

Whistleblowing System - Letter to CEO (WBS – LTC) PT Bank Mandiri (Persero) Tbk.

To maintain and improve the reputation of the Bank and in line with the second pillar of the Anti-Fraud Strategy (SAF), the detection pillar, risk control facilities and systems are needed and carried out through the Whistleblowing System (WBS) mechanism. Bank Mandiri has provided a reporting facility for complaints of violations called Whistleblowing System - Letter to CEO (WBS-LTC). WBS-LTC aims to detect acts of fraud or indications of fraud, encourage awareness and concern for all employees and improve the company’s reputation to stakeholders.

The management of WBS-LTC reports acceptance and administration is carried out by an independent third party to provide a safe-environment that encourages employees and stakeholders to report acts of fraud or indications of fraud. The types of fraud reported include fraud, deception, embezzlement of assets, leakage of information, banking crimes, corruption crimes, and other actions that can be equated with fraud in accordance with the provisions of laws and regulations, as well as actions that categorised as breaches of employee disciplinary regulation of Bank Mandiri. In addition to reporting acts of fraud or indications of fraud, WBS-LTC can also be used to report violations of norms and ethics as well as violations of respectful workplace policy.

Development of Whistleblowing System - Letter to CEO (WBS-LTC)

The development and improvement of WBS-LTC continues to be carried out to continuously improve the effectiveness of its implementation. In 2023 improvements have also been made, with the following details:

2019	2020	2021	2022	2023
<ul style="list-style-type: none"> An identity of the whistleblower is a must For employees only Media only through mail, email and SMS WBS-LTC is managed by internal parties 	<ul style="list-style-type: none"> It is allowed not to include the identity of the whistleblower Vendors can report Media Reporting plus WBS-LTC website WBS-LTC reports include fraud reports/ indications of fraud WBS-LTC is managed by internal parties 	<ul style="list-style-type: none"> WBS-LTC management involves independent parties The reporting party comes from internal or external parties The whistleblower can provide full identity or anonymous (identity is only known to independent parties) Media reporting: SMS/ WA, email, website and mail Broader WBS-LTC reports include fraud/ indication, non-fraud reports and inputs/ ideas for business process improvement 	<ul style="list-style-type: none"> Bank Mandiri's cooperation agreement (PKS) with KPK No. 83 of 2021, No. Dir.PKS/6/2021 dated 2 March 2021 concerning the handling of complaints in an effort to eradicate criminal acts of corruption signed by the Director of Compliance & Human Resources Strengthening the implementation of the LTC WBS program for members of financial conglomerates 	<ul style="list-style-type: none"> Bank Mandiri has been able to access the KPK Whistleblowing System (KWS) application to report Corruption Crimes (TPK)

Purposes and Objectives of WBS-LTC

The WBS-LTC program as one of the Anti-Fraud Strategy (SAF) programs, aims to :

1. Detecting indications or acts of fraud with the reports of Bank Mandiri employees or third parties, which can be submitted by clearly stating their identity or anonymous, which can then be carried out an investigation process or follow-up actions.

2. Encouraging awareness or concern of all employees to participate in protecting their work units from losses due to fraud, hence to improve the quality of supervision, and to elevate the sense of belonging of employees
3. Improving the company's reputation with stakeholders particularly in the context of Corporate Governance that will improve the company's image as it has adequate anti-fraud equipment.

WBS-LTC Management

The management of WBS-LTC engages the independent third party, which aims, among others, to :

1. Be Independent and professional.
2. Minimize the risk of conflict of interest.
3. Provide a sense of security for the whistleblower.
4. Increase stakeholder trust in WBS-LTC management.
5. The whistleblower can monitor the status of the followup to the WBS-LTC report being submitted.

Reporting Media

Bank Mandiri has provided reporting media for acts or indications of fraud and/or non-fraud that can harm the customers and Bank Mandiri as follows:

Website:

<https://bmri-wbsltc.tipoffs.info/>

Email:

bmri-wbsltc@tipoffs.info

Letter:

PO BOX 1007 JKS 12007

SMS and WA:

0811-900-7777

Confidentiality of Whistleblowers

As Bank Mandiri's commitment to maintaining the confidentiality of reporting data, the Bank provides:

1. Guarantee on the confidentiality of the whistleblower identity.
2. Guarantee for the confidentiality of the contents of the report submitted by the whistleblower.

Protection for Whistleblowers

Protection of Employees who submit reports containing information related to disciplinary violations and breaches of applicable stipulations/regulations, as long as the information submitted by the Employee is true, according to the facts and does not constitute a false report including no involvement of the whistleblower.

Types of Violations that can be Reported

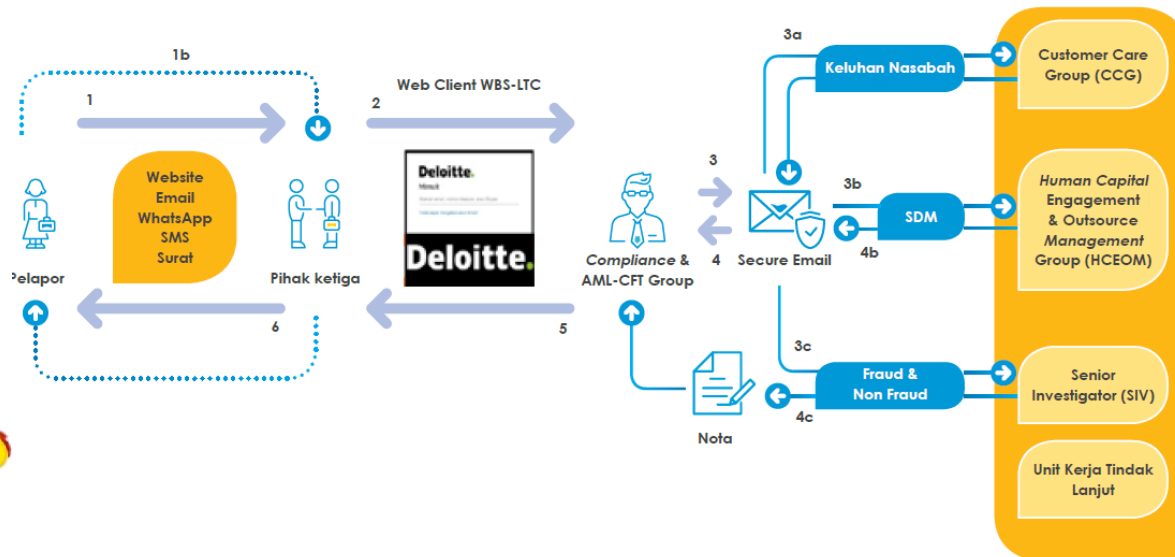
Reports that can be submitted through WBS-LTC, among others, are:

1. Fraud, which consist of :
 - a. Fraud
 - b. Deceptions
 - c. Embezzlement of Assets
 - d. Leak of Information
 - e. Banking Crimes
 - f. Corruption Crimes
 - g. Other actions that can be equated with fraud in accordance with the laws and regulations, as well as actions that are categorised as breaches to the employee disciplinary regulation of Bank Mandiri.
2. Non fraud, including violations of external and internal rules, including norms and ethics (code of conduct), with examples such as:
 - a. Abuse of authority and/or position.
 - b. Actions that can degrade the reputation and/or good name of the Bank.
 - c. Immoral acts inside and outside the Bank.
 - d. Abuse
 - e. Discrimination, violence and bullying in the workplace.
 - f. Drug use
 - g. Engage in prohibited community activities.
 - h. Violations of ethics, includethe use of social media.

Dissemination of WBS-LTC

To increase understanding of WBS-LTC at all levels within the organization, Bank Mandiri consistently and continuously conducts dissemination in various ways, including by presentation of short videos, placement of posters around the work environment, PC screen savers and e-mail blasts to Bank Mandiri employees. and the use of print media for WBS-LTC to be more effective going forward.

WBS-LTC Reporting Mechanism



Information :

1. The whistleblower submits a WBS-LTC report through the website, email, Whatsapp & SMS or PO BOX Letter to Third Parties.
 - a. Third Parties request information, documents or supporting evidence to the Whistleblower if the reporting has not met the 4W1H principle
 - b. The whistleblower completes the information.
2. Third Party delivers WBS-LTC report to Compliance & AML – CFT Group.
3. Compliance & AML – CFT Group analyzes WBS-LTC reports and forwards them to the relevant Work Units (CCG, HCEOM or SIV) according to the classification of report types.
4. 6 Each Work Unit that follows up on the WBS-LTC report, submits the results of the follow-up to Compliance & AML – CFT Group, then submits it to a Third Party to be informed to the Whistleblower.

WBS-LTC Handling Results

Reports of violation complaints entered through WBS-LTC media either through the website, e-mail, mailbox or SMS/ WA were as follows:

Year	Submission Media					Report Classifications			Followed Up Reports	Resolved Reports
	Letters	Email	Website	SMS/ WA	Call	Fraud	Non Fraud	Others		
2023	9	42	55	60	1	46	43	78	167	167
2022	1	47	66	23	0	30	55	52	137	137
2021	2	28	30	17	0	26	29	22	77	77
2020	4	24	38	9	0	29	22	24	75	75
2019	4	24	10	10	0	23	8	17	48	48
2018	0	7	1	0	0	2	2	4	8	8

Violation Reports Sanctions/Follow-Ups in 2023

Every investigated violation report and those proven as violation has received sanction based on the regulation.