



# WHISTLEBLOWING SYSTEM: LETTER TO CEO



To maintain and enhance the Bank's reputation and in line with the second pillar of the Anti-Fraud Strategy (SAF), the Detection Pillar, Bank Mandiri has established a Whistleblowing System (WBS). This mechanism, known as the Whistleblowing System - Letter to CEO (WBS-LTC), serves as a medium for reporting suspected violations. WBS-LTC aims to detect indications or acts of fraud and/or non-fraud, foster awareness among all employees, and enhance the Bank's reputation in the eyes of stakeholders.

## INDEPENDENT PARTY MANAGEMENT OF WBS-LTC

To ensure confidentiality and trust in the reporting process, the reception and administration of WBS-LTC reports are managed by an independent third party. This independent management creates a safe environment, encouraging employees and stakeholders to report indications or acts of fraud and/or non-fraud. The types of fraud that can be reported through WBS-LTC include corruption, asset misappropriation, financial statement fraud, deception, disclosure of confidential information, and other actions that can be classified as fraud in accordance with applicable laws and regulations.

## Development of WBS-LTC

The development and enhancement of WBS-LTC are carried out continuously to improve the effectiveness of its implementation. As of 2024, enhancements have also been made, with details as follows:

2019	<ul style="list-style-type: none"><li>• An identity of the whistleblower is a must</li><li>• For employees only</li><li>• Media only through mail, email and SMS</li><li>• WBS-LTC is managed by internal parties</li></ul>
2020	<ul style="list-style-type: none"><li>• It is allowed not to include the identity of the whistleblower</li><li>• Vendors can report</li><li>• Media Reporting plus WBS-LTC website</li><li>• WBS-LTC reports include fraud reports/indications of fraud</li><li>• WBS-LTC is managed by internal parties</li></ul>

## WHISTLEBLOWING SYSTEM:

2021	<ul style="list-style-type: none"> <li>WBS-LTC management involves independent parties</li> <li>The reporting party comes from internal or external parties</li> <li>The whistleblower can provide full identity or anonymous (identity is only known to independent parties)</li> <li>Media reporting: SMS/WA, email, website and mail</li> <li>Broader WBS-LTC reports include fraud/indication, non-fraud reports and inputs/ideas for business process improvement</li> </ul>
2022	<ul style="list-style-type: none"> <li>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 &amp; Human Resources</li> <li>Strengthening the implementation of the LTC WBS program for members of financial conglomerates</li> </ul>
2023	Bank Mandiri has been able to access the KPK Whistleblowing System (KWS) application to report Corruption Crimes (TPK)
2024	<b>Bank Mandiri has renewed the Secure Socket Layer (SSL) for the Whistleblowing System for Corruption Crimes (WBSTPK) to ensure secure access to the Whistleblowing System application of the Corruption Eradication Commission (KPK).</b>

## Purposes and Objectives of WBS-LTC

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

1. Detect indications or acts of fraud and/or non-fraud that may harm customers, the Bank, or other parties through reports submitted by employees or external parties. Reports can be submitted with clear identification or anonymously, followed by investigations or other appropriate actions.
2. Promote awareness and care among all employees to actively safeguard their work units from losses due to indications or acts of fraud and/or non-fraud, thereby improving the quality of supervision and fostering a stronger sense of ownership among employees.
3. Enhance the Bank's reputation among stakeholders, particularly in the context of corporate governance, by showcasing a robust anti-fraud system, thereby elevating the Bank's image.

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 follow-up 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-wbslhc.tipoffs.info/>



### Email:

[bmri-wbslhc@tipoffs.info](mailto:bmri-wbslhc@tipoffs.info)



### Surat:

PO BOX 1007 JKS 12007



### SMS dan WA:

0811-900-7777

## WBS-LTC Management

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

**WHISTLEBLOWING SYSTEM:****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:

Reports that can be submitted through the WBS-LTC include the following:

1. Fraud, which consists of:
  - a. Corruption
  - b. Misuse of assets

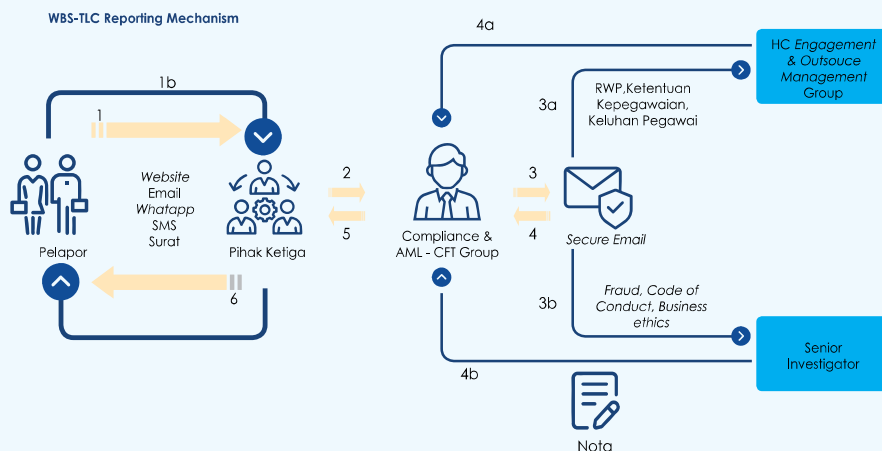
- c. Fraudulent financial reporting
  - d. Fraud
  - e. Disclosure of confidential information
  - f. Other actions equated to fraud in accordance with prevailing laws and regulations

2. Non-Fraud, which includes actions other than fraud, such as:

- a. Violations of the Code of Conduct, Business Ethics, Respectful Workplace Policy (RWP), or implementation of other employment regulations.
- b. Employee complaints, customer/non-customer complaints, and/or ideas/suggestions for improving products, services, and business processes.

**Dissemination of WBS-LTC**

To enhance understanding of the WBS-LTC at all levels within the organization, Bank Mandiri consistently and continuously conducts socialization efforts through various methods. These include displaying posters on employees' PC screensavers, email blasts, the Mandiri Magazine, elevator lobbies at Plaza Mandiri, and utilizing print media, ensuring that the WBS-LTC becomes more effective in the future.

**WBS-LTC Reporting Mechanism**

## WHISTLEBLOWING SYSTEM:

### 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 (HCEOM or SIV) according to the classification of report types.
4. Each Work Unit that follows up on the WBS-LTC report, submits the results of the follow-up to Compliance & AML – CFT Group.
5. Compliance & AML – CFT Group then submits it to a Third Party.
6. The Third Party will inform the results 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		
<b>2024</b>	<b>4</b>	<b>52</b>	<b>79</b>	<b>122</b>	<b>0</b>	<b>38</b>	<b>219</b>	<b>257</b>	<b>257</b>
2023	9	42	55	60	1	46	121	167	167
2022	1	47	66	23	0	30	107	137	137
2021	2	28	30	17	0	26	51	77	77
2020	4	24	38	9	0	29	46	75	75
2019	4	24	10	10	0	23	25	48	48
2018	0	7	1	0	0	2	6	8	8

## Violation Reports Sanctions/Follow-Ups In 2024

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