

PEDOMAN PELAKSANAAN TATA KELOLA PERUSAHAAN YANG BAIK

PT Pupuk Indonesia (Persero) menempatkan Tata Kelola Perusahaan yang Baik (*Good Corporate Governance*) sebagai fondasi dalam pengambilan keputusan, pengelolaan risiko, dan pelaksanaan kegiatan usaha. Pedoman Tata Kelola Perusahaan menjadi acuan dalam menerapkan prinsip transparansi, akuntabilitas, pertanggungjawaban, independensi, dan kewajaran secara konsisten di seluruh lini. Melalui penerapan tata kelola yang berkelanjutan, perusahaan terus memperkuat integritas proses bisnis, kepatuhan, pengendalian internal, serta penciptaan nilai jangka panjang bagi pemangku kepentingan.

DOKUMEN SELINGKAPNYA →

Penerapan Tata Kelola Perusahaan di PTPI

Corporate Governance Implementation at PTPI



“Menjaga keandalan rantai pasok pupuk nasional melalui tata kelola yang akuntabel, berintegritas, dan berbasis risiko.”

“Maintaining the reliability of the national fertilizer supply chain through accountable, integrity-based, and risk-based governance.”

Mengawal Integritas Distribusi, Mewujudkan Swasembada Pangan

Dalam mendukung program Pemerintah untuk mencapai Ketahanan Pangan Nasional, PT Pupuk Indonesia (Persero) sebagai *Holding* BUMN Pupuk memiliki peran guna mendukung tercapainya program tersebut. Wujud dukungan tersebut antara lain dalam penyediaan pupuk bersubsidi bagi Petani yang meliputi pupuk Urea, NPK, Organik dan ZA yang mengacu pada Peraturan Menteri Pertanian Republik Indonesia Nomor 15 Tahun 2025 tentang Peraturan Pelaksanaan Peraturan Presiden Nomor 6 Tahun 2025 tentang Tata Kelola Pupuk Bersubsidi.

Guarding Distribution Integrity, Achieving Food Self-Sufficiency

To support the Government's program to achieve National Food Security, PT Pupuk Indonesia (Persero), as SOE Fertilizer Holding plays a key role in supporting the program's success. This support includes providing subsidized fertilizers for farmers, including Urea, NPK, Organic, and ZA fertilizers, in accordance with the Republic of Indonesia Minister of Agriculture Regulation Number 15 of 2025 concerning the Implementing Presidential Regulation Number 6 of 2025 concerning the Governance of Subsidized Fertilizers.

Dasar Hukum Pelaksanaan Subsidi Pupuk Tahun 2025

Pelaksanaan Subsidi Pupuk Tahun 2025 mengacu pada 4 (empat) Undang-Undang, 1 (satu) Peraturan Pemerintah, 3 (tiga) Peraturan Presiden, 12 (dua belas) Peraturan Menteri, dan 3 (tiga) Keputusan Menteri yang seluruhnya menjadi panduan bagi Perusahaan dalam melaksanakan penugasan penyaluran pupuk bersubsidi guna mendukung Ketahanan Pangan Nasional.

Langkah Strategis dan Kebijakan Pelaksanaan Subsidi Pupuk

Dalam melaksanakan penugasan dari Pemerintah dan untuk mencapai tujuan utama yakni Kedaulatan Pangan Nasional, maka perlu diambil langkah-langkah strategis dan kebijakan yang tepat sehingga pupuk bersubsidi sebagai salah satu faktor utama dalam peningkatan produksi dapat tersedia dan diterima oleh pihak yang berhak untuk menerimanya. Adapun langkah-langkah strategis dan kebijakan yang diterapkan oleh Perusahaan untuk mendukung penugasan dari pemerintah antara lain:

1. Pewarnaan Pupuk Urea Bersubsidi (Pink) untuk membedakan dengan pupuk non subsidi serta mencegah terjadinya penyimpangan terhadap penggunaan pupuk bersubsidi.
2. Penggunaan kantong satu merek untuk menghilangkan preferensi terhadap produk dari produsen tertentu di suatu daerah dan memudahkan dalam melakukan monitoring dan pengawasan di lapangan.
3. Penggunaan *Bag Code* pada kantong pupuk bersubsidi untuk memudahkan penelusuran apabila terjadi penyimpangan dan penyalahgunaan pupuk bersubsidi.
4. Penyeragaman Kios Pupuk Lengkap untuk meningkatkan pelayanan kepada Petani dan memberi kemudahan dalam memperoleh pupuk bersubsidi.
5. Pengiriman Pupuk bersubsidi secara langsung ke daerah *remote* untuk mengoptimalkan penyaluran Pupuk bersubsidi pada daerah yang sulit untuk dijangkau.
6. Mencantumkan nomor telepon layanan pelanggan di kantong pupuk bersubsidi untuk memudahkan penyampaian pengaduan ataupun keluhan dari petani.
7. Monitoring stok Pupuk Bersubsidi sampai dengan titik serah dan penebusan pupuk secara *online*.
8. Digitalisasi tata kelola penyaluran Pupuk Bersubsidi menggunakan aplikasi WCM, APG dan I-Pubers.

Prinsip 7 Tepat dalam Penyaluran Pupuk Bersubsidi

Dalam melaksanakan penyaluran pupuk bersubsidi, PT Pupuk Indonesia (Persero) (PTPI) berpedoman pada prinsip 7T atau 7 Tepat, yaitu Tepat Jenis, Tepat Jumlah, Tepat Harga, Tepat Tempat, Tepat Waktu, Tepat Mutu, dan Tepat Penerima.

Prinsip 7 Tepat tersebut mencakup hal-hal sebagai berikut:

- **Tepat Jenis:** Pupuk disalurkan sesuai dengan kebutuhan lahan dan komoditas.
- **Tepat Jumlah:** Alokasi disalurkan sesuai dosis yang ditetapkan, dengan total Alokasi tahun 2025 mencapai 9,5 juta ton.
- **Tepat Harga:** Pupuk disalurkan sesuai Harga Eceran Tertinggi (HET) yang ditetapkan pemerintah.
- **Tepat Tempat:** Distribusi dilakukan hingga titik serah, yaitu kios atau pengecer resmi.
- **Tepat Waktu:** Ketersediaan pupuk disesuaikan dengan musim tanam.

Legal Basis for the Implementation of Fertilizer Subsidies in 2025

The implementation of the 2025 Fertilizer Subsidy refers to 4 (four) Laws, 16 (sixteen) Ministerial Regulations, and 3 (three) Ministerial Decrees, all of which serve as guidelines for the Company in carrying out subsidized fertilizer distribution assignments to support National Food Security.

Strategic Steps and Policies for Implementing Fertilizer Subsidies

When carrying out government assignments and achieving the primary goal of National Food Sovereignty, strategic steps and appropriate policies must be taken to ensure subsidized fertilizer, a key factor in increasing production, is available and accessible to those entitled to receive it. The strategic steps and policies implemented by the Company to support government assignments include:

1. Coloring Subsidized Urea Fertilizer (Pink) to differentiate it from non-subsidized fertilizer and prevent misuse of subsidized fertilizer.
2. Using single-brand bags to eliminate brand loyalty from specific producers in a region and facilitate monitoring and supervision in the field.
3. Using Bag Code on subsidized fertilizer bags to facilitate tracking in the event of misuse of subsidized fertilizer.
4. Standardizing Complete Fertilizer Kiosks to improve service to farmers and facilitate access to subsidized fertilizer.
5. Direct delivery of subsidized Fertilizer to remote areas to optimize distribution in hard-to-reach areas.
6. Including a customer service telephone number on subsidized fertilizer bags to facilitate the submission of complaints or grievances from farmers.
7. Monitoring subsidized fertilizer stocks up to the point of delivery and online fertilizer redemption.
8. Digitizing management of subsidized fertilizer distribution using the WCM, APG, and I-Pubers applications.

The 7 Right Principle in Subsidized Fertilizer Distribution

In distributing subsidized fertilizer, PT Pupuk Indonesia (Persero) (PTPI) adheres to The 7 Right Principle, or 7 Right Principle: Right Type, Right Quantity, Right Price, Right Place, Right Time, Right Quality, and Right Recipient.

The 7 Right Principle cover the following matters:

- **Right Type:** Fertilizer is distributed according to land and commodity needs.
- **Right Quantity:** Allocations are distributed according to the specified dosage, with a total allocation of 9.5 million tons in 2025.
- **Right Price:** Fertilizer is distributed according to the Highest Retail Price (HET) set by the government.
- **Right Place:** Distribution is carried out to the point of delivery, such as kiosks or authorized retailers.
- **Right Time:** Fertilizer availability is adjusted to the planting season.

- **Tepat Mutu:** Pupuk yang disalurkan memenuhi standar kualitas yang ditetapkan.
- **Tepat Penerima:** Penyaluran dilakukan sesuai data petani atau pembudidaya yang berhak dan terintegrasi dengan e-RDKK.

Prinsip 7 Tepat menjadi landasan utama untuk memastikan bahwa pupuk bersubsidi diterima oleh petani yang berhak secara efektif, efisien, dan akuntabel. Penerapan prinsip ini juga diarahkan untuk meningkatkan efisiensi penyaluran, memperkuat akuntabilitas, serta memperluas cakupan penerima hingga pembudidaya ikan guna mendukung ketahanan pangan nasional.

Untuk mewujudkan implementasi Prinsip 7 Tepat tersebut, PTPI terus melakukan pengembangan dan penguatan sistem informasi sebagai instrumen pengendalian dan pengawasan distribusi.

Pertama, PTPI memastikan bahwa kualitas pupuk bersubsidi yang disalurkan telah memenuhi ketentuan dan standar mutu yang berlaku, sehingga produk yang diterima petani sesuai dengan spesifikasi yang ditetapkan pemerintah.

Kedua, PTPI mengoptimalkan sistem monitoring ketersediaan stok secara aktual guna menjamin ketersediaan pupuk bersubsidi hingga tingkat gudang penyangga dan PUD/PPTS. Melalui sistem ini, pengawasan terhadap rantai pasok dilakukan secara lebih terintegrasi, sehingga potensi kelangkaan maupun keterlambatan distribusi dapat diantisipasi lebih dini.

Ketiga, PTPI bekerja sama dengan Kementerian Pertanian Republik Indonesia dalam pengembangan sistem penyaluran pupuk bersubsidi melalui aplikasi i-Pubers. Sistem ini dirancang untuk memastikan bahwa penyaluran pupuk dilakukan secara tepat sasaran, sesuai dengan data petani yang terdaftar dalam Rencana Definitif Kebutuhan Kelompok (RDKK), sehingga transparansi dan akuntabilitas distribusi dapat terjaga.

Dengan dukungan sistem informasi yang terintegrasi dan kolaborasi lintas lembaga, implementasi Prinsip 7 Tepat terus diperkuat guna meningkatkan efektivitas penyaluran pupuk bersubsidi serta mendukung keberlanjutan sektor pertanian nasional.

7

TEPAT

PTPI berpedoman pada Prinsip 7 Tepat, yaitu **Tepat Jenis, Tepat Jumlah, Tepat Harga, Tepat Tempat, Tepat Waktu, Tepat Mutu, dan Tepat Penerima**. Prinsip ini menjadi landasan utama dalam memastikan bahwa pupuk bersubsidi dapat diterima oleh petani yang berhak secara efektif, efisien, dan akuntabel.

PTPI adheres to the 7 Right Principle: **Right Type, Right Quantity, Right Price, Right Place, Right Time, Right Quality, and Right Recipient**. This principle serves as the primary foundation for ensuring that subsidized fertilizer reaches eligible farmers effectively, efficiently, and accountably.

- **Right Quality:** Distributed fertilizer meets the established quality standards.
- **Right Recipients:** Distribution is carried out according to data on eligible farmers or cultivators, integrated with e-RDKK.

The 7 Right Principle serve as the primary foundation for ensuring that subsidized fertilizer reaches eligible farmers effectively, efficiently, and accountably. The implementation of these principles is also aimed at increasing distribution efficiency, strengthening accountability, and expanding the scope of recipients to include fish cultivators, in order to support national food security.

To support the implementation of The 7 Right Principle, PTPI continues to develop and strengthen its information system as a distribution control and oversight instrument.

First, PTPI ensures that the subsidized fertilizer distributed meets applicable regulations and quality standards, ensuring that the products received by farmers meet government-determined specifications.

Second, PTPI optimizes its real-time stock availability monitoring system to ensure the availability of subsidized fertilizer down to the buffer warehouse and PUD/PPTS levels. Through this system, supply chain monitoring is more integrated, allowing potential shortages or delays in distribution to be anticipated early.

Third, PTPI collaborates with the Ministry of Agriculture of the Republic of Indonesia to develop a subsidized fertilizer distribution system through i-Pubers application. This system is designed to ensure that fertilizer distribution is targeted, in accordance with farmer data registered in the Definitive Group Needs Plan (RDKK), thereby maintaining transparency and accountability in distribution.

Through the support of an integrated information system and cross-institutional collaboration, the implementation of The 7 Right Principle is continuously strengthened to increase the effectiveness of subsidized fertilizer distribution and support the sustainability of the national agricultural sector.



Pencapaian Terbaik Penerapan Tata Kelola Perusahaan

Best Achievements in Corporate Governance Implementations

Sepanjang tahun 2025, penerapan GCG di PTPI difokuskan untuk mengawal mandat strategis: menjaga keandalan rantai pasok pupuk nasional serta memastikan pelaksanaan penugasan publik (*Public Service Obligation/PSO*) untuk pengadaan dan penyaluran pupuk bersubsidi berjalan akuntabel guna menjamin ketersediaan dan keterjangkauan pupuk sesuai dengan komitmen Pemerintah dalam mewujudkan swasembada dan ketahanan pangan nasional.

Mengingat karakter industri pupuk yang padat modal dengan dinamika energi dan logistik yang kompleks, GCG difungsikan sebagai kerangka kendali strategis. Hal ini bertujuan untuk memastikan setiap pengambilan keputusan bersifat *prudent* (hati-hati), risiko terkelola secara terukur, dan mekanisme *check and balance* berjalan efektif di seluruh level organisasi.

Penguatan penerapan GCG direalisasikan melalui efektivitas fungsi pengawasan Dewan Komisaris dan kepengurusan Direksi, yang diperkokoh oleh sistem manajemen kepatuhan dan anti-penyuapan yang terstruktur. Lebih jauh, manajemen risiko diintegrasikan secara penuh ke dalam siklus perencanaan, operasional, hingga keputusan investasi.

Dengan pendekatan tersebut, PTPI mendorong terciptanya *governance outcome*, mulai dari penguatan struktur tata kelola, konsistensi penerapan tata kelola, konsistensi asesmen tata kelola, integritas proses bisnis, hingga keandalan sistem kontrol distribusi. Hal ini memastikan amanah negara dijalankan dengan penuh tanggung jawab, memberikan dukungan yang kuat dan berkelanjutan dalam mewujudkan swasembada nasional.

In 2025, GCG implementation at PTPI focused on safeguarding its strategic mandate: maintaining the reliability of the national fertilizer supply chain and ensuring the accountable implementation of the Public Service Obligation (PSO) for the procurement and distribution of subsidized fertilizer, ensuring the availability and affordability of fertilizer in line with the Government's commitment to achieving national food self-sufficiency and security.

Given the capital-intensive nature of the fertilizer industry, with its complex energy and logistics dynamics, GCG serves as a strategic control framework. This aims to ensure that every decision is prudent, risks are managed measurably, and checks and balances operate effectively at all levels of the organization.

Strengthening governance is realized through the effective supervisory function of the Board of Commissioners and the management of the Board of Directors, reinforced by a structured compliance and anti-bribery management system. In addition, risk management is fully integrated into the planning, operational, and investment decision cycles.

By following this approach, PTPI encourages the creation of governance outcomes, ranging from strengthening governance structures, consistent governance implementation, consistent governance assessments, business process integrity, and the reliability of distribution control systems. This ensures that the state mandate is carried out responsibly, providing solid support for achieving national food self-sufficiency.

Pencapaian Tata Kelola 2025

Governance Achievements in 2025

Penilaian GCG GCG Assessment

Skor GCG
GCG Score

89,05

Predikat | Predicate:
"Sangat Baik"
"Very Good"

Most Trusted Company
Skor CGPI | CGPI Score

88,03

Predikat | Predicate:
"Sangat Terpercaya"
"Most Trusted"

Tingkat Kematangan Risiko Risk Maturity Index (RMI)

Skor RMI
RMI Score

3,1 (Skala 5)

3.1 (Scale 5)

Predikat | Predicate:
"Praktik yang Baik"
"Good Practice"

Kepatuhan LHKPN LHKPN Compliance

100%

Tepat Waktu
On time

Tindak Lanjut WBS WBS Follow-Up

100%

Selesai
Finished

Temuan Mayor Audit Major Audit Findings

0 (Nihil|Nil)

Zero Major Finding

Integritas & Kepatuhan Tersertifikasi Certified Integrity and Compliance

Sistem pencegahan korupsi & kepatuhan terstruktur
Structured Corruption Prevention & Compliance System

- **ISO 37001 (Manajemen Anti Penyuapan)**
(Anti-Bribery Management)
- **ISO 37301 (Manajemen Kepatuhan)**
(Compliance Management)

Cakupan: Holding & Fungsi Strategis
Scope: Holding & Strategic Functions

Jaminan Tata Kelola PSO PSO Governance Assurance

Penerapan Tata Kelola Penyaluran Pupuk Bersubsidi
Implementation of Subsidized Fertilizer Distribution Governance

Kebijakan PSO | Kerangka Kepatuhan | Pengawasan Dewan Komisaris
PSO Policy | Framework | Compliance | Supervision Board of Commissioners

Tata Kelola Digital yang Aman Secure Digital Governance

- **ISO/IEC 27001 (Keamanan Informasi)**
ISO/IEC 27001 (Information Security)
- **ISO 20000-1 (Layanan TI)**
ISO 20000-1 (IT Services)
- **Governance PSO: Penerapan Digital Audit**
Governance PSO: Implementation of Digital
- **Trail pada Penyaluran Pupuk Bersubsidi (I-Pubers)**
Audit Trails in Subsidized Fertilizer Distribution (I-Pubers).

Sinergi Tata Kelola Terintegrasi Integrated Governance Synergy

- **Single Risk Framework**
Deteksi dini risiko rantai pasok terintegrasi

Single Risk Framework Early detection of integrated supply chain risks

- **Joint Procurement**
Sentralisasi pengadaan untuk efisiensi (Cost Leadership) dan mitigasi fraud

Joint Procurement
Centralized procurement for efficiency (Cost Leadership) and fraud mitigation

NILAI TAMBAH TATA KELOLA 2025

Dengan penerapan kerangka kerja di atas, Tata Kelola 2025 memberikan nilai tambah, antara lain:

Akuntabilitas PSO Terjaga Maintained PSO Accountability

Penyaluran pupuk bersubsidi tepat sasaran dan dapat dipertanggungjawabkan
Distribution of subsidized fertilizer is on-target and accountable

Kepercayaan Stakeholder Stakeholder Trust

Meningkatnya reputasi di mata Pemerintah, Investor, dan Petani
Improved reputation among the government, investors, and farmers

Risiko Strategis Dimitigasi Strategic Risk Mitigation

Gangguan pasokan gas dan distribusi terdeteksi sejak dini
Gas supply and distribution disruptions were detected early

Ketahanan Pangan Food Security

Dukungan nyata terhadap cita-cita Swasembada Pangan Nasional
True support for the goal of National Food Self-Sufficiency

Komitmen Perusahaan dalam Penerapan Tata Kelola Perusahaan secara Berkelanjutan

Perusahaan menempatkan penerapan Tata Kelola Perusahaan yang Baik (*Good Corporate Governance* disingkat "GCG") sebagai landasan utama dalam menjalankan seluruh aktivitas usaha. Komitmen ini dijalankan secara konsisten untuk menjaga keseimbangan kepentingan Perusahaan dan seluruh pemangku kepentingan, serta diyakini sebagai faktor kunci dalam memperkuat kepercayaan, meningkatkan kualitas pengambilan keputusan, dan mendukung penciptaan nilai serta keberlanjutan usaha di tengah dinamika bisnis yang semakin kompetitif.

Komitmen penerapan GCG diwujudkan melalui penguatan kebijakan, struktur, sistem, dan proses tata kelola yang selaras dengan prinsip transparansi, akuntabilitas, responsibilitas, independensi, dan kewajaran. Perusahaan secara berkelanjutan mendorong pemanfaatan teknologi dan digitalisasi sebagai bagian integral dari penguatan tata kelola, khususnya untuk meningkatkan transparansi proses bisnis, efektivitas pengawasan, pengendalian internal, serta kepatuhan terhadap ketentuan peraturan perundang-undangan yang berlaku. Pernyataan komitmen ini ditandatangani oleh seluruh anggota Dewan Komisaris dan Direksi dan dituangkan dalam Pedoman Tata Kelola Perusahaan sebagai acuan pelaksanaan GCG di seluruh lini organisasi.

Sejalan dengan perannya sebagai Badan Usaha Milik Negara dan dalam mendukung keberlanjutan usaha, Perusahaan terus menyempurnakan penerapan GCG secara berkelanjutan melalui integrasi kebijakan, proses, dan sistem berbasis digital guna memastikan pelaksanaan kegiatan usaha berjalan secara sehat, bertanggung jawab, dan berorientasi pada kepentingan jangka panjang seluruh pemangku kepentingan.

ADDED VALUE OF GOVERNANCE 2025

By implementing the above framework, Governance 2025 provides added value, including:

Company's Commitment to Sustainable Corporate Governance Implementation

The Company places Good Corporate Governance (GCG) implementation as the primary foundation for all business activities. This commitment is consistently applied to maintain a balance between the interests of the Company and all stakeholders, and is believed to be a key factor in strengthening trust, improving the quality of decision-making, and supporting value creation and business sustainability despite increasingly competitive business dynamics.

The commitment to GCG implementation is demonstrated through strengthening governance policies, structures, systems, and processes that align with the principles of transparency, accountability, responsibility, independence, and fairness. The Company continuously promotes the use of technology and digitalization as an integral part of strengthening governance, particularly to enhance the transparency of business processes, the effectiveness of supervision, internal control, and compliance with applicable laws and regulations. A commitment statement is signed by all members of the Board of Commissioners and Board of Directors and is outlined in the Corporate Governance Guidelines as a reference for GCG implementation across all levels of the organization.

In line with its role as a State-Owned Enterprise and to support business sustainability, the Company continues to refine its GCG implementation through the integration of digital-based policies, processes, and systems to ensure business activities are conducted in a healthy, responsible manner, and oriented towards the long-term interests of all stakeholders.

Pernyataan Komitmen Dewan Komisaris dan Direksi PTPI atas Penerapan GCG

Sebagai bagian dari komitmen terhadap penerapan GCG, Dewan Komisaris dan Direksi PTPI secara bersama-sama telah menyampaikan Pernyataan Komitmen dalam Pedoman Tata Kelola Perusahaan, sebagai bentuk penegasan atas peran dan tanggung jawabnya, sebagai berikut:

1. Perusahaan berkomitmen untuk mengimplementasikan GCG secara konsisten di seluruh aspek bisnis sebagai langkah untuk meningkatkan kinerja Perusahaan agar tetap mampu bertahan di iklim bisnis yang semakin kompetitif dan dinamis.
2. Pedoman Tata Kelola Perusahaan merupakan pedoman yang disusun untuk menjadi panduan melandasi penerapan GCG di lingkungan Perusahaan.

Hubungan Perusahaan dengan Pemegang Saham dan Pemangku Kepentingan

PTPI membangun dan mengelola hubungan dengan pemegang saham serta seluruh pemangku kepentingan secara seimbang dan terintegrasi, dengan berlandaskan prinsip GCG. Pendekatan ini memastikan terciptanya keselarasan kepentingan dan hubungan yang saling mendukung.

Sebaliknya, PTPI tidak menerapkan pola hubungan yang timpang atau tidak selaras, karena praktik tersebut berpotensi menghilangkan keterkaitan antar pemangku kepentingan dan mencerminkan tata kelola yang tidak sehat (*Bad Corporate Governance*).

Statement of Commitment from the PTPI Board of Commissioners and Board of Directors for GCG Implementation

As part of their commitment to implementing GCG, the Board of Commissioners and Board of Directors of PTPI have jointly submitted a Statement of Commitment in the Corporate Governance Guidelines, affirming their roles and responsibilities, as follows:

1. The Company is committed to consistently implementing GCG across all aspects of its business as a step to improve PTPI's performance and ensure its continued viability in an increasingly competitive and dynamic business climate.
2. The Corporate Governance Guidelines are designed to serve as the foundation for GCG implementation in the Company.

Corporate Relationships with Shareholders and Stakeholders

PTPI builds and manages relationships with shareholders and all stakeholders in a balanced and integrated manner, based on GCG principles. This approach ensure aligned interests and mutually supportive relationships.

Conversely, PTPI does not implement unequal or misaligned relationships, as such practices have the potential to diminish the interconnectedness between stakeholders and reflect Bad Corporate Governance.

Aktivitas GCG 2025

GCG Activities 2025

Tanggal Date	Aktivitas Activities
25–26 Juni 2025 June 25–26, 2025	<i>Sharing Session & Workshop "Strengthening Internal Control System to Improve Risk Management Pupuk Indonesia Group"</i> Sharing Session & Workshop "Strengthening Internal Control Systems to Improve Risk Management at Pupuk Indonesia Group"
7 Juli 2025 July 7, 2025	<i>Sharing Session Risk-Driven Decisions for a Resilient PIHC</i> Sharing Session: Risk-Driven Decisions for a Resilient PIHC
25 Juli 2025 July 25, 2025	Pupuk Indonesia Group <i>T-Cup Series #3 Basic Risk Class</i> Pupuk Indonesia Group T-Cup Series #3 Basic Risk Class
31 Juli 2025–25 November 2025 July 31, 2025–November 25, 2025	Program Riset dan Pemeringkatan CGPI "Membangun Kapabilitas Dinamis Perusahaan Dalam Kerangka GCG" oleh IICG CGPI Research and Ranking Program "Building Dynamic Company Capabilities Within the GCG Framework" by IICG
25 Agustus 2025–24 Desember 2025 August 25, 2025–December 24, 2025	GCG <i>Assessment</i> Pupuk Indonesia Group oleh Badan Pengawasan Keuangan dan Pembangunan (BPKP) GCG Assessment of Pupuk Indonesia Group by the Financial and Development Supervisory Agency (BPKP)
25–26 Agustus 2025 August 25–26 2025	Audit Surveillance Sistem Manajemen Anti Penyuapan 37001:2016 oleh PT SGS Indonesia Anti-Bribery Management System Surveillance Audit 37001:2016 by PT SGS Indonesia
12–13 September 2025 September 12–13, 2025	<i>Executive Training: Strategic Risk Management & Value Creation</i> oleh INSEAD untuk <i>Chief Risk Officer</i> Pupuk Indonesia Group Executive Training: Strategic Risk Management & Value Creation by INSEAD for Chief Risk Officers of Pupuk Indonesia Group
2 Oktober 2025 October 2, 2025	<i>Workshop Control Self Assessment ICOFR</i> Pupuk Indonesia Group ICOFR Control Self-Assessment Workshop of Pupuk Indonesia Group
3 Oktober 2025 October 3, 2025	Bimbingan Teknis Perempuan Anti Korupsi bersama Komisi Pemberantasan Korupsi RI, dengan tema: Peran Perempuan dalam Membangun Nilai-Nilai Integritas Melawan Korupsi Technical Guidance on Women Against Corruption with the Indonesian Corruption Eradication Commission, with the theme: The Role of Women in Building Integrity Values Against Corruption

Tanggal Date	Aktivitas Activities
17–28 Oktober 2025 October 17–28, 2025	Pelaksanaan <i>Risk Culture Assessment</i> Pupuk Indonesia Group Implementation of Pupuk Indonesia Group Risk Culture Assessment
6–9 Desember 2025 December 6–9, 2025	Integrity-Expo Peringatan Hakordia 2025 Integrity Expo Commemorating Hakordia 2025
10 Desember 2025 December 10, 2025	<i>Workshop Risk Control Self Assessment (RCSA) Non Risk That Matters (RTM) Tahun 2026</i> Risk Control Self-Assessment (RCSA) Workshop on Non Risk That Matters (RTM) in 2026
10 Desember 2025 December 10, 2025	<i>Workshop Anti-Fraud "Satukan Aksi Basmi Korupsi: Penguatan Integritas dan Tata Kelola di Pupuk Indonesia"</i> Anti-Fraud Workshop "Uniting Action to Eradicate Corruption: Strengthening Integrity and Governance at Pupuk Indonesia"
11 Desember 2025 December 11, 2025	Pupuk Indonesia <i>Risk Management Forum</i> dengan tema " <i>Embedding Risk Culture for a Resilient Strategy: Navigating Marked-to-Market & Anticipating Unexpected Loss</i> " & <i>Awarding Guardian of Risk Tahun 2025</i> Pupuk Indonesia Risk Management Forum with the theme "Embedding Risk Culture for a Resilient Strategy: Navigating Marked-to-Market & Anticipating Unexpected Loss" & Awarding Guardian of Risk in 2025
19 Desember 2025 December 19, 2025	Forum Penguatan Tata Kelola dan Kepatuhan " <i>Good Governance & Compliance sebagai Pilar Pencegahan Fraud & Korupsi</i> " Strengthening Governance and Compliance Forum "Good Governance & Compliance as Pillars of Fraud & Corruption Prevention"

Tujuan Penerapan GCG

Penerapan prinsip GCG di Perusahaan diarahkan untuk membangun dan menjaga keselarasan hubungan antara Perusahaan dan seluruh pemangku kepentingan. Melalui penerapan GCG yang konsisten dan terintegrasi, Perusahaan berupaya menciptakan nilai tambah yang berkelanjutan. Adapun tujuan penerapan GCG di lingkungan Perusahaan meliputi hal-hal sebagai berikut:

1. Mendorong terciptanya mekanisme pengambilan keputusan manajemen yang *proper and prudent* melalui mekanisme *check and balance* sesuai dengan fungsi masing-masing organ Perusahaan.
2. Memaksimalkan nilai Perusahaan dalam bentuk peningkatan kinerja (*high performance*) serta citra Perusahaan yang baik.
3. Mendorong pengelolaan Perusahaan secara profesional, transparan, dan efisien serta memberdayakan fungsi dan meningkatkan kemandirian organ Perusahaan.
4. Mendorong organ Perusahaan dalam membuat keputusan dan menjalankan tindakan dilandasi dengan nilai etika/moral yang tinggi dan kepatuhan terhadap peraturan perundang-undangan yang berlaku, serta kesadaran akan adanya tanggung jawab sosial Perusahaan terhadap *stakeholders*.
5. Mendorong pengelolaan sumber daya dan risiko Perusahaan secara lebih efisien dan efektif.
6. Mengurangi potensi benturan kepentingan organ Perusahaan dan pekerja dalam menjalankan bisnis Perusahaan.
7. Menciptakan lingkungan usaha yang kondusif terhadap pencapaian tujuan Perusahaan.

Dasar Hukum Penerapan GCG

Penerapan GCG di Pupuk Indonesia Group dilaksanakan dengan mengacu pada regulasi dan ketentuan yang berlaku, antara lain:

1. Undang-Undang Nomor 40 Tahun 2007 tentang Perseroan Terbatas dan perubahannya;
2. Undang-Undang Nomor 19 Tahun 2003 tentang Badan Usaha Milik Negara dan perubahannya;
3. Peraturan Menteri Badan Usaha Milik Negara Nomor PER-2/MBU/03/2023 tentang Pedoman Tata Kelola dan Kegiatan Korporasi Signifikan Badan Usaha Milik Negara;

Purpose of Implementing GCG

The implementation of GCG principles within the Company is aimed at building and maintaining harmonious relationships between PTPI and all stakeholders. Through consistent and integrated GCG implementation, the Company strives to create sustainable added value. The GCG implementation objectives within the Company include the following:

1. Encouraging the creation of a proper and prudent management decision-making mechanism through a check and balance mechanism in accordance with the functions of each organ of the Company.
2. Maximizing the value of the Company in the form of increased performance (*high performance*) in a good corporate image.
3. Encouraging the management of the Company in a professional, transparent, and efficient manner as well as empowering the functions and increasing the independence of the Company's organs.
4. Encouraging the Company's organs to make decisions and carry out actions based on high ethical/moral values and compliance with applicable laws and regulations, as well as awareness of the Company's social responsibility to stakeholders.
5. Encouraging more efficient and effective management of the Company's resources and risks.
6. Reducing potential conflict of interest by the Company's organs and workers in running the Company's business.
7. Creating a business environment that is conducive to the achievement of the Company's objectives.

Legal Basis for GCG Implementation

The implementation of GCG at Pupuk Indonesia Group is carried out in accordance with applicable regulations and provisions, including:

1. Law Number 40 of 2007 concerning Limited Liability Companies and its amendments;
2. Law Number 19 of 2003 concerning State-Owned Enterprises and its amendments;
3. Regulation of the Minister of State-Owned Enterprises Number PER-2/MBU/03/2023 concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises;

4. Peraturan Menteri Badan Usaha Milik Negara Nomor PER-3/MBU/03/2023 tentang Organ dan Sumber Daya Manusia Badan Usaha Milik Negara;
5. Pedoman Umum Governansi Korporasi Indonesia (PUGKI) yang dikembangkan oleh Komite Nasional Kebijakan Governansi (KNKG).
6. Anggaran Dasar Perusahaan dan perubahannya.

4. Regulation of the Minister of State-Owned Enterprises Number PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises;
5. developed by the National Committee for Governance Policy (KNKG).
6. The Company's Articles of Association and amendments there to.

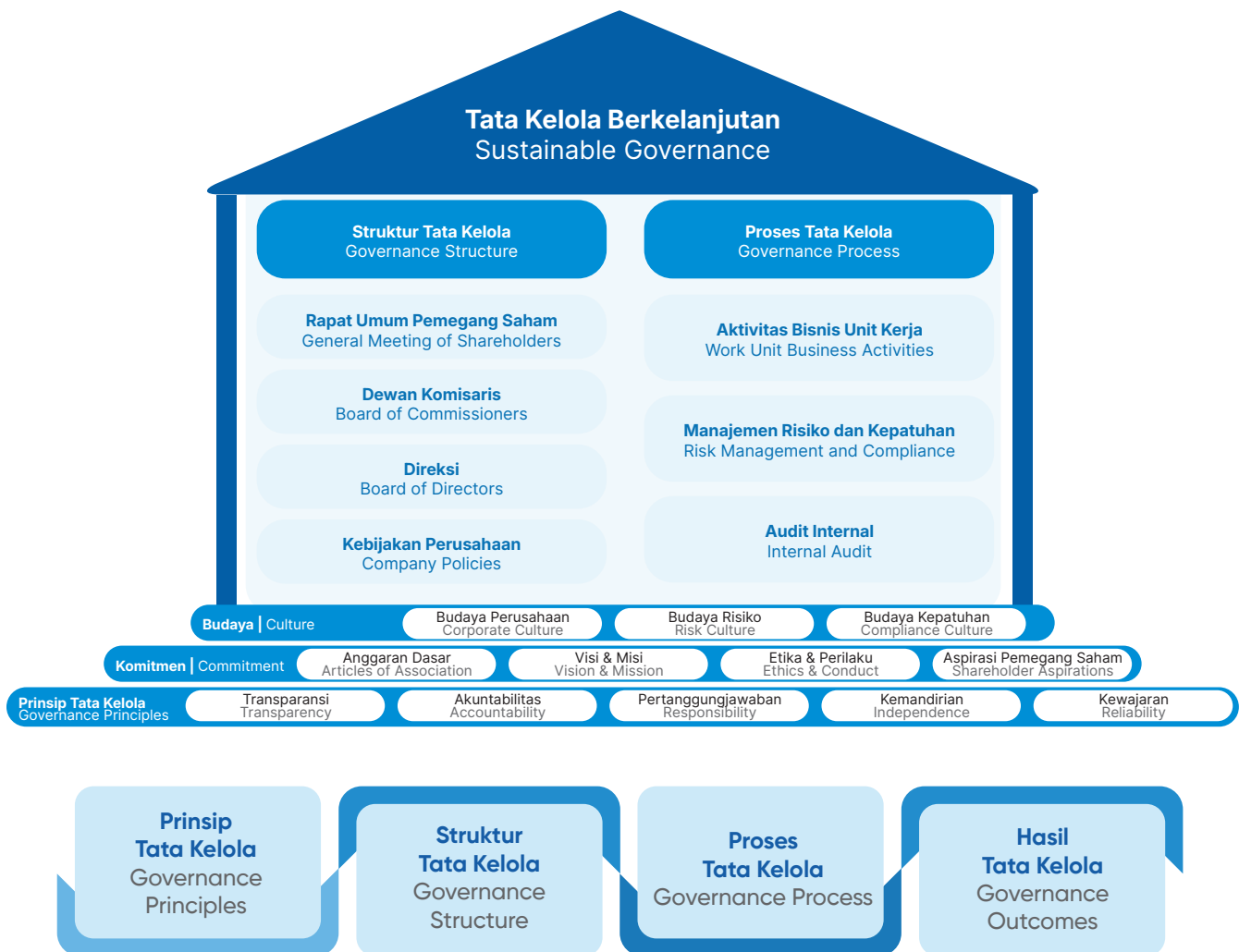
Kerangka Kerja GCG

PTPI mengimplementasikan prinsip-prinsip GCG melalui *Corporate Governance Framework* sebagai fondasi utama tata kelola perusahaan. *Framework* ini dibangun atas empat aspek, yaitu *Governance Principle*, *Governance Structure*, *Governance Process*, dan *Governance Outcome* yang secara terpadu mendorong terciptanya tata kelola perusahaan yang efektif serta memenuhi harapan Perusahaan dan seluruh pemangku kepentingan.

GCG Framework

PTPI implements the GCG principles through its Corporate Governance Framework, which serves as the primary foundation for corporate governance. This framework is built on four aspects including: Governance Principle, Governance Structure, Governance Process, and Governance Outcome, which, in an integrated manner, promote effective corporate governance and meet the expectations of the Company and all stakeholders.

Kerangka Kerja GCG PTPI
PTPI GCG Framework



Perusahaan menetapkan Kerangka Kerja Tata Kelola (*Governance Framework*) yang dioperasionalkan melalui Sistem Manajemen *Governance* yang terstruktur. Sistem ini menjadi penggerak dalam memastikan prinsip-prinsip tata kelola berjalan efektif di setiap lini operasional.

The Company has established a Governance Framework that operates through a structured Governance Management System. This system serves as the driving force for ensuring the effective implementation of governance principles across all operational lines.

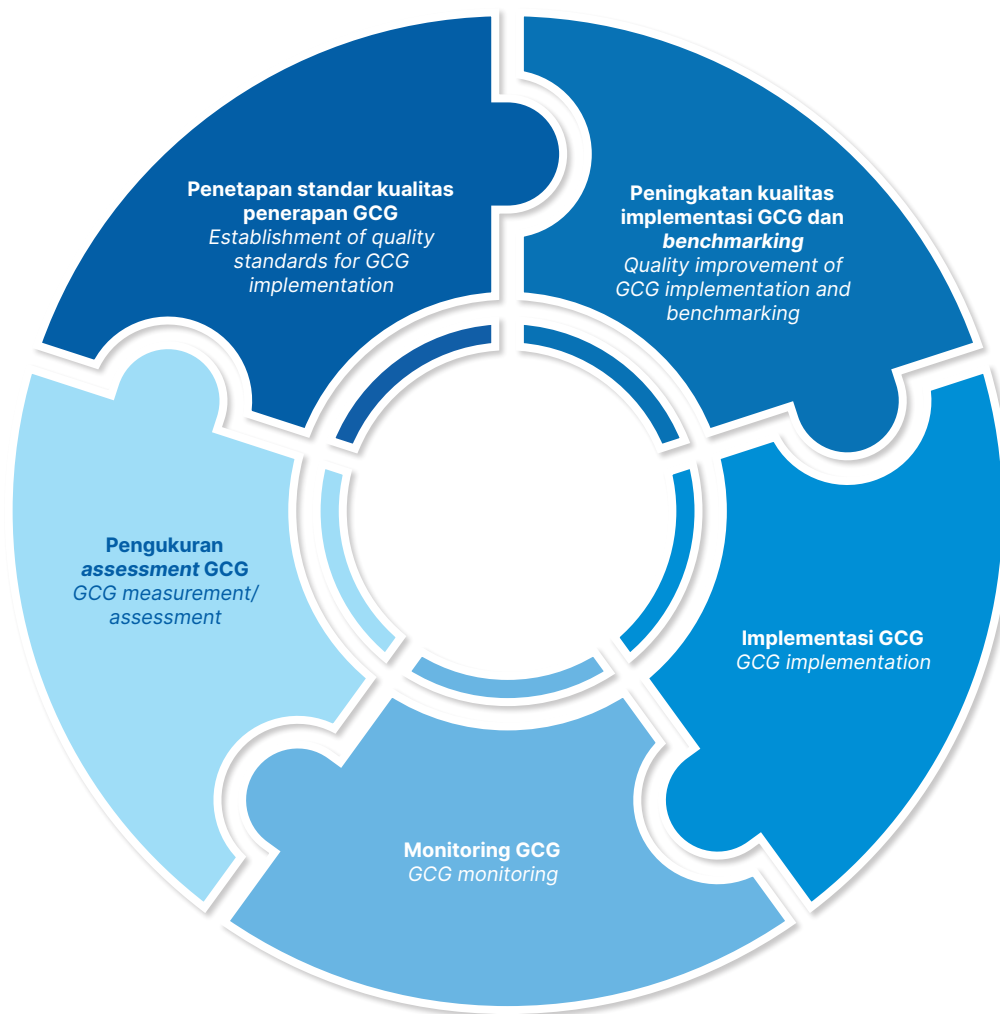
Penerapan Tata Kelola Perusahaan Secara Berkelanjutan

Implementation of Sustainable Corporate Governance

Penerapan prinsip GCG dijalankan secara konsisten dan sistematis oleh seluruh organ Perusahaan. Pelaksanaan ini diarahkan untuk memperkuat kualitas tata kelola di seluruh lingkungan Pupuk Indonesia Group. Komitmen terhadap penerapan GCG yang berkelanjutan tersebut tercermin dalam siklus penerapan sebagaimana ditunjukkan pada bagan berikut.

The application of GCG principles is carried out consistently and systematically in all Company organs to strengthen the quality of governance throughout the Pupuk Indonesia Group. This commitment to sustainable GCG implementation is reflected in the implementation cycle, as shown in the following chart.

Penerapan GCG secara Berkelanjutan
Sustainable Implementation of Good Corporate Governance



Siklus peningkatan kualitas implementasi penerapan GCG, meliputi:

1. Penetapan standar kualitas penerapan GCG, melalui penetapan Struktur Tata Kelola dan penetapan Dokumen Sistem Manajemen (DSM) yang terdiri dari Pedoman, Prosedur, dan Instruksi Kerja;
2. Implementasi GCG/GCG Proses, berupa praktik-praktik GCG meliputi aspek tata kelola dan aspek kepatuhan oleh seluruh Insan Perusahaan pada setiap aktivitas Perusahaan;

The quality improvement cycle for GCG implementation includes:

1. Establishing quality standards for GCG implementation, through the establishment of a Governance Structure and the establishment of a Management System Document (DSM), which consists of Guidelines, Procedures, and Work Instructions;
2. GCG implementation/GCG Process, in the form of GCG practices covering governance and compliance aspects by all Company Personnel in all Company activities;

3. Monitoring penerapan GCG, dilakukan secara terus-menerus oleh Dewan Komisaris dalam tupoksinya melakukan pengawasan jalannya kegiatan operasional Perusahaan yang dilakukan oleh Direksi;
4. Penilaian GCG, dilakukan setiap 2 (dua) tahun sekali sesuai ketentuan Badan Pengaturan Badan Usaha Milik Negara, guna memastikan konsistensi penerapan GCG guna mendukung keberlanjutan usaha Perusahaan;
5. Peningkatan kualitas implementasi GCG dan *benchmarking*, berdasarkan hasil pengukuran GCG diperoleh rekomendasi-rekomendasi perbaikan yang harus ditindaklanjuti untuk perbaikan penerapan GCG, dan berdasarkan hasil *benchmarking* dari perusahaan lain yang kemudian diadopsi oleh Perusahaan untuk peningkatan efektivitas dan efisiensi penerapan GCG di Perusahaan.

3. Monitoring of GCG implementation is carried out continuously by the Board of Commissioners, in its role of overseeing the Company's operational activities carried out by the Board of Directors;
4. GCG assessment is carried out every 2 (two) years in accordance with the provisions of the State-Owned Enterprise Regulatory Agency, to ensure consistent GCG implementation to support the Company's business sustainability;
5. Improving the quality of GCG implementation and benchmarking based on the results of GCG measurements, improvement recommendations obtained that must be followed up to improve GCG implementation. These recommendations are based on benchmarking results from other companies, which are then adopted by the Company to increase the effectiveness and efficiency of GCG implementation within the Company.

Standar Kualitas Penerapan Tata Kelola Perusahaan

Standar implementasi *Good Corporate Governance* (GCG) disusun sebagai pedoman utama bagi Perusahaan dalam mewujudkan visi dan menjalankan misi. Standar ini menetapkan kriteria yang ingin dicapai dari berbagai aspek penerapan GCG, sekaligus mendorong peningkatan kualitas tata kelola Perusahaan secara berkelanjutan. Penyusunan standar tersebut didasarkan pada ketentuan peraturan perundang-undangan yang bersifat wajib, masukan dari para pemangku kepentingan, hasil asesmen, serta praktik terbaik melalui *benchmarking*.

Secara khusus, standar implementasi GCG di PTPI mengacu pada Peraturan Menteri BUMN Nomor PER-2/MBU/03/2023 tanggal 3 Maret 2023 tentang Pedoman Tata Kelola dan Kegiatan Korporasi Signifikan pada Badan Usaha Milik Negara.

Internalisasi berbagai peraturan perundang-undangan dan pedoman ke dalam kebijakan internal merupakan komitmen Dewan Komisaris, Direksi, serta seluruh Insan Perusahaan dan Pupuk Indonesia Group. Komitmen tersebut tercermin dalam Visi, Misi, dan Tata Nilai Perusahaan, di mana Visi diwujudkan melalui Misi yang berlandaskan Tata Nilai Perusahaan.

Dalam mewujudkan Visi dan menjalankan Misi, Perusahaan senantiasa menerapkan prinsip-prinsip GCG yang meliputi transparansi, akuntabilitas, responsibilitas, independensi, serta kewajaran. Berlandaskan prinsip-prinsip tersebut, Perusahaan mengembangkan struktur GCG yang mencakup organ utama dan organ pendukung untuk memastikan mekanisme GCG berjalan sesuai ketentuan peraturan perundang-undangan dan praktik terbaik.

Penerapan prinsip GCG dalam seluruh kegiatan usaha diharapkan dapat mendukung terciptanya kesinambungan usaha Perusahaan dalam jangka panjang.

Quality Standards for Corporate Governance Implementation

Good Corporate Governance (GCG) implementation standards are developed as the primary guidelines for companies in realizing their vision and carrying out their missions. These standards establish the criteria to be achieved across the GCG implementation aspects, while simultaneously encouraging the continuous improvement of corporate governance. These standards are based on mandatory laws and regulations, stakeholder input, assessment results, and best practices through benchmarking.

Specifically, the GCG implementation standards at PTPI refer to the Minister of State-Owned Enterprises Regulation No. PER-2/MBU/03/2023 dated March 3, 2023, concerning Guidelines for Governance and Significant Corporate Activities in State-Owned Enterprises.

Internalizing the laws and regulations and guidelines into internal policies is the commitment of the Board of Commissioners, the Board of Directors, and all employees of the Company and the Pupuk Indonesia Group, commitment which is reflected in the Company's Vision, Mission, and Values, where the Vision is realized through a Mission based on the Company's Values.

In realizing its Vision and carrying out its Mission, the Company consistently applies GCG principles, including transparency, accountability, responsibility, independence, and fairness. Based on these principles, the Company has developed a GCG structure encompassing primary and supporting organs to ensure that GCG mechanisms operate in accordance with laws and regulations and best practices.

The application of GCG principles in all business activities is expected to support the Company's long-term business sustainability.

Perkembangan Penerapan Tata Kelola Perusahaan

Dalam rangka menindaklanjuti Peraturan Menteri BUMN Nomor: PER-02/MBU/03/2023 tentang Pedoman Tata Kelola dan Kegiatan Korporasi Signifikan BUMN, PT Pupuk Indonesia (Persero) sebagai Badan Usaha Milik Negara (BUMN) konglomerasi memiliki kompleksitas operasional dan regulasi yang tinggi sehingga terekspos risiko yang sistemik dan harus beroperasi secara hati-hati dan efisien. Untuk mendukung konglomerasi yang sehat, prudent dan berkelanjutan, maka Perusahaan menerbitkan pedoman tata kelola terintegrasi yang menaungi Pupuk Indonesia Group sebagai kelompok usaha secara terintegrasi, sehingga aktivitas operasional masing-masing entitas anggota konglomerasi dapat berjalan dengan baik dan selalu didasari prinsip-prinsip Keterbukaan, Akuntabilitas, Pertanggungjawaban, Independensi atau Profesional, dan Kewajaran. Pedoman ini merupakan penjabaran atas Kebijakan Tata Kelola Terintegrasi Konglomerasi Pupuk Indonesia Group.

Pedoman Tata Kelola Terintegrasi ini selanjutnya akan menjadi panduan bagi PT Pupuk Indonesia (Persero) selaku Entitas Induk dan seluruh Anak Perusahaan yang telah ada maupun Anak Perusahaan yang akan didirikan kemudian selaku Entitas Anak yang tergabung dalam Konglomerasi Pupuk Indonesia Group, dalam menjalankan kegiatan bisnis sehari-hari guna mendorong peningkatan kualitas penerapan tata kelola terintegrasi yang baik, menjaga keunggulan daya saing berkelanjutan, mampu menjadi perusahaan yang diterima serta dipercaya oleh pemangku kepentingan.

Penanggung Jawab Penerapan GCG

Berdasarkan Surat Keputusan Direksi PTPI Nomor 13/A/HK/E50/SK/2024 tanggal 1 Februari 2024 tentang Struktur Organisasi Direktorat Manajemen Risiko PTPI sebagaimana telah diubah dengan Surat Keputusan Direksi PTPI Nomor 92/A/HK/E0500/SK/2025 tanggal 1 Oktober 2025 tentang Struktur Organisasi Direktorat Manajemen Risiko PTPI, Kompartemen Tata Kelola & Kepatuhan ditetapkan berada di bawah Direktorat Manajemen Risiko dalam mendukung dan memastikan penerapan GCG di Perusahaan.

Developments in Corporate Governance Implementation

In response to the Minister of State-Owned Enterprises Regulation Number PER-02/MBU/03/2023 concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises (SOEs), PTPI, as a State-Owned Enterprise (SOE) conglomerate, faces high operational and regulatory complexity, exposing it to systemic risks and requiring prudent and efficient operations. To support a healthy, prudent, and sustainable conglomerate, the Company has issued integrated governance guidelines covering the Pupuk Indonesia Group as an integrated business group. This ensures the operational activities of each member entity within the conglomerate can run smoothly and consistently adhering to the Transparency, Accountability, Responsibility, Independency, Professional, and Fairness principles. These guidelines elaborate on the Integrated Governance Policy of the Pupuk Indonesia Group Conglomerate.

These Integrated Governance Guidelines serve as a guide for PT Pupuk Indonesia (Persero), as the Parent Entity, and all existing and future Subsidiaries within the Pupuk Indonesia Group Conglomerate, when carrying out their daily business activities. These guidelines aim to encourage improvements in the quality of integrated governance implementation, maintain sustainable competitive advantage, and become a company that is accepted and trusted by stakeholders.

Person in Charge of GCG Implementation

Based on PTPI Board of Directors Decree No. 13/A/HK/E50/SK/2024 dated February 1, 2024, concerning the Organizational Structure of the PTPI Risk Management Directorate, as amended by PTPI Board of Directors Decree No. 92/A/HK/E0500/SK/2025 dated October 1, 2025, concerning the Organizational Structure of the PTPI Risk Management Directorate, the PTPI Board of Directors established a Governance & Compliance Compartment under the Risk Management Directorate, responsible for supporting and ensuring GCG implementation in the Company.

Struktur Organisasi Penanggung Jawab Penerapan GCG PTPI

Person in Charge of PTPI's GCG Implementation Organizational Structure



Penilaian Penerapan GCG

Sebagai upaya memastikan kualitas penerapan tata kelola perusahaan, Perusahaan melaksanakan penilaian penerapan GCG secara berkala melalui mekanisme *assessment* yang terstruktur.

1. Penilaian Penerapan GCG berdasarkan kriteria penilaian BUMN

Untuk memastikan penerapan prinsip GCG berjalan secara konsisten dan menyeluruh, Manajemen Perusahaan melakukan penilaian atas implementasi GCG di seluruh proses bisnis dengan menggunakan kriteria penilaian yang ditetapkan oleh Kementerian BUMN (sekarang Badan Pengaturan BUMN).

2. Penilaian Penerapan GCG melalui Program Riset dan Pemeringkatan

Perusahaan mengikuti Program Riset dan Pemeringkatan *Corporate Governance Perception Index* (CGPI) yang diselenggarakan oleh lembaga independen The Indonesian Institute of Corporate Governance (IICG) bekerja sama dengan Majalah SWA.

Penilaian tambahan tersebut berfungsi sebagai pembanding sekaligus memberikan keyakinan (*assurance*) atas hasil penilaian yang telah dilakukan dengan menggunakan kriteria penilaian Kementerian BUMN (sekarang Badan Pengaturan BUMN). Sejak tahun 2018, Perusahaan secara berkelanjutan mengikuti penilaian GCG eksternal melalui program Riset dan Pemeringkatan *Corporate Governance Perception Index* (CGPI), yang diselenggarakan oleh lembaga independen The Indonesian Institute of Corporate Governance (IICG) bekerja sama dengan Majalah SWA.

GCG Implementation Assessment

To ensure the quality of corporate governance implementation, the Company conducts periodic GCG implementation assessments through a structured assessment mechanism.

1. Assessment of GCG Implementation Based on BUMN Assessment Criteria

To ensure that GCG principles are applied consistently and comprehensively, Company Management assesses the implementation of GCG across all business processes using the assessment criteria established by the Ministry of State-Owned Enterprises (now the BUMN Regulatory Agency).

2. Assessment of GCG Implementation through the Research and Rating Program

The company participates in the Corporate Governance Perception Index (CGPI) Research and Rating Program, which is organized by the independent institution The Indonesian Institute of Corporate Governance (IICG) in collaboration with SWA Magazine.

This additional assessment acts as a comparison and provides assurance on the results of the assessment conducted using the Ministry of BUMN assessment criteria (now the BUMN Regulatory Agency). Since 2018, the Company has continuously participated in external GCG assessments through the Corporate Governance Perception Index (CGPI) Research and Ranking program, conducted by the independent institution, The Indonesian Institute of Corporate Governance (IICG), in collaboration with SWA Magazine.

Penilaian Penerapan GCG PTPI

PTPI GCG Implementation Assessment

