

INTERNAL AUDIT CHARTER OF PT TOWER BERSAMA INFRASTRUCTURE, Tbk (TOWER BERSAMA GROUP)

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A. INTRODUCTION

Internal Audit is an independent and objective verification and consultation activity designed to improve the Company's value and operations. Internal Audit is carried out through a systematic approach to evaluate and enhance the effectiveness of risk management, control, and corporate governance processes.

Internal Audit helps the Company's management achieve the objectives by providing a disciplined and systematic approach to evaluate and improve risk management, supervision, and governance processes.

Internal Audit is not an extension or substitute for executive management. Operational control responsibilities remain with the operational management, which must ensure the implementation of adequate and effective control.

The Corporate governance duties must be carried out in accordance with the core principles of governance, which include Transparency, Accountability, Responsibility, Independence, and Fairness, based on sound corporate principles and compliance with applicable laws and legal provisions.

The implementation of every good corporate governance principle grant the following benefits to the Company:

1. communication enhance;
2. minimize of friction;
3. focus in main target;
4. productivity and efficiency;
5. sustainability of benefits;
6. corporate image;
7. customer satisfaction; and

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8. investor trusted.

Internal Audit Charter is an elaboration of the corporate governance implementation manual. Internal Audit Charter is a formal document that defines the purpose, authority, and responsibilities of Internal Audit activities as a reference for the Corporate Audit Division at Tower Bersama Group to operate professionally, in line with their assigned objectives.

Internal Audit Charter conforms with the **Global Internal Audit Standards** issued by The Institute of Internal Auditors (IIA). The internal audit charter also functions as a communication tool to ensure that the work carried out by the Corporate Audit Division is well understood and supported by relevant departments, divisions, and directorates.

B. CORPORATE AUDIT DIVISION

1. Vision dan Mission

Corporate Audit Division is a division in Tower Bersama Group that performs Internal Audit. To support and be an integral part of achieving the vision and mission set by the Tower Bersama Group, the Corporate Audit Division's vision and mission must align with all supervisory and control activities. The vision and mission of the Corporate Audit Division are as follows:

1.1. Vision

As a Business Partner, the Corporate Audit Division must be able to provide consultation to enhance every Tower Bersama Group's value and be a trusted one through the following work principles:

- 1.1.1. focus on the business processes of Tower Bersama Group;
- 1.1.2. focus on Customer service;
- 1.1.3. be proactive, responsive, trustworthy, and objective;
- 1.1.4. communicate effectively, both verbally and in writing;

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- 1.1.5. measure success based on both quality and quantity;
- 1.1.6. identify root causes and provide early warning system;
- 1.1.7. be able to present any findings in an objective and impactful manner;
and
- 1.1.8. be able to give effective and implementable recommendations.

1.2. **Mission**

The Internal Audit's mission is to enhance and safeguard the Company's value by providing risk-based and objective assurance, advisory, and insight. Additionally, through risk-based audit activity, the Internal Audit is intended to strengthen control functions across the business and contribute more effectively to impactful decision-making process, businesswise.

2. **Functions**

Corporate Audit Division is an independent Internal Audit unit whose mandates include authority, roles, and responsibilities to carry out the Internal Audit function.

The functions of Internal Audit are as follows:

- 2.1. Providing objective assurance, advice, insight, and forward-looking perspectives to the Board of Commissioners and Directors.
- 2.2. Assisting the President Director's supervisory duties by outlining the planning, execution, and monitoring of audit results operationally.
- 2.3. Through a systematic and disciplined approach, evaluating and improving the effectiveness of risk management and internal control governance process in Tower Bersama Group.
- 2.4. Providing objective recommendations and improvement suggestions regarding business processes audited across all departments/divisions/directorates in Tower Bersama Group.
- 2.5. Acting as a consultant to internal parties of Tower Bersama Group as

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needed, particularly concerning work processes in the relevant departments/divisions/directorates.

- 2.6. Coordinating with the departments/divisions/directorates that carry out other control functions.

3. **Mandates**

The Internal Audit function derives the mandate from the Board of Directors, Board of Commissioners, and/or the Audit Committee. The Corporate Audit Division has the following authorities:

- 3.1. The Corporate Audit Division Head is granted the autonomy to allocate resources, determine frequency, select subjects, define the scope of work, and apply the necessary methods, techniques, and approaches to achieve the objectives.
- 3.2. With strict accountability for the confidentiality and security of records and information, the Corporate Audit Division has the authority to have full and unrestricted access to all relevant records, physical properties, and Company personnels related to audit.
- 3.3. Communicate directly with the Board of Directors, Board of Commissioners, and/or the Audit Committee, including individual members from the Board of Directors, Board of Commissioners, and/or Audit Committee.
- 3.4. Hold regular and incidental meetings with the Board of Directors, Board of Commissioners, and/or the Audit Committee.
- 3.5. Coordinate the activities with an External Auditor.
- 3.6. The Internal Audit function does not have the authority or responsibility on the activities subject to audit but it is responsible for evaluating and analyzing those activities.

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4. **Scope of Activities**

The scope of Internal Audit activities include but not limited to

- 4.1. The examination and evaluation of the adequacy and effectiveness of corporate governance, risk management, and internal control in accordance with the applicable Company regulations/policies in the areas below:
 - 4.1.1. finance;
 - 4.1.2. accounting;
 - 4.1.3. operational;
 - 4.1.4. human resources;
 - 4.1.5. marketing;
 - 4.1.6. information technology; and
 - 4.1.7. other activities.
- 4.2. Reviewing established systems to ensure compliance with policies, plans, procedures, laws, and legal provisions that can significantly impact Tower Bersama Group.
- 4.3. Reviewing asset safeguarding measures and, if necessary, verifying the existence of such assets.
- 4.4. Evaluating the economy and efficiency in the use of resources.
- 4.5. Reviewing operations or programs to ensure that results are consistent with established objectives and goals, and that every operation or program is carried out as planned.
- 4.6. Conducting special audits if deemed necessary.

5. **Responsibilities**

The Corporate Audit Division is responsible for:

- 5.1. Developing a flexible annual audit plan using an appropriate risk-based

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methodology, including any risks or control issues identified by the Management, and submitting the plan to the Audit Committee for a review and approval.

- 5.2. Executing the approved annual audit plan, including specific tasks or projects requested by the Management, the Board of Commissioners, and/or the Audit Committee.
- 5.3. Evaluating and assessing new or updated services, processes, operations, and control process during their development, implementation, and/or expansion.
- 5.4. Providing objective recommendations and information regarding the activities reviewed at all Management levels.
- 5.5. Issuing periodic reports to the Management and the Board of Commissioners and/or the Audit Committee summarizing the audit results.
- 5.6. Monitoring and evaluating audit findings and providing recommendations to improve the activities within Tower Bersama Group in addition to the systems, policies, or procedures in line with the Company's development.
- 5.7. Informing the Audit Committee about emerging trends and successful practices in the world of Internal Audit.
- 5.8. Assisting the investigations of suspected significant fraudulent activities in Tower Bersama Group and reporting the results to the Management and the Audit Committee.

6. **Structure and Position**

- 6.1. The Corporate Audit Division consists of one or more Internal Auditors and is led by a Division Head.
- 6.2. The Corporate Audit Division Head is appointed and dismissed by the President Director with the Board of Commissioners' approval.

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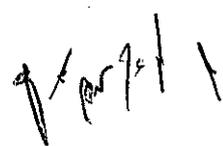
- 6.3. Administratively, the Corporate Audit Division Head reports to the President Director, while functionally being accountable and reporting to the Board of Commissioners.
- 6.4. If the Corporate Audit Division Head does not meet the qualifications of an Internal Auditor and/or fails or is deemed unfit to perform their duties, the President Director can dismiss the Corporate Audit Division Head after obtaining the Board of Commissioners' approval.
- 6.5. Any appointment, replacement, or dismissal of the Corporate Audit Division Head must be immediately informed to the Financial Services Authority (OJK).
- 6.6. Internal Auditors in the Corporate Audit Division is responsible to the Corporate Audit Division Head.
- 6.7. In carrying out its duties, the Corporate Audit Division is given full support from Tower Bersama Group to perform independently without any interference from any party.

7. Internal Auditor Requirements

An internal auditor in the Corporate Audit Division is required to meet the following requirements:

- 7.1. Have professional integrity and conduct, be able to carry out their duties independently, honestly, and objectively.
- 7.2. Have certificate and professional credential in audit according to the Global Internal Audit Standards as well as other disciplines relevant to their area of responsibility (such as related to governance process, risk management, and others).
- 7.3. Have knowledge about capital market regulations and other relevant regulatory.
- 7.4. Have the ability to interact and communicate effectively, both verbally and in

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writing.

- 7.5. Comply with professional standards issued by the Association of Internal Auditors.
- 7.6. Adhere to the internal audit code of ethics.
- 7.7. Maintain the confidentiality of information and/or data related to the duties and responsibilities of Internal Audit within Tower Bersama Group, **except** as otherwise required by the Law, legal provisions, or court ruling.
- 7.8. Understand the principles of Good Corporate Governance and risk management.
- 7.9. Willing to continuously enhance their knowledge, skills, and professional competence.

8. **Internal Auditor's Ethics and Professionalism**

The Corporate Audit Division Head and Internal Auditors within the Corporate Audit Division are responsible for upholding and enforcing ethical conduct and professionalism to Internal Auditors in accordance with the Global Internal Audit Standards. Conformity to these principles and standards instills trust in the profession, creates an ethical culture within the Internal Audit function, and provides a foundation for the reliability of the work and judgments of Internal Auditors.

Any violation of this code of ethics can result in the Internal Auditor receiving a warning or even being dismissed from audit duties altogether or from Tower Bersama Group.

Internal Audit code of ethics include:

8.1. **Demonstrating Integrity**

Integrity is a conduct that reflects adherence to moral and ethical principles, including the demonstration of honesty and the courage, of acting based on

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relevant facts even when facing pressure or when such actions can result in adverse personal consequences or impact Tower Bersama Group. The integrity of Internal Auditors builds trust and establishes respect, and therefore serves as the foundation of confidence in the Internal Auditor's judgment.

Accordingly, an Internal Auditor must have the following standards:

8.1.1. Honesty and Professional Courage

- a. Must perform every work with honesty and professional courage.
- b. Be truthful, accurate, clear, open, and respectful in all professional relationships and communications.
- c. Demonstrate professional courage by communicating truthfully and taking appropriate action, even when confronted with dilemmas and difficult situations.
- d. Feel supported by Superior when presenting legitimate and evidence-based audit results, whether favorable or unfavorable.

8.1.2. Company's Ethical Expectations

- a. Must understand, respect, comply with, and contribute to the legitimate ethical expectations of Tower Bersama Group and be able to identify behaviors that contrary to such expectations.
- b. Must encourage and promote an ethics-based culture in the Company.

8.1.3. Legal and Ethical Conducts

- a. Must not engage in any illegal activities or conduct that can discredit the Internal Audit profession, the Company, or the Employees.
- b. Understand and comply with applicable laws relevant to the

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industry and jurisdictions in which the Company operates, including making disclosures as required.

- c. Report any incidents of legal or regulatory violations to an individual or entity authorized to take appropriate action, in accordance with applicable regulations, policies, and procedures.

8.2. **Maintaining Objectivity**

An Internal Auditor must maintain an impartial and unbiased attitude when performing an Internal Audit and making decisions.

Objectivity is a mental attitude that is impartial, allowing an Internal Auditor to make professional judgments, fulfill their responsibilities, and achieve Internal Audit objectives without compromise. The Internal Auditor function's independent positioning supports the Internal Auditor's ability to maintain objectivity.

Therefore, an Internal Auditor must adhere to the standards below:

8.2.1. **Individual Objectivity**

- a. Must maintain professional objectivity when performing all aspects of Internal Audit Services.
- b. Must be aware of and manage potential biases.

8.2.2. **Safeguarding Objectivity**

- a. Must recognize and avoid or mitigate any actual, potential, or perceived impairment of objectivity.
- b. Must not accept tangible or intangible gifts that could impair or be presumed to impair objectivity.
- c. Must avoid conflicts of interest and must not be unduly influenced by their own or others' interests (including senior

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management, persons with authority, political environment, or many other aspects).

- d. An Internal Auditor must establish a methodology to address any impairment to objectivity.

8.2.3. **Disclosing Impairment to Objectivity**

If objectivity is impaired, either in fact or appearance, the details of such impairment must be promptly disclosed to the relevant stakeholders (for example to the Board of Directors, Board of Commissioners, and/or Audit Committee) to determine appropriate corrective action.

8.3. **Demonstrating Competency**

An Internal Auditor must apply their knowledge, skills, and abilities to successfully fulfill their roles and responsibilities. Demonstrating competence requires the development and application of knowledge, skills, and abilities necessary to deliver Internal Audit services. Due to the Internal Auditor's diverse services, the competencies required will vary. The Internal Auditor is expected to enhance the effectiveness and quality of the services by pursuing professional development.

Therefore, an Internal Auditor must possess the following standards:

8.3.1. **Competency**

- a. Possess or obtain the competencies necessary to successfully perform their responsibilities, including knowledge, skills, and abilities suitable to the position and responsibilities commensurate with their experience.
- b. Only engage in services for which they possess or can obtain the required competencies.

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- c. Be responsible for continually developing and applying the competencies needed to fulfill their professional responsibilities.

8.3.2. **Continuing Professional Development**

Maintain and continuously develop their competencies to improve the effectiveness and quality of Internal Audit services through continuous professional development, including education and training.

8.4. **Exercising Due Professional Care**

Internal Audit applies due professional care in planning and performing Internal Audit services. Due professional care requires that audit services be planned and executed with diligence, judgment, along with skepticism expected of a prudent and competent Internal Auditor.

Therefore, an Internal Auditor must possess the standards below:

8.4.1. **Conformance with the Global Internal Audit Standards**

- a. An Internal Auditor must plan and perform Internal Audit services in accordance with applicable standards.
- b. The Internal Audit function's methodology must be established, documented, and maintained in alignment with the standards.

8.4.2. **Due Professional Care**

An Internal Auditor must exercise due professional care by assessing the nature, circumstances, and requirements of the services to be provided.

8.4.3. **Professional Skepticism**

An Internal Auditor must apply professional skepticism when planning and conducting an Internal Audit services, such as maintaining inquisitiveness, critically assessing the reliability of information, being straightforward and honest when raising concerns and questioning inconsistent information, and seeking

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additional evidence to make judgments about information that might be incomplete, inaccurate, or misleading.

8.5. **Maintaining Confidentiality**

An Internal Auditor must appropriately use and safeguard every information, as he/she is granted unrestricted access to data, records, and other information necessary to fulfill the mandate of Internal Audit. As such, Internal Auditors often obtain information that is confidential, proprietary, and/or personally identifiable, physical, digital, or verbal information.

An Internal Auditor must respect the value and ownership of the information received, use it solely for professional purposes, and protect it from unauthorized access or disclosure, be it internally or externally, unless legally or professionally obligated to do so.

Therefore, an Internal Auditor must possess the following standards:

8.5.1. **Use of Information**

- a. Comply with the applicable policies, procedures, Laws, and other relevant regulations when using the information.
- b. Must not use information for personal gain or in a manner that conflicts with or harms the Company's legitimate and ethical objectives.

8.5.2. **Protection of Information**

- a. An Internal Auditor is responsible to protect information and maintain the confidentiality, privacy, and ownership of information acquired when performing Internal Audit services or through professional relationships.
- b. Must understand and comply with all applicable Laws, regulations, and policies related to confidentiality, information privacy, and information security applied in the Company and the

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Internal Audit function.

- c. Must not disclose confidential information to any unauthorized parties unless under a legal or professional obligation to do so.
- d. Must actively manage the risk of exposing or disclosing information inadvertently.

9. **Professional Standards**

The Internal Audit function self-regulates by adhering to the mandatory guidance issued by the IIA, including the Core Principles for the Professional Practice of Internal Auditing, the Code of Ethics, the International Standards for the Professional Practice of Internal Auditing, and the Definition of Internal Auditing. This mandatory guidance is the fundamental principles required for the professional practice of Internal Audit and serves as the basis for evaluating the effectiveness of Internal Audit activities.

10. **Assurance Program and Quality Improvement**

An Internal Audit activity develops and maintains an assurance program and quality improvement that covers all aspects of the Internal Audit function. This program can be carried out through internal and/or external assessments.

The results of these assessments will be reported periodically to the Management and/or the Board of Commissioners, including:

- 10.1. The Internal Audit function's conformance with standards and achievement of performance objectives.
- 10.2. Plans to address deficiencies in the Internal Audit function and identify opportunities for improvement.

11. **Prohibition of Dual Positions**

An Internal Auditor in the Corporate Audit Division is strictly prohibited to have multiple duties and positions concurrent with the operational activities in the Tower

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C. CONCLUSION

1. This Internal Audit Charter is an adjustment of the previous "Revised Internal Audit Charter," as stipulated in the Board of Directors Decree Number 549/TBI/VI/2020 issued on 24 June 2020, referring to the Financial Services Authority Regulation (POJK) Number 56/POJK.04/2015 dated 23 December 2015 concerning the Formation and Guidelines for the Preparation of Internal Audit Unit Charter and the Global Internal Audit Standards issued by The Institute of Internal Auditors (IIA) on 9 January 2024.
2. This Internal Audit Charter will be evaluated periodically for refinement (if necessary).
3. This Internal Audit Charter is effective upon approval by the President Director, after obtaining approval from the Board of Commissioners, both of which form an integral and inseparable part of this Internal Audit Charter.

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