CHAPTER IV
COMPANY CULTURE, CONFLICT OF INTEREST, AND WORK TIME/WORK ETHICS

Article 16
Company Culture and Conflict of Interest

1. In performing its duties and exercising its authorities, the Board of Directors shall act in good faith and prioritize the interests of the Company above personal interests, while upholding the Company's Core Values and Primary Behaviors
2. The Board of Directors shall implement the principles of Good Corporate Governance in the Bank, by observing prudential banking principles, professional code of ethics and code of conduct, national and international banking conventions, and ensuring compliance with prevailing laws and regulations as well as banking-related provisions.
3. The Board of Directors must avoid any form of conflict of interest in carrying out the Company's management duties. However, when a decision must still be made, the Directors shall prioritize the Company's economic interests and prevent any potential loss or reduction in the Company's profits, while disclosing the conflict of interest in every decision made.
4. In the event of a conflict of interest, members of the Board of Directors are required to disclose the conflict of interest in every decision that involves or meets the conditions of such conflict.
5. The disclosure of conflict of interest as referred to in paragraph (4) shall be documented in the minutes of the meeting, which must at least include the name of the party having the conflict of interest, the principal issue of the conflict, and the basis for the decision-making considerations.
6. In addition to disclosing conflicts of interest as referred to in paragraph (4), members of the Board of Directors are prohibited from taking any actions that may potentially harm the Company or diminish the Company's profits.
7. The implementation of the Code of Conduct is carried out through the establishment of an Integrity Pact and an Annual Disclosure, aimed at identifying, mitigating, and managing any violations of the Code of Conduct, including potential conflicts of interest that may arise within the Company as a result of the Company's business activities, with the following explanations :
   a. *Identification* is the process of recognizing, analyzing, assessing, and determining the potential risk of Code of Conduct violations in every activity or action that may harm the Company, either financially or non-financially.
   b. *Mitigation* is the process of controlling the risk of Code of Conduct violations with the objective of minimizing the level of violations that may occur.
   c. *Managing* refers to the process of appropriately and effectively addressing potential violations in order to control their impact, minimize losses, and prevent recurrence.
8. Members of the Board of Directors are prohibited from:
   a. Using the Company for personal, familial, or third-party interests that may harm or reduce the Company's profits.
   b. Obtaining personal benefits from the Company beyond remuneration and facilities approved by the GMS.
   c. Holding concurrent positions other than those permitted by applicable laws and regulations.
   d. Individually or jointly holding 25% (twenty-five percent) or more of the paid-up capital in another company.