

**PT Gudang Garam Tbk has direct and indirect ownership in the following subsidiaries:**

| Entity's name  | Principal Activities                 | Year commenced commercial operations | Percentage of ownership |
|--|--------------------------------------|--------------------------------------|-------------------------|
| <b>Directly-owned</b>                                |                                      |                                      |                         |
| PT Surya Pamenang                                    | Paper Industry                       | 1993                                 | 99,99% (a)              |
| PT Surya Madistrindo                                 | Trading                              | 2004                                 | 99.99% (a)              |
| PT Surya Air   | Non-scheduled Air Transport Services | 2011                                 | 99.99% (a)              |
| PT Graha Surya Media                                 | Entertainment Services               | 2013                                 | 99.99% (a)              |
| PT Surya Inti Tembakau                               | Tobacco Processing Industry          | 2018                                 | 100.00% (c)             |
| PT Surya Abadi Semesta                               | Electrical Cigarettes Industry       | (b)                                  | 99.99% (a)              |
| Galaxy Prime Ltd.                                    | Non-scheduled Air Transport Services | 2015                                 | 100.00%                 |
| PT Surya Dhoho Investama                             | Investment                           | (b)                                  | 99.99% (a)              |
| Prime Galaxy Ltd.                                    | Non-scheduled Air Transport Service  | (b)                                  | 100.00%                 |
| <b>Indirectly-owned through PT Surya Madistrindo</b> |                                      |                                      |                         |
| PT Surya Andalas Perkasa                             | Trading                              | 2009                                 | 99.99%(a)               |
| PT Surya Babel Perkasa                               | Trading                              | 2009                                 | 99.97% (a)              |
| PT Surya Celebes Perkasa                             | Trading                              | 2009                                 | 99.99% (a)              |
| PT Surya Indo Khatulistiwa                           | Trading                              | 2009                                 | 99.98% (a)              |
| PT Surya Kaltim Perkasa                              | Trading                              | 2009                                 | 99.98% (a)              |
| PT Surya Lampung Perkasa                             | Trading                              | 2009                                 | 99.99% (a)              |
| PT Surya Masaindah Perkasa                           | Trading                              | 2009                                 | 99.95% (a)              |
| PT Surya Minahasa Perkasa                            | Trading                              | 2009                                 | 99.99% (a)              |

|   |                  |      |            |
|---|------------------|------|------------|
| PT Surya Printis Riau Perkasa                 | Trading          | 2009 | 99.99% (a) |
| PT Surya Sriwijaya Perkasa                    | Trading          | 2009 | 99.99% (a) |
| PT Surya Lombok Perkasa                       | Trading          | 2009 | 99.96% (a) |
| PT Surya Bima Perkasa                         | Trading          | 2009 | 99.96%(a)  |
| PT Surya Kerbaumas Perkasa                    | Trading          | 2009 | 99.95%(a)  |
| PT Surya Raharja Perkasa                      | Trading          | 2009 | 99.98% (a) |
| PT Surya Mandala Perkasa                      | Trading          | 2010 | 99.97% (a) |
| PT Surya Papua Perkasa                        | Trading          | 2010 | 99.98%(a)  |
| PT Surya Abadi Nusantara                      | Trading          | (b)  | 99.00%     |
| PT Surya Abadi Pertiwi                        | Trading          | (b)  | 99.90% (a) |
| Indirectly-owned through PT Graha Surya Media |                  |      |            |
| PT Surya Wisata                               | Tourism Industry | 1988 | 99.99%(a)  |

(a) 100% less 1 (one) share.

(b) Have not commenced its commercial operations.

(c) 1 (one) share is owned through PT Surya Madistrindo.