

# INTERNAL FRAUD

Bank Mandiri upholds the highest standards of integrity by ensuring every business process is protected from fraud, conflicts of interest, and undue influence. This commitment forms the foundation of the Bank's trust and long-term operational sustainability.

## Anti-Fraud Strategy Implementation

Bank Mandiri has implemented its Anti-Fraud Strategy in line with POJK No. 12 of 2024 on the Implementation of Anti-Fraud Strategies for Financial Services Institutions, POJK No. 17 of 2023 and SEOJK No. 14/SEOJK.03/2025 concerning Implementation of Good Corporate Governance for Commercial Banks.

Bank Mandiri implements a comprehensive anti-fraud strategy in line with OJK regulations, including adopting an anti-bribery management system and establishing a dedicated function responsible for coordinating anti-fraud efforts across the organisation. In credit approval and disbursement, the Bank ensures full independence and applies the four eyes principle between business and risk units to prevent undue influence. Procurement of goods and/or services is governed by regularly updated policies that uphold Good Corporate Governance, ensure clear segregation of duties, and minimise fraud risks. All budgeting, expenditure processes, and allocations of social and environmental responsibility funds are carried out independently from any internal or external interests. All governance organs, the Board of Directors, Board of Commissioners, Bank Committees, Sharia Supervisory Board, Executive Officers, and employees, must reject any instructions from shareholders, affiliated parties, or other external parties that violate GCG principles, constitute or indicate criminal acts, or may cause potential loss to the Bank.

As part of its commitment to strengthening internal controls, the Bank continuously enhances its policies and provisions to align with best practices and regulatory standards. These improvements extend to various operational policies, including Standard Operating Procedures (SOP), Technical Operational Instructions (PTO), and other internal regulations, ensuring a robust and adaptive framework for fraud prevention and control.

In reference with the above regulatory, Bank Mandiri's Anti-Fraud Strategy regulates 4 pillars, as follows:

### 1. Pillar 1: Prevention

The responsibility of all levels of the Bank (work units) and part of the Fraud Control System to reduce the potential of fraud. The programs of this pillar include:

- a. Anti-Fraud Awareness, such as socializing the Anti-Fraud Statement, Employee Awareness Program, and Customer Awareness Program. Employees are trained, socialized, and made aware of fraud awareness through internal media channels of the bank that reach all employees, as well as being required to take block leave. The Customer Awareness Program is implemented by utilizing social media effectively, periodically, and dynamically.
- b. Vulnerability Identifications, such as the application of Risk Management principles where all policies and procedures are designed while observing the internal control as well as GCG and Compliance principles. Employee's works according to their authority and responsibility is stated in each of their descriptions, and signed by the employee concerned. In addition, the Annual Disclosure was signed by all employees at the beginning of the year.
- c. Know Your Employee (KYE) is a principle applied by the Bank to know each employee well, both in terms of ability and personality. KYE is carried out through the selection of candidates as well as monitoring the character and lifestyle of employees.

### 2. Pillar 2: Detection

The responsibility of all units as first line, second line, and third line of defense and is part of the fraud control system in order to identify and identify fraud in the bank business activities. The programs implemented by Bank Mandiri in this pillar include:

- a. Whistleblowing System-Letter to CEO. which has been carried out and managed by an independent party to minimize conflicts of interest and provide a sense of security to the whistleblowers.
- b. Fraud Detection System. which has been implemented to support bank detection activities. including transactional and non-transactional fraud.
- c. Surprise Audit. which is prioritized for business units that are high-risk or prone to fraud.
- d. Surveillance System. which is aimed at monitoring and testing the effectiveness of the internal control system (including the fraud control system).

### 3. Pillar 3: Investigation. Reporting. Sanctions and Legal Processes

Part of the Fraud Control System in fraud handling via investigations and the results are reported to the President Director. Board of Commissioners. and Regulators. including proposals of sanctions and legal processes for the perpetrators. To strengthen the function of this Pillar. the authority to carry out investigations and the imposition of sanctions has been delegated to each region so as to accelerate case handling process and the recovery.

### 4. Pillar 4: Monitoring. Evaluation and Follow-up

Part of the Fraud Control System to monitor the follow-up to the results of investigations and evaluations of fraud incidents. to improve on weaknesses and strengthen the Internal Control System to prevent the recurrence of fraud due to similar weaknesses. Reports to the President Director and the Board of Commissioners are carried out in an orderly manner to monitor the predetermined follow-up list.

#### Total Fraud As of 31 December 2025

Internal Fraud in 1 Year	Frauds Committed (Internal)					
	Members of BOC & BOD		Permanent Employees		Non-Permanent Employees	
	2024	2025	2024	2025	2024	2025
Total Fraud	-	-	45	35	27	23
Resolved	-	-	45	35	27	23
In resolving process internally	-	-	-	-	-	-
Not resolved	-	-	-	-	-	-
Followed up through legal processes	-	-	-	-	-	-