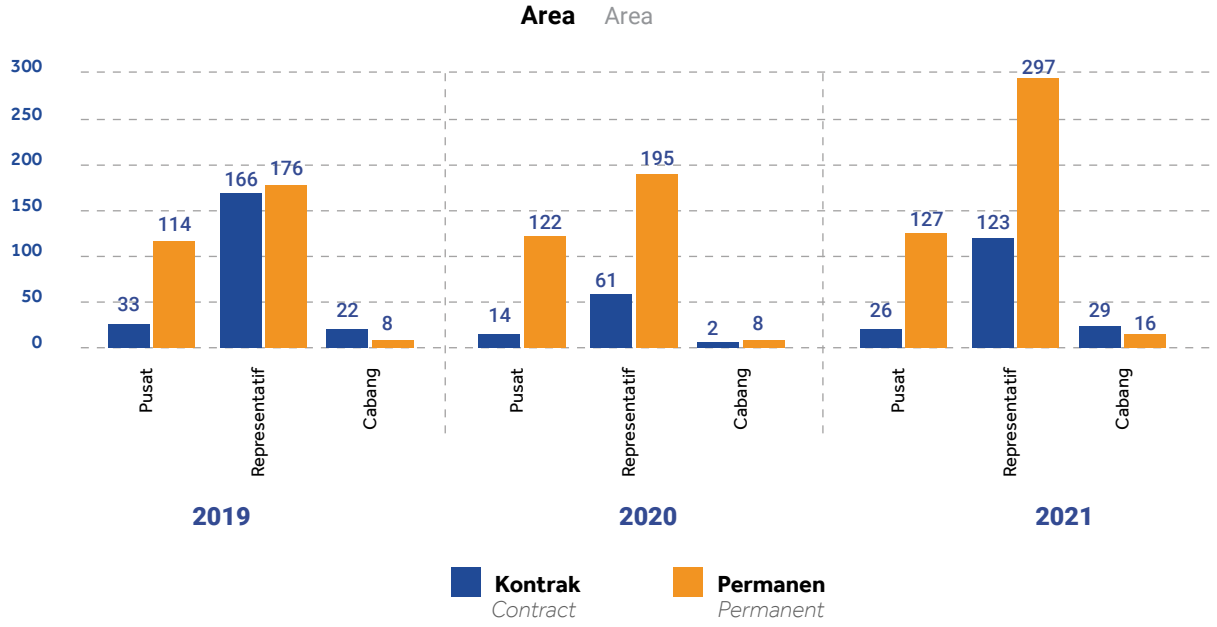
Status Ketenagakerjaan Contract Status



Persentase Status Ketenagakerjaan berdasarkan Area [102-7]

Percentage of Employment Status by Area [102-7]

Area *Area*	2019			2020			2021		
	Kontrak *contract*	Permanen *permanent*	Total	Kontrak *contract*	Permanen *permanent*	Total	Kontrak *contract*	Permanen *permanent*	Total
Pusat *Center*	33	114	147	14	122	136	26	127	153
Representatif *Representative*	166	176	342	61	195	256	123	297	420
Cabang *Subsidiary*	22	8	30	2	8	10	29	16	45
TOTAL	221	298	519	77	325	402	178	440	618



Sepanjang tahun 2021, Bali Tower terdaftar sebagai anggota dalam berbagai asosiasi yang bermanfaat untuk memperluas wawasan, meningkatkan pengetahuan serta meluaskan jaringan. Beberapa asosiasi yang keanggotaannya masih berlaku hingga tahun 2021 sebagai berikut: [102-13]

1.Asosiasi Penyelenggara Jasa Internet Indonesia (APJII)
2. Asosiasi Penyelenggara Jaringan Telekomunikasi (APJATEL)
3. *Indonesian Corporate Secretary Association* (ICSA)
4. Asosiasi Emiten Indonesia (AEI)

Perseroan juga telah mendapatkan penghargaan dan sertifikasi sebagai berikut.[102-12]

Throughout 2021, Bali Tower is registered as a member in various associations that are useful for expanding horizons, increasing knowledge and expanding networks. Some associations whose membership is still valid until 2021 are as follows: [102-13]

1.Indonesian Internet Service provider Association (APJII)
2. Telecommunication Network Providers Association (APJATEL)
3. Indonesian Corporate Secretary Association (ICSA)
4. Association of Indonesian Issuers (AEI)

The Company has also received the following awards and certifications. [102-12]

Penghargaan dan Sertifikasi Perseroan selama Tahun 2021
Company Awards and Certifications during 2021

Sertifikat ISO 27001:2013
ISO 27001:2013 Certificate



Lembaga Pemberi
Organizing Intuition

Bureau Veritas Certification

Nama Penghargaan
Award Tittle

Sistem Manajemen Keamanan Informasi berlaku untuk pengamanan fasilitas data center

Management System Security Information Applies for Security facilities data center

Masa Berlaku
Validity Period

April 1, 2023

Sertifikat ISO 9001:2015

ISO 9001:2015 Certificate



Lembaga Pemberi
Organizing Intuition

Bureau Veritas Certification

Nama Penghargaan
Award Tittle

Sistem Manajemen Mutu
Quality Management System

Masa Berlaku
Validity Period

April 6, 2023

Entitas Anak [102-45]

Subsidiaries [102-45]

PT Paramitra Intimega (PIM) didirikan berdasarkan Akta No. 14 tanggal 30 Maret 2004 yang dibuat dihadapan Yulia S.H., Notaris di Tangerang. Akta pendirian tersebut telah mendapat pengesahan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Keputusan No. C-09044HT.01.01.TH.2004 Tahun 2004 tanggal 15 April 2004. PIM beralamat di Wisma KEIAI Lt. 22 Jl. Jend. Sudirman Kav 3, RT.004/RW.011, Kelurahan Karet Tengsin, Kecamatan Tanah Abang, Jakarta Pusat - 10220.

PT Paramitra Intimega (PIM) was established based on Deed No. 14 dated 30 March 2004 made before Yulia S.H., Notary in Tangerang. The deed of establishment has been approved by the Minister of Law and Human Rights of the Republic of Indonesia with Decree No. C-09044HT.01.01. TH.2004, 15 April 2004. PIM is locacted at Wisma KEIAI, Lt. 22 Jl. Gen. Sudirman Kav 3, RT.004/RW.011, Karet Tengsin Village, Tanah Abang District, Central Jakarta - 10220.

PT Paramitra Media Interaktif (PMI) didirikan berdasakan Akta No. 118 tanggal 27 Desember 2013 yang dibuat dihadapan notaris Hannywati Gunawan, S.H., Notaris di Jakarta. Akta pendirian tersebut telah mendapat pengesahan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Keputusan No. AHU-03026.AH.01.01 tanggal 21 Januari 2014. PMI beralamat di Wisma KEIAI Lt. 22 Jl. Jend. Sudirman Kav 3, RT. 004/RW. 011, Kelurahan Karet Tengsin, Kecamatan Tanah Abang, Jakarta Pusat - 10220.

PT Paramitra Media Interaktif (PMI) was established based on Deed No. 118 dated 27 December 2013 made before Hannywati Gunawan, S.H., Notary in Jakarta. The deed of establishment has been approved by the Minister of Law and Human Rights of the Republic of Indonesia with Decree No. AHU-03026.AH.01.01 dated 21 January 2014. PMI is located at Wisma KEIAI Lt. 22 Jl. Gen. Sudirman Kav 3, RT. 004/RW. 011, Karet Tengsin Village, Tanah Abang District, Central Jakarta - 10220.

PT Paramitra Intimega

Perdagangan, Jasa Telekomunikasi dan Penyewaan Menara BTS

Trade, Telecommunication and BTS Tower Lease Services

Lokasi
Location
Jakarta

Mulai beroperasi
Start Operating
2010

Kepemilikan Saham
Share Ownership
99,9975%

Total Aset (Miliar Rp)
Total Assets (Miliar Rupiah)
162,958

Status Operasi
Operation Status
Operating

PT Paramitra Media Interaktif

Penyelenggaraan Penyiaran dan Jasa Pengelolaan Televisi Berbayar

Broadcasting and Subscribed Television Services

Lokasi
Location
Jakarta

Mulai beroperasi
Start Operating
2017

Kepemilikan Saham
Share Ownership
99,6%

Total Aset (Miliar Rp)
Total Assets (Miliar Rupiah)
2,655

Status Operasi
Operation Status
Operating

04.

IKHTISAR **KINERJA BERKELANJUTAN** [102-7] [POJK No. 2]

SUMMARY OF SUSTAINABILITY PERFORMANCE [102-7] [POJK No. 2]

	2019	2020	2021
Kinerja Ekonomi *Economic Performance*	**Pendapatan** *Revenues* 617.522 Miliar Rupiah *Billion IDR* **Laba Bersih** *Income* 277.876 Miliar Rupiah *Billion IDR* **Pelibatan Pemasok Lokal** *Local Vendors* 197.522 Miliar Rupiah *Billion IDR* **Distribusi Nilai Ekonomi** *Economic Value Distributed* 571.499 Miliar Rupiah *Billion IDR* ***Community Investment*** *Corporate Social Responsibility* 0.362 Miliar Rupiah *Billion IDR*	**Pendapatan** *Revenues* 778.896 Miliar Rupiah *Billion IDR* **Laba Bersih** *Income* 361.576 Miliar Rupiah *Billion IDR* **Pelibatan Pemasok Lokal** *Local Vendors* 197.522 Miliar Rupiah *Billion IDR* **Distribusi Nilai Ekonomi** *Economic Value Distributed* 694.493 Miliar Rupiah *Billion IDR* ***Community Investment*** *Corporate Social Responsibility* 0.440 Miliar Rupiah *Billion IDR*	**Pendapatan** *Revenues* 946.633 Miliar Rupiah *Billion IDR* **Laba Bersih** *Income* 481.318 Miliar Rupiah *Billion IDR* **Pelibatan Pemasok Lokal** *Local Vendors* 148.116 Miliar Rupiah *Billion IDR* **Distribusi Nilai Ekonomi** *Economic Value Distributed* 758.096 Miliar Rupiah *Billion IDR* ***Community Investment*** *Corporate Social Responsibility* 1.1826 Miliar Rupiah *Billion IDR*
Kinerja lingkungan *Environmental Performance*	**Penggunaan Energi** *Cakupan 1* *Energy Use (Scope 1)* 4,135.05 GigaJoule **Penggunaan Energi** *Cakupan 2* *Energy Use (Scope 2)* 79,746.64 GigaJoule **Emisi GRK Langsung** *Emission (Scope 1)* 309.70 Ton CO2 eq **Emisi GRK Tak Langsung** *Emission (Scope 2)* 19,432.57 Ton CO2 eq	**Penggunaan Energi** *Cakupan 1* *Energy Use (Scope 1)* 3,138.16 GigaJoule **Penggunaan Energi** *Cakupan 2* *Energy Use (Scope 2)* 136,343.56 GigaJoule **Emisi GRK Langsung** *Emission (Scope 1)* 235.12 Ton CO2 eq **Emisi GRK Tak Langsung** *Emission (Scope 2)* 33,224.04 Ton CO2 eq	**Penggunaan Energi** *Cakupan 1* *Energy Use (Scope 1)* 2,728.32 GigaJoule **Penggunaan Energi** *Cakupan 2* *Energy Use (Scope 2)* 145,312.26 GigaJoule **Emisi GRK Langsung** *Emission (Scope 1)* 204.52 Ton CO2 eq **Emisi GRK Tak Langsung** *Emission (Scope 2)* 35,409.52 Ton CO2 eq
Kinerja SDM *Human Resources Performance*	**Rasio Pegawai Wanita** *Ratio Employee of Female* 25 % **Total Waktu Pelatihan** *Training Hours per Employee* 14,1 Jam Setiap Pegawai *Hours per Employee*	**Rasio Pegawai Wanita** *Ratio Employee of Female* 25 % **Total Waktu Pelatihan** *Training Hours per Employee* 5,7 Jam Setiap Pegawai *Hours per Employee*	**Rasio Pegawai Wanita** *Ratio Employee of Female* 27 % **Total Waktu Pelatihan** *Training Hours per Employee* 5,9 Jam Setiap Pegawai *Hours per Employee*
Kinerja K3 *OHS Performance*	**Jumlah Kecelakaan Kerja** *Work Accident* 0 -	**Jumlah Kecelakaan Kerja** *Work Accident* 0 0	**Jumlah Kecelakaan Kerja** *Work Accident* 0 0

05.

PENDEKATAN **BERKELANJUTAN** [1]

SUSTAINABILITY APPROACH [1]

Kami paham bahwa keberhasilan jangka panjang Bali Tower membutuhkan integrasi keberlanjutan ke dalam seluruh aspek usaha. Kami melakukan pengkajian terhadap praktik terbaik global industri penyewaan menara telekomunikasi untuk meningkatkan kinerja operasi, lingkungan dan sosial.

Keselamatan dan kontribusi strategis kami tempatkan pada pencapaian tujuan pembangunan berkelanjutan sebagai salah satu misi utama dari seluruh operasi [102-16]. Penilaian efektivitas seluruh keluaran (*output*) dan dampak (*impact*) yang dihasilkan dari operasi Perseroan diukur berdasarkan pencapaian secara seimbang dari kinerja finansial, dampak pada kemajuan sosial, dan pelestarian lingkungan. [103-2] [103-3]

Sebagai Perusahaan Infrastruktur telekomunikasi yang mempunyai konsep menata, mengatur dan mengendalikan pembangunan menara telekomunikasi di Indonesia khususnya di Provinsi Bali yang merupakan daerah wisata terkemuka di dunia, dimana penataan dan pembangunan tersebut diselenggarakan untuk menjaga kawasan tersebut tetap indah, bersih dan lestari.

Hal ini sesuai dengan falsafah *Tri Hita Karana* yang memiliki konsep untuk melestarikan keanekaragaman budaya dan lingkungan di tengah hantaman teknologi dan globalisasi. Pada hakikatnya ajaran *Tri Hita Karana* menekankan keseimbangan dan keselarasan tiga hubungan manusia dalam kehidupan di dunia ini, meliputi hubungan dengan sesama manusia, hubungan dengan alam sekitar, dan hubungan dengan ke Tuhan yang saling terkait satu sama lain. Apabila keseimbangan tercapai, manusia akan hidup dengan seimbang, tenteram, dan damai.

Berdasarkan uraian di atas Perseroan menyusun rencana kerja jangka panjang sebagai *blueprint* untuk turut serta berpartisipasi aktif dalam menjaga kelestarian lingkungan. Dalam wujud nyata tersebut Perseroan mempunyai rencana untuk turut serta mengurangi limbah plastik yang secara nyata akan menjadi ancaman serius terhadap lingkungan di masa depan.

We understand that the long-term success of Bali Tower requires the integration of sustainability into all aspects of the business. We conduct assessment of global best practices in the telecommunications tower rental industry to improve operating, environmental and social performance.

Safety and strategic contribution we place on achieving sustainable development goals as one of the key missions of the entire operations [102-16]. Assessment of the effectiveness of all outputs and impacts resulting from the Company's operations is measured based on a balanced achievement of financial performance, impact on social progress, and environmental preservation. [103-2] [103-3]

As a telecommunications infrastructure company that has the concept of organizing, regulating and controlling the construction of telecommunication towers in Indonesia, especially in Bali Province which is the world's leading tourist area, where the arrangement and development is carried out to keep the area beautiful, clean and sustainable.

This is in accordance with the philosophy of Tri Hita Karana which has the concept of preserving cultural and environmental diversity amid the impact of technology and globalization. The teachings of Tri Hita Karana emphasize the balance and harmony of three human relationships in life in this world, including relationships with humans, relationships with the natural surroundings, and relationships with God that are interrelated with one another. When balance is achieved, humans will live in balance, serenity, and peace.

Based on the description above, the Company prepares a long-term work plan as a blueprint to actively participate in preserving the environment. In this tangible form, the Company has a plan to participate in reducing plastic waste which will be a serious threat to the environment in the future.

VISI Vision

"Menjadi perusahaan penyedia infrastruktur telekomunikasi dan multimedia terbesar di Indonesia."

"To become the largest telecommunication and multimedia infrastructure provider in Indonesia."

MISI Mission

- Menyediakan sistem jaringan teknologi terintegrasi dan terkini di Indonesia.
- Membangun menara telekomunikasi dan *Micro Cellular Pole* yang dapat menjangkau dan melayani seluruh wilayah Indonesia.
- Memberikan layanan Internet tercepat dan handal.
- Membangun Infrastruktur multimedia dengan jaringan luas dan pelayanan yang terbaik.

- Providing network with integrated and updated technology.
- Constructing telecommunication towers and Micro Cellular Poles that can reach and serve all areas in Indonesia.
- Providing the fastest and reliable internet services.
- Building multimedia infrastructures with wide network and excellent service.

NILAI UTAMA PERUSAHAAN Corporate Main Values

B — ***BEHAVIOR***
Berperilaku yang baik dalam mencapai Visi dan Misi Perusahaan.
Having good behaviour in achieving the Company's Vision and Mission.

A — ***ACTION***
Selalu bertindak proaktif dalam mencapai Visi dan Misi Perusahaan.
Being proactive in achieving the Company's Vision and Mission.

L — ***LOYALTY***
Loyal kepada Visi dan Misi Perusahaan.
Being loyal to the Company's Vision and Mission.

I — ***INNOVATIVE***
Selalu melakukan inovasi dalam mengantisipasi perkembangan teknologi yang pesat agar memberikan produk yang teruji dan sesuai dengan teknologi terkini.
Being innovative in anticipating the rapid technological development to provide proven & qualified products with the latest technology.



Perseroan tetap berkomitmen penuh untuk menerapkan prinsip GCG dalam seluruh aktivitas bisnis dan seluruh aspek pengelolaan perusahaan secara berkelanjutan dan terus disempurnakan dari waktu ke waktu. Perseroan menyadari bahwa kemajuan suatu perusahaan terbentuk sistem pengelolaan yang baik dan berkelanjutan agar struktur dan seluruh aspek tata kelola berjalan maksimal untuk mendukung jalannya kegiatan usaha. [103-2][103-3]

The Company remains fully committed to implementing GCG principles in all business activities and all aspects of corporate management in a sustainable manner and continues to be refined from over time. The Company believes that the progress of a company is forming a good and sustainable management system so that the structure and all aspects of governance run optimally to support the business activities. [103-2] [103-3]

Perseroan telah melengkapi struktur organisasi tata kelola seperti kelengkapan organisasi dewan komisaris dengan membentuk Komite Audit dilengkapi sekretaris perusahaan dan Unit Audit Internal sesuai dengan peraturan Otoritas Jasa Keuangan (OJK) dan perundang-undangan yang berlaku bagi perusahaan publik. Komposisi anggota Dewan Komisaris dan Direksi telah dilengkapi dengan Komisaris Independen sesuai dengan ketentuan OJK. Fungsi lain dari komite ini juga bertanggung jawab penuh terhadap pengambilan keputusan di bidang sosial, ekonomi dan lingkungan.

The Company has completed the governance organizational structure such as the completeness of the board of commissioners organization by establishing an Audit Committee equipped with a corporate secretary and Internal Audit Unit in accordance with the regulations of the Financial Services Authority (OJK) and the laws applicable to public listed companies. The composition of the Board of Commissioners and the Directors has been complemented by an Independent Commissioner in accordance with OJK regulations. Other functions of this committee are also fully responsible for decision making in the social, economic and environmental.

Perseroan berkomitmen untuk selalu menerapkan nilai-nilai inti perusahaan yakni: *Behavior, Action, Loyalty, dan Innovative* sebagai dasar dari budaya berkelanjutan yang terus dibangun Perseroan.

The Company is committed to always implementing the company's main values, namely: Behavior, Action, Loyalty, and Innovative as the basis of the sustainable culture that the Company continues to build.

Manajemen Bali Tower merencanakan untuk melengkapi dokumen-dokumen terkait prinsip-prinsip *Environment, Social & Governance (ESG)* di tahun 2021 agar Perseroan bisa mendapatkan panduan yang lebih jelas dan bisa konsisten dalam penerapan ESG pada kegiatan operasional Perseroan.

Bali Tower management plans to complete documents related to the principles of Environment, Social & Governance (ESG) in 2021 so that the Company can obtain clearer and consistent guidelines in the implementation of ESG in the Company's operational activities.

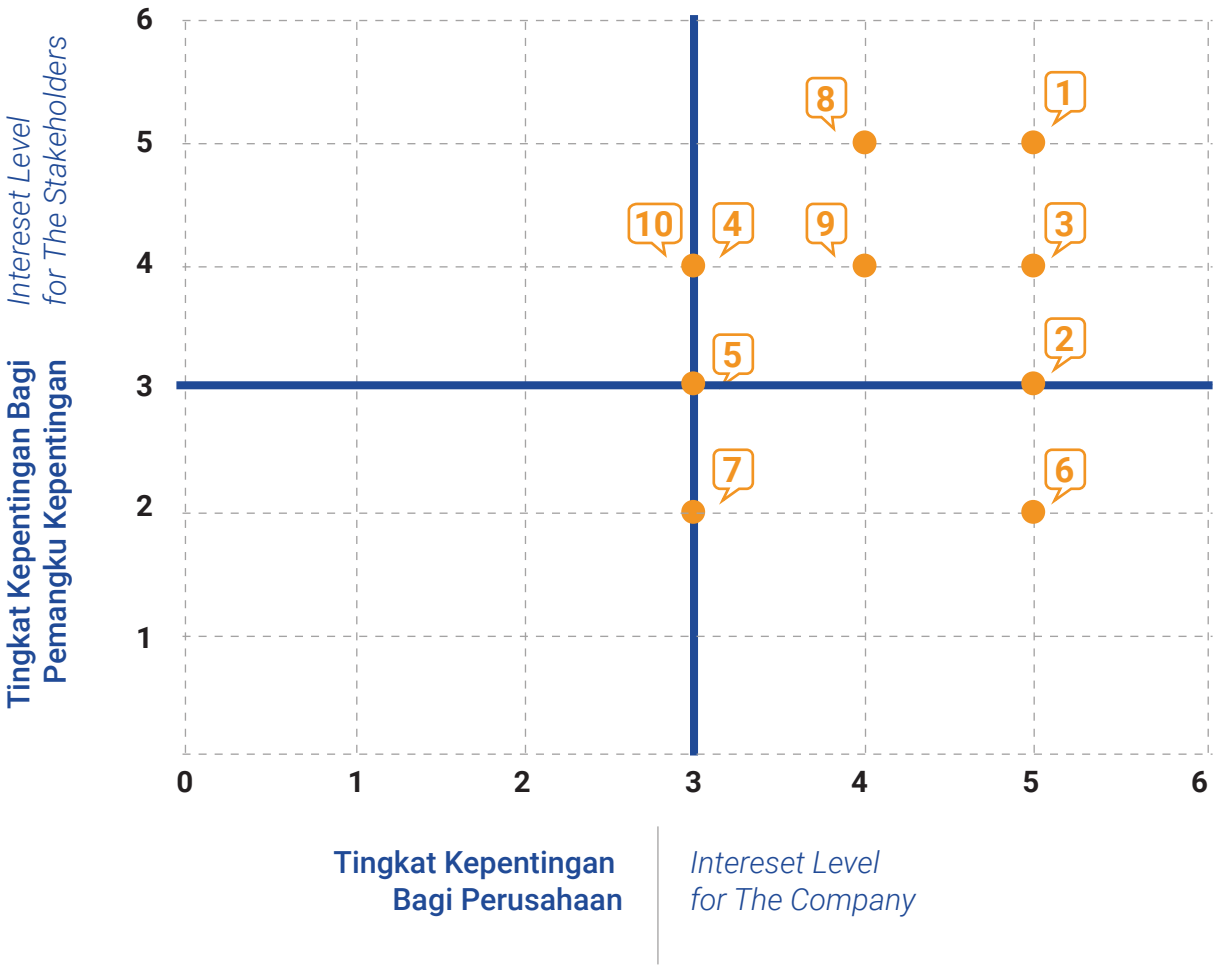
06.

MATERIALITY & **SUSTAINABILITY** [1]

MATERIALITY & SUSTAINABILITY

Bali Tower mengawali perjalanan pelaporan keberlanjutan di tahun ini dengan melakukan penentuan topik material. Para pemangku kepentingan terlibat dalam proses penilaian topik material melalui wawancara dan kuesioner yang dilakukan pada periode akhir Januari - Maret 2021. Selain itu, dilakukan juga *benchmarking* terhadap kompetitor. Dengan mempertimbangkan pemangku kepentingan, topik material diprioritaskan dan dipilih berdasarkan faktor internal dan eksternal yang digunakan sebagai kriteria penilaian. Prioritas dan topik materi yang dilaporkan menggunakan empat prinsip standar GRI dalam menentukan konten dan batasan laporan keberlanjutan: keterlibatan pemangku kepentingan, konteks keberlanjutan, materialitas dan kelengkapan.

Bali Tower started the sustainability report this year by determining material topics. Stakeholders are involved in the process of assessing material topics through interviews and questionnaires conducted in the period end January - March 2021. In addition, benchmarking is also carried out against competitors. By considering stakeholders, material topics are prioritized and selected based on internal and external factors used as assessment criteria. The priorities and topics of the material reported use the four principles of the GRI standards in determining the content and boundaries of sustainability report: stakeholder engagement, sustainability context, materiality and completeness.



List Topik Material [102-45]

List of Material Topics [102-45]

01.
Peluang kemitraan yang setara
Equal Partnership Opportunities

02.
Emisi Gas Rumah Kaca
Green House Gases Emission

03.
Pelatihan dan Pengembangan Karyawan
Employee training and development

04.
Kinerja Keuangan yang sehat dan menguntungkan
Healthy and profitable financial performance

05.
Daya saing dalam kinerja operasional, inovasi teknologi dan investasi infrastruktur
Competitiveness in operational performance, technological innovation, and infrastructure investment

06.
Kepuasan Pelanggan
Customer Satisfaction

07.
Kualitas Jasa Produk
Product Service Quality

08.
Kepatuhan terhadap peraturan yang relevan dengan perusahaan (ekonomi, sosial dan lingkungan)
Compliance with regulations relevant to the company in the economic, social, and environmental fields

09.
Konservasi penggunaan energi
Energy use conservation

10.
Kesehatan dan Keselamatan Kerja
Occupational Health and Safety

11.
Penerapan tata kelola perusahaan yang berkelanjutan
Sustainable Governance

Masing-masing topik tersebut ditulis berdasarkan batasan-batasan sesuai dengan tabel di bawah ini. [102-46]

Each of these topics is written based on the boundaries according to the table below. [102-46]

Ekonomi — Economic

Topik Material *Material Topic* [102-46]	Disclosure *Disclosure*	Kenapa Topik Ini Material *Why The Topic is Materials*	Boundary: Kantor Pusat *Head Office*	Boundary: Kantor Operasional *Operational Office*	Boundary: Unit Menara (MCP) *Towerr Unit (MPC)*	Boundary: Anak Perusahaan *Subsidiary*
Kinerja keuangan yang sehat dan menguntungkan *Healthy and profitable financial performance*	201-1	**Berdampak signifikan bagi kinerja bisnis perusahaan** *Significant impact on the company's sustainability*	✓	✓	✓	✓
Kepuasaan Pelanggan *Customer Satisfaction*	418-1	**Berdampak signifikan bagi keberlangsungan perusahaan** *Significant impact on the company's sustainability*	✓	✓	✓	✓
Kualitas Jasa/Produk *Product Service Quality*	102-2	**Berdampak signifikan bagi keberlangsungan perusahaan** *Significant impact on the company's sustainability*	✓	✓	✓	✓
Daya Saing *Competitiveness*	206-1	**Berdampak signifikan bagi keberlangsungan perusahaan** *Significant impact on the company's sustainability*	✓	✓	✓	✓
Kepatuhan terhadap peraturan *Compliance with regulations*	419-1, 307-1	**Berdampak signifikan bagi pemangku kepentingan** *Significant impact for stakeholders*	✓	✓	✓	✓
Peluang kemitraan yang setara *Equal Partnership Opportunities*	204-1	**Berdampak signifikan bagi pemangku kepentingan** *Significant impact for stakeholders*	✓	✓	✓	✓

Sosial

Social

Topik Material *Material Topic* [102-46]	Disclosure *Disclosure*	Kenapa Topik Ini Material *Why The Topic is Materials*	Boundary			
			Kantor Pusat *Head Office*	Kantor Operasional *Operational Office*	Unit Menara (MCP) *Towner Unit (MCP)*	Anak Perusahaan *Subsidiary*
Pelatihan dan Pengembangan Karyawan *Employee training and development*	404-1	**Berdampak signifikan bagi kinerja bisnis perusahaan** *Significant impact on the company's sustainability*	✓	✓	✓	✓
Kesehatan dan Keselamatan Kerja *Occupational Health and Safety*	403-1 403-4 403-5	**Berdampak signifikan bagi keberlangsungan perusahaan** *Significant impact on the company's sustainability*	✓	✓	✓	✓
Masyarakat Sekitar *Local Community*	413-1	**Berdampak signifikan bagi keberlangsungan perusahaan** *Significant impact on the company's sustainability*	✓	✓	✓	✓

Lingkungan

Environment

Topik Material *Material Topic* [102-46]	Disclosure *Disclosure*	Kenapa Topik Ini Material *Why The Topic is Materials*	Boundary			
			Kantor Pusat *Head Office*	Kantor Operasional *Operational Office*	Unit Menara (MCP) *Towner Unit (MCP)*	Anak Perusahaan *Subsidiary*
Konservasi Penggunaan Energi *Employee training and development*	302-1 302-3 302-4 302-5	**Berdampak signifikan bagi kinerja bisnis perusahaan** *Significant impact on the company's sustainability*	✓	✓	✓	✓
Emisi Gas Rumah Kaca *Occupational Health and Safety*	305-1 305-2 305-4	**Berdampak signifikan bagi keberlangsungan perusahaan** *Significant impact on the company's sustainability*	✓	✓	✓	✓

07.

MANAJEMEN **RISIKO** [102-11] [POJK No. 4c]

RISK MANAGEMENT [102-11] [POJK No. 4c]

Perseroan senantiasa berusaha membentuk dan mengembangkan budaya manajemen risiko yang kuat, penerapan praktik GCG, kepatuhan terhadap regulasi, yang tentunya didukung oleh komitmen manajemen yang mengelola aktivitas dengan prinsip kehati-hatian untuk mencapai hasil kinerja yang baik.

The Company always strives to establish and develop a strong risk management culture, implementation of GCG practices, compliance with regulations, supported by the commitment of management to manage activities with the principle of prudence to achieve good performance results.

Saat ini, Bali Tower masih belum terbentuk secara formal unit atau satuan kerja khusus yang membawahi bidang manajemen risiko. Akan tetapi, fungsi manajemen risiko untuk mengidentifikasi dan memahami risiko-risiko terkait proses usaha yang dijalankannya dengan menggunakan pendekatan koordinasi internal antar Divisi/ Departemen yang didukung oleh fungsi Unit Audit Internal Perseroan dalam mengelola Sistem Pengendalian Internal Perusahaan.

Currently, Bali Tower has not formally formed a special unit or work unit in charge of risk management. However, the risk management function is to identify and understand the risks related to the business processes it carries out using an internal coordination approach between Divisions/Departments supported by the Internal Audit Unit function in managing the Company's Internal Control System.

Untuk meningkatkan efektivitas fungsi manajemen risiko, Perseroan senantiasa melakukan evaluasi serta penyesuaian penerapan manajemen risiko sesuai dengan kebutuhan. Kedepan, untuk pengelolaan sistem manajemen risiko yang lebih baik, maka Bali Tower akan membentuk unit/satuan kerja yang membawahi manajemen risiko dimana identifikasi, pemantauan, pengendalian profil risiko dapat dilakukan secara optimal serta hasil penerapan manajemen risiko dapat diimplementasikan secara komprehensif dan berkesinambungan dalam menjalankan aktivitas kegiatan usaha.

To improve the effectiveness of the risk management function, the Company continuously evaluates and adjusts the implementation of risk management as needed. In the future, for better risk management system management, Bali Tower will establish a unit/ work unit that oversees risk management where identification, monitoring, risk profile control can be carried out optimally and the results of risk management implementation can be implemented comprehensively and continuously in carrying out business activities.

Terdapat 5 komponen profil risiko yang berpengaruh terhadap aktivitas bisnis Perseroan antara lain: [102-15] [POJK No. 5c]

There are 5 components of the risk profile that affect the Company's business activities, including: [102-15] [POJK No. 5c]

1. Risiko Usaha

Business Risk

a. Perseroan memperkirakan adanya kendala pada keterbatasan lahan, tingkat harga sewa menara telekomunikasi, bersamaan dengan kebutuhan belanja modal yang cukup tinggi untuk penyewa telekomunikasi serta tingkat persaingan usaha yang semakin ketat, membuat Perseroan mengambil langkah strategis dan produktif dalam mengembangkan usahanya. Oleh karena itu, Bali Tower mengembangkan pembangunan *Microcell Pole*, dengan mengajukan konsep kerjasama untuk pembangunan *Microcell Pole* kepada Pemerintah Daerah dan/atau Pemerintah Kota setempat, sehingga pembangunan Menara dan/atau tiang/*pole* menggunakan lahan Pemerintah Daerah dan/atau Pemerintah Kota, sehingga dapat menekan pengeluaran terkait sewa lahan dan biaya pembangunan menara.

a. The Company estimates that the constraints on land limitations, the level of rental rates for telecommunication towers, along with the relatively high capital expenditure requirements for telecommunication tenants and the increase of fierce business competition, have forced the Company to take strategic and productive steps in developing its business. Therefore, Bali Tower is developing the Microcell Pole, by proposing the concept of cooperation for the construction of Microcell Pole to the Regional Government and/or local Government, so that the construction of the Tower and/or pole/pole uses the land of the Regional Government and/or Local Government, to reduce expenses related to land rent and tower construction costs.

b. Dengan banyaknya tuntutan kebutuhan operator telekomunikasi yang ada di Indonesia, diperkirakan operator telekomunikasi akan melakukan efisiensi dengan melakukan konsolidasi menara telekomunikasi/ jaringan yang disewa dari Bali Tower, seiring dengan kemajuan teknologi telekomunikasi yang sudah menggunakan teknologi 4G (LTE). Perseroan juga memperkirakan bahwa tingkat harga sewa menara telekomunikasi saat ini, bersamaan dengan kebutuhan belanja modal yang cukup tinggi untuk penyewa telekomunikasi, hanya dapat dipertahankan secara berkelanjutan oleh penyewa dengan operasi berskala besar dari segi kapasitas jaringan dan juga jumlah total pelanggan.

b. The increase of demands for telecommunication operators in Indonesia, it is estimated that telecommunication operators will make efficiency by consolidating telecommunication towers/networks rented from Bali Tower, in line with advancement of telecommunication technology that already uses 4G (LTE) technology. The Company also estimates that the current level of telecommunications tower rental rates, along with the relatively high capital expenditure requirements for telecommunications tenants, can only be managed on a sustainable basis by tenants with large-scale operations in terms of network capacity and total number of customers.

Oleh karena itu, Bali Tower melakukan perjanjian/ kontrak dengan pelanggan secara jangka panjang sehingga bisa memperoleh kepastian pendapatan dalam jangka panjang dan mengurangi risiko Perseroan atas fluktuasi harga sewa di pasar. Selain itu, kontrak jangka panjang dapat mengurangi risiko adanya persaingan yang cukup ketat dalam hal jasa penyediaan menara telekomunikasi dan jaringan sehingga pendapatan Perseroan tetap terjaga dan hanya akan berpengaruh pada penyewaan- penyewaan yang akan datang.

Therefore, the Company enters into long-term agreement/ contract with its customers to ensure long term revenue and reduce the risk of lease price fluctuation in the market. Additionally, long-term contract can reduce the risk of tight competition in telecommunication tower and network services so that the Company's revenue will remain stable and only affect the future rentals.

2. Risiko Operasional

Perseroan memahami bahwa, aktivitas bisnis dan usahanya tidak lepas dari proses awal yang harus dijalani. Beberapa komponen penanganan terhadap Risiko Operasional Perseroan adalah :

a. Memastikan bahwa semua lini yang terkait telah memahami risiko pada setiap tahap kegiatan operasional terutama yang berhubungan dengan persetujuan atau komitmen dengan pelanggan dan/atau pihak ketiga.
b. Penyusunan dan *monitoring* laporan internal maupun eksternal Perseroan untuk memantau hasil kinerja Perseroan.
c. Pelaksanaan penerapan Standar Operasional Prosedur/ SOP yang sudah ditetapkan.
d. Menggunakan sistem teknologi informasi yang terkini untuk menunjang kegiatan operasional.

Operational Risk

The Company understands that its business activities cannot be separated from the initial process that must be performed. The following are several components of the Company's Operational Risk:

a. Ensuring that the whole related business lines have understood the risks at each level of operational activities, particularly those related to the agreement or commitment with the customers and/or third parties.
b. Preparing and monitoring the Company's internal and external reports to monitor the Company's performance.
c. Ensuring the implementation of Standard Operating Procedure (SOP) prepared by the Company.
d. Applying up to date information technology system to support the operational activities of the Company

3. Risiko Likuiditas

Dalam menangani Risiko Likuiditas, Perseroan senantiasa menjaga saldo kas yang memadai setiap hari untuk menutupi kebutuhan dana dan melakukan mitigasi dengan pantauan ketat terhadap kebutuhan likuiditas. Di samping itu, Perseroan juga melakukan pinjaman dengan suku bunga tetap dan meminjam dalam rupiah dengan jangka waktu yang sama dengan dana yang disalurkan untuk mengatasi fluktuasi suku bunga dan mata uang, sehingga menghindari dampak negatif terhadap kinerja keuangan.

Liquidity Risk

Liquidity Risk In dealing with the Liquidity Risk, the Company always maintains its daily cash balance to meet the fund needs and mitigate the liquidity needs with strict monitoring. Besides, the Company also seeks for loans in Rupiah with fixed interest rate and duration equal to the funds distributed to cope with the fluctuations of interest rates and currencies, thus avoiding the negative impact toward its financial performance.

4. Risiko Hukum dan/atau Regulasi

Legal and/or Regulation Risk

Aspek hukum merupakan komponen yang cukup berpengaruh dalam aktivitas kegiatan usaha Perseroan, oleh karena itu dalam menghadapi beberapa masalah terkait aspek hukum yang ada, Perseroan senatiasa mengelola Risiko Hukum dengan beberapa langkah sebagai berikut :

Legal aspect is one of the most influential components in the Company's business activities. Hence, in facing the legal issues, the Company always manages the legal risk through the following actions:

a. Menganalisa setiap peraturan atau ketentuan perundang-undangan yang baru diterbitkan yang memiliki dampak langsung maupun tidak langsung atas kegiatan usaha. Selain itu, Perseroan melalui Divisi/Departemen Hukum (Legal) senantiasa melakukan *review* untuk memastikan bahwa setiap kebijakan maupun kewajiban yang harus dilaksanakan oleh Perseroan kepada para pihak terkait apakah sudah memenuhi ketentuan peraturan perundang-undangan yang berlaku.

a. Analyzing all new regulations or laws that have direct or indirect impact on the business activities of the Company. Additionally, through its Legal Division/ Department, the Company performs a review to ensure that all policies or obligations that have to be implemented by the Company to relevant parties, have complied with the prevailing laws and regulations.

b. Memantau proses perijinan maupun izin-izin yang telah dimiliki untuk pembangunan menara dan jaringan telekomunikasi yang dimiliki Bali Tower agar senantiasa sesuai dengan ketentuan peraturan perundang-undangan yang berlaku.

b. Monitoring the licensing process and relevant permits for the construction of towers and telecommunication networks owned by the Company in compliance with the prevailing laws and regulations

c. Mengelola administrasi dokumen hukum Perseroan dengan baik serta melakukan review secara berkala yang dilakukan oleh Divisi/Departemen Hukum (Legal) Perseroan dan dilaporkan kepada manajemen Perseroan.

c. Managing the administration of legal documents properly and performing periodic reviews conducted by the Legal Division/Department of the Company, and reporting it to the management

d. Penanganan proses pembuatan atau kesepakatan perjanjian yang dimiliki Perseroan dengan pelanggan maupun pihak ketiga yang didukung oleh sumber daya manusia yang kompeten serta *review*/pengecekan antar Divisi/Departemen terkait dengan mempertimbangkan ketentuan dan peraturan perundang-undangan yang berlaku untuk meminimalisasi akibat hukum yang mungkin terjadi atas perjanjian, kontrak maupun MoU (*Memorandum of Understanding*) yang dimiliki oleh Perseroan.

d. Preparing the arrangement of agreement or contract between the Company and the customers or third parties supported by competent human resource as well as reviewing/crosschecking between related Division/ Department in compliance with the prevailing laws and regulations to minimize the possible legal consequences that may arise from the agreement,contract or MoU (Memorandum of Understanding) owned by the Company.

e. Koordinasi antara Perseroan dengan konsultan hukum terkait adanya kerjasama dalam penanganan kasus hukum eksternal melalui proses pengadilan atau lembaga penyelesaian sengketa.

e. Coordiantion between the Company and the Legal Consultant related cooperation of handling external legal cases through the Court or dispute settlement institutions.

5. Risiko Lingkungan

Pembangunan menara telekomunikasi membutuhkan persetujuan sebelumnya dari warga di lingkungan yang berada dalam radius yang sama dengan ketinggian menara telekomunikasi di mana lokasi tersebut berada. Setelah diperolehnya persetujuan yang diperlukan, permohonan diajukan kepada pejabat daerah setempat untuk mendapatkan izin untuk pembangunan menara telekomunikasi. Perseroan senantiasa berusaha untuk melakukan koordinasi dengan warga sekitar sebelum memulai pembangunan menara dan memproses serta memperoleh izin-izin yang diperlukan, termasuk Izin Mendirikan Bangunan (IMB). Untuk menjamin keselamatan warga sekitar, Perseroan juga melakukan pemeriksaan secara berkala terhadap kondisi menara telekomunikasi. Selain itu, Perseroan berkomitmen untuk memenuhi peraturan-peraturan lingkungan yang relevan dengan operasi perusahaan termasuk dalam pembangunan menara.

Perseroan juga senantiasa melaksanakan program Tanggung Jawab Sosial Perusahaan (*Corporate Social Responsibility*) yang berkelanjutan setiap tahunnya sebagai bentuk komitmen kepada masyarakat khususnya, bahwa Perseroan senantiasa memperhatikan masyarakat dan kondisi lingkungan sekitar menara telekomunikasi yang dibangun oleh Perseroan.

Environmental Risk

Prior to the construction of telecommunication towers, the Company needs to obtain approval from the local residents who live in the same radius as the height of telecommunication tower. After obtaining the necessary approval, the proposal is submitted to the local official to obtain a permit to build the telecommunication tower. The Company always provides coordination with the local residents before starting to build the tower and runs the process as well as obtains the required licenses, including Building Permit (IMB). To ensure the safety of the local residents, the Company also conducts periodic examination towards the telecommunication towers. To ensure the safety of local residents, the Company also conducts periodic inspections on condition of telecommunication towers. In addition, the Company is committed to complying with environmental regulations relevant to the company's operations, including the construction of towers.

Also, the Company always conducts sustainable Corporate Social Responsibility program every year as its commitment especially to the society, to show them that the Company constantly pays attention, both to the people and the environmental conditions around the telecommunication towers built.

08.

HUBUNGAN DENGAN **PEMANGKU KEPENTINGAN**

RELATIONSHIP WITH STAKEHOLDERS

Dalam menjalankan bisnis, pelibatan pemangku kepentingan menjadi elemen yang sangat penting. Untuk menjalankan pelibatan pemangku kepentingan ini, Perusahaan secara berkala melakukan pemutakhiran pemetaan pemangku kepentingan secara regular baik berkenaan dengan risiko bisnis maupun berhubungan dengan implementasi pelaksanaan *Corporate Social Responsibility* (CSR).

In carrying business, stakeholder involvement is a very important element. To carry out this stakeholder engagement, the Company regularly updates the stakeholder mapping, regarding business risks and related to the implementation of Corporate Social Responsibility (CSR).

Perseroan tidak memiliki perjanjian kolektif bersama (PKB) dikarenakan tidak ada serikat pekerja meskipun kebijakan perusahaan tidak melarang berdirinya serikat pekerja. Untuk menangani hal tersebut, Perusahaan memiliki peraturan yang mengatur hubungan industrial yang tertuang di dalam Peraturan Perusahaan, namun hingga saat ini belum ada kebutuhan akan Serikat Pekerja dimana aspirasi karyawan dikelola dan ditindaklanjuti oleh *Human Resources Department* (HRD) bagian *Employee Relation*. [102-41]

The Company does not have collective work agreement (PKB) because there is no labor union even though the company's policy does not prohibit the establishment of labor unions. To deal with this, the Company has regulations governing industrial relations contained in the Company Regulations, but until now there is no need for the Labor Union where employee aspirations are managed and followed up by the Human Resources Department (HRD) in Employee Relations section. [102-41]

Proses identifikasi pemangku kepentingan, metode pelibatan, frekuensi, serta topik utama ditentukan berdasarkan hasil *benchmark* dengan kompetitor dan kesepakatan internal di Bali Tower. Kami menyadari bahwa elemen utama dalam keberlanjutan adalah hubungan jangka panjang berasas saling percaya dan saling menghormati dengan para pemangku kepentingan [102-42] [POJK No. 5d].

Stakeholder identification process, method of engagement, frequency, and main topics are determined based on benchmark results with competitors and internal agreements in Bali Tower. We recognize that the main element in sustainability is a long-term relationship based on mutual trust and respect with stakeholders. [102-42] [POJK No. 5d]

Pemangku Kepentingan *Stakeholders* [102-40]	Metode Pelibatan *Engagement Method* [102-43]	Frekuensi *Frequency*	Topik Utama yang Diajukan *Main Topic Proposed* [102-44]
Pemegang Saham dan Investor *Shareholders and Investors*	**Rapat Umum Pemegang Saham (RUPS)** *General Meeting of Shareholders (GMS)*	**Tahunan** *Annually*	**Deviden pengembangan usaha/ tata kelola/ manajemen** *Dividend business development/ governance/ management*
Pemerintah *Government*	**Rapat Koordinasi** *Coordination meeting*	**Setiap waktu jika dibutuhkan** *Anytime when needed*	**Perizinan menara site, hasil penilaian GCG tahunan, dan realisasi CSR sesuai dengan perencanaan dan alokasi dana** *Tower site permits, results of the annual GCG assessment, and CSR realization following the planning and allocation of funds*
Pelanggan *Customer*	**Survey kepuasan pelanggan dan pusat panggilan 24/7 jam** *Customer satisfaction survey and 24/7 call center*	**Setiap waktu jika dibutuhkan** *Anytime when needed*	**Timbal balik dalam revenue** *Feedback of revenue*
Pegawai *Employee*	**Training/ Meeting** *Training/ Meeting*	**Tahunan** *Annually*	**Pemenuhan hak-hak normatif karyawan sesuai UU Ketenaga-kerjaan serta kontrak kerja yang transparan dan berkeadilan** *Fulfillment of the labour rights of employees by the Manpower Law and transparent and fair employment contracts*
Mitra Kerja/ Vendor *Vendors*	**Meeting dan email** *Meeting and email*	**Setiap waktu jika dibutuhkan** *Anytime when needed*	**Pemenuhan kontrak kerja dan melakukan pembayaran tepat waktu** *Fulfillment of work contracts and payments on time*
Media Massa *Mass Media*	**Press Realese** *Press release*	**Setiap waktu jika dibutuhkan** *Anytime when needed*	**Pelaksanaan Program** *Program implementation*
Masyarakat *Community*	**Meeting** *Meeting*	**Setiap waktu jika dibutuhkan** *Anytime when needed*	**Persetujuan warga dalam radius ketinggian menara yang akan dibangun sesuai regulasi yang berlaku** *Community approval within the radius of the tower height to be built by applicable regulations*

09.

KINERJA KEUANGAN YANG SEHAT DAN MENGUNTUNGKAN

HEALTHY AND PROFITABLE FINANCIAL PERFORMANCE

Kunci untuk terus memberikan manfaat bagi karyawan, pelanggan, investor, dan masyarakat adalah kinerja keuangan yang sehat dengan didukung oleh tata kelola yang kuat serta strategi operasional yang sangat baik. [103-1]

The key to continuing to provide benefits to employees, customers, investors and society is healthy financial performance supported by strong governance and excellent operational strategies. [103-1]

Perseroan memiliki komitmen untuk menerapkan prinsip berkelanjutan yang mampu menciptakan nilai ekonomi, sosial, dan lingkungan dalam proses pengambilan kebijakan maupun pengambilan keputusan yang dapat mendorong kesuksesan perusahaan. Hal ini berarti perusahaan berkomitmen untuk menjamin keutuhan lingkungan hidup serta keselamatan, kemampuan, kesejahteraan, dan mutu hidup generasi masa kini dan generasi masa depan. Perusahaan menjalankan kebijakan strategis dengan pertimbangan bahwa perusahaan dapat mendistribusikan nilai ekonomi maksimal kepada pemangku kepentingan, baik itu karyawan, pemerintah, pemasok, maupun masyarakat. Hal ini tercermin dalam aktivitas pembayaran pajak, pembayaran dividen, pembayaran untuk pemasok, dan realisasi dana untuk program Tanggung Jawab Sosial Perusahaan (CSR). [103-2] [103-3]

The Company is committed to implementing sustainable principles that can create economic, social and environmental value in the policy and decision-making process that can lead to the company's success. This means that the company is committed to ensuring the integrity of the environment as well as the safety, capabilities, welfare, and quality of life of present and future generations. The company carries out strategic policies with the consideration that the company can distribute maximum economic value to stakeholders, employees, government, suppliers, and the community. This is reflected in in tax payment activities, dividend payments, payments to suppliers, and the realization of funds for corporate social responsibility (CSR) programs. [103-2] [103-3]

Tahun 2021 merupakan tahun dengan penuh tantangan akibat adanya pandemi Covid-19. Ditengah pandemi Covid-19 dan kekhawatiran melemahnya perekonomian nasional, Perseroan mampu mempertahankan kinerja ekonomi. Hal ini dibuktikan dengan Perseroan menghasilkan nilai ekonomi sebesar Rp 946.633.191.563,-. Dari nilai ekonomi yang dihasilkan, nilai yang didistribusikan selama tahun 2021 adalah sebesar Rp 758.096.687.423,-. Sehingga pada tahun 2021, nilai ekonomi yang ditahan sebesar Rp 188.536.504.140,-. Kami memastikan bahwa distribusi nilai ekonomi Perusahaan dilakukan secara tepat sasaran kepada pemangku kepentingan. [201-1] [POJK No. 4b] [POJK No. 6b]

2021 was a challenging year due to the Covid-19 pandemic. During the Covid-19 pandemic and concerns about the weakening of the national economy, the Company was able to maintain its economic performance. This Company generating an economic value of IDR 946,633,191,563,-. From the economic value generated, the value distributed during 2021 is IDR 758,096,687,423,-. So that in 2021, the retained economic value is Rp. 188,536,504,140, -. We ensure that the distribution of the Company's economic value is properly targeted to stakeholders. [201-1] [POJK No. 4b] [POJK No. 6b]

Distribusi Nilai Ekonomi Perusahaan (dalam juta rupiah) *[POJK No. 2.a.2] [POJK No. 3c.1] [POJK No. 6.d.1]*

Distribution of Company's Economic Value (in million rupiah) *[POJK No. 2.a.2] [POJK No. 3c.1] [POJK No. 6.d.1]*

Nilai Ekonomi yang dihasilkan — Economic Value generated

	2019	2020	2021
	Pendapatan Usaha *Revenues* 617,523 Juta Rupiah / *Million IDR*	**Pendapatan Usaha** *Revenues* 778,896 Juta Rupiah / *Million IDR*	**Pendapatan Usaha** *Revenues* 946,633 Juta Rupiah / *Million IDR*

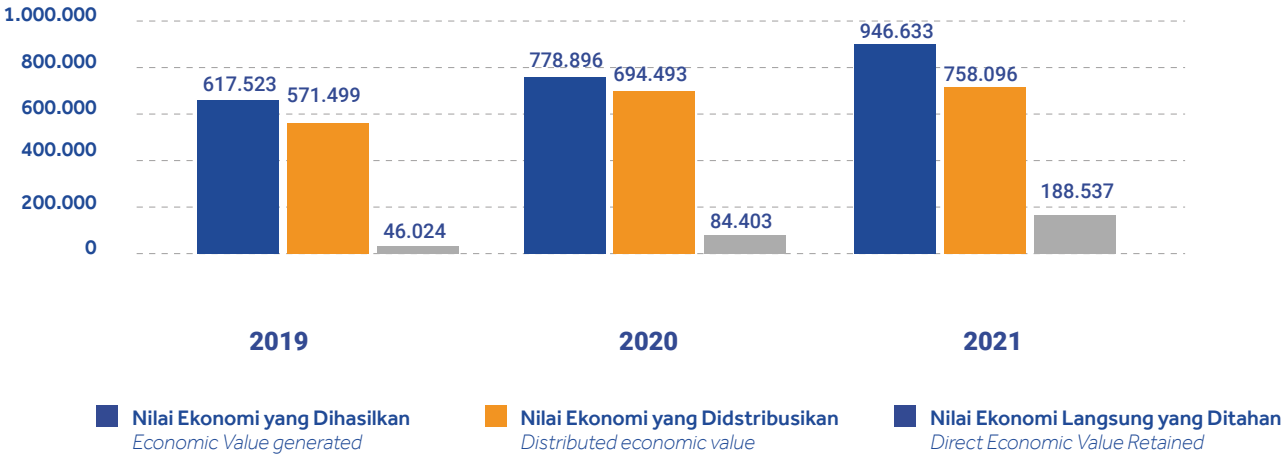
Nilai Ekonomi yang Didistribusikan — Distributed economic value

	2019	2020	2021
	Biaya Operasi *Operation Cost* 467,180 Juta Rupiah / *Million IDR*	**Biaya Operasi** *Operation Cost* 542,448 Juta Rupiah / *Million IDR*	**Biaya Operasi** *Operation Cost* 477,222 Juta Rupiah / *Million IDR*
	Gaji Karyawan dan Manfaat *Employee Salary and Benefit* 79,574 Juta Rupiah / *Million IDR*	**Gaji Karyawan dan Manfaat** *Employee Salary and Benefit* 105,950 Juta Rupiah / *Million IDR*	**Gaji Karyawan dan Manfaat** *Employee Salary and Benefit* 107,616 Juta Rupiah / *Million IDR*
	Pembayaran Dividen *Dividend Payment* - Juta Rupiah / *Million IDR*	**Pembayaran Dividen** *Dividend Payment* - Juta Rupiah / *Million IDR*	**Pembayaran Dividen** *Dividend Payment* 118,038 Juta Rupiah / *Million IDR*
	Pembayaran kepada pemerintah (pajak) *Payments to the government (taxes)* 24,383 Juta Rupiah / *Million IDR*	**Pembayaran kepada pemerintah (pajak)** *Payments to the government (taxes)* 45,699 Juta Rupiah / *Million IDR*	**Pembayaran kepada pemerintah (pajak)** *Payments to the government (taxes)* 54,038 Juta Rupiah / *Million IDR*
	Investasi untuk Masyarakat *Investment for Society* 362 Juta Rupiah / *Million IDR*	**Investasi untuk Masyarakat** *Investment for Society* 441 Juta Rupiah / *Million IDR*	**Investasi untuk Masyarakat** *Investment for Society* 1,182 Juta Rupiah / *Million IDR*
	Jumlah Nilai Ekonomi yang Didistribusikan *Total Distributed Economic Value* 571,499 Juta Rupiah / *Million IDR*	**Jumlah Nilai Ekonomi yang Didistribusikan** *Total Distributed Economic Value* 694,493 Juta Rupiah / *Million IDR*	**Jumlah Nilai Ekonomi yang Didistribusikan** *Total Distributed Economic Value* 758,096 Juta Rupiah / *Million IDR*
	Nilai Ekonomi Langsung yang ditahan *Direct Economic Value Retained* 46,024 Juta Rupiah / *Million IDR*	**Nilai Ekonomi Langsung yang ditahan** *Direct Economic Value Retained* 84,403 Juta Rupiah / *Million IDR*	**Nilai Ekonomi Langsung yang ditahan** *Direct Economic Value Retained* 188,537 Juta Rupiah / *Million IDR*

**Pembagian dividen tahun 2021 merupakan akumulasi dari tahun sebelumnya sesuai kebijakan Manajemen.*

**The dividend distribution in 2021 is an accumulation from the previous year in accordance with Management's policy.*

Distribusi Nilai Ekonomi Perusahaan
Distribution of the Company's Economic Value



Perseroan turut andil berkontribusi kepada Pemerintah dengan cara melakukan pembayaran pajak. Adapun pajak ini merupakan kewajiban yang dibayar perusahaan kepada negara tanpa kontra prestasi secara langsung dan akan digunakan untuk kepentingan Pemerintah. Pada tahun 2021, Perseroan membayar pajak sebesar Rp 54.037.958.433,-.

The Company contributes to the Government by paying taxes. This tax is an obligation that the company pays to the state without direct counter-achievement and will be used for the benefit of the Government. In 2021, the Company paid a tax of IDR 54,037,958,433,-.

Salah satu wujud dari keberadaan Perusahaan di masyarakat adalah dengan memberikan kesejahteraan kepada masyarakat sekitar dan memastikan ekualitas antara distribusi ekonomi perusahaan kepada masyarakat di sekitar tempat perusahaan beroperasi. Dalam hal ini Perseroan berkomitmen untuk memenuhi kesejahteraan para pekerja melalui kebijakan remunerasi dan *benefit* bagi pekerja yang disesuaikan dengan perundang-undangan. Penyesuaian gaji dilakukan berkala kepada seluruh karyawan tetap berdasarkan kinerja dan dilakukan penyesuaian gaji bagi tenaga kerja kontrak. Pembayaran upah tidak membedakan *gender* tetapi ditentukan berdasarkan kompetensi yang dimiliki oleh setiap karyawan.

One of the manifestations of the Company's existence in the community is by providing welfare to the surrounding community and ensure the equality of the company's economic distribution to the communities in the company operating area. In this case, the Company is committed to fulfilling the welfare of the workers through a policy of remuneration and benefits for workers that are adjusted to the laws. Salary adjustments are made periodically to all permanent employees based on performance and salary adjustments are made for contract workers. Wage payments do not differentiate gender but are determined based on the competencies of each employee.

10.

KEPATUHAN TERHADAP PERATURAN YANG RELEVAN DENGAN PERUSAHAAN BAIK DI BIDANG **EKONOMI, SOSIAL, & LINGKUNGAN**

COMPLIANCE WITH REGULATIONS RELATED TO THE COMPANY IN THE ECONOMIC, SOCIAL AND ENVIRONMENTAL



Perseroan selalu berkomitmen untuk memenuhi peraturan terkait dengan lingkungan ekonomi dan sosial. Hal ini dikarenakan Perseroan menjunjung tinggi hukum dan segala aspek peraturan dan ketentuan yang berlaku termasuk bidang sosial, ekonomi, dan lingkungan untuk menjaga eksistensi Perseroan agar kegiatan bisnis tetap berjalan lancar. Selama tahun 2021, tidak terdapat ketidakpatuhan Perseroan terhadap Undang-Undang atau Peraturan Lingkungan atau Peraturan Sosial yang mengakibatkan timbulnya denda moneter material, saksi non moneter atau kasus yang diangkat melalui mekanisme penyelesaian sengketa di semua unit operasional perusahaan. Sebagai contoh di bidang sosial, Perseroan selalu memenuhi Peraturan Ketenagakerjaan dan Jam Kerja. Bukti kepatuhan Perseroan di bidang ekonomi berupa kepatuhan Perseroan dengan melaporkan dan membayar pajak. Untuk di bidang lingkungan, Perseroan berkomitmen untuk memenuhi peraturan-peraturan lingkungan yang relevan dengan operasi perusahaan termasuk dalam pembangunan menara. [419-1] [307-1] [POJK No. 6.e.6]

The Company is always committed to comply with regulations related to the economic and social environment. This is because the Company upholds the law and all aspects of applicable regulations and provisions including the social, economic, and environmental to maintain the Company's existence so that business activities can run smoothly. During 2021, there was no non-compliance by the Company with Laws or Environmental Regulations or Social Regulations that resulted in material monetary fines, non-monetary witnesses or cases raised through dispute resolution mechanisms in all the company's operational units. For example in the social sector, the Company always complies with the Manpower and Working Hours Regulations. Evidence of the Company's compliance in the economic sector in the form of the Company's compliance by reporting and paying taxes. In the environmental sector, the Company is committed to complying with environmental regulations relevant to the company's operations, including the construction of towers. [419-1] [307-1] [POJK No. 6.e.6]

11.

KUALITAS **PRODUK & JASA** [POJK No. 6.c.1]

QUALITY OF PRODUCTS AND SERVICES *[POJK No. 6.c.1]*



Perseroan berkomitmen untuk menyediakan menara yang aman dan berkualitas bagi pelanggan dan masyarakat sekitar. Hal ini dilakukan untuk menjaga keberlangsungan operasional perusahaan yang berkelanjutan baik dari segi ekonomi, lingkungan dan sosial. [103-1]

Perseroan memastikan terpenuhinya ketentuan wajib terkait pembangunan menara sesuai standar nasional Indonesia (SNI) dan standar baku tertentu. Untuk memastikan ini maka setiap pembangunan menara akan di lakukan inspeksi internal sebagai bagian dari proses validasinya. Jika diperlukan, proses validasi ini akan dilakukan oleh konsultan pihak ketiga. Perseroan senantiasa bekerja mengikuti standar yang berlaku dan selalu memperhatikan peringatan yang dicantumkan dalam dokumen terkait. Proses pengerjaan di perusahaan telah mengikuti SOP (*Standar Operasional Prosedur*) yang telah disiapkan oleh perusahaan dimana dokumen SOP ini disupervisi dan dievaluasi oleh Tim K3 (Kesehatan dan Keselamatan Kerja) Perseroan. [103-2]

Perseroan juga menerapkan sistem pengelolaan K3 pada pembangunan menara melalui pemberlakuan sertifikasi pekerja vendor dan karyawan. Sertifikasi yang dimaksud adalah sertifikasi Tenaga Kerja Bangunan Tinggi. Kami juga memberikan perhatian lebih terhadap lokasi dan konstruksi menara agar layak serta aman bagi warga sekitar. Komitmen perusahaan untuk memberikan kualitas produk/jasa untuk pelanggan dibuktikan dengan telah didapatkannya sertifikasi ISO 9001:2015 tentang Sistem Manajemen Mutu pada implementasi di bidang *Contact Center* dan ISO 27001:2013 tentang Sistem Manajemen Keamanan Informasi atau lebih dikenal dengan *Information Security Management Systems* (ISMS). [103-3]

The Company is committed to providing safe and quality towers for customers and the surrounding community. This is done to maintain the sustainability of the company's operations that are sustainable from an economic, environmental and social perspective. [103-1]

The Company ensures the fulfillment of mandatory provisions related to tower construction in accordance with Indonesian national standards (SNI) and certain standards. Every tower construction will be subjected to an internal inspection as part of the validation process. If required, this validation process will be carried out by a third party consultant. The Company always works according to applicable standards and always pays attention to the warnings contained in the relevant documents. The work process in the company has followed the SOP (Standard Operating Procedure) that has been prepared by the company where this SOP document is supervised and evaluated by the Company's OHS (Occupational Health and Safety) Team. [103-2]

The Company also implements an OHS management system in tower construction through the implementation of vendor and employee worker certification. The certification in question is the certification of the Manpower of Tall Buildings. We also pay more attention to the location and construction of the tower so that it is feasible and safe for residents. The company's commitment to provide quality products/services for customers is proven by obtaining ISO 9001:2015 certification on Quality Management Systems in the implementation in the Contact Center and ISO 27001:2013 on Information Security Management Systems or better known as Information Security Management Systems (ISMS). [103-3]

12.

DAYA SAING DALAM **KINERJA OPERASIONAL, INOVASI TEKNOLOGI, & INVESTASI INFRASTRUKTUR**

COMPETITIVENESS IN OPERATIONAL PERFORMANCE, TECHNOLOGICAL INNOVATION AND INFRASTRUCTURE INVESTMENT



Perseroan telah menjadi perusahaan penyedia/penyewa menara telekomunikasi sejak tahun 2006. Di sisi lain, tingkat persaingan di industri semakin ketat [103-1]. Perseroan terus bergerak maju dengan strategi bisnis yang inovatif agar dapat memenangkan persaingan dan menjaga keberlanjutan usaha [103-2]. Perseroan selalu menjunjung tinggi daya saing yang sehat tanpa memonopoli industri. Hal ini dibuktikan dengan tidak adanya tindakan hukum yang menggugat perusahaan terkait anti-persaingan dan *anti-trust monopoli* selama periode pelaporan. [206-1]

The Company has been a telecommunications tower provider/tenant company since 2006. On the other hand, the level of competition in the industry is getting tougher [103-1]. The Company continues to move forward with innovative business strategies in order to win the competition and maintain business sustainability [103-2]. The Company always upholds healthy competitiveness without monopolizing the industry. This is evidenced by the absence of legal action against the company regarding anti-competition and anti-trust monopoly during the reporting period. [206-1]

13.

KEPUASAN **PELANGGAN** [POJK No. 6.f.5]

CUSTOMER SATISFACTION [POJK No. 6.f.5]

Keberlanjutan usaha Perseroan sangat tergantung dengan pemangku eksternal yaitu pelanggan. Menyadari pentingnya peran tersebut, Perseroan berupaya semaksimal mungkin untuk memberikan produk dan layanan terbaik kepada seluruh pelanggan [103-1]. Hal ini guna tidak mengecewakan pelanggan dan harapan pelanggan terhadap perusahaan benar-benar terwujud. Perseroan tidak pernah membeda-bedakan pelanggan dan selalu menerapkan kebijakan anti diskriminatif kepada semua pelanggan. [103-2] [103-3]

Perseroan selalu memenuhi persyaratan dalam mengkomunikasikan informasi mengenai produk/jasa yang diberikan dan tidak terdapat insiden ketidakpatuhan terhadap komunikasi mengenai jasa yang diberikan. Pengelolaan suara pelanggan juga difasilitasi melalui *call center* 24 Jam dalam 7 hari [418-1]

Pengelolaan suara pelanggan juga dilakukan melalui survei kepuasan pelanggan. Survei ini sebagai tolak ukur dalam melihat upaya pendekatan yang telah dilakukan oleh Perseroan kepada pelanggan. Survei ini dijalankan meliputi 5 (lima) parameter, yaitu produk, harga, kualitas TV Premium, kualitas TV, dan *after sales services*.

Berdasarkan hasil survey, 81% dari *residential customer* akan merekomendasikan Balifiber kepada teman atau kerabatnya, selain itu secara keseluruhan dari segi sales, teknisi, pelayanan pelanggan dan *after sales services,* Perseroan memperoleh skor 71%. Berdasarkan hasil survey tersebut, kedepannya akan dilakukan rencana strategis untuk meningkatkan kepuasan Balifiber dengan cara:

1. Pengecekan secara periodik untuk seluruh jaringan Balifiber
2. *Upgrade skill* berupa training ataupun sertifikasi bagi semua tim operasional
3. Adanya tim *technical support* untuk membantu penanganan gangguan yang dapat di selesaikan melalui remote
4. *Upgrade skill* tim *Contact Center* baik berupa *training* dan juga sertifikasi
5. Melakukan review langsung ke lapangan oleh Tim *Product* untuk dapat menciptakan produk baru yang sesuai dengan *market* namun tetap dapat bersaing dengan kompetitor

The Company's business sustainability is highly dependent on external stakeholders, namely customers. Realizing the importance of this role, the Company makes every effort to provide the best products and services to all customers [103-1]. This is in order not to disappoint customers and the customer's expectations for the company are realized. The Company never discriminates against customers and always applies an anti-discriminatory policy to all customers. [103-2] [103-3]

The Company always fulfills the requirements in communicating information about the products/services provided and there are no incidents of non-compliance with communications regarding the services provided. Customer voice management is also facilitated through a 24-hour call center within 7 days [418-1]

Customer voice management is also carried out through customer satisfaction surveys. This survey serves as a benchmark in the approach efforts that have been made by the Company to customers. This survey was carried out covering 5 (five) parameters, namely product, price, Premium TV quality, TV quality, and after sales services.

Based on the survey results, 81% of residential customers would recommend Balifiber to their friends or relatives, in addition, overall in terms of sales, technicians, customer service and after sales services, the Company received a score of 71%. Based on the survey results, in the future a strategic plan will be carried out to increase Balifiber satisfaction by:

1. Periodic checks for the entire Balifiber network
2. Upgrade skills in the form of training or certification for all operational teams
3. Technical support team to assist in handling problems that can be solved through remote
4. Upgrade the skills of the Contact Center team in the form of training and certification
5. Direct review to the site by the Product Team to be able to create new products that are in accordance with the market and able to compete with competitors

14.

JAMINAN **KESELAMATAN & KESEHATAN KERJA (K3) DALAM BEKERJA**

GUARANTEE OF OCCUPATIONAL SAFETY AND HEALTH (K3) AT WORK

Perseroan menyadari bahwa kesejahteraan, kesehatan dan keselamatan karyawan dalam bekerja merupakan hal yang sangat penting bagi keberlanjutan bisnis [103-1]. Keberhasilan jangka panjang bergantung terhadap penyediaan lingkungan kerja yang sehat dan aman. Oleh karena itu Perseroan berkomitmen penuh untuk memberdayakan seluruh karyawannya agar mereka bekerja dengan selamat, penuh kreativitas dan bekerja secara efektif. [103-2]

The Company realizes that the welfare, health and safety of employees at work are very important for business sustainability [103-1]. Long-term success depends on providing a healthy and safe work environment. Therefore, the Company is fully committed to empowering all its employees so that they work safely, full of creativity and work effectively. [103-2]

Perseroan menyadari kegiatan pembangunan dan pemeliharaan menara memiliki bahaya dan risiko bagi karyawan dan masyarakat sekitar. Oleh karena itu Perseroan telah melakukan identifikasi bahaya dan penilaian risiko terhadap aktivitas kerja Perseroan. Identifikasi bahaya dan penilaian risiko ini dilakukan oleh Tim HSE yang sudah memiliki Setifikat Ahli K3 Umum yang dikeluarkan oleh Kementerian Ketenagakerjaan Republik Indonesia [403-2]. Target kegiatan Tim HSE adalah mencegah atau meminimalisasi insiden kecelakaan, melakukan perbaikan sistem K3 yang berkelanjutan, serta meningkatkan budaya sadar K3 [103-3]. Sepanjang tahun 2021, Perseroan berhasil mencapai *zero fatality* dengan *Man Hour Worked* sebesar 1.148.536 jam, hal ini menjadi prestasi tersendiri bagi Perseroan dan akan terus dipertahankan di tahun-tahun selanjutnya.

The Company realizes that tower construction and maintenance activities have dangers and risks for employees and the surrounding community. Therefore, the Company has carried out hazard identification and risk assessment on the Company's work activities. Hazard identification and risk assessment is carried out by the HSE Team which already has a General OHS Expert Certificate issued by the Ministry of Manpower of the Republic of Indonesia [403-2]. The target of the HSE Team's activities is to prevent or minimize accident incidents, create continuous improvement of the OHS system, and increase the OHS awareness culture [103-3]. Throughout 2021, the Company succeeded in achieving zero fatality with 1,148,536 hours of Man H, this is a separate achievement for the Company and will continue to be maintained in the following years.

Deskripsi Description	2019	2020	2021
Kasus Kecelakaan Kerja yang Menyebabkan Kematian *Cases of Work Accidents That Cause Death*	N/A	0	0
Kasus Kecelakaan yang Menyebabkan Kerugian Properti *Cases of Accidents That Cause Property Losses*	N/A	0	2
Kasus Nearmiss *Case of Nearmiss*	N/A	2	2
Total Tingkat Keseringan Kecelakaan Kerja Tercatat *Total Frequency of Work Accidents Recorded*	N/A	0	1.74
Total Tingkat Hari Kerja yang Hilang Karena Kecelakaan Kerja *Total Rate of Workdays Lost Due to Work Accidents*	N/A	0	0

**Referensi Perhitungan menggunakan OSHA (Occupation Safety and Health Administration)*
**Pekerja hanya karyawan Balitower tidak termasuk kontraktor*
**Kecelakaan Kerja termasuk cidera, kerugian properti*

**Calculation using OSHA (Occupation Safety and Health Administration)*
**Workers are only Balitower employees, not including contractors*
**Work Accidents including injury, property loss*

Pada tahun ini Tim HSE telah melakukan kegiatan tinjauan lapangan ke menara dan kegiatan operasional Perseroan secara periodik bulanan dengan tujuan untuk memastikan prosedur Keselamatan dan Kesehatan Kerja berjalan dengan baik.

This year the HSE Team has visited the towers and the Company's operational activities on monthly basis with the aim to ensure that the Occupational Health and Safety procedures run well.

Praktik kesehatan, keselamatan dan lingkungan kerja di seluruh entitas Perseroan mencakup: (i) Menerapkan UU No. 1 Tahun 1970 serta PP No. 50 Tahun 2012 tentang Sistem Manajemen K3 dengan tingkat pemenuhan awal (64 kriteria) (ii) Latihan Tanggap Darurat rutin setiap tahun (iii) Meeting rutin divisi HSE (vi) Sosialisasi berkaitan dengan K3 seperti protokol Covid-19 (iv) Menyediakan Alat Pelindung Diri (APD) sesuai jenis pekerjaan (v) Menyediakan dan memastikan kotak P3K terisi di area kerja. Untuk fasilitas kesehatan, Perseroan sudah menyediakan kotak P3K disetiap Kantor Perseroan. Pekerja memiliki peranan yang penting dalam peningkatan kegiatan K3 yang berkesinambungan, untuk memaksimalkan peranan karyawan tersebut kedepannya akan direncanakan pembentukan Komite P2K3, sehingga adanya sinergi yang kuat antara Perseroan dan pekerja untuk menciptakan lingkungan kerja yang sehat dan aman. [403-1] [403-3] [403-4] [POJK No. 6.c.2.c]

Health, safety and work environment practices throughout the Company's entities include: (i) Implementing Law no. 1 of 1970 and PP No. 50 of 2012 concerning the OHS Management System with initial level of fulfillment (64 criteria) (ii) Regular Emergency Response Training every year (iii) Regular HSE division meetings (vi) Socialization related to K3 such as the Covid-19 protocol (iv) Provide Personal Protective Equipment (PPE) according to the type of work (v) Provide and ensure that the first aid kit is filled in the work area. For health facilities, the Company has provided a first aid kit in every office of the Company. Employees have an important role in improving sustainable K3 activities, to maximize the role of these employees in the future it will be planned to form a P2K3 Committee, so that there is a strong synergy between the Company and employees to create a healthy and safe work environment. [403-1] [403-3] [403-4] [POJK No. 6.c.2.c]

Perseroan menyadari kegiatan pembangunan dan pemeliharaan menara memiliki bahaya dan risiko bagi karyawan dan masyarakat sekitar. Oleh karena itu, Perseroan secara tegas mengharuskan karyawan atau kontraktor yang melakukan pekerjaan konstruksi atau pemeliharaan menggunakan APD atau perlengkapan keselamatan dan risiko yang terkait dengan bekerja di ketinggian seperti tali pengaman, perancah, dan alat pelindung jatuh. Selain itu karyawan atau kontraktor juga harus memiliki Sertifikat Panjat Menara Telekomunikasi. Untuk meningkatkan pengetahuan dan keterampilan kerja karyawan mengenai K3, maka sepanjang tahun 2021 telah dilakukan Training Pengenalan K3 Umum kepada karyawan Perseroan. Dimana karyawan diberikan pembekalan terkait kecelakaan, identifikasi bahaya dan pengendalian risiko serta terkait kebakaran.
[403-1] [403-5]

The Company realizes that tower construction and maintenance activities have dangers and risks for employees and the surrounding community. Therefore, the Company strictly requires employees or contractors in construction or maintenance work to use PPE or safety equipment and risks associated with working at height such as safety ropes, scaffolding, and fall protection equipment. In addition, employees or contractors must also have a Telecommunication Tower Climbing Certificate. To improve the knowledge and work skills regarding OHS, throughout 2021 a General OHS Introduction Training has been conducted for the Company's employees. The employees are provided with supplies related to accidents, hazard identification and risk control as well as related to fires. [403-1] [403-5]





Perseroan memastikan konstruksi menara memenuhi persyaratan keselamatan dengan kemampuan memikul beban muatan tetap dan sementara akibat gempa, angin atau pengaruh korosi. Perseroan memastikan bahwa tidak ada radiasi gelombang elektromagnetik yang membahayakan kesehatan warga sekitar. Perseroan memfasilitasi warga sekitar menara melaporkan keluhan akibat adanya pembangunan dan operasi menara telekomunikasi melalui *barcode* MCP yang tertera di sekitar menara telekomunikasi.

The Company ensures that the tower construction meets safety requirements with the ability to carry permanent and temporary loads due to earthquakes, wind or corrosion effects. The Company ensures that there is no electromagnetic wave radiation that endangers the health of residents. The Company facilitates residents around the towers to report complaints due to the construction and operation of telecommunication towers through the MCP barcode listed around the telecommunication tower.



Pandemi Covid-19 yang melanda Indonesia memberikan pengaruh terhadap operasional Perseroan. Selain itu, semua karyawan selama periode tahun 2021 telah melakukan vaksinasi 1 dan 2 sebesar 100%. Hal ini juga berlaku bagi rekrutmen karyawan, yang diwajibkan untuk menunjukan sertifikat vaksin 1 dan 2. Sebagai bentuk dukungan terhadap kebijakan Pemerintah untuk mencegah penyebaran penularan Covid-19, Perseroan melakukan beberapa upaya sebagai berikut :

The Covid-19 pandemic that hit Indonesia had an impact on the Company's operations. In addition, all employees during 2021 have vaccinated 1 and 2 by 100%. This also applies to employee recruitment, who are required to show vaccine certificates 1 and 2. As a form of support for the Government's policy to prevent the spread of Covid-19 transmission, the Company has made several efforts as follows:

1.Selalu menjaga jarak baik di kantor maupun di lapangan area kerja Perseroan

1. Always maintain distance both in the office and in the Company's work area





2. Melaksanakan kegiatan *rapid test* karyawan

2. Employee rapid test activities



3. Sosialisasi kepada karyawan maupun vendor untuk menjaga kebersihan dan sanitasi dengan sering mencuci tangan dengan sabun dan air mengalir

3. Socialization to employees and vendors to maintain cleanliness and sanitation by frequently washing hands with soap and running water



4. Mewajibkan seluruh karyawan untuk memakai masker di area kerja

4. Require all employees to wear masks in the work area



5. Penggunaan scan Peduli Lindungi di area kantor

5. Use of PeduliLindungi scans in the Office Area



6. Melakukan sterilisasi di area kerja

6. Sterilize the work area



7. Menerapkan *Work from Home* untuk skema 50 – 50

7. Implementing Work From Home with the 50 – 50 scheme

15.
KONSERVASI **PENGGUNAAN ENERGI**
ENERGY USE CONSERVATION

Perseroan menggunakan energi listrik dalam menjalankan kegiatan operasionalnya baik di gedung maupun operasional menara telekomunikasi dengan informasi pemakaian energi di Kantor Pusat dan Kantor Cabang. [103-1]

Dalam perhitungan konsumsi energi dilakukan berdasarkan volume total pemakaian listrik (Kwh) dan pemakaian BBM (Liter) yang dikonversi ke dalam satuan energi (GJ).

Selain itu Perseroan juga melakukan perhitungan intensitas konsumsi energi yang dilakukan dengan membandingkan konsumsi energi (GJ) selama satu tahun terhadap pendapatan (Juta Rupiah) selama periode laporan. Dan dalam laporan ini juga dicantumkan laporan intensitas konsumsi energi selama dua tahun sebelumnya. [103-2]

The Company uses electrical energy in carrying out its operational activities, both in buildings and telecommunication tower operations with information on energy consumption at the Head Office and Branch Offices. [103-1]

The calculation of energy consumption is based on the total volume of electricity consumption (Kwh) and fuel consumption (Liters) converted into energy units (GJ).

In addition, the Company also calculates the intensity of energy consumption by comparing energy consumption (GJ) for one year to revenue (Million Rupiah) during the reporting period. And this report also includes reports on the intensity of energy consumption for the previous two years. [103-2]

Konsumsi Energi di Perseroan

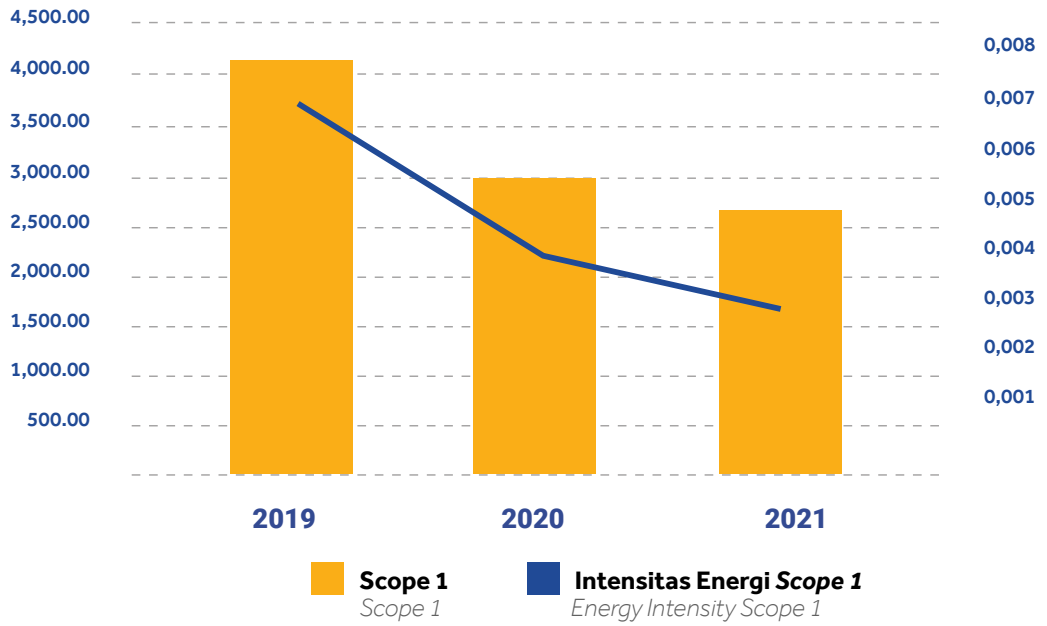
Energy Consumption in the Company

Konsumsi Energi Energy Consumption	2019	2020	2021
Listrik Electricity	22,158 *MWh*	37,884 *MWh*	40,376 *MWh*
Bensin Gasoline	101,985.9 *Liter*	74,533.3 *Liter*	60,469 *Liter*
Solar Diesel	21,434 *Liter*	18,854 *Liter*	19,474 *Liter*
Biosolar Biodiesel	- *GJ*	- *GJ*	1,317 *GJ*

Total Konsumsi Energi Scope 1 dalam GJ di Bali Tower

Total Energy Consumption Scope 1 in GJ at Bali Tower

Konsumsi Energi Energy Consumption	2019	2020	2021
BBM Operasional Operational Fuel	4,135.05 *GJ*	3,138.16 *GJ*	2,728.3 *GJ*
Pendapatan Revenue	617,522 *Juta rupiah* *Million rupiah*	778,896 *Juta rupiah* *Million rupiah*	946,633 *Juta rupiah* *Million rupiah*
Intensitas Energi Energy Intensity	0.007 *GJ/Juta Rupiah* *GJ/Million Rupiah*	0.004 *GJ/Juta Rupiah* *GJ/Million Rupiah*	0.003 *GJ/Juta Rupiah* *GJ/Million Rupiah*



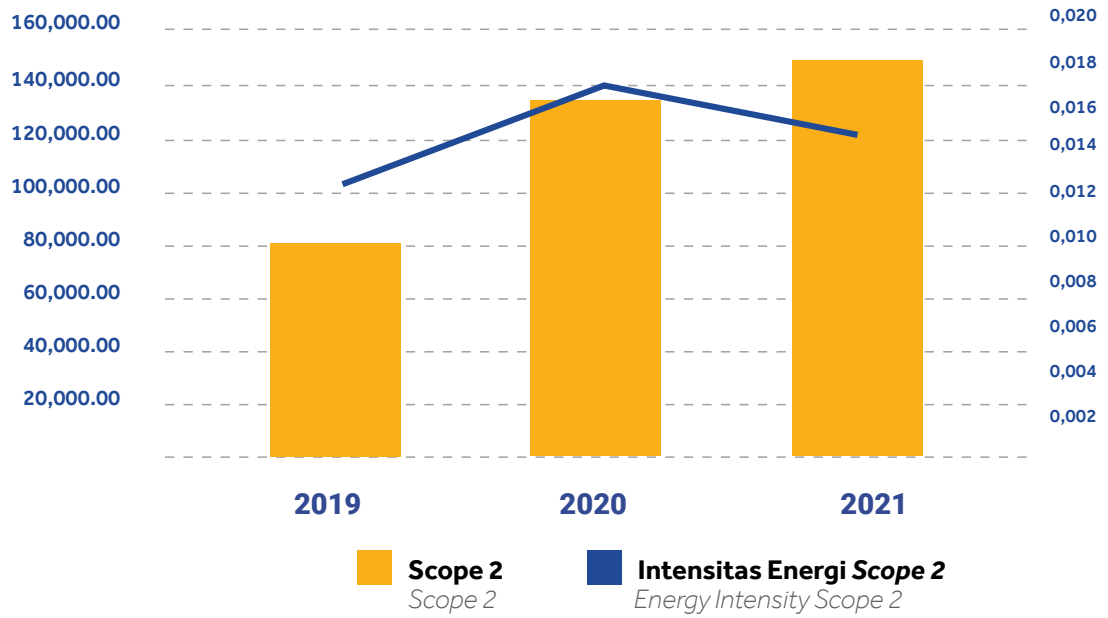
Catatan :
- Perhitungan konsumsi energi menggunakan perkalian antara jumlah konsumsi (liter) dan net calorie value yang diambil dari IPCC Guidelines 2006, Vol.2 Energy, Tabel 1.2.
- Perhitungan intensitas energi berdasarkan pembagian konsumsi energi dengan rupiah juta pendapatan.

Notes :
- Calculation of energy consumption using the multiplication between the amount of consumption (liters) and the net calorie value taken from the IPCC Guidelines 2006, Vol.2 Energy, Table 1.2.
- Calculation of energy intensity based on the division of energy consumption by million rupiah of income.

Total Konsumsi Energi Scope 2 dalam GJ di Bali Tower

Total Energy Consumption Scope 2 in GJ at Bali Tower

Konsumsi Energi Energy Consumption	2019	2020	2021
BBM Operasional Operational Fuel	79,747 GJ	136,344 GJ	145,312 GJ
Pendapatan Revenue	617,522 Juta rupiah Million rupiah	778,896 Juta rupiah Million rupiah	946,633 Juta rupiah Million rupiah
Intensitas Energi Energy Intensity	0.13 GJ/Juta Rupiah GJ/Million Rupiah	0.18 GJ/Juta Rupiah GJ/Million Rupiah	0.15 GJ/Juta Rupiah GJ/Million Rupiah



Catatan :
- Perhitungan konsumsi energi menggunakan perkalian antara jumlah konsumsi (liter) dan net calorie value yang diambil dari IPCC Guidelines 2006, Vol.2 Energy, Tabel 1.2.
- Perhitungan intensitas energi berdasarkan pembagian konsumsi energi dengan rupiah juta pendapatan.

Notes :
- Calculation of energy consumption using the multiplication between the amount of consumption (liters) and the net calorie value taken from the IPCC Guidelines 2006, Vol.2 Energy, Table 1.2.
- Calculation of energy intensity based on the division of energy consumption by million rupiah of income.

Terjadi penurunan konsumsi energi lingkup langsung (BBM Operasional) dari 3,138.16 GJ di tahun 2020 menjadi 2,728.3 di tahun 2021. Hal ini disebabkan oleh pandemi Covid-19 di tahun 2021 yang menyebabkan terjadinya penurunan mobilisasi karyawan kantor. Akan tetapi terjadi kenaikan konsumsi energi lingkup tak langsung (penggunaan listrik) dari 136.344 GJ di tahun 2020 menjadi 145.312 GJ di tahun 2021. Hal ini dikarenakan adanya kenaikan aktivitas bisnis di Bali Tower pada 2021 sehingga kebutuhan listrik juga meningkat. Secara keseluruhan intensitas konsumsi energi ditahun 2021 mengalami penurunan dari 0,18 GJ/juta rupiah menjadi 0,15 GJ/juta rupiah.

There was a decrease in direct scope energy consumption(Operational Fuel) from 3,138.16 GJ in 2020 to 2,728.3 in 2021. This was due to the Covid-19 pandemic in 2021 caused a decrease in the mobilization of employees. However, there is an increase in indirect energy consumption (electricity use) from 136,344 GJ in 2020 to 145,312 GJ in 2021. This is due to an increase in business activity at Bali Tower in 2021 the electricity usage also increases. Overall, the intensity of energy consumption in 2021 decrease from 0.18 GJ/million rupiah to 0.15 GJ/million rupiah.

Perseroan telah menerapkan beberapa inisiatif penghematan energi dan lingkungan baik di perkantoran maupun di site pada periode 2021, antara lain: [103-3] [302-4] [POJK No. 6.d.3.b]

The Company has implemented several energy and environmental saving initiatives both in offices and on sites in 2021, including: [103-3] [302-4] [POJK No. 6.d.3.b]

• Pembatasan konsumsi bahan bakar kendaraan operasional dengan menggunakan limit pemakaian.
• Peremajaan kendaraan khususnya untuk kendaraan - kendaraan dengan cc besar dan tidak layak beroperasi.
• Pemberlakuan proses administrasi secara digital untuk mengurangi penggunaan kertas.

• Restriction on the fuel consumption for operational vehicles by using a usage limit.
• Vehicle rejuvenation, especially for vehicles with large cc and unfit for operation.
• Enforcement of digital administrative processes to reduce paper usage.

Kedepannya Perseroan berencana mempersiapkan wacana penggantian kendaraan motor dan mobil berbahan bakar BBM menjadi kendaraan listrik.

In the future, the Company plans to prepare the discourse on replacing motorcycles and cars with fuel into electric vehicles.

Dalam menjalankan usahanya, Perseroan juga menggunakan air di kegiatan operasionalnya, untuk itu dilakukan juga perhitungan penggunaan energi air dalam laporan ini. Data konsumsi air yang tersaji dalam laporan berasal dari catatan PDAM di tiga kantor Perseroan (Green Mansion, Semarang, dan Surabaya). Adapun metode perhitungan konsumsi air didapatkan dari tagihan PDAM per bulan (Mega Liter) dibagi dengan Pendapatan (Rp Miliar). Terjadi penurunan konsumsi air dari 0.905 mega liter pada tahun 2020 menjadi 0.6620 Mega Liter pada tahun 2021, hal ini terjadi karena telah dilakukan dan pemantauan pemakaian air oleh Departemen General Affair per harinya juga adanya sosialisasi pemakaian air yang lebih efisien. [303-5]

In carrying out its business, the Company also uses water in its operational activities, for this reason, the calculation on the use of water energy is also carried out in this report. The water consumption data presented in the report comes from PDAM records at three of the Company's offices (Green Mansion, Semarang, and Surabaya). The method for calculating water consumption is obtained from PDAM bills per month (Mega Liter) divided by Revenue (Rp billion). There has been a decrease in water consumption from 0.905 mega liters in 2020 to 0.6620 mega liters in 2021, this happened because the General Affairs Department has conducted and monitored water usage per day as well as socialization of more efficient water use. [303-5]

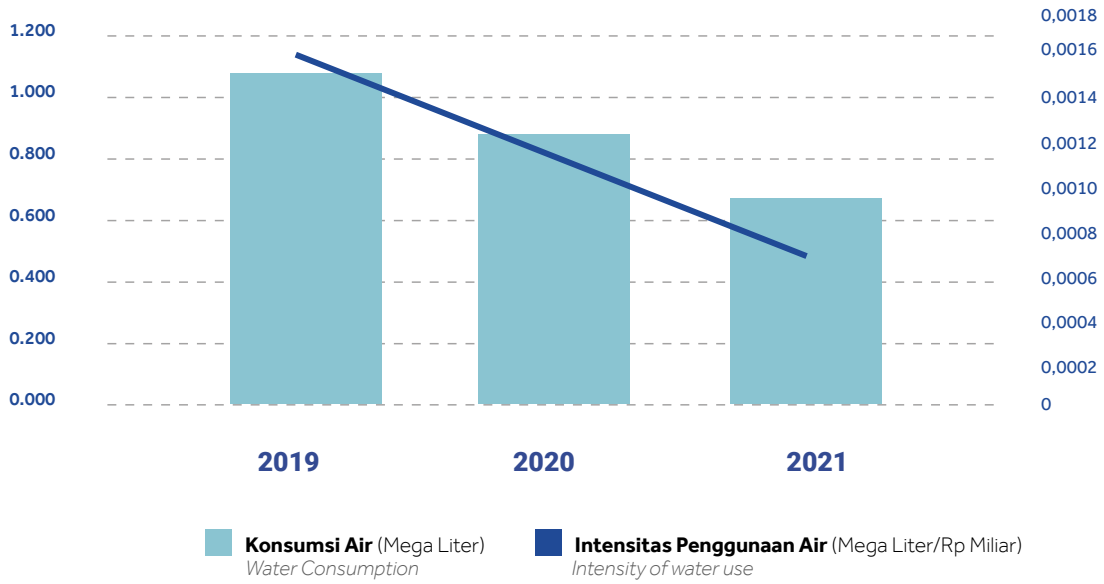
Konsumsi Air di Gedung Operasional Perseroan

Water Consumption in the Company's Operational Building

Item Item	2019	2020	2021
Konsumsi Air Water Consumption	1.56 *(Mega liter)*	0.905 *(Mega liter)*	0.6620 *(Mega liter)*
Pendapatan Revenue	617,522 *Juta rupiah Million rupiah*	778,896 *Juta rupiah Million rupiah*	946,633 *Juta rupiah Million rupiah*
Intensiitas penggunaan air Energy Intensity	0.00171 *ML/Miliar Rp ML/Billion Rp*	0.00116 *ML/Miliar Rp ML/Billion Rp*	0.0007 *ML/Miliar Rp ML/Billion Rp*

Tren Intensitas Penggunaan Air di Perseroan

Trends in Water Use Intensity in the Company



16.
EMISI **GAS RUMAH KACA**
GREENHOUSE GAS EMISSIONS

Pada pelaporan periode tahun ini, Perseroan melakukan perhitungan emisi gas rumah kaca yang dihasilkan oleh kegiatan operasionalnya. Emisi gas rumah kaca yang dihasilkan berasal dari bahan bakar kendaraan operasional dan penggunaan listrik (*scope 1 dan 2*) untuk aktivitas gedung dan menara operasional telekomunikasi.

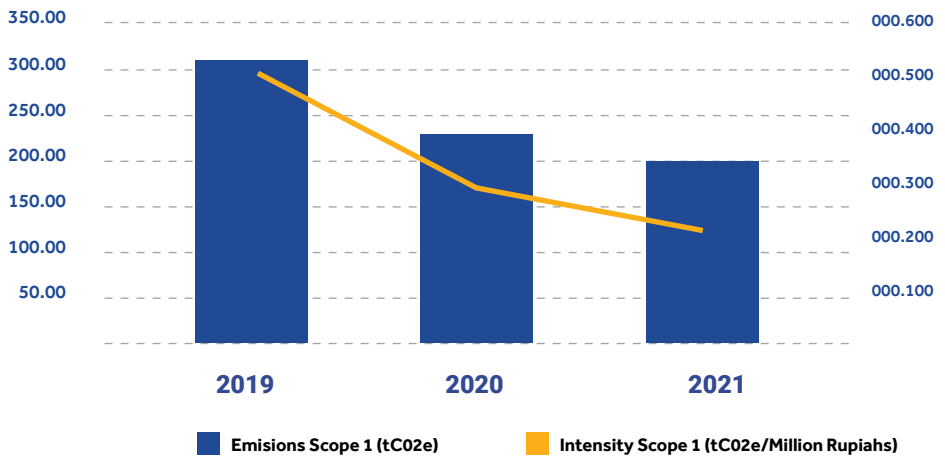
In this year's reporting period, the Company calculates greenhouse gas emissions generated by its operational activities. Greenhouse gas emissions generated from operational vehicle fuel and the use of electricity (scope 1 and 2) for building activities and telecommunications operational towers.

Perhitungan Emisi Gas Rumah Kaca Scope 1 tahun 2019, 2020, dan 2021

[305-1] [305-2] [305-4] [POJK No. 6.e.4.a]

Calculation of Greenhouse Gas Emissions Scope 1 in 2019, 2020, and 2021

ITEM Item	2019		2020		2021	
	Jumlah Pemakaian *Usage Amount*	Emisi (ton CO2 eq) *Emission*	Jumlah Pemakaian *Usage Amount*	Emisi (ton CO2 eq) *Emission*	Jumlah Pemakaian *Usage Amount*	Emisi (ton CO2 eq) *Emission*
BBM Operasional (liter) *Operational Fuel (liter)*	123,420	309.70	93,387	235.12	81,259	204.52
Intensitas (ton CO2 eq /juta rupiah) *Intensity (ton CO2 eq / million rupiah)*	0.000502		0.000302		0.000216	

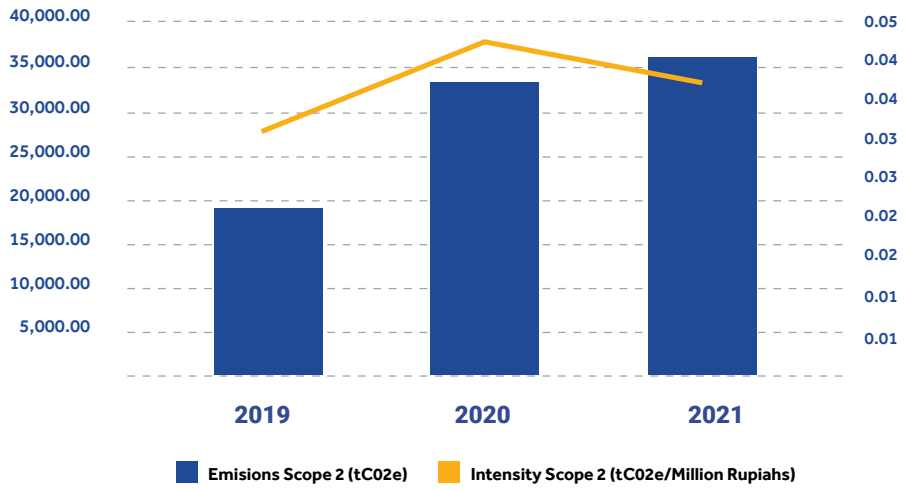


Perhitungan Emisi Gas Rumah Kaca Scope 2 tahun 2019, 2020, dan 2021

[305-1] [305-2] [305-4] [POJK No. 6.e.4.a]

Calculation of Greenhouse Gas Emissions Scope 2 in 2019, 2020, and 2021

ITEM Item	2019		2020		2021	
	Jumlah Pemakaian *Usage Amount*	Emisi (ton CO2 eq) *Emission*	Jumlah Pemakaian *Usage Amount*	Emisi (ton CO2 eq) *Emission*	Jumlah Pemakaian *Usage Amount*	Emisi (ton CO2 eq) *Emission*
Listrik(MWh) *Electricity (MWh)*	22,158	19,432.57	37,884	33,224.04	40,376	35,409.52
Intensitas (ton CO2 eq /juta rupiah) *Intensity (ton CO2 eq / million rupiah)*	0.03		0.04		0.04	



Catatan:

- Faktor emisi yang digunakan dalam perhitungan CO2 diambil dari Puslitbang Migas 2017, CH4 dan N2O diambil dari IPCC Guidelines 2006 Tabel 3.2.2, listrik dari Sistem Interkoneksi Tenaga Listrik 2016

- Perhitungan intensitas emisi didapatkan dari pembagian antara jumlah emisi ton CO2 dengan juta rupiah pendapatan perusahaan.

- Total emisi gas rumah kaca di Perseroan pada tahun 2021 adalah 35,409.52 ton CO2 eq. Nilai tersebut naik dibandingkan tahun sebelumnya (33,224.04 ton CO2 eq). Salah satu penyebab kenaikan gas emisi rumah kaca berasal dari lingkup tak langsung (penggunaan listrik). Kenaikan penggunaan listrik berasal dari kenaikan aktivitas bisnis di Bali Tower pada 2021 sehingga kebutuhan listrik juga meningkat. Akan tetapi, pada lingkup langsung (penggunaan BBM) terjadi penurunan gas emisi rumah kaca yang disebabkan pandemi COVID-19. Pandemi tersebut mengakibatkan kegiatan mobilitas di Perseroan berkurang.

- Perseroan akan terus meninjau kebijakan pengelolaan karbon yang ada dan meningkatkan sistem pengumpulan data untuk memberikan gambaran yang lebih akurat tentang profil emisi di tahun-tahun mendatang dan melakukan penghematan energi untuk mengurangi gas emisi rumah kaca.

Notes:

- Emission factors used in the CO2 calculation are taken from Research and Development Center for Oil and Gas 2017, CH4 and N2O are taken from IPCC Guidelines 2006 Table 3.2.2, electricity from Electric Power Interconnection System 2016

- Calculation of emission intensity is obtained by dividing the total emission of tons of CO2 with million rupiah of company revenue.

- The Company's total greenhouse gas emissions in 2021 are 35,409.52 tons CO2 eq. This value increased compared to the previous year (33,224.04 tons CO2 eq). One of the causes of the increase in greenhouse gas emissions comes from the indirect sphere (use of electricity). The increase in electricity use comes from the increase in business activity at the Bali Tower in 2021 so that electricity demand also increases. However, in the direct scope (fuel use) there has been a reduction in greenhouse gas emissions caused by the COVID-19 pandemic. The pandemic resulted in reduced mobility activities in the Company.

- The Company will continue to review the existing carbon management policies and improve the data collection system to provide a more accurate picture of the emission profile in the coming years and make energy savings to reduce greenhouse gas emissions.

17.
PENERAPAN TATA KELOLA PERUSAHAAN YANG BERKELANJUTAN
IMPLEMENTATION OF SUSTAINABLE CORPORATE GOVERNANCE

Perseroan menerapkan tata kelola perusahaan yang baik (*Good Corporate Governance*/ GCG), termasuk melaksanakan prinsip-prinsip berkelanjutan dalam setiap kegiatan usaha dan operasional, sehingga memberikan manfaat bagi pemangku kepentingan.

The Company implements Good Corporate Governance (GCG), including implementing sustainable principles in all business and operational activities, to provide benefits to stakeholders.

Implementasi praktik tata kelola Perusahaan mengacu kepada 5 prinsip dasar *Good Corporate Governance,* yaitu :

The implementation of good corporate governance practices refers to the following 5 basic principles:

1. Keterbukaan
Transparency



Keterbukaan dalam proses pengambilan keputusan dan keterbukaan dalam pengungkapan dan penyediaan informasi yang relevan mengenai Perseroan, yang mudah diakses oleh pemangku kepentingan sesuai dengan ketentuan dan peraturan perundang-undangan yang berlaku.

Transparency in decision-making process and disclosure of relevant information about the Company, which is easily accessible by the Stakeholders in compliance with the prevailing laws and regulations

2. Akuntabilitas
Accountability



Kejelasan fungsi dan pelaksanaan pertanggung jawaban organ Perseroan sehingga kinerja Perseroan dapat berjalan secara transparan, wajar, efektif, dan efisien.

Clarity of functions and implementation of responsibilities of the Company's organs so that the Company performance can run transparently, fairly, effectively and efficiently

3. Pertanggungjawaban
Responsibility



Kesesuaian pengelolaan kegiatan operasional Perseroan dengan ketentuan dan peraturan perundang-undangan yang berlaku dan penerapan nilai-nilai etika serta standar, prinsip, dan praktik GCG.

The conformity of the management of the Company's operational activities with the prevailing laws and regulations, and the implementation of the ethical values as well as the standards, principles, and practices of good corporate governance.

4. Kemandirian
Independency



Perusahaan yang dikelola secara mandiri dan profesional serta bebas dari benturan kepentingan dan pengaruh atau tekanan dari pihak manapun yang tidak sesuai dengan ketentuan dan peraturan perundang-undangan yang berlaku.

A Company runs independently and professionally, free from a Conflict of Interest and influence or pressure from any party that collides with the prevailing laws and regulations.

5.Kesetaraan dan Kewajaran
Equality and Fairness



Kesetaraan, keseimbangan, dan keadilan di dalam memenuhi hak-hak pemegang saham, para pemangku kepentingan serta organ yang ada di seluruh lini Perseroan yang timbul berdasarkan perjanjian maupun sesuai dengan ketentuan dan peraturan perundang-undangan yang berlaku.

Equality, balance, and justice in fulfilling the rights of the Shareholders, Stakeholders as well as organs in all lines of the Company inllicted based on agreement or in compliance with the prevailing laws and regulations.

Struktur tata kelola Perseroan terdiri dari Rapat Umum Pemegang Saham (RUPS), Dewan Komisaris dan Direksi, sesuai fungsi, tanggung jawab, dan wewenang masing-masing. Pengungkapan informasi masing-masing organ tata kelola disampaikan dalam Laporan Tahunan 2021 PT Bali Towerindo Sentra Tbk.

The corporate governance structure consists of the General Meeting of Shareholders (GMS), the Board of Commissioners and Directors, according to their functions, responsibilities and authorities. Disclosure of information on each governance organ is submitted in the 2021 Annual Report of PT Bali Towerindo Sentra Tbk.

Perusahaan belum memiliki pejabat tata kelola yang secara khusus bertanggung jawab terhadap pengelolaan berkelanjutan. Direksi melakukan identifikasi dan pengendalian risiko terkait aspek ekonomi, sosial dan lingkungan, berdasarkan masukan dari Corporate Secretary yang diawasi tim Internal Audit dan Komite Audit. [POJK No. 5a] [POJK No. 5b]

The company does not have a governance officer specifically responsible for sustainable management. The Board of Directors conduct identify, and control risks related to economic, social and environmental aspects, based on input from the Corporate Secretary supervised by the Internal Audit team and the Audit Committee. [POJK No. 5a] [POJK No. 5b]

Kebijakan Anti Korupsi
Anti-Corruption Policy

Perseroan mendukung penuh implementasi dari penerapan Undang - Undang No. 31 Tahun 1999 jo Undang – Undang No. 20 Tahun 2001 tentang Pemberantasan Tindak Pidana Korupsi. Implementasi dari semangat pemberantasan tindak pidana korupsi tersebut diterapkan Perseroan dengan membuat komitmen GCG dengan para pemasok/vendor untuk tidak memberikan parcel /bingkisan/hadiah atau dalam bentuk apapun kepada karyawan dan atau pejabat Perseroan baik ditempat kerja atau diluar tempat kerja. Hal ini dilakukan untuk menjaga independensi serta mencegah konflik kepentingan didalam organisasi Perseroan. Kebijakan anti korupsi ini juga sudah disosialisasikan kepada seluruh pemasok/vendor yang berhubungan dengan Perseroan agar penerapan ini dapat berjalan efektif dan semangat anti korupsi dapat menjadi dasar komitmen dalam menjalankan kegiatan usaha Perseroan. [205-2]

The Company fully supports the implementation of Law Number 31 Year 1999 jo Law Number 20 Year 2001 regarding the Eradication of Corruption. The spirit of such eradication of corruption is applied by the Company through its commitment of Good Corporate Governance with the supplier/vendor not to provide parcels/gifts/ presents in any form to the employees and or the Company officials, both inside or outside the work environment. It is conducted in order to maintain the independency and to prevent conflict of interest within the Company's organs. This anti corruption policy has been disseminated to the suppliers/vendors of the Company so that the implementation can run effectively and the spirit of anti corruption can be the basis of commitment in carrying out the Company's business activities. [205-2]

Perusahaan telah melakukan sosialisasi kebijakan anti korupsi melalui pakta integritas yang telah ditanda tangani seluruh karyawan. Kebijakan anti korupsi Perseroan sudah diumumkan pada website Perseroan yang disajikan dalam 2 bahasa yaitu Bahasa Indonesia dan Bahasa Inggris. [205-2]

The company has socialized anti-corruption policiy through an integrity pact which has been signed by all employees. The Company's anti-corruption policy has been announced on the Company's website which is presented in 2 languages, namely Indonesian and English. [205-2]

Mekanisme Sistem Pelaporan Pelanggaran
Mechanism of Violation Reporting System

Dalam rangka meningkatkan efektifitas penerapan Tata Kelola Perusahaan Yang Baik *(Good Corporate Governance*), optimalisasi penerapan Kode Etik dan Nilai – Nilai serta sebagai mekanisme bentuk perlindungan dan pengaduan pelanggan dalam aktivitas bisnis dan usaha yang dilakukan oleh Perseroan, maka Perseroan menerapkan sistem pelaporan pelanggaran *(Whistleblowing System)* yang terpadu dan transparan.

In order to improve the effectiveness of the implementation of Good Corporate Governance, optimization of Code of Ethics and Values implementation, and as a customer protection and feedback mechanism in business activities, the Company applies an integrated and transparent whistleblowing system.

Adapun mekanisme sistem pelaporan yang disediakan oleh Perseroan adalah sebagai berikut:

The mechanism of reporting system provided by the Company is as follows:

Surat Elektronik
E-mail
whistleblower@balitower.co.id

Telepon
Telephone
+62 21 5790 5788

Korespondensi
Correspondence
PT BALI TOWERINDO SENTRA, Tbk
c.q. DIREKSI
Wisma KEIAI, lantai 22
Jl. Jend. Sudirman Kav. 3
Jakarta 10210. Indonesia

Terkait dengan pelaporan pengaduan tersebut sekurang-kurangnya harus memenuhi persayaratan:

Related to the complaint, the report must at least fulfil the following conditions:

1.Memberikan informasi mengenai identitas diri pelapor untuk memudahkan komunikasi dengan pelapor, sekurang-kurangnya:
a. Nama pelapor
b. Nomor telepon/alamat e-mail yang dapat dihubungi

1. Provide information about the identity of the reporter to facilitate communication with the reporter, at least:
a. Name of the reporter
b. Telephone number or e-mail address that can be contacted

2. Harus memberikan indikasi awal yang dapat dipertanggung-jawabkan yang meliputi:
a. What : Perbuatan berindikasi pelanggaran yang diketahui
b. Where : Dimana perbuatan tersebut dilakukan
c. When : Kapan perbuatan tersebut dilakukan
d. Who : Siapa saja yang terlibat dalam perbuatan tersebut
e. How : Bagaimana perbuatan tersebut dilakukan (modus, cara, dsb.)

2. Shall provide early indications that are accountable, which include:
a. What : Action that indicates violation
b. Where : Where the action takes place
c. When : When the action takes place
d. Who : Who is involved in such action
e. How : How the action is conducted (modus,method, etc.)

3. Laporan yang disampaikan harus berhubungan dengan:
a. Fraud
b. Pelanggaran atas pelayanan kepada pelanggan
c. Pelanggaran hukum
d. Pelanggaran peraturan perusahaan
e. Pelanggaran kode etik
f. Hal-hal lainnya yang diangggap sama dengan hal tersebut.

3. Report submitted shall be related to:
a. Fraud
b. Violation of services to the customers
c. Violation of law
d. Violation of company regulations
e. Violation of code of ethics
f. Other things considered equal to the above violations

Perseroan memberikan perlindungan terhadap kerahasiaan identitas pelapor dan isi laporan yang disampaikan dan perlindungan akan adanya kemungkinan tindakan ancaman dan intimidasi.

The Company provides protection toward the confidentiality of the reporter's identity and the content of the report submitted, and protection from any potential threat and intimidation actions

Seluruh pelaporan yang diterima oleh Perseroan akan ditindaklanjuti dengan melakukan Investigasi yang akan dilakukan oleh Komite Audit atau unit kerja internal Perseroan yang ditunjuk oleh Dewan Komisaris Perseroan melalui surat penunjukan Dewan Komisaris. Atas hasil investigasi tersebut, Dewan Komisaris akan membuat Surat Keputusan yang akan disampaikan kepada Direksi Perseroan atas tindakan pelanggaran yang telah dilaporkan oleh pelapor untuk ditindak-lanjuti sesuai dengan Surat Keputusan Dewan Komisaris dan ketentuan peraturan yang berlaku.

All reports received by the Company shall be followed up by conducting Investigations performed by the Audit Committee or internal work unit of the Company appointed by the Board of Commissioners through a letter of appointment. Based on the result of the investigation, the Board of Commissioners will make a Decision Letter to be submitted to the Board of Directors of the Company upon violations reported by the reporter for follow up in compliance with the Board of Commissioners Decision and the applicable regulations.

Dalam hal investigasi yang dilakukan tidak ditemukan bukti pelanggaran atas pelaporan yang diterima, Dewan Komisaris akan mengeluarkan Surat Keputusan terkait hasil pelaporan yang telah diinvestigasi tersebut kepada Direksi untuk diinformasikan kepada pelapor terkait.

In the event that no evidence is found in the investigation on the reported violation, the Board of Commissioners will release a Decision Letter related to the result of the investigation to the Board of Directors to be informed to the reporter.

Sepanjang tahun 2021, berikut laporan yang diterima oleh sistem pelaporan pelanggaran:

Throughout 2021, the complaints received by whistleblowing system are as follows :

Status Laporan Pelanggaran Tahun 2021

Status of Violation Reports 2021

[205-3]

Topik (Materi) *Topic*	Area *Area*	Tipe Pelaporan *Type of Report*	Tindakan yang Dilakukan *Violation*	Status *Status*
Kehilangan Material Project MCP dan FTTH *Lost Material Project - MCP & FTTH*	***Regional Bali*** *Bali Region*	**Investigasi** *Investigation*	**Diproses oleh Pihak yang Berwajib** *Processed by the Authorities*	**On Progress**

18.
PELATIHAN UNTUK MENINGKATKAN KOMPETENSI
TRAINING TO IMPROVE COMPETENCE

Perseroan menyadari bahwa karyawan merupakan aset dari suatu perusahaan yang menentukan keberhasilan suatu organisasi [103-1]. Oleh karena itu Perseroan berkomitmen untuk memberikan kesempatan pelatihan dan pengembangan yang berkelanjutan serta memadai. [103-2]

The Company realizes that employee is the company asset that determine the success of an organization [103-1]. Therefore, the Company is committed to providing sustainable and adequate training and development opportunities. [103-2]

Pengembangan karyawan dan pelatihan menjadi tanggung jawab divisi HR dan secara berkala pelaksanaannya dilaporkan kepada Direksi untuk evaluasi.

Employee development and training is the responsibility of the HR division and its implementation is regularly reported to the board of directors for evaluation.

Selama periode pelaporan, sebanyak 1824 jam karyawan mengikuti pelatihan. Jumlah karyawan yang mengikuti pelatihan adalah 529 orang, sehingga rata-rata jam pelatihan per karyawan pada tahun 2021 adalah 5,9 jam. Sedangkan, dari sisi jumlah kegiatan pelatihan, terdapat kenaikan yang signifikan dari 25 kegiatan pelatihan pada tahun 2020 menjadi 59 kegiatan pelatihan pada tahun 2021. Selain itu, adanya peningkatan jumlah karyawan yang terlibat dalam pelatihan yaitu 529 partisipan dibandingkan 304 partisipan pelatihan. Hal ini terjadi karena Strategi Pengembangan Karyawan Bali Tower tahun 2021 berfokus pada penguatan kompetensi dasar dan fungsional di masing-masing fungsi atau Department. [404-1] [POJK No. 6.c.2.d]

During the reporting period, 1824 hours of employees attended training. The number of employees participating in the training is 529 people, so the average training hours per employee in 2021 is 5.9 hours. There were 59 training activities throughout 2021, a significant increase compared to 2020 as many as 25 activities. The number of employees involved in training in 2021 was 529 employees, this is an increase compared to 2020 as many as 304 employees. This is because the Bali Tower employee development strategy in 2021 focuses on strengthening basic & functional competencies in each function or department. [404-1] [POJK No. 6.c.2.d]

Saat ini, Perseroan sudah melakukan standarisasi kemampuan untuk meningkatkan kemampuan teknis para Kepala Divisi dan Departemen, *front liners* seperti tim IKR dan *direct sales*. Tujuan dari program tersebut ialah meningkatkan *product knowledge* bagi tim dan meningkatkan *revenue* untuk perusahaan. Pada tahun-tahun berikutnya, Perseroan berencana untuk membuat Program Kepemimpinan untuk Kepala Divisi dan Departemen dalam meningkatkan *Management dan Leadership Skill*. [103-3]

Currently, the company has standardized skills to improve the Soft skills of Division and Department Heads. Standardization of technical skills is also carried out for front liners such as the IKR team and direct sales. The purpose of the program is to increase product knowledge for the team and later will increase revenue for the Company. For the next step The Company plans to create a Leadership Program for Divisions and Department Heads to improve Management and Leadership Skills. [103-3]

Jam Pelatihan Per Karyawan Bali Tower Pada Tahun 2021 [404-1]

Training Hours of Employee Bali Tower 2021 [404-1]

Deskripsi *Description*		Jumlah Peserta *Participants*	Jam Pelatihan *Training hours*	Number of Employee *Jumlah Karyawan*	Rata-Rata Jam Pelatihan per karyawan (orang/jam) *Average training hours per employee*
Based on Gender	Laki-Laki Male	387	1,319	451	2.9
	Perempuan Female	142	505	169	3.0
Type of Training	Kompetensi yang Berbeda Differentiating competency	518	1,791	451	4.0
	Ambang Kompetensi Threshold competency	11	33	169	0.2

Catatan:
**Kompetensi Dasar (Threshold Competency) adalah kompetensi yang menggambarkan karakteristik utama/ umum yang seharusnya dimiliki oleh seseorang supaya bisa melakukan tugas-tugas dalam pekerjaannya.*

**Kompetensi Pembeda (Differentiating Competency) adalah kompetensi yang menjadi faktor pembeda antara individu yang kinerjanya tinggi dengan individu yang kinerjanya rendah.*

**Perhitungan rerata jam pelatihan per karyawan didapatkan dengan pembagian antara jam pelatihan dan total karyawan.*

Notes:
**Basic Competency (Threshold Competencies) is competency describe the main/general characteristics that should be owned by a person in order to be able to perform the tasks in his work.*

**Differentiating Competency is a competency that is a differentiating factor between high-performing individuals and low-performing individuals.*

**Calculation of average training hours per employee is obtained by dividing between training hours and total employees.*

19.
PELUANG **KEMITRAAN SETARA**
EQUAL PARTNERSHIP OPPORTUNITIES

Perseroan menyadari bahwa vendor memiliki peran penting dalam pelaksanaan pembangungan menara telekomunikasi. Lokasi operasional Perseroan yang luas dan secara langsung maupun tidak langsung bersentuhan dengan masyarakat sekitar. Kehadiran Perseroan memberikan manfaat ekonomi lokal dari pembelian barang dan jasa. Perseroan juga telah memprioritaskan pembelian barang dan jasa dari pemasok lokal [103-1]. Selama periode pelaporan, ada 587 vendor yang terdaftar di Perseroan. Dalam pelaksanaan pemilihan vendor, Perseroan melakukan penilaian sesuai dengan *Standar Operasional Procedure* (SOP) *Procurement*. Penilaian dilaksanakan oleh Departemen Procurement dan disetujui oleh Manager dari user departemen terkait yang akan menggunakan vendor. [102-9] [103-2]

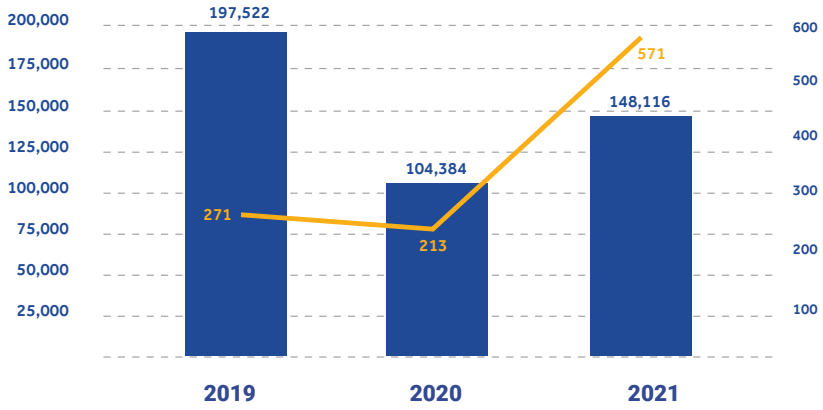
The Company realizes that vendors have an important role in the implementation of telecommunication towers construction. The Company's operational location and directly or indirectly in contact with the surrounding community. The presence of the Company provides local economic benefits from the purchase of goods and services. The Company has also prioritized the purchase of goods and services from local suppliers [103-1]. During the reporting period, there were 587 vendors registered with the Company. In the implementation of vendor selection, the Company conducts an assessment in accordance with the Standard Operating Procedure (SOP). The assessment is carried out by the Procurement Department and approved by the Manager of the relevant user department who will use the vendor. [102-9] [103-2]

Perseroan juga mengedepankan vendor lokal dalam pelaksanaan pemilihan vendor. Selama tahun 2021, Perseroan telah bermitra dengan 571 Mitra lokal dengan total pembiayaan sebesar 148,116 miliar rupiah atau setara dengan 97 % dari total belanja Perseroan. Jumlah mitra lokal ini meningkat dibandingkan dengan tahun 2020 yang berjumlah 213 mitra lokal sebesar 104,384 miliar. [204-1]

The Company also prioritizes local vendors in the implementation of vendor selection. During 2021, the Company has partnered with 571 local partners with total financing of 148.116 billion rupiah or equivalent to 97% of the Company's total expenditure. The number of local partners has increased compared to 2020 which amounted to 213 local partners of 104.384 billion. [204-1]

Pembiayaan dan Jumlah Mitra Lokal

Financing and Number of Local Partners



Kedepannya, Perseroan berencana melakukan penilaian seleksi sosial untuk vendor baru. Penilaian sosial ini bertujuan untuk memastikan calon vendor Perseroan layak menjadi mitra Perseroan sesuai dengan kriteria purchasing, hukum, keuangan, HSE, dan teknis. Perseroan juga akan memberikan peluang bagi mitra lokal di sekitar wilayah operasional melalui penetapan pedoman yang menyatakan bahwa perseroan menggunaan kompetensi dalam negeri.

In the future, the Company plans to conduct a social selection assessment for new vendors. This social assessment aims to ensure that the prospective vendors are eligible to be the Company's partners in accordance with purchasing, legal, financial, HSE, and technical criteria. The company will also provide opportunities for local partners around the operational area through the establishment of guidelines stating that the company uses domestic competence.

20.

MASYARAKAT **SEKITAR** [413-1] [413-2]

SURROUNDING COMMUNITY [413-1] [413-2]

Perseroan senantiasa berkomitmen dalam memprioritaskan investasi kepada masyarakat sekitar sebagai bagian dari implementasi tanggung jawab sosial perusahaan yang berkontribusi pada pembangunan berkelanjutan. [103-1] Dalam masa Pandemi Covid-19, Perseroan berinisiatif dengan memberikan *Corporate Social Responsibilty* (CSR) di bidang kesehatan untuk membantu Pemerintah menanggulangi penyebaran Covid-19 dalam mencapai Tujuan Pembangunan Berkelanjutan. [103-2]

Pada tahun 2021, perseroan telah mengalokasi dana investasi masyarakat sekitar sebesar Rp 1.182.652.873 yang didistribusikan melalui Pemerintah Daerah terkait ke 17 Kota/ Kabupaten dari 40 Kota/ Kabupaten atau sebesar 42.5% dari total lokasi menara operasional. Alokasi dana investasi masyarakat ini meningkat dari tahun sebelumnya juga wilayah cangkupannya. Dana tersebut disalurkan melalui beberapa kegiatan tanggung jawab sosial perusahaan (CSR) yang diserahkan ke para pemangku kepentingan terkait. Dengan dokumentasi sebagai berikut:

DKI Jakarta

Perseroan memberikan dukungan kepada Pemerintah dan masyarakat terdampak dengan menyalurkan bantuan melalui Badan Penanggulangan Bencana Daerah (BPBD) dan Dinas Kesehatan Pemerintah Provinsi DKI Jakarta berupa 85 tabung oksigen dan 5000 pcs APD Hazmat untuk melindungi petugas dan masyarakat dari penularan Covid-19.

The Company is always committed to prioritizing investment in the surrounding community as part of the implementation of corporate social responsibility that contributes to sustainable development. [103-1] During the Covid-19 Pandemic, the Company took the initiative to provide Corporate Social Responsibility (CSR) in the health sector to help the Government overcome the spread of Covid-19 in achieving the Sustainable Development Goals. [103-2]

In 2021, the company has allocated investment funds for the surrounding community in the amount of IDR 1,182,652,873 which is distributed through the relevant governments to 17 cities / regencies of 40 cities / regencies or 42.5% of the total operational tower locations. The allocation of public investment funds increased from the previous year as well as the area covered. The funds are channeled through several corporate social responsibility (CSR) activities which are handed over to the relevant stakeholders. With the following documentation:

DKI Jakarta

The Company provides support to the Government and affected communities by distributing aid through the Regional Disaster Management Agency (BPBD) and the DKI Jakarta Provincial Public Health Office in the form of 85 oxygen cylinders and 5000 pcs of Hazmat PPE to protect officers and the public from the transmission of Covid-19.







TNI

Tentara Nasional Indonesia (TNI) Perseroan bekerjasama dengan Tentara Nasional Indonesia (TNI) memberikan CSR berupa tabung oksigen sebanyak 25 tabung dengan lokasi penyerahan di Stasiun Pengisian Bahan Bakar TNI (SPBT) Kementerian Pertahanan Republik Indonesia.

The Company in collaboration with the Indonesian National Armed Forces (TNI) provides CSR in the form of 25 oxygen cylinders with submission locations at the TNI Fuel Filling Station of the Ministry of Defense of the Republic of Indonesia.



Banten

Pada tahun 2021, Perseroan memberikan bantuan Covid-19 melalui Dinas Kesehatan dan Bagian Umum Sekertaris Daerah Kab. Tangerang berupa 500 pcs APD Hazmat, dan *hand sanitizer* sejumlah 1590 botol. Perseroan juga memberikan bantuan Covid-19 ke Pemerintah Kota Tangerang dan masyarakat melalui Dinas Kesehatan berupa 20 tabung oksigen.

Banten

In 2021, the Company provided Covid-19 assistance through the Public Health Office and the General Section of the District Secretariat Tangerang in the form of 500 pcs of PPE Hazmat, and 1590 bottles of hand sanitizer. The company also provided Covid-19 assistance to the Tangerang Government and the community through the Health Office in the form of 20 oxygen cylinders.





Jawa Barat

Perseroan bekerjasama dengan Badan Penanggulangan Bencana Daerah (BPBD) Pemerintah Kota Bekasi dengan memberikan CSR berupa 20 tabung oksigen, Badan Penanggulangan Bencana Daerah (BPBD) Pemerintah Kota Depok dengan memberikan CSR berupa 20 tabung oksigen, Badan Penanggulangan Bencana Daerah (BPBD) Pemerintah Kota Bogor dengan memberikan CSR berupa 10 tabung oksigen, Badan Penanggulangan Bencana Daerah (BPBD) Pemerintah Kota Cimahi dengan memberikan CSR berupa 500 pcs APD Hazmat, 1590 botol *hand sanitizier,* RSUD Kota Bandung dengan memberikan CSR berupa 25 tabung oksigen untuk melindungi petugas dan masyarakat dari penularan Covid-19.

Jawa Barat

The Company cooperates with the Regional Disaster Management Agency (BPBD) Bekasi Government by providing CSR in the form of 20 oxygen cylinders, the Regional Disaster Management Agency (BPBD) Depok Government by providing CSR in the form of 20 oxygen cylinders, the Regional Disaster Management Agency (BPBD) Bogor Government with providing CSR in the form of 10 oxygen cylinders, the Regional Disaster Management Agency (BPBD) Cimahi Government by providing CSR in the form of 500 pcs of Hazmat PPE, 1590 bottles of hand sanitizer, Bandung Hospital by providing CSR in the form of 25 oxygen cylinders to protect officers and the public from the transmission of Covid-19.











Jawa Timur

Perseroan memberikan 1000 pcs APD Hazmat, 2000 masker, 1970 botol *hand sanitizer*, melalui PTSP Kab. Sidoarjo. Untuk Kabupaten Gresik, Perseroan memberikan bantuan berupa Tenda Pleton sebanyak 2 unit. Selain itu Perseroan bekerjasama dengan Pemerintah Kota Surabaya menyerahkan bantuan 3000 *hand sanitizer*, 200 pcs APD Hazmat, dan 10.000 masker untuk dapat disalurkan ke masyarakat sekitar guna mencegah penularan Covid-19 di Area Jawa Timur.

Jawa Timur

The company provided 1000 pcs of PPE Hazmat, 2000 masks, 1970 bottles of hand sanitizer, through PTSP Kab. Sidoarjo Gresik, the Company provided assistance in the form of 2 units of Platoon Tents. In addition, the Company in collaboration with the Surabaya City Government provided assistance with 3000 hand sanitizers, 200 pcs of PPE Hazmat, and 10,000 masks to be distributed to the surrounding community to prevent the transmission of Covid-19 in the East Java Area.







Bali

Bekerjasama dengan RSUD Mangusada Badung, Perseroan memberikan dukungan kepada masyarakat untuk menanggulangi Covid-19 dengan dalam bentuk penyerahan 50 tabung oksigen. Selain itu Perseroan juga bekerjasama dengan RSUD Sanjiwani Gianyar dengan memberikan bantuan 30 tabung oksigen.

Bali

In collaboration with the Mangusada Badung Hospital, the Company provides support to the community to overcome Covid-19 by giving 50 oxygen cylinders. In addition, the Company also cooperates with the Sanjiwani Hospital in Gianyar by providing assistance with 30 oxygen cylinders.





Pelaksanaan Program Pengembangan Masyarakat di sekitar BTS

Implementation of Community Development Programs around BTS

Tahun *Years*	*Stage* *Stage*	Aktivitas *Activity*	*Target* *Target*
2020	DONASI *Donation*	**1. Perseroan berkolaborasi dengan beberapa Lembaga seperti Dompet Dhuafa, Rumah Zakat dan Yayasan Buddha Tzu Chi Indonesia untuk menyalurkan bantuan kepada para korban masyarakat yang terdampak pandemi Covid-19** **2. Pengadaan telephon selular untuk siswa-siswi di Kota Surakarta** *1. The Company collaborates with several institutions such as Dompet Dhuafa, Rumah Zakat and the Buddhist Tzu Chi Indonesia Foundation to distribute assistance to community victims affected by the Covid-19 pandemic* *2. Procurement of handphone for students in Surakarta City*	**1. Mengurangi dampak negatif dari pandemi Covid-19 (3 lokasi)** **2. 40 siswa terbantu dalam hal sarana pendidikan siswa sekolah di masa School From Home** *1. Reduce the negative impact of the Covid-19 pandemic (3 locations)* *2. 40 students were helped in terms of educational facilities for school students during the School From Home period*
	Infrastruktur *Infrastructure*	**Pembangunan jalan infrastruktur di kawasan sejarah Indonesia** *Construction of infrastructure road in historical area of Indonesia*	**1 lokasi sejarah di Indonesia** *1 historical location in Indonesia*
2021	DONASI *Donation*	**Perseroan berkolaborasi dengan beberapa Instansi pemerintah dan suku dinas pemda untuk menyalurkan bantuan kepada para tenaga kesehatan dalam bentuk fasilitas kesehatan (APD, Masker, hand sanitizer, vitamin , tenda , dll) agar dapat melayani masyarakat** *The Company collaborates with several government agencies and regional government to distribute assistance for health workers in the form of health facilities (PPE, masks, hand sanitizers, vitamins, tents, etc.) in order to serve the community.*	**Instansi pemerintah** *Government agency*
2022 Rencana *Plan*	DONASI *Donation*	**1. Pemberian hewan kurban untuk masyarkat yang berada di lokasi menara operasional** **2. Donasi laptop untuk siswa sekolah di area menara operasional** *1. Submission the Qurban for the community arround the operational tower area* *2. Donate laptops for students at the operational tower area*	**Pembahasan target masih dalam tahap diskusi** *The target is still in the discussion*
	Infrastruktur *Infrastructure*	**Pemasangan cctv dan alat recording di Area Pantai dan Jalan Raya menuju Pantai di Bali** *Installation of cctv and recording equipment in the Beach Area and Highway to the Beach in Bali*	
	Peningkatan Kapasitas SDM *HR Capacity Building*	**Pelatihan penggunaan mesin pencacah sampah dan kompos** *Training on the use of waste and composting machines*	
	Pemberdayaan *Empowerment*	**Pemberian mesin pencacah sampah kompos untuk masyarakat sekitar menara operasional area Bali** *Submission of composting machine for the community around the operational tower in the Bali area*	

Rangkuman Kegiatan CSR di Bali Tower Pada Tahun 2021

Summary of CSR Activities in Bali Tower 2021

Kesehatan

Health

Target *Target*	**Pencapaian** *Achievement*	**Lokasi** *Location*	**Jumlah** *Total*	**Dukungan terhadap Tujuan Pembangunan Berkelanjutan** [6.c.3.c] *Support for the SDGs [6.c.3.c]*
Instansi dan fasilitas kesehatan untuk membantu menanggulangi Pandemi Covid-19 *Health agencies and facilities to help overcome the Covid-19 Pandemic*	**Perseroan berkolaborasi dengan beberapa Instansi pemerintah dan suku dinas pemda untuk menyalurkan bantuan kepada para tenaga kesehatan dan masyarakat yang terdampak pandemi Covid-19 dalam bentuk fasilitas kesehatan (APD, Masker, hand sanitizer, tenda, dll)** *The company collaborates with several government agencies and regional government departments to distribute assistance to health workers and communities affected by the Covid-19 pandemic in the form of health facilities (PPE, masks, hand sanitizers, tents, etc.)*	**DKI Jakarta , Banten, Jawa Barat, Jawa Timur, Bali** *DKI Jakarta , Banten, West Java, East Java, Bali*	**17 Lokasi** *17 Locations*	

Mekanisme Pengaduan Masyarakat
Community Complaint Mechanism

Perseroan menyadari akan potensi dampak sosial dari kegiatan bisnis terhadap masyarakat sekitar. Masyarakat sekitar juga memiliki pengaruh penting dalam operasional bisnis perseroan dalam hal persetujuan dari masyarakat yang diperlukan dalam perizinan pembangunan menara dan juga sebagai parameter pengukuran kepuasan pelanggan [103-1]. Oleh karena itu Perseroan secara aktif memperhatikan harapan dan kebutuhan masyarakat sekitar dimana Perseroan beroperasi dengan memfasilitasi proses pengaduan publik yang menggunakan platform berupa:

01.

Barcode MCP [103-2]

Pada platform tersebut masyarakat dapat menyampaikan keluhan apapun. Keluhan yang masuk kemudian ditanggapi Perseroan melalui divisi Government Relation. Selama periode pelaporan, Perseroan menerima 12 pengaduan atau keluhan masyarakat dengan status keseluruhan keluhan tersebut sudah closed

02.

Surat Elektronik/ Email Corporate Secretary

Pada periode laporan ini tidak ada pengaduan di email Corporate Secretary.

03.

Layanan Call Center

Pengaduan/ keluhan masyarakat yang diterima melalui layanan Call Center oleh Contact Center dicatat sebagai Trouble Ticket untuk ditangani sesuai informasi yang disampaikan tersebut. Dalam periode pelaporan keluhan masyarakat sudah tertangani dengan baik atau sudah closed.

The Company is aware of the potential social impact of business activities on the surrounding community. The surrounding community also has an important influence in the company's business operations in terms of approval from the community which is required in the permit of tower construction and as a parameter for measuring customer satisfaction [103-1]. Therefore, the Company actively pays attention to the expectations and needs of the surrounding community the Company operates by facilitating the public complaint process using platforms in the form of:

01.

Barcode MCP [103-2]

On this platform, the public can submit any complaints. Incoming Complaints responded to by the Company through the Government Relations division. During the reporting period, the Company received 12 complaints from the public with the overall status of the complaints is closed.

02.

Corporate Secretary E-mail/E-mail

During this reporting period there were no complaints in the Corporate Secretary's email.

03.

Call Center Service

Public complaints/complaints received through the Call Center service by the Contact Center are recorded as a Trouble Ticket to be handled according to the information submitted. During the reporting period, public complaints have been handled properly or have been closed.

ASSURANCE STATEMENT

SGS INDONESIA'S REPORT ON SUSTAINABILITY ACTIVITIES IN THE PT BALI TOWERINDO SENTRA Tbk 2021

NATURE OF THE ASSURANCE/VERIFICATION

PT SGS Indonesia was commissioned by PT Bali Towerindo Sentra Tbk to conduct an independent assurance of the Sustainability Report 2021. The scope of the assurance, based on the SGS Sustainability Report Assurance methodology, included the text, and data in accompanying tables, contained in this report.

INTENDED USERS OF THIS ASSURANCE STATEMENT

This Assurance Statement is provided with the intention of informing all PT Bali Towerindo Sentra Tbk's stakeholders.

RESPONSIBILITIES

The information in the Report and its presentation are the responsibility of the directors or governing body and the management of PT Bali Towerindo Sentra Tbk. SGS has not been involved in the preparation of any of the material included in the Report.

Our responsibility is to express an opinion on the text, data, graphs and statements within the scope of verification with the intention to inform PT Bali Towerindo Sentra Tbk 's stakeholders.

ASSURANCE STANDARDS, TYPE AND LEVEL OF ASSURANCE

The SGS ESG & Sustainability Report Assurance protocols used to conduct assurance are based upon internationally recognized assurance guidance and standards including the Principles contained within the Global Reporting Initiative Sustainability Reporting Standards (GRI Standards) 101: Foundation 2016 for report quality, and the guidance on levels of assurance contained within the AA1000 series of standards.

The assurance of this report has been conducted according to the following Assurance Standards:

- SGS ESG & SRA Assurance Protocols (based on GRI Principles and guidance in AA1000)
- AA1000ASv3 Type 2 (AA1000APS Evaluation) with level of assurance is Moderate

Assurance has been conducted at a moderate (limited) level of scrutiny

SCOPE OF ASSURANCE AND REPORTING CRITERIA

The scope of the assurance included evaluation of quality, accuracy and reliability of specified performance information as detailed below and evaluation of adherence to the following reporting criteria:

- GRI (Core Option) 2016.
- AA1000 Accountability Principles Standard (2018)

ASSURANCE METHODOLOGY

The assurance comprised a combination of pre-assurance research and interviews with relevant accountable managers and employees at the Representing Office of PT Bali Towerindo Sentra Tbk in Jakarta via remote. PT Bali Towerindo Sentra Tbk Sustainability Report 2021 covers PT Bali Towerindo Sentra Tbk documentation and record review.

LIMITATIONS AND MITIGATION

Financial data drawn directly from independently audited financial accounts has not been checked back to source as part of this assurance process.

Some statements and data within the scope were not assured due to lack of accessible records during the timescale allowed for assurance, and these are clearly marked throughout the Report.

STATEMENT OF INDEPENDENCE AND COMPETENCE

The SGS Group of companies is the world leader in inspection, testing and verification, operating in more than 140 countries and providing services including management systems and service certification; quality, environmental, social and ethical auditing and training; environmental, social and sustainability report assurance. SGS affirm our independence from PT Bali Towerindo Sentra Tbk, being free from bias and conflicts of interest with the organization, its subsidiaries and stakeholders.

The assurance team was assembled based on their knowledge, experience and qualifications for this assignment, and comprised auditors registered with International Register of Certificated Auditors (IRCA), Environmental Management System (EMS) Lead Auditor, Quality Management System (QMS) Lead Auditor, Occupational Health and Safety Management System (OHSMS) Lead Auditor, members of the assurance team have completed the IRCA Corporate Responsibility Training Programme and are internationally renowned for their expertise in sustainability.

FINDINGS AND CONCLUSIONS

ASSURANCE/VERIFICATION OPINION

On the basis of the methodology described and the verification work performed, we are satisfied that the specified performance information included in the scope of assurance is accurate, reliable, has been fairly stated and has been prepared, in all material respects, in accordance with the reporting criteria.

We believe that the organization has chosen an appropriate level of assurance for this stage in their reporting.

QUALITY AND RELIABILITY OF SPECIFIED PERFORMANCE INFORMATION

1. Organization could adopt relevant ISO management system to improve performance and compliance related to ESG
2. To improve reporting of disclosure of management approach to cover strategy, goals, action plan and evaluation
3. Organization could consider guidance of ISO 31000 risk management to cover all risk of organization
4. Consideration to be given to include reporting of contractor's OHS accident data.

ADHERENCE TO AA1000 ACCOUNTABILITY PRINCIPLES STANDARD (2018)

Inclusivity

To carry out this stakeholder engagement, the PT Bali Towerindo Sentra Tbk performed meeting with specific stakeholder and topic that provides comprehensive and balanced involvement and results in strategy, plan, action and outcomes that address and respond to issues and impacts in an accountable way.

Materiality

PT Bali Towerindo Sentra Tbk has identified stakeholders and those issues that are material to each group of stakeholders and the report addresses these at an appropriate level to reflect their importance and priority to these stakeholders. To establish key material issues PT Bali Towerindo Sentra Tbk conducted interview and questionnaire during period January – March 2021 and reported 10 (ten) material topics in the Sustainability Report 2021

Responsiveness
PT Bali Towerindo Sentra Tbk has responded to stakeholders' issues that affect to its sustainability performance and is released through decisions, actions and performance, as well as communication with stakeholders. The social and environmental responsibility is managed through and umbrella of CSR (Corporate Social Responsibility) and has been disclosed in the report.

Impact
PT. Bali Towerindo Sentra Tbk has identified and fairly represented impacts that were monitored and measured. PT Bali Towerindo Sentra Tbk has established processes to monitor, measure and evaluate impacts that lead to effective decision making management within organization.

ADHERENCE TO GLOBAL REPORTING INITIATIVE SUSTAINABILITY REPORTING STANDARDS (2016)

In our opinion, the PT. Bali Towerindo Sentra Tbk Sustainability Report 2021 is presented in accordance with the Core option for GRI Sustainability Reporting Standards 2016 and fulfills all the required content and quality criteria.

GRI 101: Foundation
In our opinion, the content and quality of the report adheres to the four GRI Report Content Principles of Materiality, Stakeholder Inclusiveness, Sustainability Context and Completeness, and the six GRI Report Quality Principles of Balance, Comparability, Accuracy, Timeliness, Clarity and Reliability.

GRI 102: General Disclosures
All the General disclosures required for reporting in accordance with the Core option for Global Reporting Initiative Sustainability Reporting Standards 2016 are included or referenced in the report.

GRI 103: Disclosures on Management Approach
Disclosure Management Approach (DMA) for each materiality aspects have been disclosed in the report in accordance with the Core option for Global Reporting Initiative Sustainability Reporting Standards 2016.

Signed:
For and on behalf of SGS Indonesia

Johnny Koe
Business Manager
Jakarta, Indonesia
5 May 2022

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000-8/V3-I0PQC

Profil Organisasi

Organization Profile

*Referensi Silang POJK No.51/POJK.03/2017 dan Standar GRI

Cross Reference POJK No.51/POJK.03/2017 and GRI Standards

Referensi Silang dan Standar GRI* Cross Reference and GRI Standards	Nomor Pengungkapan Disclosure Number	Pengungkapan Disclosure	Section (Page)
GRI 102: Pengungkapan Umum 2016 GRI 102: General Disclosure 2016	102-1	**Nama Organisasi** Name of the organization	3 (7)
	102-2	**Aktivitas, merk, produk dan layanan** Activities, brands, products, and services	3 (7)
	102-3	**Lokasi Kantor Pusat** Location of headquarters	3 (7)
	102-4	**Lokasi Operasi** Location of operations	3 (7)
	102-5	**Kepemilikan dan bentuk hukum** Ownership and legal form	3 (7,8)
	102-6	**Pasar yang dilayani** Markets served	3 (6)
	102-7	**Skala Organisasi** The scale of the organization	3 (8)
	102-8	**Informasi tentang karyawan dan pekerja lainnya** Employee Information and Others	3 (8-12)
	102-9	**Rantai Pasokan** Supply chain	19 (40)
	102-10	**Perubahan Drastis** Significant change	2 (5)
	102-11	**Prinsip atau pendekatan kehati-hatian** Precautionary Principle or approach	7 (19)
	102-12	**Inisiatif eksternal** External initiatives	3 (12)
	102-13	**Keanggotaan Asosiasi** Membership of Associations	3 (12)
POJK 51/ OJK.03/2017	3a	**Visi, misi, dan nilai berkelanjutan perusahaan** Sustainability vision, mission and values	5 (16)
	3b	**Nama, alamat, nomor telepon, nomor faksimili, alamat surat elektronik (e-mail), dan situs/web, serta kantor cabang dan/atau kantor perwakilan** Name, address, telephone number, fax number, electronic mail address, and site/web, as well as branch offices and/or representative offices	3 (7)
	3c	**3.c.1 Total aset atau kapitalisasi aset, dan total kewajiban** 3.c.1 Total asset or capitalization of assets, and total liabilities	9 (24)
		3.c.2 Jumlah karyawan yang dibagi menurut jenis kelamin, jabatan, usia, pendidikan, dan status ketenagakerjaan 3.c.2 Total employees classified by gender, occupation, age, education, and employment status	3 (9-12)
		3.c.3 Persentase kepemilikan saham (publik dan pemerintah) 3.c.3 Share ownership percentage (public and government),	3 (8)
		3.c.4 Wilayah operasional 3.c.4 Operational area	3 (6)
	3d	**Produk, layanan, dan kegiatan usaha** Products, services, and business activities	3(7)

Strategy

Strategy

*Referensi Silang POJK No.51/POJK.03/2017 dan Standar GRI

Cross Reference POJK No.51/POJK.03/2017 and GRI Standards

Referensi Silang dan Standar GRI* Cross Reference and GRI Standards	Nomor Pengungkapan Disclosure Number	Pengungkapan Disclosure	Section (Page)
GRI 102: Pengungkapan Umum 2016 GRI 102: General Disclosure 2016	102-14	**Pernyataan Pembuat Keputusan Senior** *Statement from senior decision-maker*	1 (3-4)
	102-15	**Dampak Utama, Resiko dan Peluang** *Key impacts, risks, and opportunities*	7 (20-22)
POJK 51/OJK.03/2017	1	**Penjelasan strategi berkelanjutan** *Explanation Sustainability Strategy*	5 (15)
	2	**Ikhtisar kinerja aspek berkelanjutan** *Sustainability Aspect Performance Highlights*	4 (14-15)
	4a	**Kebijakan untuk merespon tantangan dalam pemenuhan strategi keberlanjutan** *Policy to respond to challenges in the fulfillment of its sustainability strategy*	1 (3-4)
	4b	**Penerapan Keuangan Berkelanjutan** *Sustainable finance implementation*	9 (24)
	4c	**Strategi pencapaian target** *Target achievement strategy*	7 (19)

Etika dan Integritas

Ethics and Integrity

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GRI 102: Pengungkapan Umum 2016 GRI 102: General Disclosure 2016	102-16	**Nilai, Prinsip, Standar dan Norma Perilaku** Values, principles, standards, and norms of behavior	5 (16)
	102-17	**Mekanisme untuk nasihat dan etika** Mechanisms for advice and concerns about ethics	17 (37)

Tata Kelola

Governance

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GRI 102: Pengungkapan Umum 2016 GRI 102: General Disclosure 2016	102-18	**Struktur Tata Kelola** Governance structure	3 (9)

Keterlibatan Pemangku Kepentingan

Stakeholder Engagement

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GRI 102: Pengungkapan Umum 2016 *GRI 102: General Disclosure 2016*	102-40	Daftar kelompok pemangku kepentingan *List of stakeholder groups*	8 (23)
	102-42	Mengidentifikasi dan memilih pemangku kepentingan *Identifying and selecting stakeholders*	8 (22)
	102-43	Pendekatan terhadap keterlibatan pemangku kepentingan *Approach to stakeholder engagement*	8 (23)
	102-44	Topik utama dan masalah *Key topics and concerns raised*	8 (23)
POJK 51/OJK.03/2017	5d	Penjelasan mengenai pemangku kepentingan *A description of the stakeholders*	8 (23)

Praktik Pelaporan

Reporting Practice

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GRI 102: General Disclosure 2016	102-45	Entitas termasuk dalam laporan keuangan yang dikonsolidasi *Entities included in the consolidated financial statements*	3 (13-14)
	102-46	Menetapkan isi laporan dan batasan topik *Defining report content and topic Boundaries*	6 (18-19)
	102-47	Daftar topik material *List of material topics*	6 (17-18)
	102-48	Penyajian Kembali Informasi *Restatement of Information*	2 (5)
	102-50	Reporting periode *Reporting period*	2 (5)
	102-51	Tanggal laporan terbaru *Date of the most recent report*	2 (5)
	102-52	Siklus pelaporan *Reporting cycle*	2 (5)
	102-53	Titik kontak untuk pertanyaan mengenai laporan *Contact point for questions regarding the report*	2 (6)
	102-54	Mengklaim pelaporan sesuai dengan standar GRI *Claims of reporting following the GRI Standards*	2 (5)
	102-55	Index isi GRI *GRI content index*	Last page
	102-56	Pernyataan dari eksternal *External assurance*	2 (5)

Praktik Pelaporan — Reporting Practice

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POJK 51/OJK.03/2017	4a	**Kebijakan untuk merespon tantangan dalam pemenuhan strategi keberlanjutan** *Policy to respond to challenges in the fulfillment of its sustainability strategy*	1 (3)
	4b	**Penerapan Keuangan Berkelanjutan** *Sustainable finance implementation*	9 (24)
	4c	**Strategi pencapaian target** *Target achievement strategy*	7 191)
	5a	**Uraian mengenai tugas bagi Direksi dan Dewan Komisaris, pegawai, pejabat dan/ atau unit kerja yang menjadi penanggung jawab penerapan keberlanjutan** *Description of duties of the board of directors and boards of commissioners, officers, employees and/or work unit be responsible for the implementation of sustainable finance*	17 (36)
	5b	**Penjelasan mengenai pengembangan kompetensi yang dilaksanakan terhadap anggota Direksi, anggota Dewan Komisaris, pegawai, pejabat dan/atau unit kerja yang menjadi penanggung jawab penerapan Keuangan Berkelanjutan** *Board of director competency development, members of the board of commissioners, officers, employees and/or work unit be responsible for sustainable finance implementation*	17 (36)
	5c	**Penjelasan mengenai pengendalian risiko keberlanjutan** *Explanation of sustainability risk control*	7 (20)
	7	**Verifikasi tertulis dari pihak independen** *Written verification from independent parties*	

Kinerja Ekonomi — Economic Performance

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POJK 51/OJK.03/2017	103-1	Penjelasan topik material dan batasannya *Explanation of the material topic and its boundary*	9 (23)
	103-2	Pendekatan manajemen dan komponennya *The management approach and its components*	9 (24)
	103-3	Evaluasi pendekatan manajemen *Evaluation of the management approach*	9 (24)
	201-1	Nilai ekonomi langsung yang dihasilkan dan didistribusikan *Direct economic value generated and distributed*	9 (24)
	2a	2.a.2 Pendapatan penjualan *2.a.2 Income*	9 (24)
	3c	3.c.1 Total aset atau kapitalisasi aset, dan total kewajiban *3.c.1 Total asset or capitalization of assets, and total liabilities (in million Rp)*	9 (24)
		3.c.3 Persentase kepemilikan saham (publik dan pemerintah) *3.c.3 Share ownerships percentage (public and governance)*	3 (8)
		3.c.4 Wilayah operasional *3.c.4 Operational area*	3 (6)
	6b	Uraian mengenai kinerja ekonomi *The description of economic performance*	9 (24)
	6c	6.c.1 Komitmen Perusahaan untuk memberikan produk dan/atau jasa keuangan berkelanjutan *6.c.1 The Company's commitment to deliver products and/or services equivalent to the customers*	11 (25-26)
	6d	6.d.1 Biaya Lingkungan Hidup yang dikeluarkan *6.d.1 Environmental costs incurred*	20 (68)

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GRI 205: Anti Korupsi 2016 *GRI 205: Anti Corruption 2016*	205-1	Penilaian resiko kegiatan usaha sehubungan dengan korupsi *Operations assessed for risks related to corruption*	17 (37)
	205-2	Komunikasi dan pelatihan tentang kebijakan dan prosedur anti korupsi *Communication and training about anti-corruption policies and procedures*	17 (37)

Kepuasan Pelanggan — Customer Satisfaction

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GRI 103: Pendekatan Manajemen 2016 *GRI 103: Management Approach 2016*	103-1	**Penjelasan topik material dan batasannya** *Explanation of the material topic and its boundary*	13 (26)
	103-2	**Pendekatan manajemen dan komponennya** *The management approach and its components*	13 (26)
	103-3	**Evaluasi pendekatan manajemen** *Evaluation of the management approach*	13 (26)
GRI 418: Customer Privacy *GRI 418: Customer Privacy*	418-1	**Keluhan yang disertai pembuktian mengenai pelanggaran privasi dan kehilangan data pelanggan** *Substantiated complaints concerning breaches of customer privacy and losses of customer data*	13 (26)
POJK 51/OJK.03/2017	6f	**6.f.5 Survei kepuasan pelanggan** *6.f.5 Customer satisfaction survey on sustainable finance products and/or services*	13 (26)

Daya Saing — Anti-Competitive Behaviour

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GRI 103: Pendekatan Manajemen 2016 *GRI 103: Management Approach 2016*	103-1	**Penjelasan topik material dan batasannya** *Explanation of the material topic and its boundary*	12 (26)
	103-2	**Pendekatan manajemen dan komponennya** *The management approach and its components*	12 (26)
GRI 206: Daya Saing *GRI 206: Anti-Competitive Behaviour*	206-1	**Tindakan hukum untuk perilaku anti persaingan, anti kepercayaan dan praktik monopoli** *Legal actions for anti-competitive behavior, anti-trust, and monopoly practices*	12 (26)

Sosial Kesehatan & Keselamatan Kerja

Social Occupational Health and Safety

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GRI 103: Pendekatan Manajemen 2016 *GRI 103: Management Approach 2016*	103-1	**Penjelasan topik material dan batasannya** *Explanation of the material topic and its boundary*	14 (27)
	103-2	**Pendekatan manajemen dan komponennya** *The management approach and its components*	14 (27)
	103-3	**Evaluasi pendekatan manajemen** *Evaluation of the management approach*	14 (27)
GRI 403: Kesehatan dan Keselamatan Kerja 2018 *GRI 403: Occupational Health and Safety 2018*	403-1	**Sistem manajemen Keselamatan dan Kesehatan Kerja (K3)** *Occupational health and safety management system*	14 (28)
	403-2	**Identifikasi bahaya, penilaian resiko dan investigasi kecelakaan** *Hazard identification, risk assessment, and incident investigation*	14 (28)
	403-3	**Layanan kesehatan kerja** *Occupational health services*	14 (28)
	403-4	**Keikutsertaan, konsultasi, pelatihan dan komunikasi pekerja tentang Keselamatan dan Kesehatan Kerja (K3)** *Worker participation, consultation, and communication on occupational health and safety*	14 (28)
	403-5	**Pelatihan tentang Keselamatan dan Kesehatan Kerja (K3)** *Worker training on occupational health and safety*	14 (28)
POJK 51/OJK.03/2017	6c	**6.c.2.c Lingkungan bekerja yang layak dan aman** *6.c.2.c Lingkungan bekerja yang layak dan aman*	14 (27)

Pelatihan & Pengembangan Karyawan

Training and Development

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GRI 103: Pendekatan Manajemen 2016 *GRI 103: Management Approach 2016*	103-1	**Penjelasan topik material dan batasannya** *Explanation of the material topic and its boundary*	18 (38)
	103-2	**Pendekatan manajemen dan komponennya** *The management approach and its components*	18 (38)
	103-3	**Evaluasi pendekatan manajemen** *Evaluation of the management approach*	18 (39)
GRI 404: Pelatihan dan Pendidikan 2016 *GRI 404: Training and Education 2016*	404-1	**Rata-rata jam pelatihan per tahun per karyawan** *Average hours of training per year per employee*	18 (39)
POJK 51/OJK.03/2017	6c	**6.c.2.d Pelatihan dan pengembangan kemampuan pegawai** *6.c.2.d Employee training and development*	18 (39)

Manajemen Karyawan — Employee Management

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POJK 51/OJK.03/2017	3c	3.c.2 Jumlah karyawan yang dibagi menurut jenis kelamin, jabatan, usia, pendidikan, dan status ketenagakerjaan *3.c.2 Total employees classified by gender, occupation, age, education, and employment status*	3 (9-12)
POJK 51/OJK.03/2017	6c	6.c.2.a Kesetaraan kesempatan bekerja dan ada atau tidaknya tenaga kerja paksa dan tenaga kerja anak *6.c.2.a Equality of employment opportunities and the presence or absence of forced labor and child labor*	3 (9-12)

Masyarakat Sekitar — Local Community

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GRI 103: Pendekatan Manajemen 2016 *GRI 103: Management Approach 2016*	103-1	Penjelasan topik material dan batasannya *Explanation of the material topic and its boundary*	20 (40)
	103-2	Pendekatan manajemen dan komponennya *The management approach and its components*	20 (41)
GRI 413: Masyarakat Lokal 2016 *GRI 413: Community 2016*	413-1	Operasi dengan keterlibatan masyarakat lokal, penilaian dampak, dan program pengembangan *Operations with local community engagement, impact assessments, and development programs*	20 (40)
GRI 419: Kepatuhan Sosial Ekonomi 2016 *GRI 419: Economic Social Compliance 2016*	419-1	Ketidakpatuhan terhadap peraturan dan perundang-undangan dalam area sosial dan ekonomi *Non-compliance with laws and regulations in the social and economic area*	20 (25)
GRI 307: Kepatuhan Lingkungan 2016 *GRI 307: Environmental Compliance 2016*	307-1	Ketidakpatuhan terhadap peraturan dan perundang-undangan hukum lingkungan *Non-compliance with environmental laws and regulations*	10 (25)
GRI 204: Praktik Pengadaan Barang & Jasa *GRI 204: Procurement Practices*	204-1	Pengeluaran proporsional atas supplier lokal *Proportion of spending on local suppliers*	19 (40)
POJK 51/OJK.03/2017	6c	6.c.3.a Informasi kegiatan atau wilayah operasional yang menghasilkan dampak positif dan dampak negatif terhadap masyarakat sekitar *6.c.3.a Information on the activities or operational areas that generate positives impacts and negative impacts on society, about including literacy and financial inclusion*	20 (41)
		6.c.3.c TJSL pada tujuan pembangunan berkelanjutan meliputi jenis dan capaian kegiatan program pemberdayaan masyarakat *6.c.3.c TJSL which can be attributed to the support of the sustainable development goals include type and achievements of community empowerment program activities*	20 (45)
		6.c.3.b Mekanisme dan jumlah pengaduan masyarakat yang diterima dan ditindaklanjuti *6.c.3.b Public complaints mechanisms as well as the number of public complaints received and followed-up*	20 (47)

Lingkungan Hidup

Environmental Performance

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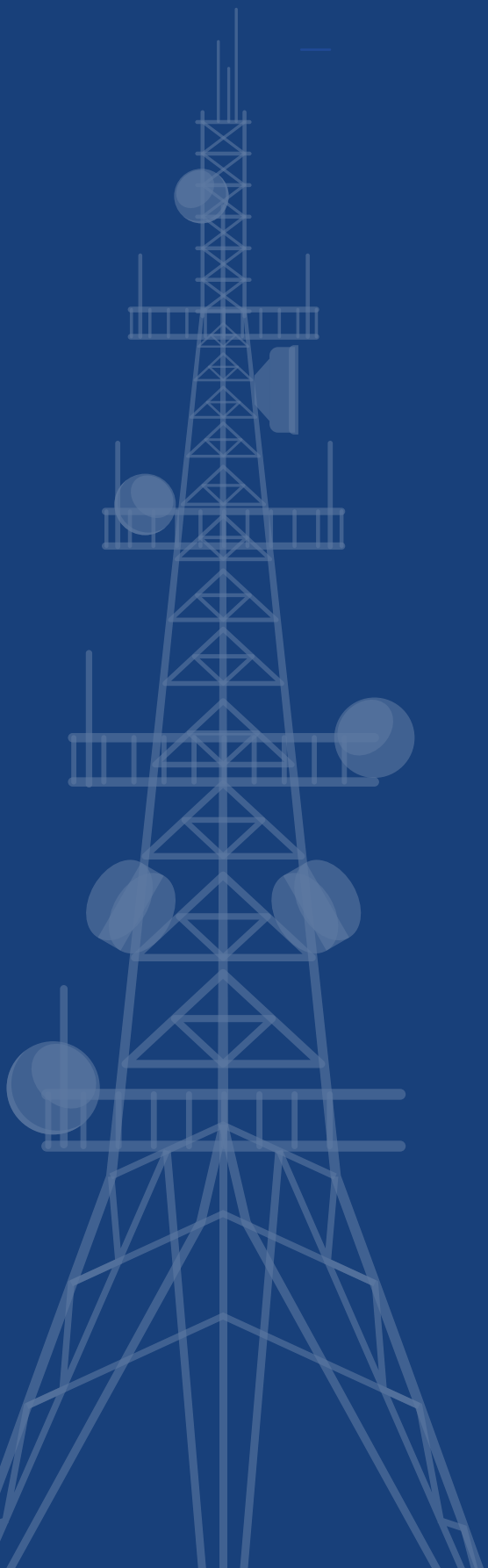
GRI 103: Pendekatan Manajemen 2016 *GRI 103: Management Approach 2016*	103-1	**Penjelasan topik material dan batasannya** *Explanation of the material topic and its boundary*	15 (31)
	103-2	**Pendekatan manajemen dan komponennya** *The management approach and its components*	15 (31)
	103-3	**Evaluasi pendekatan manajemen** *Evaluation of the management approach*	15 (33)
GRI 302: Energi 2016 *GRI 302: Energy 2016*	302-1	**Penggunaan energi dalam organisasi** *Energy consumption within the organization*	15 (31-32)
	302-3	**Intensitas Energi** *Energy intensity*	15 (31-32)
GRI 305: Water and Effluent 2018	305-5	**Konsumsi Air** *Water Consumption*	15 (33)
POJK 51/OJK.03/2017	6d	**6.d.3 Penggunaan energi** *6.d.3 Energy Use*	15 (31-32)
		6.d.3.a Jumlah dan intensitas energi yang digunakan *6.d.3.a total energy consumption and intensity*	15 (31-32)
		6.d.3.b Upaya dan pencapaian yang dilakukan untuk efisiensi energi *6.d.3.b Energy efficiency initiatives and achievement including the use of renewable energy sources*	15 (33)
GRI 305: Emisi 2016	305-1	**Lingkup langsung Emisi Gas Rumah Kaca** *Direct (Scope 1) GHG emissions*	16 (34)
	305-2	**Lingkup tidak langsung Emisi Gas Rumah Kaca** *Energy indirect (Scope 2) GHG emissions*	16 (35)
	305-4	**Intensitas Emisi Gas Rumah Kaca** *GHG emissions intensity*	16 (34-35
POJK 51/OJK.03/2017	6e	**6.e.4.a Jumlah dan intensitas emisi berdasarkan jenisnya** *6.e.4.a Number and intensity of emissions generated by type*	16 (34-35)
		6.e.6 Jumlah dan materi pengaduan Lingkungan Hidup yang diterima dan diselesaikan *6.e.6 Number and material environmental complaints received and resolved*	10 (25)



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Laporan Keberlanjutan

Sustainability Report 2021