



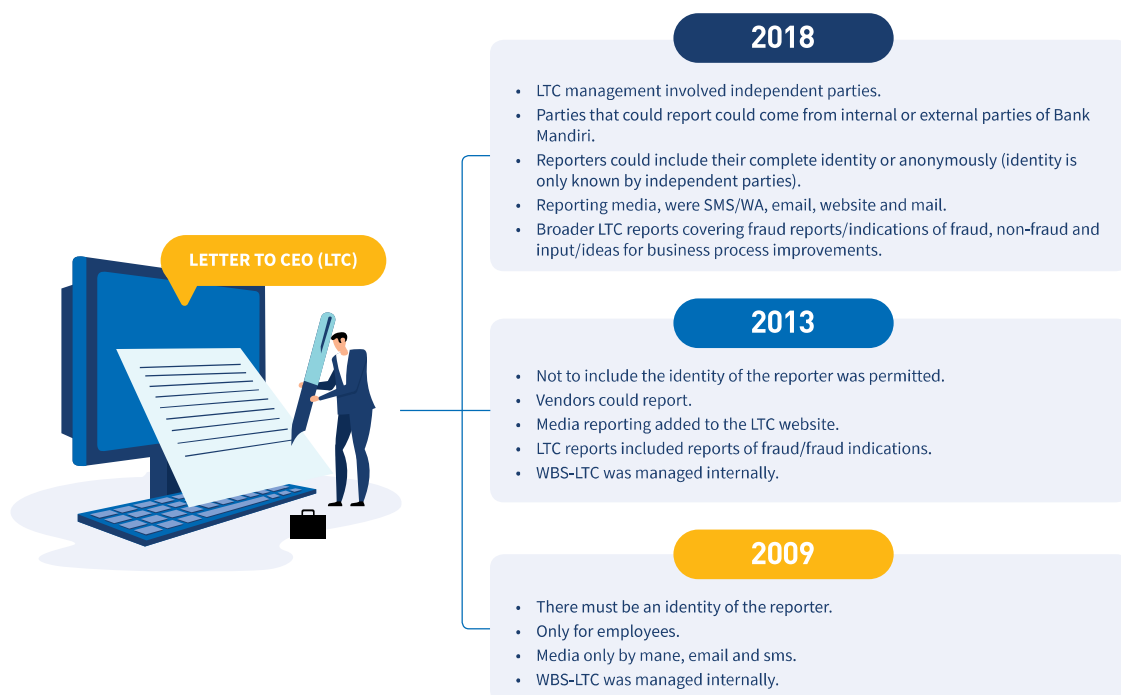
Whistleblowing System

To maintain and enhance the reputation of Bank Mandiri and in line with the second pillar of Anti-Fraud Strategy (SAF), i.e. the pillar of detection, a risk control system and means are required through the Whistle Blowing System (WBS) mechanism. Bank Mandiri has provided a media report on complaints of violations named Letter to CEO (LTC). LTC aims to detect acts of fraud or indications of fraud, encourage awareness and concern for all employees as well as improve the company's reputation in the eyes of stakeholders.

Management of LTC report receipts and administration is carried out by independent third parties to provide safe-environments that encourage employees and stakeholders to dare to report fraud or indications of fraud. Types of reported fraud include corruption, fraud, theft, embezzlement and forgery. In addition to reporting fraud or indications of fraud, LTC can also be used to report non-fraud violations such as violations of norms and ethics (code of conduct).

Development of Letter to CEO (LTC)

LTC has undergone development and has been refined in 2018 to increase the effectiveness of its implementation. This is done to improve the effectiveness of its implementation, as follows:



Purposes and Objectives of LTC

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

1. Detect fraud crimes or fraud indications with reports of employees or third parties of Bank Mandiri, which can be submitted by clearly stating their identity or anonymity, which can then be investigated or followed up.
2. Encourage awareness or concern of all employees to participate in keeping the work unit from loss due to fraud so that the quality of supervision is better, and the sense of belonging to employees becomes higher.
3. Improve the Company's reputation in the eyes of Stakeholders, especially in the context of Corporate Governance that will enhance the company's image because it has adequate anti-fraud tools.

LTC Management

The management of LTC involved independent third parties, which aimed to include:

1. Independent and professional.
2. Minimize conflict of interest risk.
3. Provide security for reporters/whistle-blowers
4. Increase stakeholder confidence in the management of the LTC
5. The reporter can monitor the status of the follow-up of the WBS report he submitted.



Report Media

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

1. *Website*, dengan cara ketik <https://whistleblowing.tips/wbs/@bmri-lettertoceo>
2. *E-mail*: bmri-lettertoceo@rsm.id
3. *Surat*: PT. RSM Indonesia melalui PO BOX 1007 JKS 12007
4. *SMS dan Whatsapp*: 08119007777

Protection for Whistleblower

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

1. Guarantee for the confidentiality of the reporter's identity.
2. Guarantee for the confidentiality of the contents of submitted reports.

Types of Violations that can be Reported

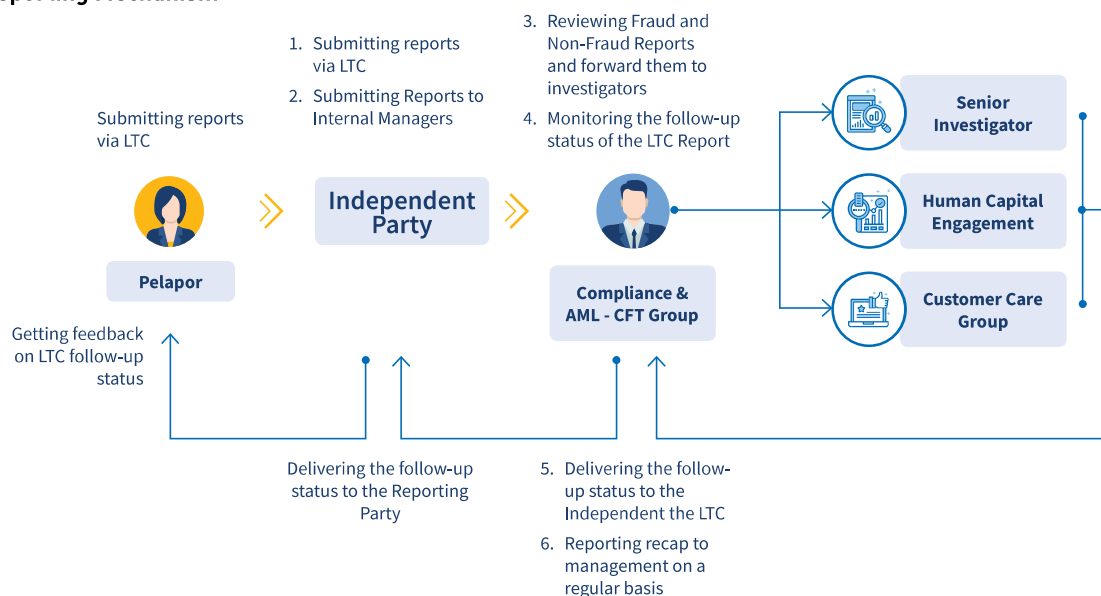
Reporting that can be delivered via LTC, among others, consists of:

1. Fraud, which consists of:
 - a. Fraud
 - b. Fraudulence
 - c. Asset Embezzlement
 - d. Information Leaking
 - e. Banking Crimes
 - f. Other actions that could be equated with Fraud in accordance with the provisions of the legislation.
2. Non fraud, including violations of norms and ethics (code of conduct), with examples of actions include:
 - a. Opening Bank secrets for personal gain.
 - b. Insider behaviour.
 - c. Immoral acts inside and outside the Bank.
 - d. Harassment.
 - e. Drug abuse.
 - f. Being involved in prohibited community activities.

Socialization of LTC

In order to increase understanding of WBS at all levels of the organization, Bank Mandiri consistently and continuously socializes the system in various ways, including short video displays, placing posters around the office environment, PC screen savers and e-mail blasts to the board of directors of Bank Mandiri and using printed media that can be implemented by WBS more effectively in the future.

LTC Reporting Mechanism





LTC Handling Results

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

Year	Submission Media				Klasifikasi Laporan			Followed-up	Completed Report
	Letter	Email	Website	SMS/WA	Fraud	Non Fraud	Lainnya		
2017	0	8	0	0	5	3	0	8	8
2018	0	7	1	0	2	2	4	8	8
2019	4	24	10	10	23	8	17	48	48
2020	4	24	38	9	29	22	24	75	75

Violation Reports Sanctions/Follow-Ups In 2020

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

Diversity of Board of Commissioners and Directors

Policies on Diversity of Board of Commissioners

In the Articles of Association of Bank Mandiri had regulated the diversity of the composition of the Board of Commissioners in accordance with the Attachment to FSA Circular Letter No. 32/SEOJK.04/2015 on Public Company Governance Guidelines. The appointment of the Board of Commissioners was carried out taking into account the age, gender, education, experience, integrity, dedication, understanding of the company's management issues, having knowledge and/or expertise in the required areas of Bank Mandiri and being able to provide sufficient time to carry out its duties and other requirements based on the laws and regulations. Currently the Board of Commissioners had met the criteria both from age, gender, education, experience, integrity, dedication, comprehension of company management issues, as well as having knowledge and/or expertise in the required areas of Bank Mandiri.

In the period of 2020, the diversity of the composition of the Board of Commissioners reflected in education, work experience, age and gender, could be seen as in the table below:

Table of Diversity in Composition of Board of Commissioner

Name	Position	Age	Gender	Education	Work Experience	Expertise
Muhamad Chatib Basri	President Commissioner/ Independent Commissioner	55 years old	Male	<ul style="list-style-type: none"> Bachelor degree in Economics. Master of Business Administration in Economic Development. Ph.D in Economics. 	Having work experience, among others, in finance and company supervision.	Macroeconomic, Finance
Andrinof A. Chaniago	Deputy Chief Commissioner / Independent Commissioner	58 years old	Male	<ul style="list-style-type: none"> Bachelor degree in Social and Political Science. Master in Planning and Public Policy. 	Having work experience, among others, in banking and corporate supervision.	Macroeconomic
Boedi Armanto	Independent Commissioner	61 years old	Male	<ul style="list-style-type: none"> Bachelor degree in Agronomy Master in Applied Economics Doctorate in Economics 	Having work experience, among others, in the field of banking supervision.	Audit, Banking
Loeke Larasati A.	Independent Commissioner	61 years old	Female	<ul style="list-style-type: none"> Bachelor degree in Law. Master in Management. 	Having work experience, among others, in the fields of law and banking.	Legal
Mohamad Nasir	Independent Commissioner	60 years old	Male	<ul style="list-style-type: none"> Bachelor degree in Accounting. Master in Accounting. Doctor in Accounting. Honorary Doctorate in the field of Education. 	Having work experience in accounting and finance, among others.	Accounting
Ardan Adiperdana	Commissioner	61 years old	Male	<ul style="list-style-type: none"> Bachelor of Economics. Master in Business Administration. Doctorate in Strategic Management. 	Having work experience, among others, in the fields of accounting and financial auditing.	Accounting, Audit