

3.7. Personal Investment

3.7.1. Insider Information

Insider trading or insider dealing is a crime. The example of this includes, but not limited to, employees purchasing or selling Corporate obligation (such as shares), whereas the employees have insiders information that, in this case, is (a) non-public, and (b) price sensitive . Employees are prohibited to perform obligation/share transaction when they have insiders information pertaining to that matter. The term 'dealing' (or 'trading') does not only refer to purchasing, selling and to exercise options of their own account but also for the family, friend and relatives.

3.7.2. Provisions for Corporate Share Transaction

Each employee must submit to all laws, provisions and regulations related to corporate obligation/share trade and other corporate obligation that can be influenced by corporate business activity.

Employees cannot use their position to obtain special treatment in purchasing or selling obligation/share for personal or their families unless otherwise determined by the corporate.

3.7.3. Blackout Period

“The Board of Directors, LPKR top executives, and related employees (including their spouses and minors) are prohibited from trading Company shares two weeks before the release of the Company’s quarterly and annual financial statements, and they are also prohibited to trade Company shares for 24 hours after the release of financial statements.

Moreover, for those Board of Directors, LPKR top executives, and related employees (including their spouses and minor) who have knowledge of any confidential information that could have any impact to the Company’s share price are prohibited from trading Company shares until 24 hours after the shares are disclosed to the public.”