

CONFLICT OF INTEREST POLICY

Referring to SEOJK No. 14/SEOJK.03/2025. Bank Mandiri applies the following Conflict of Interest Policy.

Bank Mandiri upholds integrity and objectivity in all operational and decision-making activities. Therefore, all members of the Board of Directors, Board of Commissioners, Bank Committees, Executive Officers, and employees must avoid any form of conflict of interest in performing their duties and responsibilities.

The Bank has established and implemented a Conflict of Interest Policy aimed at identifying, preventing, and managing potential conflicts that may arise from its business operations. The policy includes:

- a. Mechanisms for preventing and handling conflicts of interest, binding all management and employees, including decision-making procedures and mitigation steps when potential conflicts are identified; and
- b. Procedures for recording, documenting, and disclosing conflicts of interest in meeting minutes or other official records.

In cases where a conflict of interest arises, each member of the Board of Directors, Board of Commissioners, Bank Committees, Executive Officers, and employees is required to disclose the conflict transparently in the decision-making process and is prohibited from taking actions that could harm the Bank. Such disclosures are documented in meeting minutes, including the name of the related party, the nature of the conflict, and the rationale for the decision. The decision-making authority is adjusted according to the hierarchical level of the individual involved to ensure independence in the process.

As part of its sound governance practices, Bank Mandiri ensures that all transactions with related parties are conducted on an arm's-length basis and do not provide preferential treatment compared to similar transactions with other parties. Related parties include:

- a. Entities or individuals that control or are controlled by the Bank, directly or indirectly, including controlling and ultimate shareholders;
- b. The Bank's majority shareholders;
- c. Entities affiliated with the Bank (subsidiaries, sister companies, subsidiaries of sister companies, or special-purpose entities established by the Bank or its affiliates);
- d. Members of the Board of Directors, Board of Commissioners, and Executive Officers;
- e. Parties with professional or business relationships with the Bank's management or its affiliated companies; and

- f. Individuals with family relations up to the second degree with the Bank's controlling parties, management, or controlling shareholders, either vertically or horizontally.

Through this policy, Bank Mandiri ensures that all business activities and decisions are carried out professionally, transparently, and in the best interest of the Bank.

BOARD OF COMMISSIONER'S CONFLICTS OF INTEREST MANAGEMENT

The management of conflict-of-interest for the Board of Commissioners is regulated in the BOC Charter as follows:

1. Pursuant to laws and regulations, each Commissioner shall maintain the information by keeping it confidential including provisions on insider trading and other information that the Company has not disclosed to the public.
2. Each Commissioner shall disclose:
3. Ownership of shares in the Company and in other companies domestically or abroad.
4. Financial and family relationships with other members of the Board of Commissioners and members of the Board of Directors and their families.
5. Other information related to laws and regulations must be disclosed to the public.
6. The Board of Commissioners is prohibited from being involved in making decisions related to banking operational activities and/or making decisions that may cause conflicts of interest.
7. The Board of Commissioners in carrying out its duties, responsibilities and authority is prohibited from using the Company for personal, family, other companies or certain parties' interests in a manner that is contrary to the laws and regulations and the Company's code of ethics.

BOARD OF COMMISSIONERS SHARE OWNERSHIP

Based on SEOJK No. 14/SEOJK.03/2025 - XXIII.2, the Board of Commissioners has disclosed share ownership of 5% (five percent) or more, either in the Bank concerned or in other banks and/or companies, both domestically and internationally. The share ownership of Bank Mandiri's Board of Commissioners is described in the table below.