

INDEPENDENT ASSURANCE STATEMENT

of

PT Sarana Menara Nusantara Tbk

Sustainability Report 2022

Number : 01/V/2023/SRA/000-548
Assurance Type : Type 1
Assurance Level : Moderate
Reporting Standards : GRI Universal Standard 2021
Reporting Regulation : Sustainable Finance Regulation POJK No.51/2017 (Indonesia)

The Stakeholders of PT Sarana Menara Nusantara Tbk

Jl. Jend. A. Yani No. 19A Kudus, Indonesia

Scope

PT Sarana Menara Nusantara Tbk, hereinafter referred to as “SMN,” the Company,” or “the Reporting Organization,” has engaged with SRA Consulting to assure the Sustainability Report (“the Report”) for the reporting period of January 1 to December 31, 2022. SMN is a company engaged in telecommunication infrastructure and operates in Indonesia. This is the Independent Assurance Statement (“the Statement”) that reflects the results of assurance work conducted following the specific methods and approaches as agreed upon by the “Management.” The engagement is a ‘Type 1 Moderate Level’ of assurance, as defined by AccountAbility Assurance Standard (AA1000 AS v3).

Other than as described in the preceding paragraph, which sets out the scope of our engagement, we did not perform assurance procedures on the remaining information included in the Report. Accordingly, we do not express a conclusion on this information.

Intended Users and Purpose

The intended users of the Statement are Stakeholders & Management of PT Sarana Menara Nusantara Tbk. This assurance aims to provide an assurance on the Company’s Sustainability Report based on the ‘Type 1 Moderate Level’ of assurance, as defined by AccountAbility Assurance Standard (AA1000 AS v3).

PT Sarana Menara Nusantara Tbk’s Responsibilities

The directors or governing body and the management of PT Sarana Menara Nusantara Tbk has sole responsibility for preparing and presenting the Report. The company's responsibilities also include maintaining effective internal controls over the information and data, resulting in the

preparation of the material topics in a way that is free from material misstatements. SRA Consulting has not been involved in preparing any of the material included in the report.

Our Responsibilities

The responsibilities of SRA Consulting are to evaluate the Report for performing an assurance service (NOT an audit) and to come up with recommendations as well as the Statement. The Report content, including the presentation of claims, data, information, and figures, is the sole responsibility of the Management. SRA Consulting is only responsible for presenting the results of the assurance work, including the Statements to the Management. We have a code of ethics that regulates SRA Consulting not to disclose the results of assurance work, data, and information for any purpose or to any party. SRA Consulting has NO responsibility or accountability for any risks or claims arising from third-party reliance on the results of assurance work, the Statements and the Reports, or any issues, data, and information that is NOT covered in this Statement or Report

Scope and Limitation of Assurance Service

Any references to PT Sarana Menara Nusantara Tbk's business activities mentioned in this Sustainability Report refer to the Company's business activities carried out through the operational activities of its business units.

The following are the scope of the assurance services:

1. Data and information in the Report are for the period of January 1st to December 31st, 2022.
2. Topics in the Report content identified as “Material” by the Company are Direct Economic Performance, Indirect Economic Impact, Materials, Energy, Emission, Education and Training, Occupational Health and Safety, Local Community, and Social Assessment for Suppliers.
3. Adherence to the following reporting principles, standards, and regulations:
 - a) Consolidated set of GRI Sustainability Reporting Standards 2021 (GRI Universal Standard)
 - b) Regulation of Indonesia Financial Service Authority No.51/POJK.03/2017 regarding the Implementation of Sustainable Finance for Financial Service Institutions, Listed, and Public Companies (POJK 51) with reference to Financial Services Authority Circular Letter (SEOJK) 2022 No. 16/SEOJK.04/2021.
4. Evaluation of publicly disclosed information, system, and process of the Company to ensure adherence of the Report content to the reporting principles.
5. Financial data, information, and figures in the Report content are NOT included in the scope of assurance. SRA Consulting assumes the Company or other parties associated with, have verified and/or audited any data and information related to financial statements.

The Report's Subject Matter

The report's subject matter that have been identified as "Material Topics" by the Company are: Direct Economic Performance, Indirect Economic Impact, Materials, Energy, Emission, Education and Training, Occupational Health and Safety, Local Community, and Social Assessment for Supplier.

Our Independence and Quality Control

The assurance work was assigned to a team having expertise, in-depth knowledge, and experience in sustainability reports. SRA Consulting also confirms that the appointed Assurance Team members have skills and knowledge in sustainability reports of companies in various industrial sectors as well as knowledge of the principles and standards of assurance such as AA1000 AccountAbility, and various reporting regulations, standards, and principles. All this engagement was carried out by an independent team of sustainability assurance professionals who already obtained the Certified Sustainability Report Assurer (CSRA) and any relevant certifications.

We have established policies and procedures that are designed to ensure that our team maintains independence and integrity. During the assurance work, SRA Consulting abided by a professional code of conduct and work procedures to ensure the objectivity and integrity of the Assurance Team. No relationships between the team and the Company can influence their independence and impartiality in generating the Statement.

SRA Consulting also applies Quality Control procedures and maintains a comprehensive quality control system, including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

Our Methodology

Procedures performed in a moderate assurance engagement vary in nature and timing and are less in extent than for a high assurance engagement. Consequently, the level of assurance obtained in a moderate assurance engagement is substantially lower than the assurance that would have been obtained had a high assurance engagement been performed. Our methodology was designed to obtain a moderate level of assurance on which to base our conclusion and not provide all the evidence that would be required to provide a high level of assurance.

A moderate level of assurance engagement consists of making inquiries, primarily of persons responsible for preparing the sustainability report and related information and applying analytical and other appropriate procedures. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculating data within IT systems.

Our procedures included:

- Assign the experts and form an Assurance Team to conduct the pre-engagement phase to ensure the independence and impartiality of the Assurance Team.
- Obtain an understanding of the company's business and the report's subject matter to design procedures that are appropriate in the sustainability program and strategy.

- Review of the Company's approach towards materiality assessment disclosed in the Report to identify relevant issues.
- Conducted interviews with select personnel of the Company to understand the process for collecting, collating, and reporting the subject matter as per Global Reporting Initiative (GRI) Universal Standards.
- Evaluate the adherence of report content, disclosure, and presentation against the criteria of standard, principles, and indicators using references from AA1000AS v3, AA1000AP (2018) (AccountAbility Principles), GRI Standards, POJK51, SEOJK 16.
- Review of the Company's plans, policies, and practices, pertaining to social, environmental, and sustainable development, so as to be able to make comments on the fairness of sustainability reporting.
- Discuss and analyze data and reports with management and data contributors to determine whether there are any material misstatements of fact or material inconsistencies based on our understanding obtained as part of our assurance engagement.

We also performed such other procedures as we considered necessary in the circumstances.

Emphasis of matter

The assurance scope excludes:

- Data and information outside the defined reporting period (January 1, 2022 to December 31, 2022).
- Data and information on the economic and financial performance of the Company.
- Data, statements, and claims already available in the public domain through Annual Report, or other sources available in the public domain.
- The Company's statements that describe the expression of opinion, belief, inference, aspiration, expectation, aim, or future intention provided by the Company.
- The Company's compliance with regulations, acts, and guidelines with respect to various regulatory agencies and other legal matters

Our Conclusion

On the basis of our review scope and methodology to obtain a 'Type 1, Moderate Level' of assurance (as per AA1000 AS) our conclusions are as follows:

Adherence to AA1000AP (2018)

Inclusivity

The Company has described its stakeholder engagement approach and activities in the Report. The Company collectively manages stakeholder engagement in business activities with various work units using various approaches and methods. SMN's stakeholders consist of Shareholders and Investors, Regulators and the Government, Employees, Communities, Work Partners, Customers/Clients, and Media. The Company engages with stakeholders through several engagement methods such as regular communication and coordination activities or other methods. We are not aware of any matter that would lead us to conclude that the Company has

not applied the principle of inclusivity in engaging with the key stakeholder groups identified in the Report.

Materiality

The Company has identified key issues material to its ability to create value and has described the process for materiality analysis in the Report. In determining the topic of the Sustainability Report, the Company conducted internal discussions through Focus Group Discussion (FGD) with various relevant divisions represents various inputs and aspirations from internal and external stakeholders. The Company considers the extent to which related topics can have a potential or actual impact, both positive and negative, on each of the existing stakeholders. The materiality topics shown in the report provide fair and sufficient information which enables its stakeholders to make a professional judgment about the Company's performance and management. We suggest the Company to document all the materiality analysis procedure as an evidence document in the next sustainability reporting.

Responsiveness

The Company has responded to stakeholders' issues that affect its sustainability performance and is released through decisions, actions, and performance, as well as communication with stakeholders. The Company provides several contact access for stakeholders to respond or express concern about sustainability issues. We suggest the Company to measure response effectiveness for each material topic disclosed.

Impact

The Report presents information about the impacts of the Company's decisions and activities on the sustainability context. The Company has identified and fairly represented impacts that were monitored and measured. The processes to monitor, measure and evaluate impacts had led to effective decision-making. The Company needs to establish formal policies and procedure for impact identification and measurement, and implement those policies in the future.

Adherence to GRI Universal Standards and Indonesian Regulation

The report has followed the option of “with reference to GRI Standards” where all disclosure of each material topic is presented in the report. The disclosure of management approach for each material topic, in general, are fairly disclosed. The Management has applied the principles for defining the report's quality (balance, comparability, accuracy, timeliness, clarity, and reliability) and the principles for defining the report's content (stakeholder inclusiveness, sustainability context, materiality, and completeness) and supporting documents were adequately presented during the assurance program. The report also in adherence to Regulation of Indonesia Financial Service Authority No.51/POJK.03/2017 regarding the Implementation of Sustainable Finance for Financial Service Institutions, Listed, and Public Companies (POJK 51) with reference to Financial Services Authority Circular Letter (SEOJK) 2022 No. 16/SEOJK.04/2021.

Conclusion

Our professional and certified team of sustainability report assurers has assured this report in accordance with the AA1000AP (2018), AA1000AS v3, and GRI Standards. From the review progress, we conclude that the Sustainability Report PT Sarana Menara Nusantara Tbk year 2022 provides a fair view of all the Company's programs and performances during 2022. The extent to which the GRI Standards have been applied in the Report and this report has been prepared with reference to GRI Standards. We believe the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Recommendations

1. Enhance the material topics identification by conducting a stakeholder engagement following the global standards and best practices by considering the sustainability context that materially impacts the Company and stakeholders. We suggest the Company to conduct stakeholder engagement strategically, including establishing formal policies and procedures for stakeholder engagement and developing the stakeholder engagement report annually in accordance with the AA1000 Stakeholder Engagement Standard (AA1000SES 2015).
2. Document all the materiality analysis procedures to identify the material topics in the sustainability report.
3. Measure the appropriateness of the responses for each materiality topics so that all stakeholders' suggestions, inputs, complaints, and concerns will be handled appropriately.
4. Develop an integrated impact identification and measurement of those impact by establishing a sustainability performance monitoring system with a better database system. By doing so, the sustainability performance database can be monitored, its accuracy is maintained, and target achievement can be more measurable.

For and on behalf of SRA Consulting,
Jakarta, May 3rd 2023



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