



Anti-Financial Crime Policy

Anti-Bribery and Anti-Corruption Policy [GRI 2-27]

Bank Mandiri has established comprehensive internal policies aimed at preventing corruption, including the Internal Control Policy, Operational Policies, Employee Disciplinary Regulations, the Code of Conduct and Business Ethics, as well as the Gratification Policy and the Anti-Bribery Management Policy. All of these policies are formulated in alignment with an integrated anti-fraud strategy and encompass operational standards and other provisions in accordance with applicable laws and regulations. This reflects Bank Mandiri's commitment to a zero-tolerance principle toward all forms of corruption, fraud, and gratification.

In defining gratifications, Bank Mandiri refers to Law No. 31 of 1999 on the Eradication of Corruption Crimes, as amended by Law No. 20 of 2001. Under this framework, gratifications are defined as the receipt of gifts, whether in the form of money or other items that can be equated to monetary value, including goods, rebates or discounts, memberships, commissions, interest-free loans, tickets, accommodation facilities, travel packages, scholarships, free medical services, and other facilities, whether provided through electronic or non-electronic means. Such gratification is classified into two main categories:

1

Gratification That Requires Reporting

a. Gratification Deemed as Bribes

Gratification related to one's position and contrary to the recipient's duties or obligations. Gratification is deemed to constitute bribes when they include the following:

- Gratification that may reasonably be suspected of influencing policies, decisions, or the conduct of an authority holder.
- Gratification received in connection with services related to duties, authority, or responsibilities.
- Gratification received during official business trips that are not related to official duties.
- Gratification provided in the context of employee recruitment, employee transfers, or promotions.

b. Gratification Related to Celebrations, which are classified into:

- Gratification received in connection with religious celebrations from customers, debtors, business partners, suppliers, or other parties with conflicts of interest.
- Gratification received in connection with other celebrations, such as engagements, weddings, births, or customary or religious ceremonies, exceeding the maximum threshold of one million rupiah.

2

Gratification Not Requiring Reporting

a. Gratification related to official duties, such as serving as a speaker or official resource person, participating in official activities, or undertaking official travel, provided that they comply with internal provisions.

b. Other gratifications that are exempt from mandatory reporting in accordance with the Corruption Eradication Commission regulations on gratifications reporting.

Bank Mandiri implements specific policies and strategies to prevent bribery and corruption, including prohibitions on all forms of bribery, such as kickbacks, direct or indirect political contributions, as well as charitable donations and sponsorships that may be subject to misuse. All policies are publicly disclosed to ensure transparency and accountability in their implementation.

Bank Mandiri defines corruption as the abuse of public or private positions to obtain personal or group benefits. Bribery, meanwhile, is defined as the giving or receiving of gifts, services, or unlawful compensation with the intent to influence business decisions. Fraud encompasses all forms of misconduct in banking practices, including deception, misuse of assets, disclosure of confidential information, and corrupt acts that contravene applicable laws and regulations as well as employee disciplinary rules.

As part of its ongoing efforts to prevent corruption, Bank Mandiri has implemented the Anti-Bribery Management System in accordance with ISO 37001:2016 through certification, audits, and verification against international standards, fully integrated as a key element of the Bank's Code of Conduct. [\[GRI G4 FS9\]](#)

Bank Mandiri first obtained the ISO 37001:2016 Anti-Bribery Management System certification for the scope of Procurement and Vendor Management on August 10, 2020. Bank Mandiri subsequently expanded the scope of this certification by integrating internal audit processes, thereby covering Procurement, Vendor Management, and Internal Audit Processes as of September 20, 2022. Bank Mandiri's commitment was reaffirmed through the renewal of its ISO 37001:2016 certification on October 13, 2023, and Bank Mandiri successfully maintained this certification based on the recommendation letter issued on October 29, 2025. [\[GRI G4 FS9\]](#)

The Anti-Bribery Management System ensures that Bank Mandiri adheres to the following principles:

1. Prohibiting bribery practices and similar acts within the Company.
2. Complying with applicable laws and regulations, as well as other relevant anti-bribery provisions.
3. Aligning anti-bribery policies with the Company's objectives.
4. Implementing corporate governance practices that support the achievement of anti-bribery objectives.
5. Committing to the fulfillment of Anti-Bribery Management System requirements.
6. Enhancing anti-bribery awareness among relevant stakeholders.

7. Implementing the principle of continual improvement within the Anti-Bribery Management System.
8. Assigning responsibility, authority, and independence to the Anti-Bribery Compliance Function.
9. Imposing sanctions for violations of the provisions set out in the Anti-Bribery Management System policy.

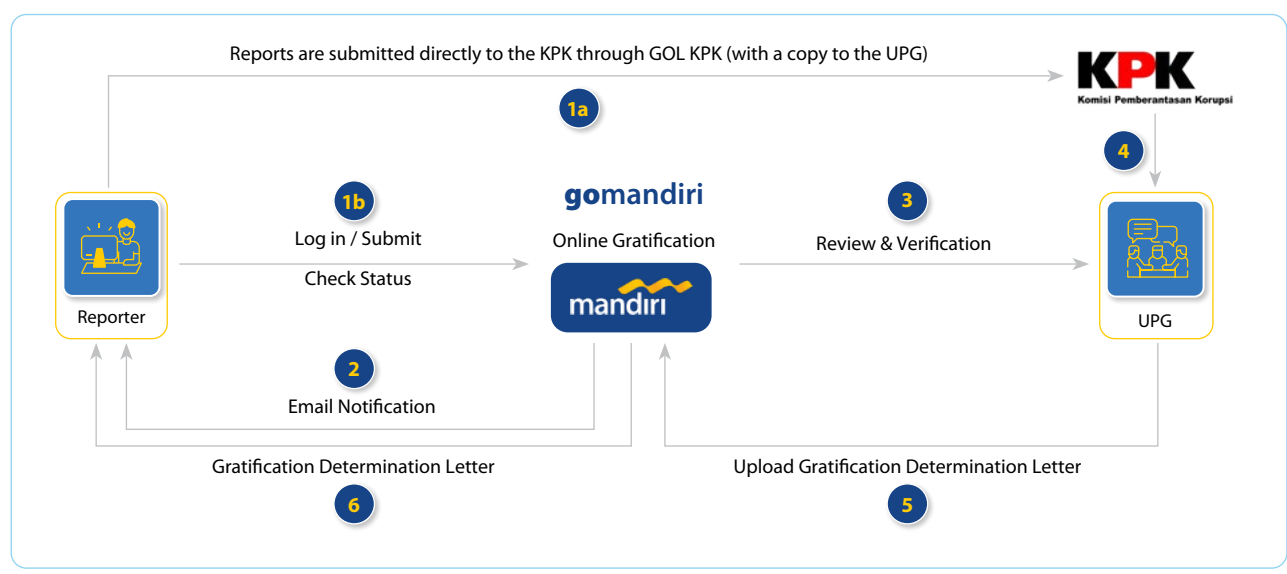
Bank Mandiri implements an internal oversight system by placing supervisory units at every level, including the head office, branches, and regional offices. These units specifically focus operational oversight on functions with a high risk of fraud and corruption, covering procurement processes, the management of cash and valuable assets, and financial transactions involving customers. In response to these risks, the Company actively strengthens oversight mechanisms, enhances transparency in procurement processes, and provides anti-corruption training for all employees. This training delivers operational guidance covering record-keeping procedures, approval procedures, and appropriate behavior, with the objective of effectively reducing potential risks. [\[GRI 205-1\]](#)

In mitigating the risks of fraud and gratifications, Bank Mandiri enforces a strict policy prohibiting all forms of improper payments, including facilitation payments, whether made directly or indirectly. The Bank defines facilitation payments as small payments intended to expedite administrative processes that should be completed in accordance with applicable regulations without any additional charges.

Bank Mandiri implements a systematic gratification control program through the following measures:

1. Establishing a Gratification Control Unit, which serves as the coordinator of gratification control at Bank Mandiri. This Unit forms part of the Compliance Work Unit and was established pursuant to a Board of Directors' Decree, most recently updated under Decree No. KEP.DIR/64/2021.
2. Issuing provisions on gratification control within the Bank Mandiri environment, the Company periodically reviews and enhances these on an annual basis or as necessary, in line with internal developments within the Bank and/or to comply with prevailing laws and regulations, with the most recent update conducted in 2025.
3. Conducting comprehensive socialization of the gratification control program to all employees and stakeholders of Bank Mandiri.

Gratification Control Scheme



Anti-Fraud Strategy

Pillar 1: Prevention

- Across all work units to reduce the potential occurrence of fraud.
- Anti-fraud awareness through the dissemination of the Anti-Fraud Statement, Employee Awareness Program, and Customer Awareness Program.
 - Identification of vulnerabilities through policies and procedures, job descriptions, and annual disclosures.
 - Employee policy (Know Your Employee/KYE) implemented during the recruitment process.

Pillar 2: Detection

- Across all units, including the first, second, and third lines of defense, to identify and detect fraud in the Bank's business activities.
- Whistleblowing system.
 - Fraud detection systems in retail transaction channels and retail credit segments (micro, consumer, and MSMEs).
 - Surprise audits, particularly in high-risk business units or those vulnerable to fraud.
 - Monitoring systems to observe and test the effectiveness of internal control systems.

Pillar 3: Investigation, Reporting, Sanctions, and Legal Processes

- Handling fraud through investigation and reporting to the President Director, the Board of Commissioners, and regulators.
- Delegation of authority for conducting investigations and imposing sanctions to respective regions to accelerate case handling and recovery processes.

Pillar 4: Monitoring, Evaluation, and Follow-Up

- Monitoring follow-up actions on investigation results and evaluating fraud incidents to address weaknesses and strengthen internal control systems to prevent recurrence.
- Written reporting to the President Director and the Board of Commissioners conducted in an orderly manner to monitor the list of established follow-up actions.

Communication and Training on Anti-Corruption and Anti-Fraud by Work Region in 2025 [GRI 205-2]

Work Area	Has been communicated by the Company on Anti-Corruption and Anti-Fraud Policies and Procedures		Has participated in Anti-Corruption and Anti-Fraud Training	
	Total	%	Total	%
Head Office	16,016	100.00%	14,872	92.86%
Sumatra (Regions 1, 2)	4,949	100.00%	4,570	92.34%
Jakarta (Regions 3, 4, 5)	7,015	100.00%	6,382	90.98%
Java (Regions 6, 7, 8)	7,825	100.00%	7,288	93.14%
Kalimantan (Region 9)	1,810	100.00%	1,686	93.15%
Sulawesi and Maluku (Region 10)	2,050	100.00%	1,879	91.66%
Bali and Nusa Tenggara (Region 11)	1,200	100.00%	1,075	89.58%
Papua (Region 12)	687	100.00%	616	89.67%
Total	41,552	100.00%	38,368	92.34%

In 2025, Bank Mandiri also conducted various socialization activities on anti-fraud and anti-corruption policies for all employee categories, covering 100% of employees. [GRI 205-2]

Implementation of the Anti-Money Laundering (AML), Counter Financing of Terrorism (CFT), and Prevention of Proliferation Financing of Weapons of Mass Destruction (PF-WMD) Programs

Bank Mandiri has proactively responded to the rapid development of innovation and technology in the financial services sector by implementing a digital based business transformation. This constitutes a fundamental component of the bank wide business strategy to enhance competitiveness, operational efficiency, and the quality of services provided to customers.

Alongside the digital transformation, trends in cybercrime, such as hacking, online gambling, and online fraud, have also increased and increasingly exploit banking services. Bank Mandiri balances its digital transformation efforts by upholding the principles of prudence, security, and confidentiality, while implementing adequate risk mitigation measures. These actions are intended to prevent the misuse of the Bank by perpetrators of Money Laundering Crimes, Terrorist Financing

Crimes, and/or the Financing of the Proliferation of Weapons of Mass Destruction.

The strengthening of the Anti-Money Laundering (AML), Counter Financing of Terrorism (CFT), and Prevention of Proliferation Financing of Weapons of Mass Destruction programs (PF-WMD) is carried out in reference to applicable regulations, risk management practices, the Bank's Business Plan, and international best practices. Bank Mandiri's vision, "The Best Financial Institution in Southeast Asia," is realized through a series of strategic initiatives focused on procedures and processes, systems and technology, as well as human capital development. This approach is designed to enhance the effectiveness and optimization of the AML, CFT, and PF-WMD programs.