

INTERNAL AUDIT CHARTER PT LINK NET TBK

1.0 PURPOSE

The purpose of the internal audit function is to strengthen PT Link Net Tbk's ("Link Net" or "Company") ability to create, protect, and sustain value by providing the Board Audit Committee ("BAC") and Management with independent, risk-based, and objective assurance, advice, insight, and foresight.

The internal audit function enhances Link Net's:

- Successful achievement of its objectives.
- Governance, risk management, and control processes.
- Decision-making and oversight.
- Reputation and credibility with its stakeholders.
- Ability to serve the public interest.

Link Net's internal audit function is most effective when:

- Internal auditing is performed by competent professionals in conformance with The IIA's Global Internal Audit Standards™, which are set in the public interest.
- The internal audit function is independently positioned with direct accountability to the BAC.
- Internal auditors are free from undue influence and committed to making objective assessments.

1.1 Commitment to Adhering to the Global Internal Audit Standards

The Link Net's internal audit function will adhere to the mandatory elements of The Institute of Internal Auditors' International Professional Practices Framework, which are the Global Internal Audit Standards ("GIAS" or "Standards") and Topical Requirements. The Head of Internal Audit ("HIA") will report bi-annually to the BAC and Management regarding the internal audit function's conformance with the Standards, which will be assessed through a quality assurance and improvement program.

2.0 MANDATE

Mandatory Requirement:

Article 3 of the Indonesia Financial Services Authority (OJK) regulation number 56/POJK.04/2015 states that "*issuers or public companies are required to have an internal audit unit.*"

2.1 Authority

The Link Net's BAC grants the internal audit function the mandate to provide the BAC and Management with objective assurance, advice, insight, and foresight.

The internal audit function's authority is created by its direct reporting relationship to the BAC. Such authority allows for unrestricted access to the BAC.

The BAC authorizes the internal audit function to:

- Have full and unrestricted access to all functions, data, records, information, physical property, and personnel pertinent to carrying out internal audit responsibilities. Internal auditors are accountable for confidentiality and safeguarding records and information.
- Allocate resources, set frequencies, select subjects, determine scopes of work, apply techniques, and issue communications to accomplish the function's objectives.
- Obtain assistance from the necessary personnel of Link Net and other specialized services from within or outside Link Net to complete internal audit services.
- Have oversight authority over the internal audit functions of all Operating Companies ("Opcos") within the Company including (but not limited to) audit reports, major control issues, reports to BAC, quarterly reports and Minutes of subsidiary BAC.

2.2 Independence, Organizational Position, and Reporting Relationships

The HIA will be positioned at a level in the organization that enables internal audit services and responsibilities to be performed without interference from Management, thereby establishing the independence of the internal audit function. (See "Mandate" section.) The HIA will report functionally to the BAC and administratively (for example, day-to-day administrative matters of IA function) to the President Director & CEO of the Company. This positioning provides the organizational authority and status to bring matters directly to Management and escalate matters to the BAC, when necessary, without interference and supports the internal auditors' ability to maintain objectivity.

The HIA will confirm to the BAC, at least annually, the organizational independence of the internal audit function. If the governance structure does not support organizational independence, the HIA will document the characteristics of the governance structure limiting independence and any safeguards employed to achieve the principle of independence. The HIA will disclose to the BAC any interference internal auditors encounter related to the scope, performance, or communication of internal audit work and results. The disclosure will include communicating the implications of such interference on the internal audit function's effectiveness and ability to fulfill its mandate.

2.3 Changes to the Mandate and Charter

Circumstances may justify a follow-up discussion between the HIA, BAC, and Management on the internal audit mandate or other aspects of the internal audit charter. Such circumstances may include but are not limited to:

- A significant change in the GIAS.
- A significant acquisition or reorganization within the organization.
- Significant changes in the HIA, Board of Commissioners (BOC), and/or Management.
- Significant changes to the organization's strategies, objectives, risk profile, or the environment in which the organization operates.
- New laws or regulations that may affect the nature and/or scope of internal audit services.

3.0 BAC OVERSIGHT

To establish, maintain, and ensure that Link Net's internal audit function has sufficient authority to fulfill its duties, the BAC will:

- Discuss with the HIA and Management the appropriate authority, role, responsibilities, scope, and services (assurance and/or advisory) of the internal audit function.
- Ensure the HIA has unrestricted access to and communicates and interacts directly with the BAC, including in private meetings without Management present.
- Discuss with the HIA and Management other matters that should be included in the Internal Audit Charter.
- Participate in discussions with the HIA and Management about the "essential conditions," (refer GIAS Domain III – Governance in each Standard) described in the GIAS, which establish the foundation that enables an effective internal audit function.
- Approve the internal audit function's Charter, which includes the internal audit mandate and the scope and types of internal audit services.
- Review the Internal Audit Charter at least once in every three years with the HIA to consider changes affecting the organization, such as the employment of a new HIA or changes in the type, severity, and interdependencies of risks to the organization; and approve the internal audit charter.
- Approve the risk-based internal audit plan, human resources administration and budgets.
- Collaborate with Management to determine the qualifications and competencies the organization expects in a HIA, as described in the GIAS (refer Standard 7.2 Chief Audit Executive Qualifications).
- Authorize the appointment and removal of the HIA inclusive of the HRL, remuneration, benefits and compensations.
- Review and approved the HIA's Key Performance Indicator ("KPI") and performance.
- Receive communications from the HIA about the internal audit function including its performance relative to its plan.
- Ensure a quality assurance and improvement program has been established and review the results annually.
- Make appropriate inquiries of Management and the HIA to determine whether scope or resource limitations are inappropriate.

4.0 HIA ROLES AND RESPONSIBILITIES

4.1 Ethics and Professionalism

The HIA will ensure that internal auditors:

- Conform with the GIAS, including the principles of Ethics and Professionalism: integrity, objectivity, competency, due professional care, and confidentiality.
- Understand, respect, meet, and contribute to the legitimate and ethical expectations of the organization and be able to recognize conduct that is contrary to those expectations.
- Encourage and promote an ethics-based culture in the organization.
- Report organizational behavior that is inconsistent with the organization's ethical expectations, as described in applicable policies and procedures.

4.2 Objectivity

The HIA will ensure that the internal audit function remains free from all conditions that threaten the ability of internal auditors to carry out their responsibilities in an unbiased manner, including matters of engagement selection, scope, procedures, frequency, timing, and communication. If the HIA determines that objectivity may be impaired in fact or appearance, the details of the impairment will be disclosed to appropriate parties.

Internal auditors will maintain an unbiased attitude that allows them to perform engagements objectively such that they believe in their work product, do not compromise quality, and do not subordinate their judgment on audit matters to others, either in fact or appearance.

Internal auditors will have no direct operational responsibility or authority over any of the activities they review. Accordingly, internal auditors will not implement internal controls, develop procedures, install systems, or engage in other activities that may impair their judgment, including:

- Assessing specific operations for which they had responsibility within the previous year.
- Performing operational duties for Link Net's or its affiliates.
- Initiating or approving transactions external to the internal audit function.
- Directing the activities of any Link Net's employee that is not employed by the internal audit function, except to the extent that such employees have been appropriately assigned to internal audit teams or to assist internal auditors.

Internal auditors will:

- Disclose impairments of independence or objectivity, in fact or appearance, to appropriate parties and at least annually, such as the HIA, BAC, Management, or others.
- Exhibit professional objectivity in gathering, evaluating, and communicating information.
- Make balanced assessments of all available and relevant facts and circumstances.
- Take necessary precautions to avoid conflicts of interest, bias, and undue influence.

4.3 Managing the Internal Audit Function

The HIA has the responsibility to:

- At least annually, develop a risk-based internal audit plan that considers the input of the BAC and Management. Discuss the plan with the BAC and Management and submit the plan to the BAC for review and approval.
- Communicate the impact of resource limitations on the internal audit plan to the BAC and Management.
- Review and adjust the internal audit plan, as necessary, in response to changes in the Company's business, risks, operations, programs, systems, and controls.
- Communicate with the BAC and Management if there are significant interim changes to the internal audit plan.
- Ensure internal audit engagements are performed, documented, and communicated in accordance with the GIAS.

- Follow up on engagement findings and confirm the implementation of recommendations or action plans and communicate the results of internal audit services to the BAC and Management quarterly and for each engagement as appropriate.
- Ensure the internal audit function collectively possesses or obtains the knowledge, skills, and other competencies and qualifications needed to meet the requirements of the GIAS and fulfill the internal audit mandate.
- Identify and consider trends and emerging issues that could impact Link Net's and communicate to the BAC and Management as appropriate.
- Consider emerging trends and successful practices in internal auditing.
- Establish and ensure adherence to methodologies designed to guide the internal audit function.
- Ensure adherence to Link Net's relevant policies and procedures unless such policies and procedures conflict with the internal audit charter or the GIAS. Any such conflicts will be resolved or documented and communicated to the BAC and Management.
- Coordinate activities and consider relying upon the work of other internal and external providers of assurance and advisory services. If the HIA cannot achieve an appropriate level of coordination, the issue must be communicated to Management and if necessary escalated to the BAC.

4.4 Communication with the BAC and Management

The HIA will report quarterly (*unless otherwise stated) to the BAC and Management, which shall consist of:

- The internal audit function's mandate.
- The internal audit plan and performance relative to its plan.
- Internal audit budget.
- Significant revisions to the internal audit plan and budget.
- Potential impairments to independence, including relevant disclosures as applicable.
- Results from the quality assurance and improvement program, which include the internal audit function's conformance with The IIA's Global Internal Audit Standards and action plans to address the internal audit function's deficiencies and opportunities for improvement (*half-yearly).
- Significant risk exposures and control issues, including fraud risks, governance issues, and other areas of focus for the BAC.
- Results of assurance and advisory services.
- Resource requirements (financial, human resource and technological).
- Management's responses to risk that the internal audit function determines may be unacceptable or acceptance of a risk that is beyond Link Net's risk appetite.

4.5 Quality Assurance and Improvement Program (“QAIP”)

The HIA will develop, implement, and maintain a QAIP that covers all aspects of the internal audit function. The program will include external and internal assessments of the internal audit function's conformance with the GIAS, as well as performance measurement to assess the internal audit function's progress toward the achievement of its objectives and promotion of continuous improvement. The program also will assess, if applicable, compliance with laws and/or regulations relevant to internal auditing. Also, if applicable, the assessment will include plans to address the internal audit function's deficiencies and opportunities for improvement.

Bi-annually, the HIA will communicate with the BAC and Management about the internal audit function's QAIP, including the results of internal assessments (ongoing monitoring and periodic self-assessments) and external assessments. External assessments will be conducted at least once every five years by a qualified, independent assessor or assessment team from outside of the Company; qualifications must include at least one assessor holding an active Certified Internal Auditor® credential.

5.0 SCOPE AND TYPES OF INTERNAL AUDIT SERVICES

The scope of internal audit services covers the entire breadth of the organization, including all Link Net's activities, assets, and personnel. The scope of internal audit activities also encompasses but is not limited to objective examinations of evidence to provide independent assurance and advisory services (such as performance auditing, assurance regarding internal controls over financial reporting, and investigations) to the BAC and Management on the adequacy and effectiveness of governance, risk management, and control processes for Link Net.

The nature and scope of advisory services may be agreed with the party requesting the service, provided the internal audit function does not assume management responsibility. Opportunities for improving the efficiency of governance, risk management, and control processes may be identified during advisory engagements. These opportunities will be communicated to the appropriate level of Management.

Internal audit engagements may include evaluating whether:

- Risks relating to the achievement of Link Net's strategic objectives are appropriately identified and managed.
- The actions of Link Net's officers, directors, management, employees, and contractors or other relevant parties comply with Link Net's policies, procedures, and applicable laws, regulations, and governance standards.
- The results of operations and programs are consistent with established goals and objectives.
- Operations and programs are being carried out effectively and efficiently.
- Established processes and systems enable compliance with the policies, procedures, laws, and regulations that could significantly impact Link Net.
- The integrity of information and the means used to identify, measure, analyze, classify, and report such information is reliable.
- Resources and assets are acquired economically, used efficiently and sustainably, and protected adequately.

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Approved by Link Net's Board of Commissioners

Acknowledgments / Signatures

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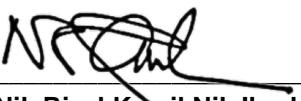
Vivek Sood
President Commissioner

19 Nov 2025

Date

Thomas Hundt
Commissioner

Date


Nik Rizal Kamil Nik Ibrahim Kamil
Commissioner

18th Nov 2025

Date

Alexander S. Rusli
Independent Commissioner

Date

Thandalam Veeravalli Thirumala Chari
Independent Commissioner

Date



Approved by Link Net's Board of Commissioners

Acknowledgments / Signatures

Vivek Sood

President Commissioner

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Date

Thomas Hundt

Commissioner

Date

Nik Rizal Kamil Nik Ibrahim Kamil

Commissioner

Date

Alexander S. Rusli

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President Commissioner

Date

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Commissioner

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Commissioner

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Alexander S. Rusli

Independent Commissioner

Date

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Thandalam Veeravalli Thirumala Chari

Independent Commissioner

Date

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