

Gratuity Policy And Anti-Bribery Management PT Bank Mandiri (Persero) Tbk.

Gratification Policy

Gratification control is a pivotal activity to maintain business processes in line with business ethics that uphold the value of integrity. To that end, Bank Mandiri has in place the Operating Technical Guideline of Gratification Control that regulates the prohibition on receiving gratuity for all Bank Mandiri employees.

In addition, gratification control aims at building the values of GCG and embed integrity values for all employees, thereby, in carrying out daily business activities with customers, vendors, partners and all stakeholders, it's always based on ethics, mutual trust, and to be responsible. As such, business interests continue to perform well and ethically but do not conflict with the provisions on the prohibition of gratuity. Currently, Bank Mandiri strives to make continuous improvements in the implementation of its gratification controls.

Anti-Bribery Management System

To continuously foster Gratification Control program, specifically on anti-bribery that in line with the ISO 37001:2016 Standard of Anti-Bribery Management System, Bank Mandiri has stipulated the following matters :

1. Prohibits bribery practices and its kinds in the company's environment
2. Compliance with laws and regulations and other prevailing rules related to anti-bribery
3. Align the anti-bribery policies with the company's objectives
4. Corporate governance that fosters the achievement of antibribery goals
5. Commitment to fulfil the requirements of Anti-Bribery Management System
6. Promote the improvement of anti-bribery awareness to related stakeholders
7. Carry out sustainable improvement principles in the Anti-Bribery Management System
8. Provide responsibility, authority, and independency to Anti- Bribery Compliance Functions
9. Sanctions to the violators of the rules in the Anti-Bribery Management System.

Bank Mandiri has received ISO 37001:2016 Certificate of Anti-Bribery Management System for the scope of Procurement & Vendor Management since 10 August 2020 and addition of Internal Audit Process scope, thereby it changed to become Procurement, Vendor Management and Internal Audit Process since 20 September 2022.

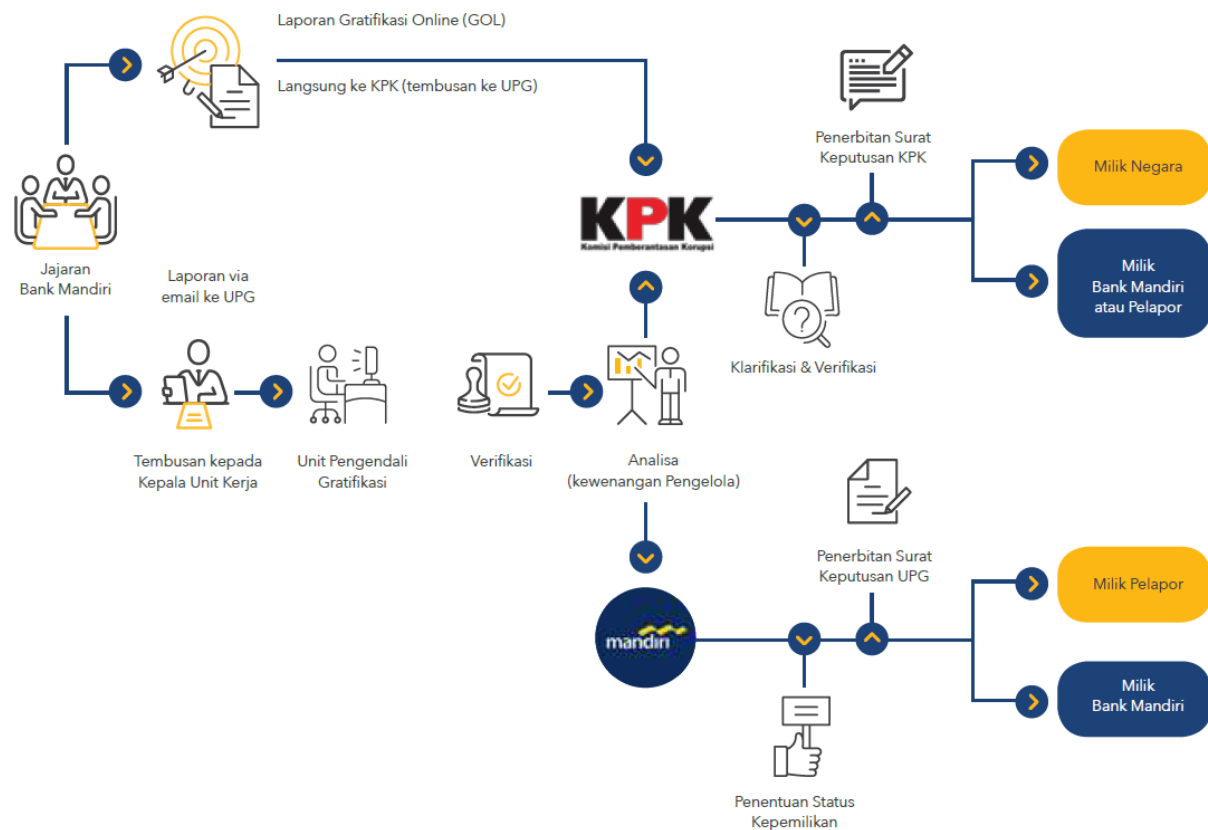
Gratification Control Management

The Organization Structure of Gratification Control Unit (UPG) is managed by the Compliance Unit, namely the Compliance & AMLCFT Group. The UPG is established according to the Board of Directors Decree No. KEP.DIR/64/2021 dated 8 December 2021, and renewed by the Board of Directors Decree No. KEP.DIR/64/2021 dated 8 December 2021.

The UPG functions to control gratuities within Bank Mandiri, which in carrying out their duties are assisted by Senior Operational Risk (SOR) and Regional Business Control (RBC) – Anti Money Laundering Officer (AMLO).

Gratification Reporting Mechanism

Bank Mandiri has a gratification reporting mechanism that is adjusted to the KPK reporting mechanism, with the following charts :



Socialization of Gratification Policy

Socialization related to gratification control was carried out continuously to all levels of organization to increase awareness where in its implementation the UPG coordinated with RBC-AMLO. The socialization is carried out directly to the Working Units at Head Office, Regional Offices, Branch Offices and through regular ODP/SDP/BBMC.

During 2022, socialization has been carried out to Bank Mandiri employees, third parties (vendor meetings), and benchmark visits from Subsidiary Companies online.

Other media used in disseminating gratification control policies are :

1. Installation of Gratification Control Posters on email blasts, screen savers, home pages of internal websites of Bank Mandiri employees, Mandiri Magazine, Plaza Mandiri elevator hallways and the display of gratification control videos in the elevators of Bank Mandiri office buildings, as well as displays of gratification items on the display cabinet of gratuities in the south lobby of Plaza Mandiri.
2. Invite all Bank Mandiri partners/vendors not to provide gratuities related to religious celebrations through the media of national newspapers and Bank Mandiri’s social media (Bank

Mandiri's Instagram Story, Twitter, and Facebook), as well as Memorandums and Letters to the Board of Commissioners, Directors and Employees of Bank Mandiri at the Head Office and Regionals and Subsidiaries.

Gratification Reports In 2022

Bank Mandiri employees who accept/reject gratuities are required to report their acceptance/refusal directly to the KPK via the GOL (Gratifikasi Online) with the address <http://gol.kpk.go.id> application or via UPG using the email upg@bankmandiri.co.id.

During 2022, the number of reports of acceptance/refusal of gratuities received by the UPG was 81 reports. The reported gratuities included bribery, perishable food/goods, and honorarium in official circumstances.