

Assessment of Company Expectations 2025/26

Company adherence to the Expectations for EITI supporting companies

Company name	Pertamina
Sector	Oil and gas
Headquarters	Jakarta, Indonesia
Type	State-owned enterprise (SOE)
Date of submission to company (month/year)	January 2026
PREAMBLE MSG Participation	<i>Pursuant to the Guidance on the Expectations for EITI supporting companies, companies are encouraged to participate in national EITI multi-stakeholder groups (MSGs). This data is collected for information purposes.</i>
Does the company participate in a multi-stakeholder group?	Yes
If yes, indicate in which countries the company is participating in MSGs?	GABON INDONESIA
Secretariat comment on MSG participation	The Secretariat notes Pertamina's engagement in the multi-stakeholder group (MSG) in Indonesia as well as the participation of its subsidiary, Maurel & Prom, in the MSG in Gabon. The Secretariat thanks the many companies directly and indirectly participating in MSGs in EITI implementing countries and encourages supporting companies to take part in MSGs in the EITI implementing countries in which they operate.
EXPECTATION 1 Public support for the EITI	<i>Publicly declare and publish support for the EITI and the objective of the EITI Association to make the EITI Principles and the EITI Standard the internationally accepted standard for transparency in the oil, gas and mining sectors.</i>

Does the company publish a statement of support for the EITI and the objective of the EITI Association?	Yes
URL for Statement Support	Sustainability Network Webpage: https://www.pertamina.com/en/sustainability-network
Secretariat's assessment on Expectation 1	Expectation met
Secretariat comment	Statement of support published. See URL.
EXPECTATION 2 <i>Disclosures in accordance with the EITI Standard</i>	<i>Make comprehensive disclosures in accordance with the EITI Standard in all EITI implementing countries where the company or its controlled subsidiaries operate. Where not disclosed in other company reporting, publicly disclose a list of controlled subsidiaries operating in the oil, gas or mining sectors in EITI implementing countries.</i>
Does the company publish a list of controlled subsidiaries?	Yes
URL for controlled list of subsidiaries	Annual Report Landing Page: https://www.pertamina.com/en/publikasi-laporan-tahunan Annual Report 2024: https://www.pertamina.com/file/files/2025/06/pertamina-annual-report-2024-final.pdf
EITI implementing countries where the company operates.	ANGOLA GABON INDONESIA IRAQ NIGERIA TANZANIA
Does the company make disclosures in accordance with the EITI Standard or	Partial

<p>in relation to EITI implementing countries?</p>	
<p>Secretariat's assessment on Expectation 2</p>	<p>Expectation partially met</p>
<p>Secretariat comment</p>	<p>Pertamina discloses a list of controlled subsidiaries. See URL Annual Report 2024 p. 615-631.</p> <p>Pertamina is assessed as contributing to partial disclosures in EITI implementing countries in accordance with the Standard. The Secretariat has identified the following gaps in Indonesia:</p> <ul style="list-style-type: none"> - Gaps in disclosures of disaggregated information on sales of the state's in-kind revenues (Requirement 4.2). - Incomplete reporting of company payments to state-owned enterprises (SOEs), which does not fully cover payments from SOE subsidiaries, associates and joint ventures (Requirement 4.5). - A lack of analysis of the financial impact of quasi-fiscal expenditures related to Pertamina (Requirement 6.2). <p>In addition, further efforts should be considered in Gabon to ensure comprehensive disclosures of mandatory social payments, ownership structure and details, and discrepancies in employment information.</p>
<p>EXPECTATION 3 <i>Disclosure of taxes and payments in non-EITI implementing countries</i></p>	<p><i>Publicly disclose taxes and payments to governments at a project level in line with the EITI Standard in all non-EITI implementing countries where the company operates unless disclosure is not feasible. Where not feasible, the country-specific legal or practical barriers to disclosure should be publicly explained.</i></p>
<p>Does the company publicly disclose taxes and payments to governments in non- EITI implementing countries where the company operates upstream in the oil, gas and mining sectors?</p>	<p>Yes</p>
<p>URL to disclosures of taxes and payments to</p>	<p>Report on Payments to Governments 2024: https://www.pertamina.com/file/files/2025/09/report-on-payments-to-goverments-2024.pdf</p>

<p>governments in non-EITI implementing countries</p>	<p>Maurel & Prom Universal Registration Document 2024: https://www.maureletprom.fr/en/documents/download/1782/2024-universal-registration-document</p> <p>Sustainable Finance and Tax Transparency Webpage: https://www.pertamina.com/en/sustainable-finance-and-tax-transparency</p>
<p>Are the disclosures disaggregated by project?</p>	<p>Yes</p>
<p>Secretariat's assessment on Expectation 3</p>	<p>Expectation met</p>
<p>Secretariat comment</p>	<p>Pertamina discloses taxes and payments to governments in non-EITI implementing countries. See URL Report of Payments to Governments 2024 & Maurel & Prom Universal Registration Document 2024.</p> <p>The company discloses taxes and payments to governments disaggregated by project. See URL Report of Payments to Governments 2024.</p> <p>The Secretariat notes that Pertamina has confirmed that it has upstream operations in the following non-EITI implementing countries: Algeria, Malaysia, Venezuela.</p> <p>Pertamina's Report on Payments to Governments 2024 contains payments to government disclosures in Malaysia and Algeria. These payments are disaggregated to the project level. See URL.</p> <p>No taxes or payments to governments in Venezuela are disclosed for the financial year 2024. The company explains this is because the operation made a loss and thus did not accrue any tax obligations.</p> <p>The Secretariat did not verify whether project-level disaggregation in all non-EITI implementing countries was adequate, as definitions vary across jurisdictions.</p>
<p>EXPECTATION 4 Commodity trading transparency</p> <p><i>Companies buying oil, gas and/or mineral resources from the state in EITI implementing countries, disclose volumes received and payments made in line with the EITI Standard and the EITI reporting guidelines for companies buying oil, gas and minerals from governments unless disclosure is not feasible.</i></p>	

<p>Does the company buy oil, gas, and/or mineral resources from the state in EITI-implementing countries?</p>	<p>Yes</p>
<p>If yes, which countries?</p>	<p>ANGOLA DEMOCRATIC REPUBLIC OF THE CONGO GABON NIGERIA NORWAY PAPUA NEW GUINEA</p>
<p>Does the company make disclosures in line with the EITI Standard and reporting guidelines?</p>	<p>Yes</p>
<p>URL for disclosure(s)</p>	<p>Transparency Through EITI Webpage: https://www.pertamina.com/en/transparency-commitment-through-eiti</p>
<p>Secretariat's assessment on Expectation 4</p>	<p>Expectation met</p>
<p>Secretariat comment</p>	<p>Pertamina buys oil, gas and/or mineral resources from the state in EITI implementing countries.</p> <p>Company discloses information in line with EITI Standard and EITI reporting guidelines for companies buying oil, gas and minerals from governments. See URL.</p> <p>The Secretariat recommends that the company ensure comprehensive disclosure in accordance with Templates 2 and 3 of the Commodity Trading Transparency Guidelines.</p>
<p>EXPECTATION 5 Disclosure of audited financial statements</p>	<p><i>In line with the EITI Standard, publicly disclose audited financial statements, or the main items (i.e., balance sheet, profit/loss statement, cash flows) where financial statement are not available.</i></p>

Does the company disclose its audited financial statements?	Yes
URL audited financial statements	Annual Report Landing Page: https://kpi.pertamina.com/en/hubungan-investor/laporan-tahunan Annual Report 2024: https://kpi.pertamina.com//App_Data/hubunganInvestor/laporan_tahunan_doc_m3m0035y.pdf
Secretariat's assessment on Expectation 5	Expectation met
Secretariat comment	Pertamina disclose audited financial statements. See URL from p. 581.
EXPECTATION 6 <i>Beneficial ownership transparency</i>	<i>Publicly declare and publish support for beneficial ownership transparency and publicly disclose beneficial owners in line with EITI Standard, recognising that listed companies will disclose the name of the stock exchange, include a link(s) to stock exchange filings where they are listed and otherwise do what is required by applicable regulations and listing requirements.</i>
Does the company publish a statement of support for beneficial ownership transparency?	Yes
URL for statement of support for Beneficial Ownership	Transparency Through EITI: https://www.pertamina.com/en/transparency-commitment-through-eiti
Does the company disclose beneficial owners, either directly or according to stock exchange regulations and listing requirements?	Yes
Where disclosures are made according to stock exchange regulations,	N/A

please provide the name of the stock exchange	
URL to stock exchange	N/A
URL for recent beneficial ownership disclosures	Annual Report Landing Page: https://kpi.pertamina.com/en/hubungan-investor/laporan-tahunan Annual Report 2024: https://kpi.pertamina.com//App_Data/hubunganInvestor/laporan_tahunan_doc_m3m0035y.pdf
Secretariat's assessment on Expectation 6	Expectation met
Secretariat comment	<p>Pertamina publishes a statement of support for beneficial ownership transparency. See URL.</p> <p>Pertamina publicly discloses its 100% ownership by the Indonesian State.</p> <p>The 2024 Annual Report discloses information regarding its ownership by the Indonesian Government "As a closed company with the status of a State-Owned Enterprise (BUMN) (Pertamina's) entire shares (100%) are owned by the Government of the Republic of Indonesia" See URL 2024 Annual Report pgs. 47, 119. The report states this ownership is enacted through the Ministry of SOEs. See URL 2024 Annual Report pgs. 190-192.</p>
EXPECTATION 7 <i>Due diligence processes and anti-corruption policies</i>	<i>All EITI supporting companies are expected to engage in rigorous due diligence processes and publish an anti-corruption policy setting out how the company manages corruption risk, including how the company collects and takes risk-based steps to use beneficial ownership data regarding joint venture partners, contractors, and suppliers in its processes.</i>
Does the company publish an anti-corruption policy?	Yes
URL to the policy	Anti-Bribery Policy Webpage: https://www.pertamina.com/en/anti-bribery-policies

	<p>Anti-Bribery Policy 2022 (Indonesian): https://www.pertamina.com/file/files/2025/04/anti-bribery-policy-2022.pdf</p> <p>Annual Report Landing Page: https://kpi.pertamina.com/en/hubungan-investor/laporan-tahunan</p> <p>Annual Report 2024: https://kpi.pertamina.com//App_Data/hubunganInvestor/laporan_tahunan_doc_m3m0035y.pdf</p>
<p>Does the company's anti-corruption policy describe how the company manages corruption risk with regards to identification and use of beneficial ownership data?</p>	<p>Partial</p>
<p>Secretariat's assessment on Expectation 7</p>	<p>Expectation partially met</p>
<p>Secretariat comment</p>	<p>Pertamina publishes an anti-corruption policy. See URLs.</p> <p>Pertamina's anti-corruption framework partially sets out how the company manages corruption risk through the identification and use of beneficial ownership data. The framework consists of the Anti-Bribery Webpage, the Anti-Bribery Policy, and the 2024 Annual Report.</p> <p>The Anti-Bribery Webpage outlines Pertamina's commitment to prevent and prohibit bribery and links to the company's Anti-Bribery Policy. The Anti-Bribery Policy states that Pertamina identifies, evaluates, and manages bribery risks through a "Fraud Risk Assessment process" and conducts due diligence on business partners through the vendor registration, data update, and Compliance Due Diligence (CDD) processes. It includes potential actions for managing high-risk partners, such as termination, cancellation, postponement, or withdrawal from collaborations where risk cannot be mitigated.</p> <p>The policy does not indicate whether or how beneficial ownership information from counter parties is collected or used within these procedures. The 2024 Annual Report reiterates Pertamina's prohibition on corruption and bribery and lists nine measures to</p>

	<p>mitigate corruption risk, primarily relating to gifts and bribery (pp. 535–540, 946–949). The Annual Report 2024 does not reference due diligence processes or the collection or use of beneficial ownership data. The Secretariat notes that to fully meet this expectation, Pertamina should disclose how it collects and uses beneficial ownership data from counter parties as part of its anti-corruption framework.</p> <p>The Secretariat notes it is aware of an ongoing investigation launched by the Indonesian Attorney General’s office relating to alleged corruption in the management of crude oil and refinery products by Pertamina subsidiaries. The Secretariat notes there has not yet been a judgement or official finding in this case.</p> <p>Pertamina is encouraged to communicate progress in implementing their anti-corruption policies, for example, by reporting internally and externally how they enforce their anti-corruption policy and how they measure and review its effectiveness especially in light of the recent corruption investigations.</p>
<p>EXPECTATION 8 Contract transparency</p>	<p><i>Publicly declare and publish support for governments’ efforts to publicly disclose contracts and licenses that govern the exploration and exploitation of oil, gas and minerals in line with the EITI Standard, and contribute to public disclosure of contracts and licenses in EITI implementing countries consistent with government procedures.</i></p>
<p>Does the company publish a statement of support for contract transparency?</p>	<p>Yes</p>
<p>URL for statement of support for contract transparency</p>	<p>Transparency Through EITI: https://www.pertamina.com/en/transparency-commitment-through-eiti</p>
<p>Does the company contribute to public disclosure of contracts and licenses in EITI-implementing countries consistent with government procedures?</p>	<p>Partial</p>
<p>Secretariat’s assessment on Expectation 8</p>	<p>Expectation partially met</p>

<p>Secretariat comment</p>	<p>Pertamina publishes a statement of support for governments efforts to disclose contracts and licenses. See URL.</p> <p>Pertamina is assessed as partially contributing to contract disclosures in accordance with the EITI Standard. The company is encouraged to promote full disclosures of contracts in Indonesia (making full texts of contracts available) and Tanzania (contracts of subsidiaries including Maurel & Prom).</p> <p>In Indonesia specifically, Pertamina is expected to support and contribute to disclosure of contracts. This may include promoting contract transparency via participation on multi-stakeholder group (MSGs) in country.</p>
<p>EXPECTATION 9 Gender Diversity</p> <p><i>Publish a commitment and/or policy on gender diversity in the oil, gas or mining sectors and support reporting by EITI implementing countries under the EITI Standard by disclosing employment in the sectors disaggregated by gender.</i></p>	
<p>Does the company publish a commitment/policy on gender diversity?</p>	<p>Yes</p>
<p>URL for commitment/policy on gender diversity</p>	<p>Sustainability Policy: https://www.pertamina.com/en/pertamina-sustainable-policy</p>
<p>Does the company disclose employment data disaggregated by gender?</p>	<p>Yes</p>
<p>URL for gender disaggregated employment data</p>	<p>Sustainability Report Landing Page: https://www.pertamina.com/en/sustainability-reports</p> <p>Sustainability Report 2024: https://www.pertamina.com/file/files/2025/06/sustainability-report-pt-pertamina-persero-2024-2.pdf</p> <p>Link from Pertamina: https://pertaminastorage.blob.core.windows.net/file/2025/06/sustainability-report-pt-pertamina-persero-2024-2.pdf?sv=2025-01-05&st=2025-07-04T12%3A55%3A44Z&se=2025-07-05T13%3A00%3A44Z&sr=b&sp=r&sig=MbclgdwTokpw4VjU8EB6XGF7Z%2BfbgtX%2BvXlx7UYjeEs%3D</p>

Secretariat's assessment on Expectation 9	Expectation met
Secretariat comment	<p>Pertamina publish a commitment or policy on gender diversity in its 2024 Sustainability Report. See URL pgs. 165, 169.</p> <p>Pertamina publish employment data disaggregated by gender. See URL Sustainability Report pgs. 153, 155 & 157, 171, 172, 173. The employment data is further disaggregated by occupational level.</p> <p>Pertamina disclose information on the company's gender pay gap. See URL pg. 174.</p>