



Perihal: Laporan Keterbukaan Informasi PT Surya Citra Media Tbk (“Perseroan”) sesuai dengan Peraturan OJK No. 31/POJK.4/2015

Re. : Disclosure of Information of PT Surya Citra Media Tbk (“Company”) in accordance with OJK Rule No. 31/POJK.4/2015

Dalam rangka memenuhi ketentuan Peraturan OJK No. 31/POJK.4/2015 tentang Keterbukaan Informasi Emiten tertanggal 16 Desember 2015 (“POJK 31”) Pasal 6 huruf (p), Perseroan dengan ini memberitahukan bahwa pada tanggal 12 Juli 2016, Perseroan telah menerima Memori Peninjauan Kembali (“Memori PK”) sehubungan dengan perkara gugatan Perseroan terhadap Direktorat Jenderal Pajak Republik Indonesia (“DJP”), terkait dengan Keputusan Direktorat Jenderal Pajak No. KEP-2630/WPJ.07/2013 tertanggal 13 Desember 2013 perihal Penolakan Penggunaan Nilai Buku Atas Pengalihan Harta Dalam Rangka Penggabungan Usaha (“DJP Kep 2630”).

In order to comply with OJK Rule No. 31/POJK.4/2015 regarding Disclosure of Information of Issuer, dated December 16, 2015 (“POJK 31”) Article 6 letter (p), the Company hereby announces that on July 12, 2016, the Company had received the Memory of Civil Review Petition (“Memori PK”) in connection with Company’s lawsuit against the Directorate General of Taxation of the Republic of Indonesia (“DGT”), related to the decision of the Directorate General of Taxation No. KEP-2630/WPJ.07/2013 dated December 13, 2013 regarding the Rejection to Implement Net Book Value On The Assets Transferred In Relation To the Merger (“DGT Decision Letter 2630”).

Adapun keterangan mengenai perkara hukum yang dihadapi oleh Perseroan yaitu sebagai berikut:

Details of the legal proceedings involving the Company are as follows:

- a) Jenis perkara hukum: Perpajakan (Peninjauan Kembali terhadap Putusan Pengadilan Pajak sehubungan dengan perkara Gugatan Perseroan terhadap DJP, terkait dengan DJP Kep 2630);
- b) Pihak yang berperkara: Perseroan melawan Direktorat Jenderal Pajak Republik Indonesia;
- c) Lokasi perkara: Jakarta;
- d) Status dan keterangan mengenai perkara hukum:

- a) Type of legal proceeding: Taxation (Civil Review Petition regarding the Tax Court Award in relation with Company’s lawsuit against the DGT related to DGT Decision Letter 2630);
- b) Parties: the Company against the Directorate General of Taxation of the Republic of Indonesia;
- c) Location: Jakarta;
- d) Status and details of the legal proceeding:

Sebagaimana telah disampaikan dalam Keterbukaan Informasi Perseroan tertanggal 15 Januari 2014, Perseroan telah mengajukan gugatan terhadap DJP sehubungan dengan DJP Kep 2630 melalui Pengadilan Pajak dan Pengadilan Tata Usaha Negara (“Gugatan”).

Pursuant to the Disclosure of Information dated January 15, 2014, the Company has announced that it has filed a lawsuit against DGT with regard to the DGT Decision Letter 2630 to the Tax Court and State Administrative Court (“Lawsuit”).



Dalam proses persidangan melawan DJP tersebut, Majelis Hakim Pengadilan Tata Usaha Negara dalam Sidang tanggal 3 Juli 2014 telah memutuskan dan memenangkan Perseroan ("Putusan Pengadilan Tata Usaha Negara"). Lebih lanjut, Majelis Hakim Pengadilan Pajak dalam Putusannya No. 54110/PP/M.XIVB/99/ 2014 yang dibacakan dalam Sidang tanggal 16 Juli 2014 ("Putusan Pengadilan Pajak") juga memenangkan Gugatan Perseroan dan menyatakan batal DJP Kep 2630 serta memerintahkan DJP untuk menerbitkan keputusan yang menyetujui permohonan Perseroan untuk menggunakan nilai buku atas pengalihan harta dalam rangka penggabungan usaha Perseroan dan PT Indosiar Karya Media Tbk.

In regard to the said legal proceedings against the DGT, the Panel of Judges of the State Administrative Court in the Hearing Session on July 3, 2014 decided in favor of the Company ("Administrative Court Award"). Furthermore, the Panel of Judges of the Tax Court, in its Decision No. 54110/PP/M.XIVB/99/2014 ("Tax Court Award"), which was read in the Hearing Session on July 16, 2014, also decided in favor of the Company, thereby annulling the DGT Decision Letter 2630 and ordering the DGT to issue its approval on the Company's application to implement the net book value on the assets transferred in relation to the merger between the Company and PT Indosiar Karya Media Tbk.

Pada tanggal 18 September 2014, DJP mengajukan banding ke Pengadilan Tinggi Tata Usaha Negara dan Perseroan menerima pemberitahuan banding pada tanggal 22 September 2014. Perseroan menyampaikan tanggapannya terhadap memori banding ke Pengadilan Tinggi Tata Usaha di Jakarta pada tanggal 17 Oktober 2014. Pada tanggal 20 November 2014, Perseroan menerima keputusan Majelis Hakim Pengadilan Tinggi Tata Usaha Negara Nomor 268/B/2014/PT.TUN.JKT tanggal 23 Oktober 2014 ("Putusan Banding") yang menguatkan dan menegaskan kembali Putusan Pengadilan Tata Usaha Negara.

On September 18, 2014, DGT filed an appeal to the State Administrative High Court and the Company received the appeal notice on September 22, 2014. The Company submitted its response to the appeal to the State Administrative High Court in Jakarta on October 17, 2014. On November 20, 2014, the Company received the decision of the Panel of Judges of the State Administrative High Court No. 268/B/2014/PT.TUN.JKT dated October 23, 2014 ("Appeal Award"). The Appeal Award, which was in favor of the Company, reaffirmed the Administrative Court Award.

Atas Putusan Banding tersebut, DJP kemudian mengajukan kasasi ke Mahkamah Agung pada tanggal 6 Januari 2015 dan Perseroan menerima pemberitahuan kasasi dan memori kasasi pada tanggal 15 Januari 2015. Perseroan menyampaikan kontra memori kasasi pada tanggal 28 Januari 2015. Berdasarkan Putusannya No. 186K/TUN/2015 tertanggal 8 Juni 2015, Majelis Hakim Mahkamah Agung menyatakan menolak permohonan kasasi yang diajukan oleh DJP.

DGT later filed an appeal to the Supreme Court on January 6, 2015 in regard to the Appeal Award and the Company received the appeal notice on January 15, 2015. The Company submitted its response to the appeal on January 28, 2015. Pursuant to its Decision No. 186K/TUN/2015 dated June 8, 2015, the Panel of Judges of the Supreme Court rejected the appeal submitted by DGT.

Pada tanggal 29 Januari 2015, sebagai pelaksanaan Putusan Pengadilan

On January 29, 2015, as the implementation of the Tax Court Award No. PUT.54110/PP/



Pajak PUT.54110/PP/M.XIVB/99/2014, DJP menerbitkan: (1) Surat Keputusan No. KEP-231/WPJ.07/2015 tentang Pembatalan dan Pencabutan Surat Keputusan Direktur Jenderal Pajak No. KEP-2630/WPJ.07/2013 tentang Penolakan Penggunaan Nilai Buku atas Pengalihan Harta dalam Rangka Penggabungan Usaha, yang berlaku efektif sejak tanggal diterbitkannya surat keputusan tersebut, dan (2) Surat Keputusan No. KEP-232/WPJ.07/2015 tentang Persetujuan Penggunaan Nilai Buku atas Pengalihan Usaha dalam rangka Penggabungan Usaha, yang berlaku surut sejak 1 Mei 2013.

M.XIVB/99/2014, DGT has issued to the Company the following decision letters: (1) Decision Letter No. 231/WPJ.07/2015 concerning Cancellation and Revocation of Director General of Tax Decision Letter No. KEP-2630/WPJ.07/2013 regarding Rejection to Implement Net Book Value On The Assets Transferred In Relation To The Merger, effective as of the date of the decision letter, and (2) Decision Letter No. 232/WPJ.07/2015 concerning Approval for Implementing the Net Book Value on the Assets Transferred in Relation to the Merger, effective from May 1, 2013.

Pada tanggal 12 Juli 2016, Perseroan telah menerima Memori Peninjauan Kembali yang diajukan oleh DJP ke Mahkamah Agung terhadap Putusan Pengadilan Pajak. Perseroan saat ini sedang mempersiapkan tanggapan berupa Kontra Memori Peninjauan Kembali.

On July 12, 2016, the Company received the Memory of Civil Review Petition filed by DGT to the Supreme Court in response to the Tax Court Award. The Company is currently in the process of preparing the response.

Perseroan akan melaksanakan setiap upaya yang diperlukan untuk melindungi hak-hak hukum Perseroan dan seluruh pemangku kepentingan Perseroan. Putusan-Putusan sebelumnya yang telah dikeluarkan oleh Mahkamah Agung, Pengadilan Tinggi Tata Usaha Negara, maupun Pengadilan Pajak yang memenangkan Perseroan adalah bukti bahwa Perseroan memiliki posisi hukum yang kuat dalam perkara ini.

The Company will perform all necessary actions to protect its legal rights and to also protect the interests of all its stakeholders. The earlier Awards of the Supreme Court, State Administrative High Court and the Tax Court in favor of the Company are evidence that the Company has a strong legal position in this tax dispute.

Demikian keterbukaan informasi dan pemberitahuan ini disampaikan.

Please be informed accordingly of this disclosure of information and announcement.