

PT DHARMA SATYA NUSANTARA GROUP'S (DSNG) TAX STRATEGY

DSNG's Corporate Group Finance has established a Tax Strategy to guide how tax affairs are conducted, and risks are managed. This Tax Strategy shall apply to all DSNG companies.

Key Principles

1. DSNG is committed to meeting all statutory tax compliance and disclosure obligations by all relevant tax laws and regulations.
2. DSNG shall make the proper amount of tax payment.
3. DSNG shall manage its tax affairs in an efficient manner where all tax planning is built on robust commercial business activities and complies with all relevant laws and regulations, and at the same time, pursue optimizing the shareholder value.
4. DSNG will not adopt any aggressive tax planning and strategies violating the laws and regulations for tax avoidance.
5. DSNG is committed to establishing and maintaining a constructive working relationship with the tax authorities. We shall provide timely and accurate responses to any reasonable and legitimate requests from any tax authorities.

Tax Compliance

DSNG's Corporate Group Finance department oversees the tax risks of all companies within the Group. The Corporate Group Finance department is under the leadership of the Chief Finance Officer (CFO), who has a team of experienced personnel and shall be supported by the external tax advisors wherever necessary.

We expect our Group of companies to ensure that:

- All tax returns are completed accurately and submitted timely.
- All taxes are reported and paid by their specified due dates.
- Inter-company transactions are conducted reasonably at arm's length and supported by relevant transfer pricing analysis and documentation.



Risks and Oversight

In order to manage the tax risks of business transactions effectively and pro-actively, the Corporate Group Finance department shall be involved from the inception at the planning stage and throughout the implementation processes of any significant commercial transactions, such as the following:

- All mergers and acquisitions
- Changes in corporate/ shareholding structures
- Significant investments or new businesses or financing transactions
- All significant changes in business and financing transactions

DSNG may engage external tax advisors to assist the internal team to the extent necessary. DSNG believes using the service of external tax advisors may bring additional value to managing some tax administration risks, particularly in irregular significant transactions or new regulatory implementation.

DSNG's Corporate Group Finance department and CFO will oversee DSNG's adherence to our Tax Strategy. Corporate Group Finance will submit all compliance to the Audit Committee.

