

## CODE OF CONDUCT

### ANNUAL GENERAL MEETING OF SHAREHOLDERS FOR THE 2025 FISCAL YEAR PT AGUNG PODOMORO LAND TBK. TUESDAY, MAY 26, 2026

#### 1. GENERAL

- i. The Annual General Meeting of Shareholders for the 2025 fiscal year of PT Agung Podomoro Land Tbk (the “**Company**”), hereinafter referred to as the “**Meeting**”, will be held:
  - a. physically, and electronically using the KSEI Electronic General Meeting System application (“**eASY.KSEI**”);
  - b. in Indonesian language; and
  - c. consisting of 5 (five) Meeting Agendas.
- ii. The term “**Shareholder(s)**” in these Code of Conduct means the Company’s Shareholder(s).
- iii. **Meeting participants** are:
  - a. the Shareholders whose names are registered in the Company's Shareholders Register on Thursday, April 30, 2026 at the close of trading hours on the Indonesia Stock Exchange at 16.00 Western Indonesia Time (WIB); and
  - b. invitees from the Company's Board of Directors, however, these invitees do not have the rights to ask questions and/or express opinions on any Meeting Agenda, unless requested by the Chairman of the Meeting.

#### 2. TO THE SHAREHOLDERS OR THEIR PROXIES WHO WILL ATTEND PHYSICALLY TO THE MEETING

- i. It is mandatory to register with the registration officers at the event location before entering the Meeting room:
  - a. Individual Shareholders or their Proxies are required to submit photocopy of their Resident Identity Card (KTP) or other valid identification of the Shareholders, both the Authorizers and the Proxies, and show that original KTP or other identification.
  - b. Representatives of Shareholders in the form of legal entities, cooperatives, foundations, or pension funds are required to submit, in addition to photocopy of KTP or other valid identification, photocopy of the most recent and valid articles of association, as well as the deed containing the latest composition of the management still in office on the date of the Meeting is held;
  - c. Shareholders in KSEI collective custody are also required to submit the original Written Confirmation for the Meeting (“**KTUR**”).
- ii. Due to limited room capacity, without intending to diminish the rights of Shareholders or their Proxies to be physically present at the Meeting, the Company has the right and authority to not allow Shareholders or their Proxies to enter the Meeting room and physically participate in the Meeting and/or to limit the number of Shareholders or their Proxies who may enter the Meeting room, if:

- a. the Shareholder or his Proxies exhibits symptoms of illness/unhealthiness, such as coughing, flu, fever, etc; or
- b. the seating capacity in the Meeting room is already full;

and therefore, the Company has the right to request:

- Shareholders who arrive later to grant their power of attorney (attendance and voting on each Meeting Agenda) to the independent party appointed by the Company by completing and signing a written Power of Attorney form provided by the Company at the Meeting venue; or
- Proxies who arrive later to submit their Power of Attorney to the registration officer at the Meeting venue.

### **3. SHAREHOLDERS AND VOTING RIGHT**

- i. Shareholders can be represented by their Proxy with a valid Power of Attorney.
- ii. Each 1 (one) share of the Company entitles its owner to cast 1 (one) vote in the Meeting.
- iii. Members of the Board of Directors, members of the Board of Commissioners, and employees of the Company may act as proxies for the Shareholders at the Meeting, but the votes they cast as proxies for the Shareholders shall not be counted in the voting process.
- iv. Shareholders or their Proxies have the right to ask questions and/or express opinions, as well as vote on each of Meeting Agenda.
- v. Shareholders or their Proxies who intend to attend the Meeting physically but arrive late after the registration period has closed, may still attend the Meeting, however will not be able to participate in the question and answer session, and their votes will not be counted in the resolution-making process.

### **4. ATTENDANCE AND RESOLUTION QUORUM**

- i. Meeting is valid and can be held as well as adopt binding resolutions if the number of shareholders of the Company present or represented by:
  - a. more than 1/2 (one half) of the total number of shares issued by the Company with valid voting rights, for Agenda 1 to Agenda 4; and
  - b. at least 2/3 (two thirds) of the total number of shares issued by the Company with valid voting rights, for Agenda 5.
- ii. Meeting resolutions are taken based on deliberation for consensus, and if deliberation for consensus is not reached, resolutions will be taken by voting as follows:
  - a. resolutions are valid if agreed by more than 1/2 (one half) of the total shares with voting rights present at the Meeting, for Agenda 1 to Agenda 4; and
  - b. resolutions are valid if agreed by more than 2/3 (two thirds) of the total shares with voting rights present at the Meeting, for Agenda 5.
- iii. The Notary, assisted by the Company's Securities Administration Bureau, will conduct an examination and calculation of the attendance votes, as well as the votes for resolution-making on each Meeting

Agenda based on the votes submitted physically at the Meeting, or those have been submitted electronically through eASY.KSEI.

## 5. PROCEDURES FOR SUBMITTING QUESTIONS AND/OR OPINIONS IN THE MEETING

Chairman of the Meeting will provide an opportunity for Shareholders or their Proxies to submit questions and/or opinions on each Meeting Agenda, prior to voting on the relevant Meeting Agenda is carried out, in the following manner:

- i. For Shareholders or their Proxies physically present at the Meeting:
  - a. questions and/or opinions must be submitted in writing by completing a form distributed to Shareholders or their Proxies before entering the Meeting room;
  - b. The form must include the name of the Shareholder or their Proxy, the number of shares owned or represented, and the Shareholder's e-mail address;
  - c. Shareholders or their Proxies must raise their hands first, and the forms will be collected by an officer, then the original copy will be submitted to the Meeting Chairman, and a copy will be submitted to the Notary;
  - d. Chairman of the Meeting will read out the questions and/or opinions raised at the Meeting, then directly answer the questions and/or respond to the opinions, or the Meeting Chairman will request member of the Board of Directors, or other member of the Board of Commissioners, or Supporting Professionals to answer the questions and/or respond to the opinions raised.
- ii. For Shareholders or their Proxies who attend electronically via the Zoom webinar/GMS Broadcast ("**Tayangan RUPS**") as referred to in Number 7 below:
  - a. The Company will deactivate the "Q&A" feature through "raise hand" and "allow to talk" available in the 'Tayangan RUPS', so that questions and/or opinions can only be submitted in writing via the "chat" feature in the "Electronic Opinions" column available on the "E-Meeting Hall" screen in the eASY.KSEI, as long as the "General Meeting Flow Text" column still shows "Discussion started for agenda item no. [ ]";
  - b. when submitting questions and/or opinions, Shareholder or their Proxy is required to write name of the Shareholder or his/her Proxy, the number of shares owned or represented, and the Shareholder's email address;
  - c. The Corporate Secretary will read out questions and/or opinions submitted electronically. The Chairman of the Meeting then directly answer the questions and/or respond to the opinions, or the Meeting Chairman will request member of the Board of Directors, or other member of the Board of Commissioners, or Supporting Professionals to answer the questions and/or respond to the opinions.
- iii. Questions and/or opinions submitted must be directly related to the Meeting Agenda being discussed.
- iv. The Chairman of the Meeting has the right not to read or respond to questions and/or opinions submitted if the name of the Shareholder or his/her Proxy and the number of shares owned or represented by him/her are not listed, and has the right not to answer and/or respond to questions and/or opinions that, according to the Chairman of the Meeting, are not directly related to the Meeting Agenda being discussed.

- v. To provide equal opportunity to all Shareholders or their Proxies, one Shareholder or his/her Proxy, whether physically present or electronically, may submit a maximum of 3 (three) questions and/or opinions, and to ensure the Meeting runs more effectively and efficiently, the duration of the question and answer session for each Agenda is a maximum of 10 (ten) minutes. Therefore, the Chairman of the Meeting has the right to determine whether to answer questions directly (verbally) in the Meeting, or in writing.
- vi. Questions and/or opinions that have not been responded directly (verbally) at the Meeting will be responded in writing to the Shareholder's email address, no later than 3 (three) working days after the date of the Meeting. If the Shareholder or his/her Proxy does not provide an email address, the Company's response will be sent by mail to the Shareholder's address listed in the Company's Shareholder Register.

## **6. MEETING RESOLUTION-MAKING PROCESS**

- i. Meeting resolutions are taken based on deliberation for consensus, and if deliberation for consensus is not reached, resolutions will be taken by voting, with the following provisions:
  - a. The votes cast by a Shareholder are valid for all the shares he/she owns and the Shareholder does not have the right to give power of attorney to more than one proxy for a portion of the number of shares he/she owns with different votes.
  - b. Shareholders or their Proxies have the right to cast AGREE vote, DISAGREE vote, or ABSTAIN vote (not vote) on the proposed resolutions submitted by the Company for each Meeting Agenda.
  - c. ABSTAIN vote is deemed to be the same as the majority vote of the Shareholders or their Proxies who cast the vote.
  - d. "Invalid" votes are considered non-existent and are not counted in determining the number of votes cast at the Meeting. The number of DISAGREE votes will be counted against the valid votes and the difference will be the number of AGREE votes.
- ii. Voting for Shareholders or their Proxies who are physically present at the Meeting is conducted verbally with the following procedures:
  - a. The Meeting Chairman will request the Shareholders or their Proxies who will vote DISAGREE or ABSTAIN to raise their hands and submit their voting cards to the officer.
  - b. Shareholders' Proxies who have received power of attorney with voting options through the eASY.KSEI but are physically present at the Meeting, do not need to raise their hands and submit their voting cards to the officers, because the votes which are counted are the votes cast by the Shareholders through the eASY.KSEI.
  - c. Shareholders or their Proxies who do not raise their hands to submit the vote card of DISAGREE or ABSTAIN are deemed to have agreed to the proposed decision without the need for the Chairman of the Meeting to ask the Shareholders or their Proxies to raise their hands as a sign of agreement.
  - d. Vote counting will be done by scanning the barcode on the DISAGREE and ABSTAIN voting cards submitted to the officer.
  - e. If there are Shareholders or their Proxies whose presence has been taken into account in determining the quorum, but are not in the Meeting room when the voting is carried out, then the persons concerned are deemed to have approved all resolutions taken in the Meeting.

- iii. Voting for Shareholders or their Proxies who attend the Meeting electronically via the eASY.KSEI will be conducted in the following procedures:
  - a. The voting process takes place in the eASY.KSEI in the “E-Meeting Hall” menu, “Live Broadcasting” submenu.
  - b. Shareholders who are present or have provided electronic power of attorney at the Meeting through the eASY.KSEI, but have not yet determined their voting option, then the Shareholders or their Proxies have the opportunity to submit their voting option during the voting period opened by the Company through the “E-Meeting Hall” screen in the eASY.KSEI.
  - c. During the electronic voting process, the status “Voting for agenda item no. [ ] has started” will be visible in the “General Meeting Flow Text” column.
  - d. Direct electronic voting through the eASY.KSEI is allocated for a maximum of 2 (two) minutes.
  - e. Shareholders who have cast their votes before the Meeting starts, and Shareholders or their Proxies who have registered through the eASY.KSEI on the date of the Meeting, will be deemed to have validly attended the Meeting, even if they do not join the holding of the Meeting until the end for whatever reasons.
  - f. If the Shareholders or their Proxies do not vote until the Meeting holding status shown in the "General Meeting Flow Text" column changes to "Voting for agenda item no. [ ] has ended", then the Shareholders or their Proxies will be deemed to have voted ABSTAIN for the relevant Meeting Agenda.
- iv. The Notary, assisted by the Company's Securities Administration Bureau, will examine and count the votes for resolution-making on each Meeting Agenda based on the votes submitted by Shareholders or their Proxies, either at the physical Meeting or through eASY.KSEI. The Notary will then report the voting results to the Chairman of the Meeting.
- v. All Meeting resolutions taken and concluded at the Meeting are binding on all Shareholders of the Company.

## **7. LIVE BROADCAST OF THE MEETING**

- i. Shareholders or their Proxies who have declared their attendance and are registered on eASY.KSEI no later than Monday, May 25, 2026 at 12:00 WIB can watch the Meeting through ‘Tayangan RUPS’ by accessing the eASY.KSEI, ‘Tayangan RUPS’ submenu on the AKSes KSEI facility (<https://akses.ksei.co.id/>), or on ‘Tayangan RUPS’ menu on AKSes KSEI mobile.
- ii. Participants of ‘Tayangan RUPS’ are determined on a first come first serve basis with capacity of up to 500 participants.
- iii. Shareholders or their Proxies who do not have the opportunity to watch the holding of the Meeting through ‘Tayangan RUPS’, or choose not to watch ‘Tayangan RUPS’, their attendance will still be considered valid electronically and their shares ownership and voting options are taken into account in the Meeting, as long as they have been registered on eASY.KSEI.
- iv. Shareholders or their Proxies who only watch the holding of the Meeting through ‘Tayangan RUPS’, but are not registered to attend electronically on eASY.KSEI, then the presence of the Shareholders or their Proxies will be considered invalid and will not be included in the calculation of the attendance quorum for the Meeting.

- v. To get the best experience in using eASY.KSEI and/or 'Tayangan RUPS', Shareholders or their Proxies are advised to use the Mozilla Firefox browser.

## **8. OTHERS**

- i. During the Meeting, to avoid disrupting the Meeting's proceedings, all Meeting participants who are physically present are kindly requested to:
  - turn off or set the mobile phones or other communication devices to silent,
  - refrain from chatting with other Meeting participants, and
  - refrain from entering or leaving the Meeting room unless absolutely necessary
- ii. All Meeting participants, except the Meeting officers, are not permitted to take photographs and videos during the Meeting.
- iii. Any matters relating to the Meeting that are not and/or insufficiently regulated in these Code of Conducts, will be determined later by the Chairman of the Meeting.
- iv. Meeting participants are expected to leave the Meeting venue immediately after the Meeting concludes.
- v. The Meeting officers has the right to take all necessary measures to ensure orderliness in the Meeting and the area where the Meeting is held.

Jakarta, May 4, 2026

**PT Agung Podomoro Land Tbk.**

Board of Directors