

Overview Fair Advertising and Responsible Marketing Policy

Objectives

This document serves as a summary and overview policy of Bank Mandiri's advertising and marketing practices, broader commitments, and supporting information from relevant units. Its purpose is to provide a comprehensive understanding of Bank Mandiri's marketing and advertising practices, ensuring they align with principles of compliance, consumer protection, transparency, and ethical communication.

This document served as a guideline for the Bank Mandiri's marketing communication activities for products and services. In addition, this policy is intended to ensure that the implementation and governance of marketing communication activities for products and services comply with regulatory provisions and applicable laws.

Scope

This document provides Bank Mandiri's practices in governing end-to-end marketing communication activities for products and services, covering planning, implementation, monitoring and evaluation, and other provisions including risk mitigation, documentation, administration, and reporting. This policy applies to all Bank Mandiri Units that carry out marketing communication activities for products and services in Indonesia and may also be used as a reference by Bank Mandiri Work Units abroad.

Advertising and Marketing Commitments

Bank Mandiri commit to the following in our marketing practices:

- **Accuracy and Transparency of Information**

As part of its commitment to maintain public trust, Bank Mandiri ensures that all marketing materials and advertisements contain accurate, complete, and verifiable information.

- **Accuracy of Information**

All information presented to consumers must be free of errors, including regarding benefits, costs, risks, or expected outcomes from the promoted product or service. This includes the use of superlative terms, which can only be used if supported by valid evidence.

- **Transparency About Risk**

Any information of products and services must clearly state the potential risks and consequences associated with using the promoted product or service. If there are potential risks that could affect consumers—such as additional costs, inconveniences, or other issues—this information must be communicated transparently and in an understandable manner.

- **Supporting Documentation**

Every claim made in marketing materials must be supported by documents or evidence. Bank Mandiri ensures that all advertisements or promotions materials undergo review and approval of authority holder based on internal marketing communication policy.

- **Target Audience**

Bank Mandiri is committed to ensuring that all advertisements and communications are marketed to the right audience. Each product or service has specific characteristics and benefits, which means marketing materials must be tailored to the needs, interests, and demographic profiles of the target audience.

 - **Message Delivery**

In delivering messages to the right audience, Bank Mandiri ensures that the marketing material is not only relevant but can be understood easily by the target audience. This includes using terms appropriate to the audience's level of understanding and avoiding jargon that could confuse consumers.
 - **Avoiding Overpromising or Unfulfillable Claims**

Bank Mandiri commits to refraining from making excessive claims or promises that cannot be fulfilled.
 - **Ongoing Evaluation and Adjustment**

To ensure marketing materials remain relevant to the right audience, Bank Mandiri conducts ongoing monitoring and evaluation of communication effectiveness. This includes analyzing marketing data to ensure that products and services are promoted effectively to the right segments.
- **Adherence Personal Data Protection**

In carrying out this commitment, Bank Mandiri also follows such as respecting consumer privacy, not using personal data for marketing purposes without explicit consent and ensuring that all marketing practices are conducted in a manner that does not exploit or harm consumers.

Advertising and Marketing Communication Guideline

The marketing policy regulates consumer protection on how information is conveyed in advertisements across various media, including print media, digital media, electronic media, outdoor media, promotional media, or any other similar platforms. Advertisements must meet the following criteria:

- **Accurate Information**
 - *Superlative Terms*

Advertisements using superlative words such as “best,” “number one,” “only,” “top,” or terms that imply superlative meaning must provide verifiable evidence or sources. This is to maintain consumer and/or public trust in the industry.
 - *Past Performance and Performance Projections*
 - Advertisements that include past performance must state that past performance does not guarantee future performance.
 - Information related to performance projections can only be used in advertisements if relevant and well-supported to avoid misleading consumers. Methods that produce good performance in one industry may not apply to others.
 - Advertisements presenting performance projections must include a disclaimer that the projections are not guaranteed, so consumers are aware of the risks that the actual benefits may differ from those projected.

- *Use of Research Data*
 - Research data should not be manipulated or presented in a misleading way that could deceive consumers.
 - Advertisements that include research data must provide the source, including the title of the research, the organization conducting the research, and the time of the research (at least the month and year).
 - Research sources must be independent and credible (internal data cannot be used).
- **Complete Information**

Provide and/or deliver accurate information regarding products and/or services, including their benefits, costs, and risks. This information should be communicated during marketing activities, when making agreements with consumers, and/or if there are changes when consumers use the products or services. The information should be backed by follow-up actions and supporting documentation.
- **Understandable Information**
 - **Easy-to-Understand Language**

Advertisements must use language that is easily understood by consumers and/or the public, in accordance with the General Guidelines for Indonesian Spelling and/or the Indonesian Dictionary (KBBI).
 - **Completeness of Information and Inclusion of Links**

The specific terms and conditions related to the advertised products and/or services must be included in the advertisement. Consumers must be given access to information about the benefits, costs, risks, as well as the terms and conditions of the advertised products and/or services, so they can make informed decisions regarding the use of the advertised products and/or services.

Key terms and/or conditions that may invalidate promises made in the advertisement must be written in the advertisement. Other information can be included in the form of specific links that direct to the relevant information. This information may be provided through a link, QR code, or a special contact that leads directly to that information, such as:

 - Links such as "For more information, visit bmri.id/promo" or a QR code must lead directly to a page containing benefits, costs, risks, and terms and conditions.
 - For contact information in advertisements, the contact provided must be specifically for information related to the advertised product/service and/or capable of providing adequate explanations about benefits, costs, risks, and terms and conditions.
 - Specific links in social media advertisements must be included in the caption with the correct and complete URL.
 - **Statement in Every Advertisement: "Terdaftar dan diawasi oleh Otoritas Jasa Keuangan" (or "Registered and Supervised by the Financial Services Authority") and special relate to payment system, Statement Advertisement: "Terdaftar dan diawasi oleh Bank Indonesia" (or "Registered and Supervised by the Bank Indonesia")**

The statement "Terdaftar dan diawasi oleh Otoritas Jasa Keuangan" (or "Registered and Supervised by the Financial Services Authority") must be written horizontally.

- **Money-Back Guarantee**

If an advertisement promises a money-back guarantee for a product purchase and/or service use, the conditions for the refund must be clearly and fully stated, including the types of conditions that must be met and the duration for the refund.
- **Availability of Prizes**

Advertisements promising certain prizes, whether through direct prizes, sweepstakes, or contests, are prohibited from stating “while supplies last” or similar phrases. The advertisement must clearly and fully state the eligibility criteria, duration, date of the drawing, the number of prizes provided by the financial services institution (POJK), the timeframe for awarding prizes, the types of prizes, and how the prizes will be distributed.
- **Non-Deceptive Information and Suitability for Target Audience**
 - **Use of the Word "Free"**

Advertisements may only use the word “free” or other similar terms if the promise can be obtained without any prior effort by the consumer. If obtaining it requires the consumer to take certain actions and/or pay a fee, it should be considered a gift.
 - **Testimonials and Recommendations**
 - Testimonials and recommendations may only be made on behalf of individuals, not representing an institution, group, or the general public. Personal testimonials represent individual opinions, so if they are made on behalf of an institution, group, or the public, written consent from all members is required.
 - Consumer testimonials must be substantiated with a written statement signed by the consumer, including their identity and address, to ensure they understand and consent to the use of their statement in the advertisement.
 - Advertisements containing consumer testimonials or information from famous figures, celebrities, or media commentators must accurately represent the actual experience and be presented honestly, without exaggeration, and should only include reasonable opinions about the product and/or service.
 - **Adherence to Procedure and Non-Deceptive Offers**
 - Advertisements promising fast and instant processes must follow the applicable standard procedures.
 - Advertisements must clearly state when offering multiple products and/or services with specific benefits that stand alone and cannot be combined.
 - **Objective Information**

The objective of the message should align with the target audience.

Oversight Mechanism

Bank Mandiri has established a comprehensive oversight mechanism of fair marketing that comprises the Board of Directors, the management, and the execution level.

The Board of Directors provides strategic oversight and ensures all marketing communications align with legal requirements, industry best practices, and internal guidelines. At the management level, the Digital Marketing Group (DGM) supervises and reviews marketing content for compliance with internal brand guidelines and external regulations (e.g., POJK requirements). The review process includes evaluating aesthetic quality (handled by designers) and ensuring compliance with financial consumer protection

regulations (reviewed by Department Heads and above). Additionally, marketing budgets follow a tiered approval structure, from Group Head level to Board-level approval.

The execution level ensures continuous monitoring and evaluation of marketing practices. Marketing teams track campaign effectiveness, gather customer and market feedback, and adjust strategies accordingly. Oversight extends to outsourced marketing activities and third-party platforms, ensuring compliance with the Bank's advertising standards. The evaluation process assesses whether marketing communications provide clear and accurate product information and offers recommendations for strategic improvements. External partners involved in marketing undergo periodic performance reviews to ensure alignment with ethical advertising principles.

During execution, the marketing initiating institution shall organize monitoring of the marketing operations of corresponding institution, the outsourcing agency and the marketing platform, collect, sum up and analyze the feedback of customers and the market, track execution effect, and fully perceive the changes in the internal and external environments.

The marketing initiating institution shall dynamically adjust and optimize the contents, channels and forms of marketing based on the feedback obtained from execution monitoring, with the goal of improving customer experience and protection.

- **Monitoring**

Monitoring is conducted on the implementation of activities that have been carried out, either directly by the Bank Mandiri Unit or by another party appointed to carry out the activities on a regular basis.

- **Evaluation**

The evaluation process is carried out to:

- Assess the effectiveness of the marketing communication activities for products and services.
- Provide recommendations to the work units at Bank Mandiri, along with an action plan for improvements in the strategy, planning, and implementation of future marketing communication activities for products and services.
- Evaluate external parties who are collaborating with Bank Mandiri in the marketing communication activities.

Training Requirement

Bank Mandiri provides a wide range of marketing-related training programs through Mandiri University (MUG), its dedicated internal training group. These programs include topics such as digital marketing, analytics, integrated strategies, and consumer communication. Additionally, consumer protection training is delivered via e-learning, internal campaigns, and surveys to enhance awareness and compliance. To ensure every customer receives accurate information, all relevant employees (marketing personnel) are mandated to complete annual training on financial products and services, as well as regular refresher courses. Regular assessments are conducted to ensure training effectiveness, foster fair marketing practices, and strengthen employees' skills in responsible marketing and consumer protection.