

# 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 WBSLTC 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 the WBS-LTC are carried out continuously to ensure its implementation becomes increasingly effective. By 2025, several improvements have been implemented, with details as follows:

2009	<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>
2013	<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>
2018	<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>
2021-2022	<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>
2023-2025	<ul style="list-style-type: none"> <li>› Bank Mandiri has been able to access the KPK Whistleblowing System (KWS) application to report Corruption Crimes (TPK)</li> <li>› 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)</li> </ul>

## Purposes and Objectives of WBS-LTC

The WBS-LTC program as one of the Anti-Fraud Strategy 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.




#### 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 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:

	<p><b>Website</b>  <a href="https://bmri-wbsltc.tipoffs.info/">https://bmri-wbsltc.tipoffs.info/</a></p>		<p><b>E-mail</b>  <a href="mailto:bmri-wbsltc@tipoffs.info">bmri-wbsltc@tipoffs.info</a></p>
	<p><b>SMS / WA</b>            0811-900-7777</p>		

#### 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 the WBS-LTC include the following:

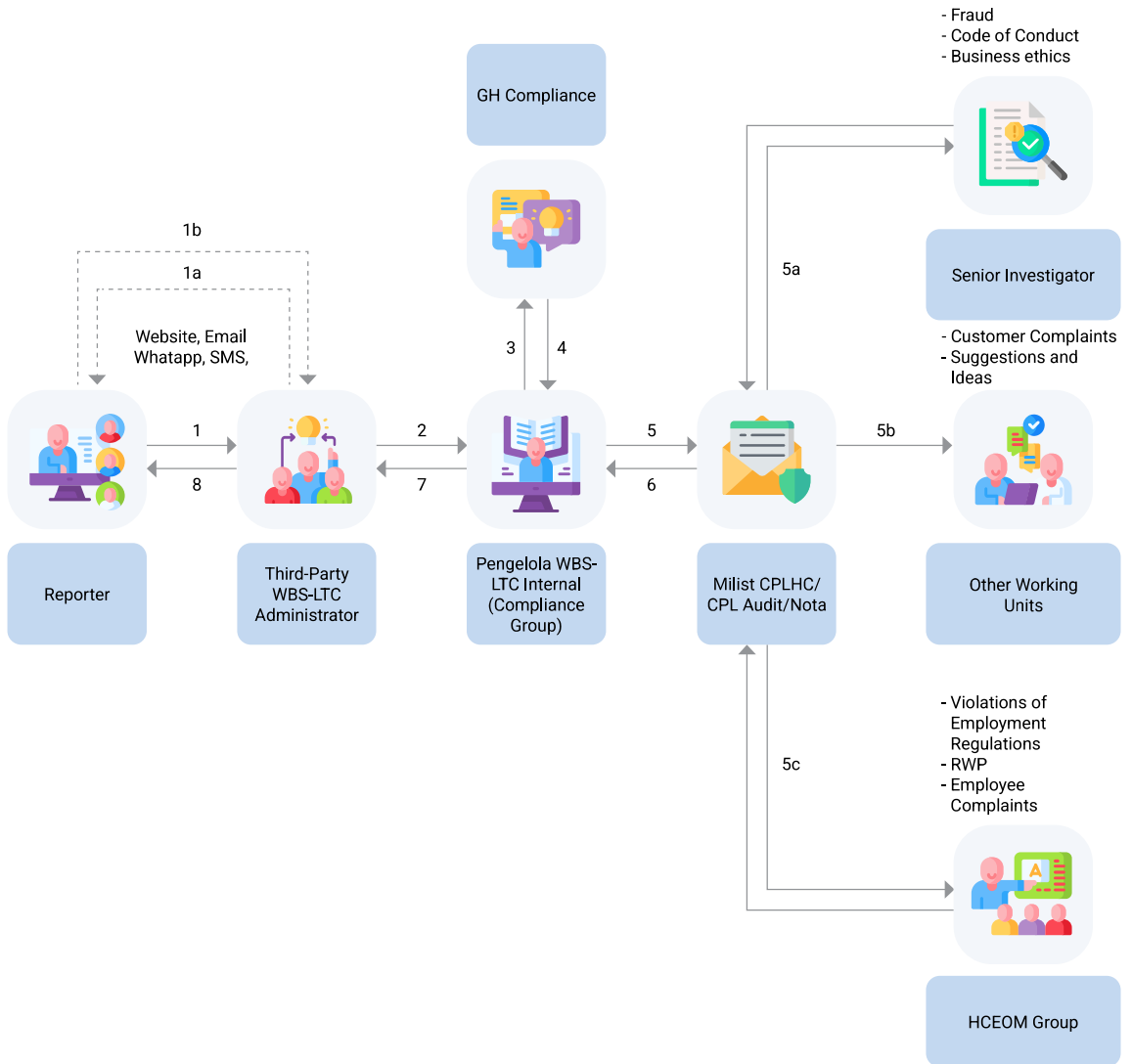
1. Fraud, which consists of:
  - a. Corruption
  - b. Misuse of assets
  - c. Fraudulent financial reporting
  - d. Fraud
  - e. Disclosure of confidential information
  - f. Other actions equated to fraud in accordance with prevailing laws and regulations

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, including the installation of posters. Information on WBS-LTC is also disseminated through email blasts, employees' PC screen savers, the internal website homepage of Bank Mandiri employees, Majalah Mandiri, as well as through social media and print media, so that the WBS-LTC can be implemented more effectively in the future.

**WBS-LTC Reporting Mechanism**



**Information:**

1. The whistleblower submits a WBS-LTC report through the website, email, or WhatsApp & SMS to Third Parties.
  - c. Third Parties request information, documents or supporting evidence to the Whistleblower if the reporting has not met the 4W1H principle.
  - d. The whistleblower completes the information.



2. Third Party delivers WBS-LTC report to Compliance Group.
3. Compliance Group analyzes WBS-LTC reports and forwards them to the relevant Work Units (HCEOM or SIV) according to the classification of report types.
4. GH Compliance provides approval for the proposed determination of follow-up actions on the WBS-LTC reports.
5. The Compliance Group forwards the WBS-LTC reports to the relevant Working Units.
6. The Working Units responsible for following up the WBS-LTC reports submit the results of the follow-up actions to the Compliance Group.
7. The Compliance Group forwards the reports to the third party.
8. The Third Party informs the whistleblower of the follow-up results

### WBS-LTC Handling Results

Reports of violation whistleblowing entered through WBS-LTC media either through the website, e-mail, 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		
2025	2	103	79	227	0	47	364	411	411
2024	4	52	79	122	0	38	219	257	257
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 2025

Any whistleblowing that is confirmed as a violation following the investigation process will be subject to sanctions in accordance with applicable regulations.

# RELATED PARTY TRANSACTIONS

All related-party transactions must comply with the arm's length principle, ensuring decisions remain objective and aligned with the Bank's best interests.

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Bank Mandiri ensures that all transactions with related parties are conducted transparently, fairly, and in accordance with Good Corporate Governance principles. These transactions may include credit exposures, professional services, procurement of goods or services, asset transfers, construction or lease agreements, joint business arrangements, and other financial activities. All relevant policies and procedures are designed to identify, control, and mitigate potential conflicts of interest.

The Bank has established specific policies and procedures governing related-party transactions, including clear definitions, transaction scope, mechanisms for identifying and monitoring exposures, and the application of the arm's length principle. Transactions must be carried out under terms no more favorable than those offered to non-related parties under similar conditions. Any material transaction or those posing potential conflicts of interest must obtain approval from the Board of Commissioners, with interested Directors or Commissioners excluded from the decision-making process.

Bank Mandiri also applies exposure limits appropriate to its business complexity and conducts independent monitoring through periodic reviews or audits. Reporting mechanisms to the Board of Directors and, when required, the Board of Commissioners are in place to address policy exceptions or identified conflict-of-interest risks.

