

# Sustainable Operations

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### Our Customers



### Consumer Financial Protection

Bank Mandiri is committed to protecting the financial rights of our customers and supporting the creation of a sustainable and stable financial ecosystem. This is done by safeguarding consumer interests, in line with POJK Regulation No. 22 of 2023 on Consumer and Public Protection, through the provision of equitable and responsible financial products and services. Each product and service is designed with customer welfare in mind, emphasizing transparency and accessibility at every stage. [OJK F.17]

The areas of customer protection included in Bank Mandiri's Consumer Protection Policy are regulated under the Customer Protection Standard Procedure No. K4.SP27 of 2024, which includes:

- Good Faith in every interaction and transaction with customers.
- Customer Data Protection to maintain the confidentiality and security of personal information.
- Product and Service Design ensuring suitability and feasibility for customers.
- Provision of Product and/or Service Information to help customers make informed decisions.

- Transparent Communication of Product and/or Service Information in product and service offerings.
- Marketing of Products and/or Services that protects customers from misleading information.
- Preparation of Agreements for Products with clear and fair terms and conditions.
- Provision of Services for Product Usage that supports responsible credit recovery.
- Complaint Handling and Dispute Resolution as a commitment to customer satisfaction.
- Enhancing Financial Literacy and Inclusion to support customer understanding of financial products and services.

Consumer protection begins with an analysis of the potential customer's profile to ensure product understanding and prevent loans beyond financial capability. This policy includes limiting Paylater services for customers with payroll accounts, setting maximum limits, and applying risk criteria. Bank Mandiri also utilizes Enterprise Data Analytics to assess the financial capacity of customers, ensuring installments align with their financial capabilities.



For customers facing financial challenges, Bank Mandiri provides flexible loan restructuring options, including installment adjustments or loan modifications to help them meet their financial obligations. Bank Mandiri also upholds fair advertising through transparent and accurate advertising policies, ensuring that all product information is communicated honestly. In terms of credit collection, Bank Mandiri upholds customer rights by implementing ethical collection procedures that respect the privacy and dignity of every individual. Customer data security is also a top

priority. Bank Mandiri ensures that all personal and financial information is protected with advanced security systems and high encryption standards, maintaining customer trust and confidentiality.

To increase awareness and understanding regarding customer protection, Bank Mandiri conducts internal socialization using various media, including wallpapers, email blasts, and the Mandiri magazine, followed by surveys to assess their effectiveness.

### Employee Training on Consumer Financial Protection [GRI 404-2]

During the reporting period, 10 (ten) socialization materials were delivered, followed by surveys to measure their success. Bank Mandiri also ensures understanding of consumer financial protection among employees in relevant departments, including front-line staff and all relevant

customer-facing employees through annual training and comprehension testing. In the reporting year, a total of 52,138 employees participated in consumer protection training through e-Learning.

### Employee Training on Consumer Financial Protection in 2024 [GRI 404-2]

Bank Mandiri Consumer Protection E-Learning

### **Training Scope:**

- Understanding the concept of consumer protection
- Comprehending the implementation of consumer protection at Bank Mandiri
- Identifying risks related to consumer protection in Bank Mandiri's business activities

Number of Training Participants

52,138

Employees

To increase awareness and knowledge among all employees regarding consumer protection, Bank Mandiri implements various socialization and capacity-building initiatives through the following actions:

- Socialization through Various Internal Platforms
   Carried out for all employees using a variety of bank's internal platforms, such as:
  - Displaying information on PC wallpapers;
  - Email blasts through corporate email;
  - WhatsApp blasts through the Culture Squad across all Groups:
  - Through Business Continuity Management Awareness Guidance (BCMAG) surveys, podcasts, and Majalah Mandiri (Bank Mandiri's magazine).

### 2. Implementation of E-Learning on Consumer Protection

E-Learning training is provided to all employees in compliance with regulations requiring employee capacity development in understanding consumer protection regulations.

### 3. Awareness Survey for All Employees

Surveys are conducted to measure the level of understanding and effectiveness of the socialization activities, ensuring that the messages and information related to consumer protection are effectively communicated.

### **Debt Collection Policy**

Bank Mandiri adheres to all applicable laws and regulations related to debt collection management to ensure that each process is carried out in accordance with the prevailing legal provisions. Bank Mandiri implements a responsible, respectful, and fair debt collection policy for all customers. Every employee or authorized representative of Bank Mandiri involved in the debt collection process is required to adhere to high ethical principles and respect the rights of debtors, ensuring that the collection process is conducted professionally and in compliance with applicable regulations.

Bank Mandiri has developed a debt collection policy applicable to all Bank Mandiri employees and subsidiaries, covering retail and wholesale segment products and services, as outlined in the Overview of Debt Collection Policy<sup>1</sup>. The debt collection policy includes procedures and management practices, and defines the working mechanisms for debt collection, including collection methods, frequency, and other requirements. The policy also mandates that employees specifically involved in debt collection undergo periodic training based on the Credit Collection & Recovery Policy, which encompasses the management of problematic loans and collection procedures. Debt collection execution is supervised by The supervision of debt collection activities is carried out by the Wholesale Credit Recovery Unit for the wholesale segment and the Retail Credit Recovery Unit for the retail segment.

At every stage of collection, Bank Mandiri applies financial protection policies that respect the fundamental rights of customers in accordance with the valid credit agreement.

Whether direct or indirect. Bank Mandiri ensures that each collection process complies with internal and external regulations to maintain transparency and integrity in customer relations. The collection process is not solely focused on protecting the interests of Bank Mandiri, but also ensures that the rights and privacy of customers are respected in accordance with applicable rules.

Bank Mandiri ensures that debt collections performed by third-party agencies can only be carried out once the debtor's debt has become delinguent, Bank Mandiri guarantees that collections are conducted without physical or verbal pressure and are not directed toward anyone other than the debtor in question. Additionally, the collection process must adhere to communication guidelines that avoid disruption, such as being conducted only at the debtor's address between 08:00 and 20:00 local time and only on occasion. Collections that need to take place outside the designated time and location can only be done with the debtor's consent.

Bank Mandiri requires employees handling credit and collection officers to undergo training and certification through internal and external programs. For debtors still under the management of the Business Unit (BU), Bank Mandiri provides guidance through joint efforts between the BU and relevant divisions. Collection officers are required attend training related to debt collection activities such as basic collection, collection negotiation, anti-fraud strategies. and operational collection risks, organized in collaboration with Mandiri University Group.

### Training on Debt Collection Policy in 2024 [GRI 2-24, 404-2]

### Scope of Training:

Basic Collection for Operational/Outsourced Employees, Operational Risk Management for Collectors, Retail Collection Product Knowledge, Negotiation Collection, Collection for Business, Marketing Skills for Collection, and others.

Number of Training Titles

**Total Training Hours** 

Number of Training Participants

<sup>&</sup>lt;sup>1</sup> Overview of Debt Collection Policy: https://www.bankmandiri.co.id/documents/20143/385754317/EN\_Draft\_Overview+Debt+Collection+Policy\_FINAL.pdf



### Loan Modification Policy

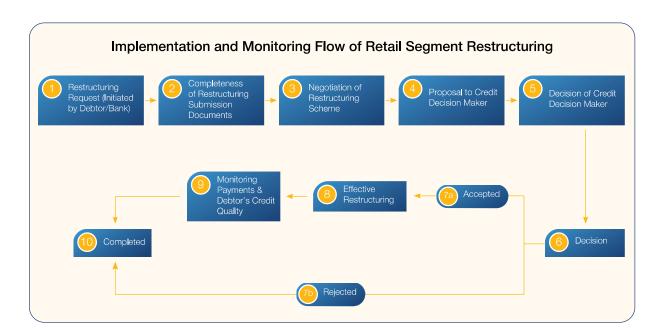
Bank Mandiri offers clear loan restructuring options which consider the financial condition of the customer to ensure solutions that align with their financial capacity. The implementation policy for restructuring refers to the SPO Credit Collection & Recovery and POJK Regulation 40 of 2019. The restructuring options provided, in accordance with POJK 40 of 2019, include:

- · Reduction of interest rates
- Extension of loan tenure and/or rescheduling
- Waiver of interest, penalties, and fees for loan restructuring
- Additional credit facilities
- Conversion of loans into temporary equity participation
- · Merging and/or splitting of credit facilities

- Conversion of loan currency
- Sale of debtor's company shares
- · Reduction of overdue interest

Apart from Bank Mandiri's official website, information regarding credit restructuring and the escalation process can be accessed by debtors through direct discussions with account managers or relationship managers. Debtors may also access information on loan restructuring through the OJK as the government financial services regulator. Debtors will also receive more detailed information regarding the scheme, terms, and conditions outlined in a Loan Restructuring Approval Letter, issued when the restructuring request is approved by Bank Mandiri.

To ensure the restructuring goals are achieved and comply with the consumer financial protection policy, Bank Mandiri implements the following loan restructuring and monitoring process in accordance with the scheme below:



In providing credit restructuring, Bank Mandiri ensures that the process is conducted by officials or employees who are not involved in the credit granting process. This process adheres to the fundamental principles of restructuring, including:

- a. Four Eye Principle
- b. Exposure Consolidation Principle
- c. One Obligor Principle
- d. Credit restructuring is not performed solely to avoid:
  - 1). Downgrading of credit quality classification
  - 2). Increased provisioning for impairment of assets (PPKA)

Suspension of accrual-based interest income recognition

As part of the monitoring process, Bank Mandiri conducts a comprehensive assessment and establishes specific criteria when considering credit restructuring requests. This step aims to identify opportunities for credit recovery for the debtor, ensuring that the credit becomes productive again and provides benefits for both parties. Several factors are considered, including:

- 1. Business prospects, which include:
  - a. Potential for business growth

- Market conditions and the debtor's position in the competition
- c. Management quality and workforce issues
- d. Support from business groups or affiliates
- e. Efforts made by the debtor to maintain environmental sustainability
- 2. Business performance, which includes:
  - a. Profitability
  - b. Capital structure
  - c. Cash flow
  - d. Sensitivity to market risks
- 3. Payment ability, which includes:
  - a. Timeliness of principal and interest payments
  - b. Availability and accuracy of financial information
  - c. Completeness of credit documentation

- d. Compliance with credit agreements
- e. Appropriateness of fund usage
- f. Reasonableness of sources of repayment

Bank Mandiri also continuously monitors credit quality through several mechanisms, one of which is a watchlist, which serves as an early warning signal. This mechanism analyzes three key aspects: the debtor's business prospects, financial performance, and payment history. If the monitoring results indicate a decline in credit quality, Bank Mandiri will take corrective actions, particularly for debtors who still have viable business prospects and payment ability. This approach aims to minimize potential losses and recover the credit granted.

### Resolution of Non-Performing Loans

As part of its efforts to maintain its credit portfolio quality and mitigate risks, Bank Mandiri applies a systematic approach in handling non-performing loans. This process involves a series of steps tailored to the conditions and potential of each debtor to ensure appropriate and effective handling. The following describes the process for handling non-performing loans applied by Bank Mandiri.

### Non-Performing Loan Handling Process

#### 1. Review

Evaluation of credit quality on a regular basis based on the three pillars of Bank Indonesia's credit assessment.

### 2. Diagnosis

Identification of the root cause of non-performing loans and analysis of debtor conditions to determine the account strategy.

### 3. Restructuring

Credit restructuring for debtors who still have business prospects and good intentions.



#### 6. Write Off

Writing off non-performing loans from the Bank's books, but credit resolution efforts continue.

#### 5. Exit Strategy

Resolution of credit for debtors who are unable to undergo restructuring or have failed in their attempts.

### 4. Monitoring

Monitoring of debtor compliance to ensure credit quality is maintained.



### Marketing Policy Based on Fair Advertising Principles

Bank Mandiri adheres to a fair marketing policy in compliance with regulatory provisions related to financial services advertising. Every advertisement and promotion of Bank Mandiri's products and financial services is designed to provide accurate, clear, honest, and non-deceptive information.

As outlined in its Overview Fair Advertising and Responsible Marketing Policy<sup>2</sup>, Bank Mandiri is committed to applying high standards of transparency and ethics in fair and responsible advertising practices. This commitment includes delivering accurate, complete, and easily understandable information in all marketing materials to ensure that consumers can make informed decisions. As part of its customer responsibility, Bank Mandiri also ensures that all marketing materials disclose any potential negative consequences associated with any Bank product or service. Bank Mandiri is also committed to responsibly targeting the appropriate audience, ensuring that products and services are promoted to relevant parties in an ethical and inclusive manner. This approach reflects the values of sustainability and integrity that are integral to Bank Mandiri's operations.

The Board of Directors, as an oversight body, is responsible for overseeing all marketing and communication activities related to products and services. To support this oversight, the Managing Unit reports to the Board of Directors at least once a year, detailing all marketing communication activities related to products and services that have been carried out.

The objective of Bank Mandiri's marketing communication for products and services is to increase brand awareness through digital and conventional media, as well as events. Bank Mandiri applies risk management principles, including identification, measurement, monitoring, and risk control, to ensure that marketing communication activities are conducted securely, accurately, and in a timely manner. Bank Mandiri has also established the following measures:

- Assigning duties and responsibilities between related units (segregation of duties).
- Implementing a check and balance process to carry out marketing communication activities with a dual control mechanism.
- 3. Adhering to internal and external regulations.

- 4. Applying risk management principles.
- Conducting marketing communication activities for products and services based on Core Values, AKHLAK (Amanah, Kompeten, Harmonis, Loyal, Adaptif, and Kolaboratif), good corporate governance, corporate culture, Code of Conduct, business ethics, and always applying the principle of prudence (prudential banking).

Bank Mandiri's marketing personnel are tasked with thoroughly explaining the features, consequences, and risks of products to customers in compliance with applicable laws and regulations, including for digital products and services. In delivering marketing information to the public and prospective customers, Bank Mandiri ensures the provision of the following product and service information:

- Providing clear, accurate, truthful, easily accessible information that does not mislead customers.
- Using legible fonts, writing, symbols, diagrams, and signs.
- 3. Explaining any terms, phrases, sentences, symbols, diagrams, or signs that the customer does not understand.
- 4. Providing a summary of product and/or service information in both general and personalized versions, which includes:
  - a. Information related to:
    - i. Description/explanation of the product;
    - ii. Product benefits and advantages;
    - iii. Product features;
    - iv. Terms and conditions of the product;
    - v. Instructions/tutorial on how to use the product or application;
    - vi. Product/promotion validity period (if applicable, such as for limited-edition products); and
    - vii. Communication channels that customers can contact if they wish to confirm further information.
  - b. Simulations and/or historical data in cases of products and/or services that involve fund collection, fund distribution, and/or fund management.

To ensure that every customer receives accurate information, every marketing staff at Bank Mandiri is required to undergo training on financial product and service knowledge, as well as annual refreshment training.

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<sup>&</sup>lt;sup>2</sup> Overview Fair Advertising and Responsible Marketing Policy: https://www.bankmandiri.co.id/documents/20143/385754317/EN\_Overview+Fair+Advertising+Policy\_FINAL.pdf/1c3e2c27-fcaf-fc88-4ab9-cbbe5131ac8b?t=1739259875999

### Training on Responsible Marketing and Product Offering 2024 [GRI 404-2]

### Scope of Training:

SPO Marketing of Product and Service Communications, Basic Marketing, Marketing Foundations: Consumer Behavior, Agile Marketing Foundations, Digital Marketing Foundations, Integrated Marketing Communication Strategies, Marketing Communications, and so on.

Number of Training Titles

70 Titles

Total Training Hours

5,227 Hours

Number of Training Participants

1,013 Employees

### Responsible Product Offering

Bank Mandiri has policies related to the introduction of new products outlined in its Standard Operating Procedures (SPO) for New Product Launches, and Operational Technical Guidelines (PTO) for New Product Launches. These policies reflect the implementation of responsible product and service risk management practices, and includes integrating risk assessment and potential impacts into the new product development process through a comprehensive (end-to-end) approach regulated by risk acceptance and new product development. Additionally, Bank Mandiri consistently conducts monitoring and evaluation of new products to ensure continuous oversight of risks and potential impacts after the product is launched.

Bank Mandiri also transparently communicates risk information to customers. This includes providing information that is clear, accurate, honest, easily accessible, and not misleading; balancing the potential benefits and risks; and ensuring that no significant risk

information is hidden or minimized. Through these steps, Bank Mandiri is committed to supporting sustainability and ensuring that every product and service offered meets ethical and transparency standards, and are socially and environmentally responsible.

According to a Board of Directors' Decision Letter of 2024, every new product recommendation is to be submitted through a structured process, starting with discussions at a technical meeting and with the New Product Coordinator. The recommendation is further evaluated by the Secretary and the Working Group of the Business Committee (BC) for wholesale and retail segments. The final result is presented to the BC, which ensures that every product and service undergoes evaluation in accordance with policies and oversight standards. Bank Mandiri applies a process flow for the BC's oversight of the new product launch, which is as follows:

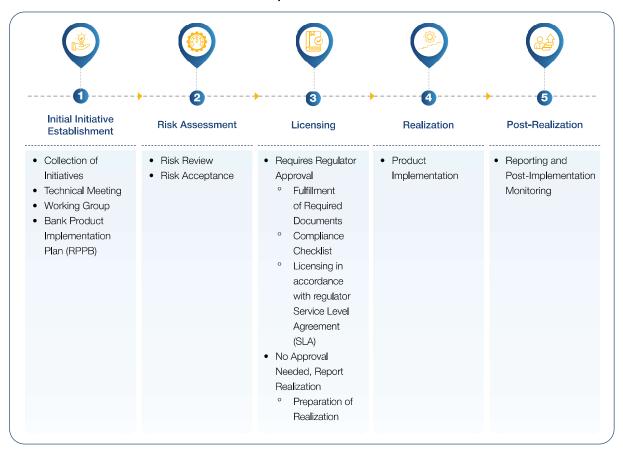


In line with the oversight conducted by the Business Committee, the introduction of new products at Bank Mandiri also follows a series of stages, starting from gathering initiatives, determining product status, to risk approval. Each new product developed is evaluated through a risk assessment and licensing process in accordance with regulatory requirements, including limited trials if necessary. After obtaining approval from the relevant parties, the product is implemented with strict oversight and regularly evaluated to ensure compliance, reliability, and security for customers.



All these stages are depicted in the following process flow.

### **New Product Implementation Process Flow**



In 2024, Bank Mandiri launched 25 products listed in the Bank's Product Implementation Plan (*Rencana Penyelenggaraan Produk Bank*). These products span various categories, including new core products, advanced products, and digital services. Each product is developed in accordance with internal policies, regulatory requirements, and relevant global sustainability guidelines to ensure reliability, security, and regulatory compliance. Additionally, all products undergo independent external reviews before being submitted for regulatory approval.

During the reporting period, all (100%) of Bank Mandiri's new products and services were evaluated based on security aspects and other criteria established by the Company, as well as regulatory requirements. Additionally, all (100%) of Bank Mandiri's products and services were

reviewed for compliance with labeling procedures and product and service information standards. There were no financial products or services withdrawn or discontinued by the Company or its subsidiaries.

In this sustainability report, the Company does not disclose information regarding incidents of violations related to product and service labeling regulations, product information, and marketing communications/advertising, considering confidentiality and information sensitivity aspects. Any customer complaints regarding product information and labeling, as well as marketing communications, will be addressed in accordance with the Bank's established complaint handling procedures. [GRI 417-2, 417-3] [OJK F.27, F.29]

### Products and Services of Bank Mandiri

Bank Mandiri continues to innovate in the development of sustainable financial products and services to enhance convenience and improve the banking experience. The following are the products and services developed up to 2024, encompassing both previous innovations and newly introduced offerings this year. This list provides an overview of various initiatives that Bank Mandiri continues to enhance, reinforcing its commitment to delivering better financial solutions.

### Livin' by Mandiri

Livin' by Mandiri is a financial super app that provides comprehensive banking services accessible via smartphones. Livin' by Mandiri offers a selection of the latest solutions tailored to customers' financial and non-financial needs. Various conveniences are embedded in Livin' by Mandiri, such as account opening in more than 120 countries, Cardless Cash Deposit and Withdrawal, e-Wallet Linkage, Smart Payment, Instant Transfer using BI FAST, Instant Access, QR Payment and Transfer Receipt, Tap to Pay, Paylater, Foreign Exchange Transfer, investment product purchases, and also Livin' Sukha, along with various other exciting features that undoubtedly make banking easier for customers.

### Livin' Merchant

A merchant application that provides point-of-sale (POS) services starting from sales record keeping, stock management, various payment methods, and cash out.

### Livin' Sukha

One of the flagship features of Livin' by Mandiri to meet customers' lifestyle needs is SUKHA. SUKHA enables customers to purchase airline tickets, train tickets, medicines, and healthcare equipment, buy gaming vouchers and subscribe to streaming services, purchase concert and entertainment tickets, shop for daily necessities and electronics, order food and beverages, and even book health check-up appointments. Additionally, SUKHA offers a combination of entertainment and educational content through articles, live streaming, and reels. SUKHA serves as an integrated solution that fulfills entertainment and shopping needs, ensuring a comprehensive lifestyle experience.

### Mandiri e-money

Chip-based electronic money issued by Bank Mandiri as a cash substitute for payment transactions such as toll roads, parking, TransJakarta, trains, minimarkets, and various other merchants.

### **Mandiri Paylater**

Livin' Paylater is a loan facility provided by Bank Mandiri for QR payment transactions at all merchants, following a buy now, pay later concept with installment options of 1, 3, 6, 9, or 12 months. Customers can apply for Livin' Paylater online through Livin' by Mandiri.

### **Mandiri Direct Debit**

A transaction acceptance service for Mandiri Cards at merchants partnering with Bank Mandiri. This service provides a seamless transaction experience with an integrated payment flow.

### **Mandiri Chat Banking**

A communication service between Bank Mandiri and customers through the official WhatsApp Business account WhatsApp Bank Mandiri at 08118414000. Through this service, Bank Mandiri provides information, notifications, and interacts with customers. Conversely, customers can also inquire about Bank Mandiri's products and services using the same WhatsApp number.



### **ATM**

A banking transaction service through ATMs that allows customers to access their accounts, conduct cash transactions, check balances, transfer funds, make payments, and purchases using a Mandiri Card. Through domestic networks and the International Payment Network, Mandiri ATMs also support transactions using other banks' cards. Currently, Bank Mandiri has also equipped its ATMs with cash deposit and cash withdrawal functions.

### **Mandiri EDC**

A service providing Electronic Data Capture (EDC) machines available at stores/merchants partnering with Bank Mandiri. Mandiri EDC facilitates transaction acceptance for purchases, payments, cash withdrawals, and e-money top-ups using Mandiri Cards or other bank cards electronically through domestic networks, the International Payment Network, and the Bank Mandiri Network.

### **KOPRA** by Mandiri

KOPRA by Mandiri is a wholesale super digital platform that provides digital single access services and serves as a central hub for financial transactions and business information for wholesale segment entrepreneurs and their ecosystems, covering end-to-end operations KOPRA is available in three variants:

- 1. KOPRA Portal: A front-end digital service variant featuring a single access portal for seamless access.
- KOPRA Host to Host: A digital single access service variant that integrates the customer's system with the Bank's system.
- 3. KOPRA Partnership: A digital solution that connects wholesale and retail customers by offering a comprehensive business ecosystem to strengthen engagement between customers and the Bank's group.

### Mandiri E-Commerce

A transaction acceptance service for Mandiri Cards and other bank cards at online stores/merchants partnered with Bank Mandiri. Mandiri e-Commerce offers a seamless transaction experience, as payments are processed within an integrated transaction flow without the need to access other banking channels. Customers can use Mandiri Cards or other bank cards through the International Payment Network.

### **Mandiri QRIS**

A payment transaction acceptance service using QR Code at Bank Mandiri merchants, supporting server-based electronic money and other funding sources. The QR system is standardized by Bank Indonesia, enabling users to transact interoperably using Livin' by Mandiri or other registered and Bank Indonesia-approved applications from banks and non-bank (fintech) providers. Mandiri QRIS offers merchants a seamless and cashless transaction experience.

### **Digital Lending for Ecommerce and Fintech**

Bank Mandiri collaborates with digital companies in Indonesia to provide non-revolving working capital loans to MSMEs registered as online sellers/merchants. The loan application process is conducted online through the partner's platform and submitted to Bank Mandiri via API integration. Funds are disbursed to the customer's account upon loan approval. Additionally, for digital companies without a dedicated financing application platform, Bank Mandiri offers an onboarding website to facilitate loan applications.

### **Digital Lending for Value Chain Business**

A business financing product provided by Bank Mandiri for customers selling through digital platforms. Customers can withdraw loan funds as needed on a revolving basis, as long as the loan limit has not been reached. The loan application process is conducted online via partner platforms collaborating with Bank Mandiri and is submitted to the bank through API integration. Customers can also track their loan application status directly through the partner platform.

### **Mandiri Customer Service Machine (CSM)**

The latest digital banking service from Bank Mandiri, equipped with biometric verification technology for card replacement services (changing card types, replacing damaged cards, or lost cards) and new account opening. Customers can conduct transactions self-service at CS Machines with a practical transaction process (without the need to fill out forms), fast, available 24/7, and without the need to wait at a branch.

### Oversight on Evaluation of Financial Products or Services

Bank Mandiri is committed to providing equitable products and services to all its customers. Each new or updated financial product and service is designed with customer needs in mind, including features, convenience, reliability, security, and compliance. Additionally, these financial products and services are tested to ensure adequate protection of personal data and secure transactions in accordance with established standards.

Evaluations are conducted to ensure that all Bank Mandiri's financial products and services, including new offerings, meet security standards and applicable regulations. The Business Committee (BC), led by the President Director, is a board-level committee with oversight of current and new product and service reviews, including the evaluation of product development and discontinuation in accordance with applicable regulations of the Bank. The oversight process also ensures that product development complies with applicable regulations and obtains the necessary approvals and/or submits realization reports to the regulator.

### **Business Committee (Board-level committee) members**

- President Director
- Vice President Director
- Director of Corporate Banking
- Director of Network & Retail Banking
- Director of Finance & Strategy
- Director of Treasury & International Banking
- Director of Risk Management
- SEVP of Corporate Banking
- SEVP of Wholesale Risk
- SEVP of Micro & Consumer Finance

### Roles and Responsibilities

Evaluate the development, updating, and discontinuation of credit and non-credit bank products, including digital banking products and services, while considering the applicable regulations within Bank Mandiri.



### Financial Product Complaint Handling

Customer loyalty is a key foundation for Bank Mandiri's existence for over 25 years, playing an active role in providing banking solutions to individuals and businesses from various sectors. This loyalty is built on customer satisfaction with the best services offered by the company, providing the right solutions that meet customers' financial needs. Bank Mandiri understands that customer loyalty must be maintained by building strong relationships and a deep understanding of their needs, so they will be motivated to recommend Bank Mandiri's services to others.

In addition to offering the best financial products, Bank Mandiri's commitment to customer satisfaction is reflected in its after-sales services, including a customer complaint handling mechanism which is designed in accordance with regulatory requirements and prioritizes customer comfort. This mechanism is implemented through internal policy for customer complaint management.

### Independent Complaint Handling Structure

As a strategic step to ensure transparency and the quality of complaint resolutions, Bank Mandiri has established a Customer Care Unit as an internal independent body. This unit is responsible for:

- Managing and monitoring customer complaints in accordance with the established Service Level Agreement (SLA).
- Handling customer complaints accurately and effectively in accordance with or even more efficiently than the established SLA.
- Coordinating with internal and external Ombudsman<sup>3</sup> to review resolved and unresolved complaint handling processes in compliance with applicable regulations

Customers can submit inquiries and complaints, in writing and verbally, through these easily accessible communication channels:



Website www.bankmandiri.co.id and select the "Contact Us" menu

mandiricare@bankmandiri.co.id

MITA Whatsapp **0811-8414-000** 

Official Social Media:

- χ Twitter @mandiricare and @bankmandiri
- Facebook "Mandiri Care" and "Bank Mandiri"
- Instagram @bankmandiri
- An official letter addressed to Bank Mandiri, either delivered in person or sent by mail.
- Bank Mandiri Branch Offices Across Indonesia

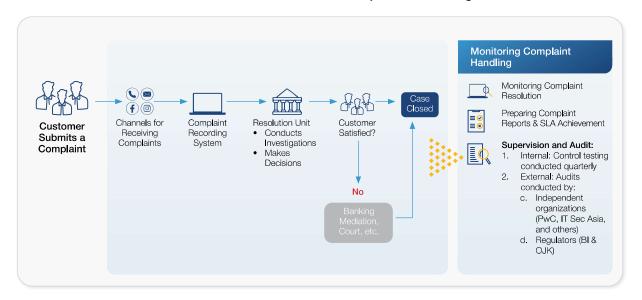
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<sup>&</sup>lt;sup>3</sup> Ombudsman refers to independent parties, both internal and external, who conduct reviews/audits of the bank's activities.

### **Customer Complaint Handling Process**

Bank Mandiri has a clear and effective mechanism for handling customer complaints, aimed at ensuring customer satisfaction and convenience. Each complaint is processed through the following workflow:

### **Process Flow for Customer Complaints Handling**



### a. Customer Complaint Handling by the Customer Care Unit

Complaints received from customers through any complaint submission channels are recorded in the complaint recording system. They are then followed up by the Resolution Unit for investigation and decision-making in accordance with the established SLA. The entire complaint handling process is managed and monitored by the Customer Care Unit.

If customers are dissatisfied with the resolution provided by Bank Mandiri, they may escalate their complaints to independent parties, such as regulators (Bank Indonesia and the Financial Services Authority/OJK), and other institutions such as LAPS SJK, the Indonesia Ombudsman, the Ministry of SOEs, and other external media channels.

### b. Complaint Oversight and Audit

To ensure effectiveness and compliance with complaint management policies, Bank Mandiri conducts regular oversight and audits performed by Ombudsman through the following mechanisms:

 Audit/ Internal Ombudsman: Internal audits are conducted by the Senior Operational Risk (SOR)

- officer through quarterly control testing to ensure adherence to policies, procedures, and the SLA. These audits also include evaluating the quality of complaint resolution and providing recommendations for continuous improvement.
- Audit/ External Ombudsman: External audits are carried out by regulators (Bank Indonesia & the Financial Services Authority) as well as independent institutions such as PwC and IT Sec Asia to ensure transparency, integrity, and compliance with regulatory requirements. These audits assess the effectiveness of control systems, validate the complaint escalation process, and provide improvement recommendations based on independent evaluations.

Bank Mandiri implements customer complaint resolution strategy in accordance with designated levels of authority, taking into account the decision-making authority required for resolving customer issues and the complexity of the complaints. In line with this approach, the Customer Care Unit routinely collaborates with product owners to review received complaints, aiming to enhance service quality and expedite the resolution process.



### Oversight of the Complaint Resolution Process

The Risk Monitoring Committee, a Board-level committee, oversees the review of customer complaints, alongside the Director of Operations, who receives reports on the performance of customer complaint management and a summary of customer complaints directly from the Customer Care Unit. These efforts are undertaken to thoroughly discuss the complaint resolution process and identify necessary follow-up actions in collaboration with relevant work units.

Bank Mandiri sets complaint resolution targets proposed by the Operational Risk Unit to the Risk Management & Credit Committee (RMC), which are subsequently approved by the Board of Directors and the Board of Commissioners. For 2024, Bank Mandiri's target is 90 complaints per one million transactions. To enhance the quality of complaint handling, PT NielsenIQ Services Indonesia conducted a customer satisfaction survey on Bank Mandiri's complaint handling, achieving a score of 8.6 out of 10.

### **Customer Complaint Recapitulation**

During the reporting year, there were 987,822 customer complaints, representing a 9% decrease compared to the previous year. Of these, 100% were resolved in accordance with the established Service Level Agreement (SLA).

Description	2024	2023	2022
Total customer complaints	987,822	1,082,317	725,559
Complaints in the resolution process during the reporting year	-	-	-
Resolved complaints	987,822	1,082,317	725,559
Total transactions	19,086,390,532	15,146,907,333	12,038,675,803
Target RAS metrics	90	90	108
Realized RAS metrics	52	71	60
Resolution rate	100%	100%	100%

<sup>\*</sup>RAS metrics: Ratio of complaints to 1 million transactions

### **Customer Satisfaction**

Customer satisfaction and loyalty are key to sustainable business growth. Bank Mandiri consistently applies service excellence to ensure positive experiences and satisfaction for customers across all its service contact points. As part of this commitment, Bank Mandiri conducts annual customer satisfaction surveys to gather the voice of the customer and input to achieve the highest quality of service. In 2024, the surveys were conducted in collaboration with PT NielsenIQ Services Indonesia for the Customer Experience Survey

(CX Survey) and PT Morrigan Services for the Service Excellence Survey (SES) using a sampling method.

The CX Survey measures two main indicators, Customer Satisfaction Score (CSAT) and Net Promoter Score (NPS). These are assessed using methods such as face-to-face interviews (F2F), computer-assisted personal interviewing (CAPI), focus group discussions (FGD), and in-depth interviews (IDI). Meanwhile, the SES uses the mystery

shopping method to evaluate the consistency of Bank Mandiri's service standards across all contact points.

Bank Mandiri's service performance in 2024 showed growth with a Customer Satisfaction Score (CSAT) of 86.11, a Net Promoter Score (NPS) of 67, and a Service Excellence Survey (SES) score of 91.52.

To further improve complaint handling quality, the Company, in collaboration with independent parties, also conducted customer satisfaction surveys regarding complaint handling within Bank Mandiri and the industry. Two specific indicators were measured in detail, with the survey results as follows:

#### **Customer Satisfaction Scores**

Indicator	Bank Mandiri	Industry*
Satisfaction score for complaint handling	8.6	8.6
Satisfaction score for the duration of complaint resolution	8.5	8.4

<sup>\*</sup>Bank Group Based on Core Capital Tier IV

The results of the survey indicate that Bank Mandiri's customer satisfaction score is higher than the average satisfaction level in the banking industry.

Bank Mandiri is committed to consistently making improvements to continue providing the best services to customers, thereby enhancing customer satisfaction and loyalty.

## Privacy Management, Cybersecurity, and Data Protection

The ease of transactions enabled by the digital era and the adoption of the latest technologies brings not only opportunities but also risks to information security. These risks include theft, manipulation, and misuse of data, which can threaten the confidentiality, integrity, and availability of information. Bank Mandiri places privacy and information security as key elements in delivering secure banking

services. The topic of Customer Data Security and Privacy has been selected as one of the primary material topics, reflecting its significant impact on business sustainability and stakeholder trust. To address this, Bank Mandiri continuously mitigates these risks to safeguard against potential financial losses, reputational damage, and legal actions. [FN-CB-230a.2]

## Responsibilities for Managing Privacy, Cybersecurity, and Data Protection

Bank Mandiri has established responsibilities at the Board-Level Committee for managing Privacy, Cybersecurity, and Data Protection (including personal data in accordance with the Personal Data Protection Law), as stipulated in the company's internal regulations at the Policy and Standard Procedure level. These responsibilities include overseeing Committees Under the Board of Directors, which are formed to assist the Board of Directors in making decisions aligned with the vision, mission, and strategy of Bank Mandiri.

Oversight by the Board of Directors and Board of Commissioners related to the Management of Privacy, Cybersecurity, and Data Protection:

1. Risk Management Committee

This committee is formed to assist the Board of Directors in implementing effective Risk Management processes and systems by ensuring adequate identification, measurement, and monitoring of risks, as well as the establishment of risk management policies and strategies.



### Structure of Risk Management Committee

Chairperson	Vice President Director	
Secretary	Group Head of Credit Portfolio Risk	
Alternate Secretary	Group Head of Market Risk	
Permanent Voting Member	<ol> <li>Vice President Director</li> <li>Director of Compliance &amp; Technology</li> <li>Human Resources</li> <li>Director of Risk Management</li> <li>Director of Network &amp; Retail</li> <li>Banking</li> <li>Director of Operations</li> <li>Director of Finance &amp; Strategy</li> </ol>	
Non-Permanent Voting Member	Members of the Board of Directors and SEVPs related to the subject matter attending as invitees	

### 2. Risk Monitoring Committee

This committee was established to assist the Board of Commissioners in carrying out its supervisory duties and providing advice to the Board of Directors. Its role is to ensure that the Bank's risk management implementation remains aligned with adequate procedures and methodologies. By maintaining proper risk management practices, the committee helps ensure that the Bank's business activities remain within acceptable and profitable limits.

### Members, Duties & Responsibilities of the Risk Monitoring Committee

Member	<ol> <li>Risk Monitoring Committee consists of at least three (3) members, comprising Independent Commissioners and Non-Commissioner Independent Parties.</li> <li>The composition of the Risk Monitoring Committee includes at least 1 (one) Independent Commissioner serving as Chairperson and member, with expertise in finance, risk management, and/or business, 1 (one) Non-Commissioner Independent Party with expertise in finance, 1 (one) Non-Commissioner Independent Party with expertise in risk management.</li> </ol>
Duties and Responsibilities	<ol> <li>Monitoring and evaluating risk management policies (including implementation and compliance with regulations).</li> <li>Reviewing risk profile reports, bank health reports, and other types of risk reports.</li> <li>Providing recommendations to enhance the effectiveness of risk management.</li> <li>Conducting regular meetings with relevant work units.</li> <li>Reporting supervision results periodically to the Board of Commissioners.</li> <li>Preparing and reviewing work guidelines regularly.</li> </ol>

### 3. Steering Committee for Personal Data Protection

This committee was established as a commitment to compliance with data protection regulations. It is responsible for formulating strategies and defining measures to fulfill obligations under the Personal Data Protection Law.

### Members, Duties & Responsibilities of the Steering Committee for Personal Data Protection

Members	<ol> <li>Director of Compliance &amp; Human Resources</li> <li>Director of Information Technology</li> <li>Director of Risk Management</li> <li>Members of the Board of Directors, SEVP, Group Heads, and Department Heads related to the subject matter, attending as invitees</li> </ol>	
Duties and Responsibilities	<ol> <li>Providing guidance on strategy and the effectiveness of Personal Data Protection implementation Bankwide.</li> <li>Conducting mapping, assessment, and all necessary actions to align Bank Mandiri's operations/activities with the provisions of the Personal Data Protection Law.</li> </ol>	

### Active Oversight by the Board of Directors and the Board of Commissioners

Strategic oversight by the Board of Commissioners and the Board of Directors is carried out through a structured mechanism. Every quarter, data security and privacy performance is discussed and formally reported in the Risk Monitoring Committee, Audit Committee, and Integrated Governance Committee forums. These discussions include ESG achievements related to data privacy and security, the effectiveness of layered security systems, and compliance with Mandiri Group security standards. This mechanism ensures holistic information security management aligned with the Company's strategic objectives.

In addition, the Steering Committee for Personal Data Protection has been established as a testament to Bank Mandiri's commitment to data protection regulations. The Steering Committee is responsible for formulating strategies and establishing measures to fulfill obligations under the Personal Data Protection Law (PDP Law).

Furthermore, Bank Mandiri has established a Data Governance Body to support the corporate strategy through the implementation of an effective and efficient data strategy. This data governance framework is structured based on best practices, external regulations, and Bank Mandiri's internal policies. Additionally, this governance framework involves all business units within Bank Mandiri to ensure integrated and optimal data management.

To support the comprehensive management of information security and cyber resilience across all operational lines, Bank Mandiri implements the 3 Lines of Model, which includes:

### 1st Line of Model: Chief Information Security Officer (CISO) Office Group

Responsible for managing cyber resilience and security by implementing operational security controls.

### 1.5 Line of Model: Senior Operational Risk Information Technology (SOR IT)

Responsible for testing the effectiveness of implemented operational controls.

### 2<sup>nd</sup> Line of Model: Operational Risk Group

Responsible for developing the framework and strategy for cybersecurity risk management.

### 3rd Line of Model: IT Audit Group

Responsible for conducting independent assurance, including periodic verification and review of the implementation of cybersecurity risk management.

In 2018, Bank Mandiri established a dedicated unit, the Chief Information Security Officer (CISO) Office Group, to manage information security and cyber resilience. This unit operates under the direct supervision of executive management (C-level) to ensure comprehensive implementation of cybersecurity resilience across all operational lines of the Company (bank-wide). In its operations, the unit adopts a cyber resilience framework based on international standards and best practices, ensuring readiness to face the ever-evolving cyber threats.

Furthermore, to support the implementation of the PDP Law at Bank Mandiri, the Board of Directors has approved the appointment of a Personal Data Protection Officer (PDPO) or Data Protection Officer (DPO) and the establishment of a dedicated work unit to support the functions of the PDPO.

In line with efforts to comprehensively manage information security, data privacy, and cyber resilience, Bank Mandiri adopts a collaborative approach across relevant work units to ensure optimal data protection. The information and data security governance structure at Bank Mandiri includes the following key elements:



Unit	Duties and Responsibilities
	Managing information security and cyber resilience by:
Chief Information Security Officer (CISO) Office Group	<ul> <li>Designing, implementing, and evaluating information security architecture.</li> <li>Managing regulations, standards, processes, and baselines based on best practices and compliance with information technology security requirements from regulators and the government.</li> <li>Ensuring the effective implementation of security reviews in application design, application security testing, and penetration testing within the IT application system development framework under the System Development Life Cycle.</li> <li>Identifying and analyzing cybersecurity threats through continuous monitoring functions.</li> </ul>
Data Protection Officer and Data Protection & Fraud Risk Group Work Unit	<ul> <li>Review and provide advice to Work Units to ensure compliance with the provisions of laws and regulations regarding Personal Data Protection.</li> <li>Monitor and evaluate compliance with laws and regulations on Personal Data Protection, as well as the Bank's policies and/or Personal Data Processors.</li> <li>Provide recommendations regarding the impact assessment of Personal Data Protection and monitor the performance of Work Units related to Personal Data Processing, including other Personal Data Controllers and/or Personal Data Processors.</li> <li>Coordinate and act as the point of contact for matters related to Personal Data processing.</li> <li>Follow up and develop internal procedures to address requests from Personal Data Subjects' Rights while adhering to applicable laws and regulations as well as business processes.</li> <li>Declare and deliver written notifications to Personal Data Subjects and the Personal Data Protection Authority in the event of a Personal Data Protection failure.</li> </ul>
Enterprise Data Analytics Group	<ul> <li>The work unit responsible for carrying out tasks and duties as Data Governance and Data Steward.</li> <li>Supporting the accurate and timely implementation of strategies, development, and business policies of the bank, while being trend-oriented and data-driven.</li> <li>Ensure the data management and data governance provisions that guarantee the quality of data provided to other work units.</li> <li>Ensure the effectiveness of reporting activities and project initiatives aimed at achieving and realizing the Bank Mandiri Data Center / single source of truth at Bank Mandiri.</li> <li>Ensure that bank business strategies, development, and policies are data-driven, focusing on trends or data patterns, so that strategy implementation becomes more accurate and timely.</li> <li>Oversight the work program related to the development of strategies and policies for data management at Bank Mandiri and its subsidiaries, in accordance with the specified requirements and schedules, and make necessary adjustments for improvement.</li> </ul>
Operational Risk Group	<ul> <li>Work unit responsible for managing cybersecurity risk.</li> <li>Provide input to management in the formulation, development, and enhancement of the cybersecurity risk management framework, including strategy, policies, and organizational adequacy.</li> <li>Develop and refine procedures and tools for implementing cybersecurity risk management.</li> <li>Design and implement necessary controls to strengthen cybersecurity measures.</li> <li>Monitor the implementation of the cybersecurity risk management framework as established by the Board of Directors and approved by the Board of Commissioners.</li> <li>Conduct assessments to evaluate the impact of cybersecurity risk management strategies and policies on the Bank's overall risk profile.</li> <li>Provide recommendations for cybersecurity risk management implementation to the Board of Directors and/or other relevant units.</li> <li>Prepare and submit periodic cybersecurity risk management maturity assessment reports to regulators.</li> <li>Review proposals for new products and emerging technologies developed by specific units within the Bank, focusing on assessing their potential impact on the Bank's overall cybersecurity risk exposure.</li> </ul>

### Privacy and Data Protection Policy

To ensure compliance with regulations and safeguard personal data, Bank Mandiri implements a Personal Data Protection (PDP) Policy and Privacy Policy, as outlined in internal policies in the form of Memorandum on Personal Data Protection. This policy governs all relevant business lines/operations of Bank Mandiri, including overseas branches, customers, and vendors. This policy also applies to all financial products, whether account openings are conducted through branch offices or digital platforms. To harmonize data management across subsidiaries, including data privacy and security, Mandiri Subsidiary Management Principle Guideline (MSMPG) establishes data management provisions that can be adopted and aligned by subsidiaries. A component of Bank Mandiri's Privacy Policy, namely the Individual Customer Privacy Policy and the Privacy Policy of Customer of Entity, can be accessed at the following link: bmri.id/KebijakanPrivasi.

All internal policies of Bank Mandiri are reviewed as needed, at a minimum of once per year (annual review), or in accordance with regulatory requirements. Reviews are also conducted whenever there are provisions or changes issued by external regulators that impact Bank Mandiri's internal policies or when there are changes in business or operational needs. To ensure implementation across all employees regarding privacy and cybersecurity, as well as to raise awareness of the threats and the importance of these issues, Bank Mandiri has established internal policies in the form of standard procedures on information technology and data management as the primary guidelines. These are further supported by internal policies in the form of technical guidelines on data retention and security baseline, serving as operational technical guidelines. Internal policies in the form of standard procedures related to information technology also regulate various aspects of information technology security and cybersecurity. Meanwhile, internal policies in the form of standard procedures related to data management focus on data governance across all Bank units, both domestically and internationally. Specifically for overseas branch offices, in addition to adhering to the provisions of these standard procedures, they are also required to comply with the regulations applicable in each operational country.

### Personal Data Protection Strengthening Program

The personal data protection strengthening program is integrated into Bank Mandiri's bank-wide compliance governance system, risk management, and technical operations through its Personal Data Protection Program (PPDP) to ensure adherence to regulatory standards and internal policies. Periodic evaluations are conducted on the policies and procedures implemented by relevant units, along with internal audits and audits by independent third parties to ensure compliance with the bank's Personal Data Protection Policy.

To enhance data security, Bank Mandiri implements various protection measures, including encryption, access control, and regular security audits. Through the Personal Data Storage Implementation Unit, Bank Mandiri ensures the security of customer personal data by applying physical and electronic data security controls, data retention mechanisms, strict access management, and prevention of data protection failures. This unit is also responsible for managing storage locations and media, addressing requests for data copies by data subjects, and recording and adjusting storage processes as needed.

The complexity of implementing personal data protection impacts all operational activities, including those involving customers, employees, and third parties. A comprehensive personal data protection program has been developed in collaboration with the Data Protection and Fraud Risk Group, CISO Office Group, Enterprise Data Analytics

Group, IT Application Support Group, Operational Risk Group, and Human Capital Strategy & Talent Management Group. The program focuses on four key areas:

- 1. Business process improvement;
- 2. System development;
- 3. Enhancement of internal regulations, and
- 4. Organizational strengthening.

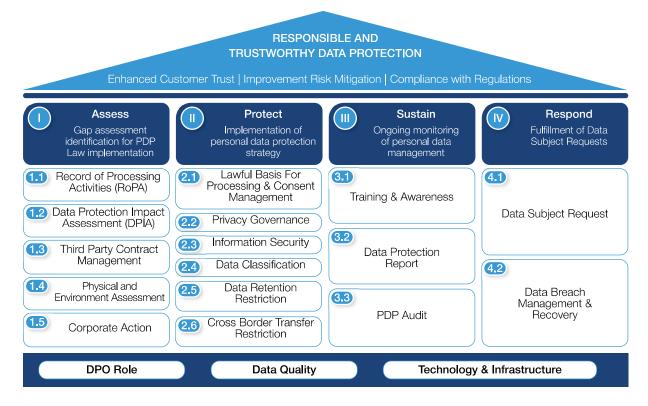
Bank Mandiri's personal data protection strengthening program covers not only customer personal data but also employee and third-party data associated with the bank. The personal data protection strengthening program is integrated into Bank Mandiri's compliance governance system, risk management, and technical operations through PPDP, ensuring adherence to regulatory standards and internal policies. To enhance security, Bank Mandiri implements various protective measures, including encryption, access control, and regular security audits.

During the reporting period, Bank Mandiri reviewed internal regulations, appointed Personal Data Protection (PDP) officers, provided a Record of Processing Activity (ROPA), and conducted Data Protection Impact Assessments (DPIA). The implemented programs included metadata management, data quality improvement, and adjustments to customer requirements, supported by personal data protection training through the Mandiri University Group.



Bank Mandiri continuously conducts comprehensive reviews of its personal data protection program to ensure operational compliance with the Personal Data Protection Law (PDP Law). Bank Mandiri also organizes focus group discussions (FGDs) with various associations in Indonesia, foreign institutions, and consultants to discuss best practices in personal data protection.

### Framework for the Implementation of Personal Data Protection



Bank Mandiri has established a framework to support the implementation of Personal Data Protection, with the vision of "Responsible and Trustworthy Data Protection." The framework aims to enhance customer trust, improve risk mitigation, and ensure compliance. In its implementation, this framework is supported by four main pillars: assess, protect, sustain, and respond.

The four supporting pillars in the data protection framework implemented by Bank Mandiri are:

#### Sustain Assess Protect Respond 1.1. Record of 2.1 Lawful Basis 3.1. Training & 4.1. Data Subject **Processing Activities Awareness** for Processing Request Identification of & Consent Socialization, A response Management the processes for awareness, and from the Bank in The basis for recording personal mandatory training accommodating processing personal the rights of Data data processing, on Personal data and the Data Protection, including mapping Subject customers management of data flows and other considering the in accordance with processing consent detailed information as involvement of each the procedures and provided by the data required by law. work unit in personal timeframes set by the subject. data processing applicable laws and activities. regulations.

#### Assess

### 1.2. Data Protection Impact Assessment (DPIA)

An analysis/ assessment conducted to evaluate personal data processing activities with high potential risks.

### 1.3. Third Party Contract Management

Adding PDP clauses and security protection standards in agreements with third parties.

### 1.4. Physical & Environment Assessment

Includes risk management for physical facilities and environments against threats and vulnerabilities, such as human factors, disasters, and environmental risks, by implementing controls like access cards, access control, alarms, and video surveillance (CCTV).

### 1.5. Corporate Action

In the event of mergers, splits, acquisitions, consolidations, and/or the dissolution of legal entities, the Bank must notify the Data Subjects and relevant authorities through information transparency.

#### **Protect**

### 2.2. Privacy Governance

The creation of internal provisions related to Personal Data Protection and the adjustment of existing provisions to comply with the Personal Data Protection Law.

#### 2.3. Information Security

Ensuring the security of processed personal data through:

- Pseudonymization, encryption, and/or data anonymization mechanisms
- Routine testing and review of security control measures to ensure effective and ongoing activities.

### 2.4. Data Classification

Implementing data classification mechanisms to protect sensitive data (including personal data) from being accessed by unauthorized parties/individuals.

### 2.5. Data Retention Restriction

Strategies for the deletion/destruction of personal data that has exceeded its retention period.

### 2.6. Cross Border Transfer Restriction

Policies related to the transfer of personal data outside the jurisdiction of the Republic of Indonesia.

#### Sustain

The establishment of internal regulations for employees to comply with the provisions of the PDP Law, highlighting the do's and don'ts in the implementation of personal data protection.

Media: Newsletter, Podcast, Video, Online & Offline Training, Pulse-check.

### 3.2. Data Protection Report

A periodic report to the Director of Risk Management in the form of a monthly report, and reports to Management in the Data Protection Steering Committee.

### 3.3. PDP Audit

An audit process conducted by independent parties, both internal and external, on the implementation of the PDP to ensure compliance and alignment with applicable laws.

### Respond

### 4.2. Data Breach Management & Recovery

Handling personal data protection failures and reporting them to the PDP Authority, as well as notifying the Data Subjects of the personal data protection failure.



### Privacy Governance in Information Security and Data Protection

In line with technological advancements and the increasing risks to information security, Bank Mandiri continues to enhance data and information protection as part of its corporate sustainability strategy. Bank Mandiri does not rent, sell, or provide data in any form to third parties, except for the purpose of financial transactions/services. The bank minimizes data backup management, risk mitigation, as well as documentation and monitoring. As a concrete step, Bank Mandiri has refined its policies to mandate the application of personal data protection principles in accordance with PDP Law. The scope of the policy and the implementation of personal data protection principles are outlined in the internal policy through the Memorandum of Procedure on Personal Data Protection.

Bank Mandiri consistently updates its SOPs for Data Management, which regulate the processing of personal data. This includes processing data in accordance with the purposes agreed upon by customers, data retention periods, processes for receiving and sending data to external parties, and data deletion. The data protection policies outlined in the SOPs cover all data stored within Bank Mandiri's database systems, which impact assets and liabilities, including commitments and contingencies. These SOPs govern data management activities and establish data governance as the foundation for an end-to-end process, encompassing:

- Data initiation management;
- Metadata management;
- · Master data management;

- Data quality management;
- Data storage management;
- Data development management;
- Data security management;
- Data provisioning management;
- Big data analysis management;
- Data backup management.

Internal policies, which include Standard Operating Procedures related to Data Management and Personal Data Protection, also regulate several prohibitions concerning the management of customer data. Some of these prohibitions include:

- Prohibiting the disclosure of customer data and/or personal information to third parties;
- Forcing potential customers to share data as a condition for product/service agreements; and
- Using personal data of potential customers whose applications have been rejected. Exceptions apply only if there is written or electronic consent from the customer or based on legal provisions.

All policies and procedures related to information security and data protection are internally available for all employees. To support this, Bank Mandiri provides internal access through its POPCORN (Policy and Procedure Corner) online platform. This platform facilitates easy access for employees to applicable policies and procedures, ensuring consistent and comprehensive implementation in maintaining information security and data protection.

### Information Security and Data Protection Implementation at Mandiri Group

Bank Mandiri has developed the Mandiri Subsidiaries Management Principles Guideline (MSMPG), which includes provisions governing collaboration on information technology and data management with its Subsidiaries. This guideline aims to create sustainable value while adhering to the principles of good corporate governance and the Articles of Association of each subsidiary. All policies and procedures are periodically reviewed to ensure their relevance to technological advancements, operational needs, and applicable regulations. Policies implemented at

subsidiaries must align with those of Bank Mandiri as the parent entity.

MSMPG addresses various aspects, including aligning information technology security architecture to ensure corporate security and regulatory compliance; and data management that promotes the implementation of integrated management information systems and data governance in accordance with applicable regulations. Data governance at subsidiaries must also align with Bank Mandiri's data governance framework.

As the parent entity, Bank Mandiri has aligned and synergized with its subsidiaries in the areas of information resilience and security, as well as personal data protection within the Mandiri Group conglomerate, through the implementation of monitoring and assistance provided by each subsidiary. For information resilience and security, the CISO Office Group collaborates with subsidiaries by establishing Mandiri Group's information security standards, which include controls to anticipate cybersecurity attacks that are non-negotiable, considering the complexity of each subsidiary's systems. Compliance with these standards and controls is monitored and reported to the Board of Commissioners and the Board of Directors of Bank Mandiri and the subsidiaries on a regular basis. In 2024, the CISO Office Group will also organize a knowledge-sharing forum as part of the ongoing strengthening of cybersecurity resilience within the Mandiri Group.

Furthermore, regarding data protection, Bank Mandiri,

through the Personal Data Protection Officer (PPDP) / Data Protection Officer (DPO), also coordinates the implementation of data protection across the Mandiri Group Financial Conglomerate through monitoring and assistance provided to the subsidiaries. In 2024, Bank Mandiri will organize a workshop for all subsidiaries to ensure that the implementation of Personal Data Protection has been comprehensively carried out and complies with the law. In this regard, all subsidiaries have implemented privacy policies that are listed on their respective corporate websites.

The information security policies at the subsidiaries are based on the information security policies in place at Bank Mandiri, while taking into account the operational conditions of each entity.

The information security and data protection policies at











subsidiaries include the following:



### **Bank Syariah Indonesia**

(https://www.bankbsi.co.id/kebijakan-privacy/bsi)

The privacy of customer personal data is a top priority for BSI. The BSI Privacy Policy explains how the company collects, uses, discloses, processes, and manages customer personal data. The policy applies to all personal data owned by or under the control of BSI.

BSI provides information regarding the use of customer data, for business needs and product and service marketing. The use and disclosure of customer data are conducted in accordance with the regulations of Bank Indonesia, the Financial Services Authority (OJK), data protection laws, and applicable privacy regulations.

The stored data is required for application operations, including customer data (such as customer photos and photos of visits and collateral), data entered into the menu pipeline, and unique device identifiers used. Without this data, the application cannot be processed or stored for searches. The application does not share data internally or externally with any third party, and this data is protected using Secure Socket Layer (SSL) encryption. Data stored in the system can be deleted through an official request submitted in accordance with the procedures established by the bank.



### **Mandiri Taspen**

https://www.bankmandiritaspen.co.id/article/id-kebijakan-privasi/id

Bank Mandiri Taspen is committed to maintaining the confidentiality of customer digital transactions amidst the increasing prevalence of phishing attacks by employing advanced encryption technology as a layer of protection. Although every transaction—including digital ones—has risks, most of these risks can be minimized through proper understanding and use of safe transaction methods. The core principle is simple and easy to remember: BE CAUTIOUS, BE THOROUGH, AND CONFIRM.



### **Mandiri Utama Finance**

https://www.muf.co.id/kebijakan-privasi/

MUF always maintains the trust of every customer. One way is by ensuring customer security during transactions and applying the following principle: BE CAUTIOUS, BE THOROUGH, AND CONFIRM.



### **Mandiri Tunas Finance**

https://www.mtf.co.id/id/kebijakan-privasi-mtf1access

As part of its commitment, MTF uses customer personal information solely for service development purposes, without requiring the completion of personal data forms. The website collects cookie data and visitor statistics to enhance services. MTF also safeguards the confidentiality of consumer transactions, including digital transactions, where most risks can be minimized through proper understanding of safe transaction practices based on the principle: BE CAUTIOUS, BE THOROUGH, AND CONFIRM.



#### **AXA Mandiri Financial Services**

https://axa-mandiri.co.id/web/customer/kebijakan-privasi

The need for data usage continues to grow with technological advancements. AXA Mandiri innovates to improve customer experiences in transactions and data protection through tailor-made protection, information simplification, and procedural efficiency. AXA Mandiri is responsible for ensuring the security and confidentiality of customer personal data in compliance with applicable laws.

AXA Mandiri is committed to protecting customer data by implementing physical, technical, and organizational procedures to ensure secure access, storage, and disclosure. Customer data is not shared without consent, and identities are verified before accessing or altering data



#### **Mandiri Sekuritas**

(https://www.mandirisekuritas.co.id/id/kebijakan-privasi)

Mandiri Sekuritas is committed to maintaining the privacy and security of customer personal data as well as prospective customers in compliance with applicable laws and regulations. The company's privacy policy covers various aspects of data management, from collection and use to disclosure when customers use or access our electronic systems.

The policy also includes details on customer preferences, such as data collection, tracking, cookies, transfers, disclosures, security, the use of third-party providers, website links, and policy disclosures.

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### Mandiri Capital

(https://mandiri-capital.co.id/kebijakan-privasi/)

MCI provides information about its privacy policy on its website, including the collection and use of personal data such as name, address, and email provided voluntarily by visitors. This personal data is used to enhance customer service in compliance with applicable laws and regulations. Although customers are not required to provide such data, certain services may not be available without it. MCI also collects cookie data and visitor statistics to improve user experience. Users have the right to disable cookies while visiting the website.



### Mandiri Europe

(https://www.bkmandiri.co.uk/privatepolicy.htm)

Bank Mandiri (Europe) is committed to protecting customer privacy by implementing clear privacy policies. These policies include processes for maintaining confidentiality, including the use of cookies, to ensure all customer personal data is securely stored. Customer data is not disclosed without prior consent, unless required by law and explained in the privacy policy. Any questions regarding privacy are also addressed under the policy to maintain customer security.



### **Mandiri Remittance**

(https://www.mandiriremittance.com/privacy-policy/)

The Privacy Notice of Mandiri International Remittance Sdn. Bhd. (MIR) explains the use of customer personal data. MIR is committed to ensuring the processing of personal data complies with the Personal Data Protection Act 2010 (PDPA). This notice applies to all personal data voluntarily provided by customers when accessing MIR services, as well as data on the website and all products and services offered. This policy also governs the purposes and types of personal data, disclosure, security, storage, integrity, and access principles for personal data processed by MIR.



### Bank Mandiri Privacy Policy

To ensure responsible management, Bank Mandiri consistently informs customers of the purpose and legal basis for data processing, ensuring that each consent is given consciously and based on a clear understanding. Bank Mandiri has provided information outlined in the Privacy Policy, including the legality of personal data processing (basis for personal data processing), the purpose of processing personal data, the types and relevance of personal data to be processed, the retention period of documents containing personal data, details of the information collected, the processing period of personal data, and the rights of Data Subjects.

### 1. Basis for Personal Data Processing

Bank Mandiri has established the basis for personal data processing as regulated in the internal provisions related to Personal Data Protection, which include:

- a. Consent from the Data Subject for the Privacy Policy signed through an inseparable consent form
- b. Agreement with the Data Subject
- c. Fulfillment of legal obligations
- d. Protection of the vital interests of the Data Subject (Vital Interest)
- e. Performing tasks in the public interest
- f. Fulfillment of other legitimate interests, while ensuring a balance between Bank Mandiri's interests and the rights of the Data Subject

Bank Mandiri manages consent for personal data processing with a focus on transparency and compliance with Law No. 27 of 2022 concerning Personal Data Protection (PDP Law). The consent management system in place allows customers to provide, modify, or withdraw their consent.

### 2. Purpose of Personal Data Processing

Bank Mandiri implements comprehensive measures in managing and protecting data to ensure the security of customer information and compliance with applicable regulations. Personal data processing is carried out only based on the approved legal basis and purpose as consented by the data subject.

The purpose of processing personal data and the types of data processed have been thoroughly identified and outlined in Bank Mandiri's Privacy Policy, which includes:

 Management of products, services, and/or Bank Mandiri's offerings, including profiling and scoring, to enhance service to customers and manage Bank Mandiri's risk.

- Provision of promotions or programs by Bank Mandiri that may collaborate with third parties for products and/or services that the customer already possesses.
- c. Marketing and/or offering products, services, and/or offerings from Bank Mandiri and/or other companies within the Mandiri Group and/or third parties collaborating with Bank Mandiri, for products and/or services not yet owned by the customer.
- d. Fulfillment of legal regulations and orders from regulators, law enforcement, and other authorized institutions.

### 3. Types and Relevance of Personal Data to be Processed

Bank Mandiri implements comprehensive measures in managing and protecting data to ensure the security of customer information and compliance with applicable regulations. The collection, use, and storage of customer information are conducted with caution and transparency. All data collected by Bank Mandiri is determined based on the applicable transaction requirements. However, Bank Mandiri is committed to minimizing personal data requests, ensuring that the requested data is relevant and complies with regulatory provisions. The types of data processed are outlined in Bank Mandiri's Privacy Policy.

### 4. Retention Period for documents containing Personal Data

Bank Mandiri has established a retention period in accordance with applicable legal regulations and laws.

### 5. Details of the Information Collected

Details regarding the information collected have been provided on the types of personal data collected and outlined in Bank Mandiri's Privacy Policy. Personal data processed by Bank Mandiri includes, but is not limited to, identification data, correspondence, education and employment, family, financial, digital activities, and personal preferences, obtained directly or through third parties in accordance with the provisions.

### 6. Processing Period for Personal Data

Bank Mandiri will process personal data upon receiving the legal basis for processing. Processing will continue during the use of Bank Mandiri's products, services, and/or offerings or in accordance with applicable legal provisions.

## Rights Provided to Customers to Control Their Data (Rights of Personal Data Subjects)

Bank Mandiri guarantees customers' rights to access, correct, update, delete, and destroy personal data, as well as obtain data portability in accordance with applicable regulations. Bank Mandiri ensures the fulfillment of customer rights regarding personal data management, as outlined in the Privacy Policy, which includes the following rights:

#### 1. Right to Information and Access

The Data Subject has the right to obtain information regarding the identity of the party requesting their personal data, the purpose of the request, and access to copies of their personal data.

### 2. Right to Rectification of Data

The Data Subject has the right to complete, update, and/or correct personal data that is inaccurate or incomplete.

### 3. Right to Obtain, Use, and/or Transfer Personal Data to Others

The Data Subject has the right to obtain, use, or provide their personal data held by Bank Mandiri to third parties, as long as the communication systems used by Bank Mandiri and the third parties are secure.

### 4. Right to Terminate Processing, Delete, and/or Destroy Personal Data

The Data Subject has the right to terminate processing, delete, and/or destroy their personal data. The Data Subject agrees to provide Bank Mandiri with time to process the termination of processing, deletion, and/or destruction of personal data as long as Bank Mandiri requires.

### 5. Right to Withdraw Consent

The Data Subject has the right to withdraw consent for the processing of personal data that has been given to Bank Mandiri, and the Data Subject agrees to provide Bank Mandiri additional time to process the termination of processing of their personal data as long as Bank Mandiri requires.

### 6. Right to Object to Automated Processing Results

The Data Subject has the right to object to the results of automatic personal data processing that have legal consequences or significantly impact the Data Subject, including profiling and/or credit scoring.

### 7. Right to Suspend or Limit Processing

The Data Subject has the right to suspend or limit the processing of their personal data proportionally according to the purpose of personal data processing. To exercise this right, the Data Subject can contact Bank Mandiri through the communication channels provided in section H of this Privacy Policy.

### 8. Other Rights in Accordance with Legal Regulations

The Data Subject has the right to exercise other rights related to personal data processing as provided by applicable laws and regulations.

As a form of transparency, Bank Mandiri outlines the mechanism for fulfilling its obligations in response to requests from Personal Data Subjects by providing the contents of the Privacy Policy to the Personal Data Subjects through branches, the corporate website, and other touchpoints that engage with Personal Data Subjects.

### Data Protection Systems and Procedures

### **Data Protection Procedures**

To safeguard customer personal data, Bank Mandiri conducts periodic reviews and ensures that all data usage has obtained customer consent. Data processing is carried out in a limited manner, aligned with its purpose, and guarantees the accuracy, completeness, and reliability of information. The Company also protects personal data from loss, misuse, unauthorized disclosure, alteration, or destruction by notifying the purpose of data collection and processing activities.

Bank Mandiri's strong commitment to independent

data management includes processing and deleting unauthorized or accidental data. This commitment is realized through the implementation of data security management, which includes monitoring asset management, protecting data during transfer processes, and destroying data in accordance with applicable procedures. Additional security measures include:

- Implementing data classification mechanisms to protect sensitive data from unauthorized access;
- 2. Applying data loss prevention (DLP) mechanisms to all

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IT assets supporting business activities, preventing the loss of sensitive data or information;

- Utilizing secure file sharing integrated into data management technologies, covering data collection, processing, storage, and transfer;
- Conducting security awareness and risk awareness programs for all employees to ensure adequate human resource capabilities in data security and management, and
- Performing data backup, switch-over, and disaster recovery training to ensure the resilience of data and IT assets supporting business operations.

### **Data Encryption**

To prevent illegal access to sensitive and personal data, Bank Mandiri uses encryption as a protective measure. Encryption is applied to data management during usage (Data-in-Use), transmission (Data-in-Transit) to ensure data remains secure from unauthorized parties. Encryption measures include:

- Data Transfer: Secure data exchanges with third parties using Secure Manage File Transfer (MFT).
- Drive Encryption: Encrypting storage devices to ensure data security.
- 3. Advanced Encryption Standard (AES): Applying encryption to electronic data.
- Communication Encryption: Securing communication channels, such as using Transport Layer Security (TLS) for encrypted communication media.

User access rights are centrally managed through an Identity Management system. For managing high-level access rights (power users), Bank Mandiri employs Privileged Access Management (PAM), which includes features like Privileged Threat Analysis (PTA) to detect and notify threats based on predefined rules.

### **Data Breach**

To prevent intentional and unintentional data breaches, Bank Mandiri uses Data Loss Prevention (DLP) Tools, Identity Access Management (IAM), and Multi Factor Authentification (MFA). For enhanced protection, personal data is also secured through de-identification techniques, such as anonymization and pseudonymization (data masking and generalization). These techniques ensure that data cannot be directly identified without authorized access. These proactive measures prevent threats, while reactive measures effectively address incidents, thereby ensuring customer data protection in compliance with the highest security standards. [GRI 418-1] [FN-CB-230a.1]

To ensure employee compliance with the implementation of personal data protection, Bank Mandiri has added a point related to compliance with personal data protection in the Employee Integrity Pact. This statement declares that employees will protect and maintain the confidentiality, reputation, credibility, and interests of Bank Mandiri, including actively supporting the implementation of Personal Data Protection and preventing the misuse of personal data that could result in harm to other individuals or parties.

Furthermore, Bank Mandiri has implemented sanctions if employees violate and/or fail to fulfill the obligations outlined in the provisions related to Personal Data Protection. The sanctions imposed are in accordance with the Employee Discipline Regulations, as specified in the Standard Operating Procedures related to Human Resources.

As of the end of 2024, Bank Mandiri has recorded no cases of data breaches or misuse of customer privacy. Additionally, over the past three years (2022–2024), there are no information security breaches, ensuring that no customers, clients, or employees were affected. Any complaints related to privacy breaches are handled in accordance with Bank Mandiri's established complaint management procedures.

### Integration of Data Protection Safeguards in Product and Service Development

Bank Mandiri integrates data protection into the development of products and services to ensure data security at every stage of the business process, from design to implementation. Minimum security requirements and standardization measures for mitigating vulnerabilities during the development phase are implemented in accordance with the Internal Policy in the form of Technical Guidelines related to Security Baseline, where all IT initiatives and IT application developments must meet established security requirements.

Bank Mandiri has also adopted a privacy by design concept, integrating personal data protection from the development stage, which includes:

- 1. Record of Processing Activities (RoPA): Identifying processes and mapping data flows.
- 2. Data Protection Impact Assessment (DPIA): Assessing personal data protection, including risk identification and mitigation.

All of these processes are governed by internal provisions related to information technology planning, change requests, and testing. Additionally, information security testing is conducted based on vulnerability analysis through penetration testing and scenario-based testing activities. Bank Mandiri has also implemented document confidentiality classification and security mechanisms for each confidentiality level using a manual tagging and labeling system. Furthermore, in implementing information security, data transmission to external parties is restricted through the implementation of Data Loss Prevention (DLP).

### Disclosure and Control of Data to Third Parties

Bank Mandiri is committed to maintaining the confidentiality and security of personal data and does not rent, sell, or provide such data with third parties, except for purposes related to transactions or financial services as stipulated by applicable regulations. Bank Mandiri has a strict policy governing customer data disclosure to ensure compliance with regulations and protect customer privacy, as regulated in the Internal Policy on Personal Data Protection in 2024. This policy permits data disclosure only for legitimate purposes, such as fulfilling legal and regulatory obligations or supporting banking transactions or services.

Data disclosure is carried out in a limited manner and at a level consistent with the company's privacy policy to relevant third parties, including regulators, law enforcement authorities, or business partners with the appropriate authority. Additionally, the policy governs data disclosure to entities such as joint controllers, processors, or other parties (counterparties), with strict oversight to ensure compliance with data protection standards. For requests from law enforcement agencies or regulators, the data management policy regulates disclosure in contexts such as money laundering (AML), terrorism financing (CFT), or special audit requirements. All third parties receiving customer

data are required to sign confidentiality agreements or nondisclosure agreements (NDAs) to ensure data protection remains safeguarded.

In addition, as a form of mitigation related to cooperation with third parties, Bank Mandiri has implemented:

- Including PDP clauses in Partnership Agreements with Third Parties;
- 2. Establishing personal data protection security standards as part of Cooperation Agreements, focusing on security aspects in personal data processing;
- Adding requirements related to the implementation of PDP into the procurement process.

In collaborations with third parties, including IT contractors or external parties in the supply chain, Bank Mandiri does not provide data in any form to third parties for purposes other than executing transactions. To ensure data security in third-party collaborations, the CISO Office Group routinely conducts vendor security inspections, covering human, process, and technological aspects. These inspections are performed through questionnaires, interviews, and/or onsite visits to the third-party locations.

### Collection, Use, Storage, and Retention of Data

Bank Mandiri implements comprehensive measures in data management and protection to ensure the security of customer information while complying with applicable regulations. The collection, use, and storage of customer information are carried out with principles of prudence and transparency. All data collected by Bank Mandiri is determined based on applicable transactional requirements. However, Bank Mandiri is committed to minimizing the collection of personal data, ensuring that only relevant data is requested in compliance with regulatory requirements. The nature of data collected includes general personal data and specific personal data. General personal data includes:

- Full name
- Gender
- Nationality

- Religion
- Marital status
- Other personal data that can be combined to identify an individual.

Meanwhile, specific personal data includes:

- · Health data and information
- Biometric data
- · Genetic data
- · Criminal records
- Child-related data
- Personal financial data
- Other data as regulated under applicable laws and regulations.



Bank Mandiri ensures that customer data is used strictly for legitimate banking transactions, in compliance with security regulations, data protection laws, and customer consent. The data is used to facilitate banking transactions, improve service quality, fulfill legal obligations, and enhance the customer experience through relevant product or service offerings. All data usage is conducted under strict supervision and in adherence to applicable data protection regulations.

In accordance with Internal Policies in the Form of Technical Guidelines on Data Retention and Law No. 27 of 2022 on Personal Data Protection (PDP Law), Bank Mandiri retains personal data for a maximum of 30 years. Once the retention period expires, personal data will be destroyed if

the customer no longer holds active products or services with Bank Mandiri and if the data is not included in the exception categories outlined in Article 50 of the PDP Law. Bank Mandiri also does not collect personal data from third parties, except when required by law.

Personal data management can be conducted through various channels, such as branch offices, call centers, and Mandiri's Livin' application. To ensure data security, Bank Mandiri implements data masking for sensitive data in accordance with internal provisions outlined in the Technical Guidelines on Security Baseline. Additionally, Bank Mandiri also enforces data transmission limitations through Data Loss Prevention (DLP) tools, as regulated in the Technical Guidelines on Data Loss Prevention.

### Management of Consent for Personal Data Processing

Bank Mandiri manages customer consent for personal data processing by prioritizing transparency and compliance with Law No. 27 of 2022 on Personal Data Protection (PDP Law). The consent management system implemented by Bank Mandiri enables customers to provide, modify, or withdraw their consent at any time as needed. Customer consent covers data processing activities such as collection, use, storage, updating, and deletion of personal

data. To ensure responsible management, Bank Mandiri consistently informs customers about the purpose and legal basis of data processing, ensuring that all consents are given consciously and based on clear understanding. Aligned with data protection and privacy principles, Bank Mandiri does not use customer data for secondary purposes beyond the agreed transaction requirements.

### Data Governance

The implementation of an effective and efficient corporate strategy requires data governance based on best practices and compliance with internal and external regulations, involving the participation of all Bank Mandiri work units. Bank Mandiri applies data governance with a model and

structure that supports its business strategy and corporate culture while remaining adaptable to emerging challenges. The data governance framework consists of several structures, ranging from the Board of Directors level to daily operationalization, as follows:

Data Steering Forum

The Data Steering Forum, comprising the Director of Information Technology, Director of Risk Management, Director of Compliance, Director of Operations, and other relevant Directors/SEVPs, is responsible for providing direction and approving data governance strategy. The committee ensures compliance with regulatory requirements, supports the bank's sustainable business growth in line with the corporate plan, and reviews the implementation of the data governance strategy.

Data Governance Council

Consisting of Group Heads and Department Heads, discusses matters with financial impact.

Department Head and Team Leader Level

Data Task Force

Comprising Department Heads, Team Leaders, and Technical Teams, conducts discussions related to the bank's operational aspects and coordinates implementation.

## Cyber Security Risk Management and Management of Operational Resilience and Cybersecurity

In managing the bank's cyber resilience and security, Bank Mandiri has separated the functions of cyber security risk management and operational management of cyber resilience and security. This separation ensures a more strategic, independent, and effective approach to addressing cyber threats. As the foundation for implementing these functions, the Cyber Security Risk Management Framework and the Operational Management Framework for Cyber Resilience and Security have been developed.

Bank Mandiri also continuously enhances the quality of cyber security risk management and operational management of cyber resilience and security through Cyber Security Management Certifications, both national and international, adequate internal controls by both internal and external parties, and conducting information security assessments and evaluations to identify areas for improvement.

### Cybersecurity Management

To strengthen cybersecurity processes and infrastructure, Bank Mandiri has designed, implemented, and regularly reviewed its information security strategy. This strategy not only complies with national regulations, such as those set by Bank Indonesia and the Financial Services Authority (OJK), but also aligns with international standards and industry best practices, including ISO 27001, NIST Cybersecurity Framework, CIS Benchmark, and PCI Security Standard.

This framework consists of three main pillars: Pillar 1 covers Risk Management Strategy for Cyber Security, Pillar 2 focuses on Organizational Structures for Cyber Security, and Pillar 3 encompasses Policies, Procedures, and Risk Limits for Cyber Security. This framework is designed to achieve the primary objective of cyber security: Zero Security Breach.

### Cyber Security Risk Management Framework

### Cybersecurity Risk Management Strategy

- Scope of Cybersecurity
   Risk Management Strategy
- 2 Roles and Responsibilities of Units Related to Cybersecurity
- 3 Communication of Cybersecurity Risk Management Strategy
- Periodic Review of the Cybersecurity Risk Management Strategy (MRKS)

### Organizational Structure Related to Cybersecurity

- Cybersecurity
   Organizational Structure
  - a. Units Related to Cyber Resilience and Security Function to Maintain Cyber Resilience
  - b. SKMR Functions for Implementing MRKS
  - c. Internal Control
    Unit Functions for
    Testing Control
    Effectiveness and
    Providing Independent
    Assurance
- Review of the Adequacy of Cybersecurity Organizational Structure

### Policies, Procedures, and Risk Limits Related to Cybersecurity

- Cybersecurity Policies and Procedures
- 2 Risk Appetite, Tolerance & Threshold Related to Cybersecurity
- 3 Documentation and Communication of Policies, Procedures, and Limits
- Review of Cybersecurity Policies, Procedures, and Limits



### Pillar 1

Cyber Security Risk Management Strategy, with a scope covering the following six aspects:

- 1. Comprehensive understanding of cyber risks and their relation to the Bank's business, the level of exposure to cyber security risks, and the current state of the Bank's cyber security. To foster a cyber risk culture within the Bank, awareness programs are consistently conducted for all employees and customers through all communication channels.
- **2.** Identification, classification, and prioritization of critical functions, IT assets, and system interconnections to develop a complete and accurate cyber risk profile.
- 3. Identification of threats and resolution of cyber security issues, including steps to mitigate the Bank's reputational risks. Through Risk Control Self-Assessment (RCSA) and robust risk testing, cyber risks are continuously evaluated, and appropriate mitigation strategies are applied. The Bank also conducts monitoring and takes preventive actions against potential cyber risks.
- 4. Security controls to protect the Bank's IT assets from evolving cyber threats. To safeguard IT assets from constantly evolving cyber threats, the Bank implements data security management, endpoint security, and protection for software, hardware, and networks. Furthermore, the Bank ensures data protection through User Access Management, allowing only authorized employees to access sensitive data.
- 5. Timely detection of cyber incidents through regular surveillance and monitoring. The Bank has established a Security Operations Center (SOC) to monitor suspicious anomalies or cyber threats perpetrated by cybercriminals by leveraging Security Information and Event Management (SIEM) and Threat Intelligence, ensuring Bank Mandiri remains resilient against global cyber threats.
- 6. Detailed cyber incident response to support swift and effective recovery from any impact. This includes timely incident escalation, clear role definitions for the team, post-incident analysis, and continuous testing of future cyber risks.

### Pillar 2

Organizational Structure for Cyber Security, to support comprehensive information security management and cyber resilience across all operational lines, Bank Mandiri implements the Three Lines of Model.

Policies, Procedures, and Cyber Security Risk Limits,

### Pillar 3

covering policies and procedures established by the Bank as part of cyber security risk management, regulated within internal provisions. The Bank also defines the Risk Appetite Statement (RAS) for cyber risk as part of the bank-wide operational risk Risk Appetite Statement. The cyber risk RAS is quantified into cyber risk thresholds and continuously monitored.

The Cyber Security Risk Management Framework will continue to be evaluated for its relevance to business strategy, cyber risk exposure, and the latest cyber developments through periodic reviews. Review of Pillar 1 Cyber Security Risk Management Strategy includes adjustments to its relevance to the ongoing business strategy and the latest cyber risk developments. Review of Pillar 2 Organizational Structure for Cyber Security includes ensuring the quantity and quality of Human Resources in cyber security risk management remain aligned with business strategy, cyber risk exposure, and evolving cyber threats through staffing, training, certification, talent management, and competitive remuneration. Review of Pillar 3 Policies, Procedures, and Cyber Security Risk Limits includes periodic evaluations of Risk Appetite, Risk Tolerance, and cyber risk thresholds, or as needed when specific conditions require reassessment.

As part of the cyber security risk management strategy, particularly in ensuring cyber resilience and security, Bank Mandiri is committed to continuously strengthening its cyber resilience and security posture through the implementation of a Comprehensive, Proactive, & Reactive Cyber Security Framework, which consists of three main pillars: Governance & Awareness, Protection, and Operations.

### Management of Operational Resilience and Cyber Security

Bank Mandiri is committed to continuously strengthening its cybersecurity posture through the implementation of a Comprehensive, Proactive, & Reactive Cybersecurity Framework, which consists of three main pillars: Governance & Awareness, Protection, and Operations.

### Cybersecurity Framework



Governance and Awareness

### 1. Security Awareness:

Employee education on personal data protection awareness (such as data collection, processing, storage, correction, display, and deletion) and customer education on secure transaction practices (such as anti-fraud awareness).

### 2. IT Security Regulations & Standards:

Building a strong security culture through the establishment of security policies and regulations, including guidelines for data collection, maintenance, management, usage, and storage.

### 3. Organizational Structure and Personnel:

Establishing a dedicated cybersecurity operations team and enhancing personnel capabilities through training and up-to-date professional certifications.



Protection

### 1. Defense Mechanism:

Securing digital assets with the latest technologies, such as antivirus implementation, encryption, and access restrictions, as part of a layered defense mechanism to prevent cyber threats.

### 2. Penetration Test:

Regular hacking simulations are conducted to ensure optimal security measures.

3. Access Management:

Restricting data access in accordance with SOPs and enforcing regular password changes.



Operations

### 1. Security Operations Center (SOC):

Proactively and reactively maintaining system resilience against cyber threats through 24/7 monitoring by the Security Operations Center (SOC).

### 2. Threat Intelligence:

Anticipating emerging cyber threats to support a swift and measured incident response.

### 3. Vendor or Supply Chain Security Assessment:

Evaluating security aspects, including the adequacy and competence of vendors.

Regulation:





International Standard:



International Best Practice:









### Cybersecurity Testing

Bank Mandiri regularly maintains IT infrastructure security tools, ensuring their functionality and monitoring the expiration of the technologies used. Security enhancements are conducted periodically through activities such as vulnerability analysis (VA) by independent third parties, which include penetration testing and hacker attack simulations.

To maintain and evaluate cyber resilience and security as well as to train preparedness for incident response processes, Bank Mandiri regularly conducts cybersecurity testing in compliance with applicable regulations (SEOJK No. 29/SEOJK.03/2022 on Cyber Resilience and Security for Commercial Banks). These tests are performed by independent external parties and include penetration testing, table-top exercises, social engineering exercises, and adversarial attack simulation exercises, covering:

### i. Vulnerability-Based Testing

Bank Mandiri performs penetration testing for every new application developed and periodically on internetfacing and/or critical applications, at least once a year. These penetration tests are conducted by independent external parties with internationally certified penetration testing expertise.

#### ii. Scenario-Based Testing

Bank Mandiri conducts scenario-based testing through the following activities:

#### a. Table-top Exercise

This discussion-based testing involves personnel from various work units, including the IT, Compliance, Risk Management, Business Continuity, Customer Care, and Corporate Secretary units. They collaboratively discuss handling and mitigating cyber incidents based on their respective roles. Tested scenarios include ransomware attacks, illegal hacking, unauthorized access, data breaches, and email threats.

Bank Mandiri collaborates with independent international consultants to develop scenarios and conduct table-top exercises, aligning with the latest cyber-attack trends and best practices.

### b. Phishing Drill

Bank Mandiri conducts social engineering simulations, such as phishing attacks via email, designed to trick employees into disclosing sensitive information such as passwords. These tests are executed using phishing training tools that

automatically send phishing email simulations to all employees. The objective is to help employees identify and report phishing emails, mirroring real-life scenarios.

### c. Adversarial Attack Simulation Exercise (AASE)

Bank Mandiri routinely conducts real-life attack simulations performed by independent consultants to test its cyber resilience. These simulations employ the latest cyber-attack tactics, techniques, and procedures, focusing on human, process, and technology aspects. One implementation of this is the Adversarial Attack Simulation Exercise (AASE), which includes testing attack scenarios through third-party connections interacting with the bank's systems and data. This initiative aims to identify and address potential security gaps or vulnerabilities across the company's IT operations.

Examples of scenarios tested include unauthorized intrusion into unencrypted access. communications, theft of source code from the code repository, disabling of defense systems, and theft of confidential data from the data center. Vulnerability information identified during the simulations, including third-party attack surfaces, is a key focus of Bank Mandiri's ongoing cybersecurity improvement program. Through these regular simulations, Bank Mandiri minimizes the risk of exploitation and strengthens its overall cybersecurity posture. The testing results showed that all scenarios were successfully mitigated, with an "Excellent" rating across all security control aspects. The test results report is submitted to the Board of Directors and regulators in accordance with applicable regulations.

### d. Cyber Crisis Management Exercise (Cybersecurity Simulation)

Testing is conducted through a cyber crisis management simulation involving the IT Crisis Management Team (CMT) to ensure a swift and effective response to incidents and minimize their impact. The simulation includes discussions on strategic actions based on the roles of each team, risk analysis to identify potential threats, and testing recovery measures such as the use of backup systems and data recovery processes.

Additionally, the simulation scenarios include communication exercises with regulators, customers, and business partners to maintain transparency. The testing aims to train and assess the team's readiness, develop strategies, and prepare for effective crisis management. The simulation results are used to periodically update disaster recovery policies, ensuring the protection of personal data during and after the crisis. Examples of scenarios tested include natural disasters, ransomware attacks, phishing, malware on employee devices, application vulnerabilities, and network attacks.

## Strengthening Information Security

Bank Mandiri uses a multi-layered defense strategy to ensure information security by protecting applications, networks, and systems using state-of-the-art and continuously updated technology. Bank Mandiri also leverages threat intelligence services to detect the latest cyberattacks and potential data leaks on the dark web.

Bank Mandiri consistently enhances its IT security capabilities through strategic investments across all security layers, including endpoints, networks, applications, data, and infrastructure. Network and account anomaly detection is strengthened using artificial intelligence (AI) and machine learning, while a best-in-class, multi-layered security architecture is implemented to protect the bank's systems and data, as well as to identify and block security anomalies at each layer.

#### · Endpoint Security:

Bank Mandiri implements protection against all potential vulnerabilities associated with endpoints, including the use of Virtual Private Networks (VPNs), Network Access Control (NAC), antivirus/antimalware, Endpoint Detection and Response (EDR), disk encryption, multi-factor authentication (MFA), and other advanced measures.

#### · Network Security:

Bank Mandiri strengthens its internal network security by utilizing layered and redundant devices, including Intrusion Prevention Systems, Anti-DDoS tools, Antispam filters, Virtual Patches, and Web Application Firewalls. These devices are deployed in two key locations—Data Centers and Disaster Recovery Centers—to ensure service availability and readiness to handle emergency situations in accordance with the Company Business Continuity Plan.

#### Application Security:

Bank Mandiri applies a Secure System Development Life Cycleateverystage of system and application development

to identify and address security vulnerabilities early. Bank Mandiri also adopts Agile Development to quickly meet business needs. These methods are further reinforced through Dynamic Application Security Testing (DAST) and Static Application Security Testing (SAST). Additionally, source code management is conducted centrally using repository, versioning, and security source code reviews. Bank Mandiri also possesses digital forensic capabilities to support security incident investigations, post-incident recovery, and overall improvement of its security posture. Additionally, applications accessed by customers and employees are equipped with Multi-Factor Authentication (MFA) and transaction security using PINs to enhance protection for digital access and transactions.

#### • Encryption and Data Protection:

As a valuable asset, data is protected through encryption at the Data-in-Use and Data-in-Transit stages to prevent unauthorized access. These measures include Secure Managed File Transfer (MFT) for data transfer, Advanced Encryption Standard (AES) for electronic data, and Transport Layer Security (TLS) for communications. Personal data is also protected with Data Loss Prevention (DLP) tools and Identity Access Management (IAM), as well as de-identification techniques such as anonymization and pseudonymization.

## • Infrastructure Security:

IT infrastructure is managed rigorously through routine activities such as vulnerability analysis, including patching, hardening, penetration testing, and cyberattack simulations. User access rights are centrally managed through Identity Management, while the highest-level access is controlled using Privileged Access Management (PAM) equipped with Privileged Threat Analysis (PTA) for threat detection. Additionally, servers (branch and data center servers) are protected through security patches and antimalware to ensure system security and prevent potential cyber threats.



## Information Management System Certification

#### ISO/IEC 27001:2013

Bank Mandiri is committed to implementing the Information Security Management System (ISMS) based on ISO/IEC 27001:2013 and ISO/IEC 27001:2022, by adhering to the principles of confidentiality, integrity, availability, reliability, continuity, and compliance. This is achieved while ensuring effectiveness and efficiency through the implementation of internal regulations related to information technology across the bank. Bank Mandiri has also been certified in the Information Security Management System (ISMS) in accordance with ISO/IEC 27001:2013 and ISO/IEC 27001:2022 standards. In 2024, Bank Mandiri renewed its certification, which includes:

- Provision of information security services by the Security Operation Center (SOC) to manage cyber threats to the banking system and cyber operations.
- Application development and IT operations related to Livin' by Mandiri.
- Provision of infrastructure and operations at the Data Center and Disaster Recovery Center.
- Application development and IT operations related to KOPRA by Mandiri.

#### ISO/IEC 17025:2017

Bank Mandiri has a digital forensic laboratory managed by the CISO Office Group, which has successfully obtained a compliance certificate for ISO/IEC 17025:2017 issued by the National Accreditation Committee (KAN). Digital forensic examinations are conducted on digital evidence following processes that include identification, collection, acquisition, and preservation. With the support of digital forensic investigation processes in the laboratory, Bank Mandiri can identify the causes, impacts, and risks of incidents on the bank's systems and applications.

## Information Security Measurement and Evaluation

To measure and evaluate the optimization of information security processes, Bank Mandiri conducts a series of assessments by independent external assessors, including the National Cyber and Crypto Agency (BSSN), with the following results:

- a. Cyber Security Maturity (CSM) Assessment achieved an "Optimal" maturity level (highest score).
- b. Incident Handling Maturity Level (TMPI) Measurement reached an "Optimize" maturity level (highest score).

## Handling of Information Security Breaches

To address the threat of cyberattacks, Bank Mandiri has developed the capability to detect and respond to cyber threats through its Security Operation Center (SOC), which operates 24/7. As a reactive measure against information security incidents, the SOC is managed consistently, effectively, and in a measurable manner. Proactive measures include monitoring and mitigating risks associated with evolving cyber threats using leading Threat Intelligence Services. In addition, Bank Mandiri has built internal capabilities for threat hunting to protect its brand and website from phishing threats, online fraud, unauthorized access, and forgery.

Bank Mandiri also established a Computer Security Incident Response Team (CSIRT), registered with the National Cyber and Crypto Agency (BSSN), to facilitate collaboration, coordination, and information sharing in handling cyber incidents. The CSIRT regularly conducts IT security incident testing and simulations to ensure readiness in responding to incidents. The SOC team works closely with the CSIRT to promptly respond, remediate, or mitigate issues according to the cybersecurity incident handling framework, which generally includes:

- Identification and analysis of the scope of the incident and determination of countermeasures.
- Containment Mitigation processes to prevent further damage.
- Eradication and recovery Actions to terminate the incident and restore systems.

As part of a holistic approach to cybersecurity, Bank Mandiri not only focuses on incident response through the CSIRT but also strengthens early reporting by establishing a clear escalation process via the email service laporciso@ bankmandiri.co.id. This process can be utilized by employees to report any irregularities related to information security and data protection. Information about this service

is regularly disseminated to all employees through posters, newsletters, and podcasts. This ensures that any risks or potential impacts related to cybersecurity are swiftly and appropriately addressed by relevant units, such as the CISO Office Group, following strict standards aligned with regulations and internal policies.

Related to incident response, Bank Mandiri developed a recovery and business continuity management strategy to mitigate impacts and restore system and network security. This strategy is specifically outlined in internal policies. Bank Mandiri also established digital forensic capabilities to support security incident investigations, aiding postincident recovery, enhancing its security posture, and preventing similar incidents in the future. The cybersecurity incident handling framework is continuously enhanced based on lessons learned from previous incidents that have been resolved.

In addition, Bank Mandiri has established a mechanism for handling Personal Data Protection failures (Data Breach), which has been outlined in the internal provisions. The process for handling PDP failures generally consists of several stages, including:

## Mechanism for Handling Data Breaches

## Identification

The process of collecting basic information (notification) related to the personal data protection failure incident based on complaints received.

#### **Analysis**

The process of detecting and analyzing the validity of the indications and/or complaints of the incident based on incident classification.

#### Containment

The process of taking initial mitigation actions against the indications and/or complaints of the incident based on the analysis of impact and risk to the Data Subject to prevent personal data disclosure.

## Handling and Recovery

The process of handling and recovering from a personal data protection failure incident based on the classification and the results of the incident analysis.

#### Reporting and Lessons Learned

The process of providing written notifications to regulators, data subjects, and the public in the event of personal data disclosure, along with submitting reports and documentation to the relevant regulator regarding the personal data protection failure incident.

The role distribution for work units as module users in handling Personal Data Protection (PDP) failures includes:

- a. Users with Super Admin and Organization Admin roles CISO Office Group IT Security Services & Subsidiary Support.
- b. Users with Operator roles IT Applications Support Group (SME Applications), including IT Information & Data Services, IT Wholesale and Supporting App, IT Delivery Channels, IT Onboarding and Servicing, and IT Core Banking System.
- Users with DPO (Data Protection Officer) roles Data Protection & Fraud Risk (DFR) Group, specifically Data Protection Operations and Data-Fraud System Monitoring.

Any violations related to privacy, data security, or cybersecurity are categorized as breaches of the Code of Conduct and are subject to disciplinary actions in accordance with the Employee Disciplinary Regulations, as outlined in the Human Resources Standard Procedures (SPSDM). Disciplinary measures may range from a first written warning to termination of employment (PHK). The levels and sanctions for Code of Conduct violations can be referenced in the Sustainability Commitment and Governance chapter.



Additionally, for data security violations, particularly those involving personal data, Bank Mandiri refers to Law No. 27 of 2022 on Personal Data Protection (PDP Law), which stipulates administrative sanctions for data controllers violating provisions in Articles 35 to 46. These sanctions include:

- a. Written warnings.
- b. Temporary suspension of personal data processing activities.
- c. Deletion or destruction of personal data.
- d. Administrative fines of up to 2% of annual revenue or income, depending on the violation variables.

## Training and Capability Development [GRI 404-2]

Bank Mandiri strengthens the management of information security, cybersecurity, and personal data protection through regular training and capability development provided to all employees, vendors, and contractors at least once a year. The training and certifications offered cover technical and non-technical skills such as Certified Information Security Manager (CISM), Certified Information Systems Security Professional (CISSP), Certified in Risk and Information Systems Control (CRISC), ISO 27001 Lead Implementer, ISO 27001 Lead Auditor, Certified Information Systems Auditor (CISA), Certified Ethical Hacker (CEH), Computer Hacking Forensic Investigator (CHFI), cybersecurity awareness training, and product knowledge enhancement to deepen expertise in the bank's security systems.

The information security awareness program is conducted regularly bankwide to enhance understanding and foster a work culture oriented toward information security. Initiatives include information security campaigns through various media, such as monthly bulletins, quarterly posters, quarterly podcasts, and quarterly phishing simulation exercises.

Topics covered include data protection and confidentiality, the latest cyber-attack trends, phishing identification and prevention, and online transaction security. In addition, cybersecurity awareness certifications are organized annually by Bank Mandiri for all employees, vendors, and contractors.

## **Phishing Drill**

Information security and cybersecurity are key elements in employee performance evaluations, assessed through understanding and response in training, awareness of phishing simulations, compliance with information security policies, and awareness of potential cyber threats. These evaluations not only strengthen a security-conscious work culture but also serve as a basis for individual competency assessments.

As part of this effort, Bank Mandiri regularly conducts phishing drill simulations, designed as social engineering attack scenarios to train employees in recognizing and reporting phishing emails. These tests are carried out using an automated system that sends phishing simulation emails to all employees. The simulations aim to enhance employees' ability to identify and report phishing attempts, ensuring they are better prepared for real-world threats.

In 2024, Bank Mandiri has implemented various training and awareness programs regarding personal data protection to enrich the knowledge and awareness of employees. The programs that have been carried out are as follows:

## Training on Privacy and Data Security [GRI 2-24] [GRI 404-2]

## Scope of Training:

Certified Information Privacy Manager (CIPM), Certified Information Systems Auditor (CISA), Certified Information Systems Security Professional (CISSP), Certified Cloud Security Professional (CCSP), Building a Cybersecurity Awareness Program, Cybersecurity Awareness: Phishing Attacks, Data-Driven Network Security Essentials, Cybersecurity for Executives, ISO 27001:2022-Compliant Cybersecurity: Getting Started, Privacy in the New World of Work, and so on.

Number of Training Titles
412 Titles

Number of Training Hours
190,502 Hours

Number of Training Participants
81,929 Employees

#### **Awareness Activities**

## 1. Personal Data Protection (PDP) Poster

A one-page poster containing quotes/statements encouraging employees to be more aware of the potential risks and mitigation strategies related to the implementation of personal data protection.

#### 2. Newsletter

An article/infographic providing a comprehensive explanation of risk issues and tips related to personal data protection.

#### 3. Personal Data Protection (PDP) Cartoon

A short cartoon-style comic depicting everyday work situations in a lighthearted and contemporary manner.

## 4. Personal Data Protection (PDP) Narrative Video

A short video containing information, calls to action, and awareness about the implementation of personal data protection, along with the associated sanctions.

## 5. Personal Data Protection (PDP) Pulse Check

A survey/checklist containing brief questions for employees regarding the readiness for the implementation of personal data protection in each work unit, both at the Head Office and in regional offices.

#### 6. Education on Personal Data Protection Consent

Education is provided to customers via social media through videos and posters on Meta, TikTok, Google Android & iOS, and X. The campaigns include video content on Meta (consent), TikTok, and Google.

#### **Vendor Training and Capability Development**

1. In 2024, Bank Mandiri once again hosted its annual Vendor Meeting to strengthen collaboration with strategic partners. Under the theme "Fostering Synergy & Driving Collaborative Growth Through Vendor Meeting", the event took place on November 26, 2024, and invited 712 vendors which comprising 225 construction vendors, 297 non-IT vendors, and 190 IT vendors.

During this forum, several key topics were discussed, including:

#### a. Implementation of Personal Data Protection

The topic of personal data protection implementation was presented by the Vice President – Data Protection & Fraud Risk Group, covering the addendum of personal data protection clauses in cooperation agreements and the Partnership Assessment Criteria for Personal Data Protection (PAC-PDP), which are criteria set by Bank Mandiri to ensure personal data protection for (prospective) procurement partners and (prospective) credit partners.

## b. Implementation of Vendor Security Requirements

The topic of implementing the Vendor Security Requirement was presented by the Vice President – CISO Office Group, discussing the fulfillment of Vendor Security Requirement (VSR) as part of the information security implementation for third parties and its inclusion in the procurement process stages for the use or provision of IT services.

## 2. Personal Data Protection Playbook for Vendors

Bank Mandiri has developed a Playbook to facilitate partners/vendors in fulfilling their responsibilities in executing the scope of cooperation related to personal data processing, ensuring data security and compliance with the PDP Law.



## Information Security System Audits

Bank Mandiri conducts regular audits on all information security activities and critical business processes, including data privacy and fraud management, in accordance with internal and regulatory requirements. Information security audits are carried out annually by both internal and external parties.

## Internal Audit

Bank Mandiri's Internal Audit, specifically the IT Audit division, conducted audits related to security aspects, focusing on Cyber Resilience and Security. These audits were divided into two phases during 2024, as follows:

- a. Phase 1 (January April 2024), consisted of 2 audits:
  - Cyber Resilience Audit of Core Banking Systems (CBS), assessed the security and availability of core banking system (eMAS) infrastructure and applications.
  - ii. Cyber Resilience Audit of Mandiri Utama Finance (MUF) & Mandiri Tunas Finance (MTF), evaluated the security of MTF and MUF web and mobile applications.
- b. Phase 2 (May October 2024):
  - Cyber Resilience Audit of Internet Facing Applications (IFA), evaluated the security of Bank

- Mandiri's internet-facing IT assets, including public IP addresses and bank-owned subdomains.
- ii. Cyber Resilience Audit of Ring 2 and Internal Productivity Applications (IPA), inspected the security of IT assets in Ring 2 servers and IPA applications hosted in the bank's on-premise data centers or under the management of respective application owners.
- iii. Audit of Mandiri Cash Management (MCM), evaluated security controls of the MCM application.
- iv. Microsoft Office 365 Audit Examination of email security controls in Office 365 applications, including anti-malware, attachment filtering, and malware sandboxing.
- V. Cyber Resilience Risk Management Information System Audit – Assessment of the Cybersecurity Risk Management System, specifically the Phantom application.

## **External Audit**

The management system for IT infrastructure security and information at Bank Mandiri has also been audited by an independent external auditor to validate compliance and the effectiveness of the management systems in place. Additionally, Bank Mandiri fulfills its risk management obligations and information system security standards through periodic audits by external auditors, which include:

- a. Payment Service Provider (PSP) Audit: This audit is conducted to ensure the reliability of the IT infrastructure supporting the payment system and information security management. The audit was conducted from July to November 2024 as part of compliance
- with Bank Indonesia Regulation No. 23/6/PBI/2021 regarding Payment Service Providers. The audit report was submitted to Bank Indonesia on November 22, 2024.
- b. Data Privacy Audit is conducted to evaluate the maturity level of personal data protection controls and compliance with Law No. 27 of 2022. This audit is carried out from September to December 2024. It also aims to provide an external perspective on data management at Bank Mandiri, with the final report submitted to OJK and BI.

# Our Employees

Bank Mandiri recognizes that employees are the primary drivers of the company's sustainability and growth. Committed to fostering an inclusive, equitable, and supportive work environment, Bank Mandiri has designed various strategic programs focused on enhancing employee well-being, competencies, and potential. Diversity, development, welfare, and employee safety remain top priorities in creating an empowering work ecosystem that enables every individual to reach their full potential and make meaningful contributions to Bank Mandiri's success.



## Human Resource Development [GRI 404-2]

Talent management at Bank Mandiri serves as a cornerstone for supporting business sustainability and fostering the potential of every individual. Guided by the core values of AKHLAK (Amanah, Competent, Harmonious, Loyal, Adaptive, and Collaborative), which underpin every aspect of human resource management, a holistic approach to creating an inclusive and productive work ecosystem has been designed. Through the Employee Value Proposition (EVP), which encompasses four pillars—Learn, Synergize, Grow, and Contribute to Indonesia—Bank Mandiri ensures that every employee not only achieves professional growth but also makes meaningful contributions to the company and society.

## Employee Value Proposition (EVP) Mandirian

#### Learn

Acquire or strengthen new and distinct knowledge, behaviors, skills, or values.

## Synergize

Collaborate for mutual benefit in achieving the Company's vision and mission

#### Grow

Develop personally and professionally

#### Contribute to Indonesia

Make meaningful contributions and provide value and benefits for Indonesia



This EVP is reinforced by the 3-3-1 Human Capital Strategy, which emphasizes employee development to support business sustainability.

## 3-3-1 Human Capital Strategy



## **Our Goals**

To cultivate productive employees who are actively engaged, drive growth, ensure business sustainability, and develop future leaders.



## **Human Capital Strategy**

- Strategy #1 (Accelerate Capability)
   Intensive and continuous development of technical and leadership capabilities.
- Strategy #2 (Augment Productivity)
   Fulfillment of capacity and accelerated enhancement of productivity.
- Strategy #3 (Amplify Experience)
   Strengthening employee experience through various initiatives, such as employee well-being, business process improvements, and Mandirian DNA.



## **Mandate for Human Capital**

- #1 For Mandiri
   Support and activate corporate strategies and plans.
- #2 For the Nation
   Contribute to talent development for Indonesia.
- #3 For Employees

  Create meaningful employee experiences.

As part of human resource risk management, Bank Mandiri recognizes employee turnover as a key challenge in the banking industry. To address this issue, strategic initiatives have been implemented that include continuous training, employee engagement through transparent communication, and the provision of competitive compensation. These measures are designed to reduce turnover, enhance retention, and create a work environment that supports professional growth and employee well-being.

To prepare top talent for future leadership roles in strategic positions, Bank Mandiri employs a structured approach focusing on the identification, development, and retention of individuals with strong leadership potential. This approach consists of four key stages:



## **Talent Identification**

The identification process is based on performance, leadership characteristics, capabilities, agility, and engagement.

2

## **Talent Profiling**

Talent profiling process is based on track record, technical skills, leadership abilities, and personal characteristics.

3

## **Talent Development**

The formulation and implementation of talent development plans based on capability gaps.

4

## Strategic Talent Review

The review process for development plans and implementation to ensure optimal succession management sustainability.

## Leadership Development Training Program [GRI 404-2]

Bank Mandiri has a structured and tiered leadership development program designed to develop or deliver joint training programs for all employee aligned with the leadership capacities at every level of the organization. As part of its implementation, Bank Mandiri collaborates/partnership with educational institutions, including top universities such as Singapore Management University, the International Institute for Management Development, and Bandung Institute of Technology. Additionally, Bank Mandiri also partners with the BUMN School of Excellence (BSE) in delivering the Leadership Development Program. [GRI 3-3]

#### Orientation Phase (Onboarding)

Orientation programs for new employees and those assuming new positions (rotation or promotion).

 Onboarding for New Employees (Officer Development Program (ODP) and Staff Development Program (SDP)

A training program for potential leaders at Bank Mandiri consisting of recent graduates from leading universities and high-performing employees who have passed a rigorous selection process. Participants undergo various stages of training, including online courses, in-class training, and on-the-job training.

ODP:

827 employees

SDP:

611 employees

## Onboarding - Executives

An orientation program for new or promoted L2 employees (BOD-1 level, including Group Heads, RCEOs, and equivalents), aimed at strengthening leadership characteristics for strategic business leaders.

21 employees

## Mandiri People Manager - Executive

A training program for Level 2 employees (BOD-1, equivalent to Group Head, RCEO, and similar positions) are designed to formulate strategic objectives, uphold integrity, and strengthen leadership capabilities. These programs also aim to enhance adaptability, drive innovation, and prepare leaders to navigate change with flexibility, ensuring they remain relevant in an everevolving business environment.

213 employees

## Mandiri People Manager - Mastery

A Training program for Level 3 employees (BOD-2, equivalent to Department Head and Area Head) aim to embed the Mandirian DNA as both a work approach and a leadership style. These programs are designed to strengthen team leadership effectiveness through productive communication and the management of high-performing teams, while cultivating a profound sense of purpose in every aspect of their work.

1,027 employees

#### Mandiri People Manager - Advance Fundamental

A Training program for Level L3 employees (BOD-2) are designed to enhance managerial and leadership skills, aligning with the Mandirian character traits of Always Deliver and Ahead. These programs aim to drive superior performance and proactively address business challenges.

163 employees



#### **Equipping Phase**

Practical managerial skills training focused on leadership capabilities.

## Strategic Business Leader Program – Leading for Impact

A training program for L2 (BOD-1) and L3 (BOD-2) employees, designed to build leadership capabilities that meet dynamic business demands and lead change in achieving Bank Mandiri's aspirations.

115 employees

## Managerial Series Program

A training program focused on managerial skills, aimed at building understanding and capabilities in alignment with the Mandirian Way, to cultivate the mindset of effective leaders.

6,204 employees

#### **Development Phase**

Acceleration of top talent to enhance capabilities for advancement to the next level.

## Mandiri Advance Executive Leaders Program (MAELP)

A program for the Board of Commissioners, Board of Directors, and SEVPs, aimed at enhancing leadership and technical capabilities in line with Bank Mandiri's business needs. This is achieved through training at global universities, as well as building relationships with stakeholders.

members of the Board of Directors & Board of Commissioners

#### Mandiri Advance Leaders Program (MALP)

A program designed to prepare top talent at the BOD-2 level for the next leadership level, focusing on intrapreneurship, strategic leadership, people focus, and digital leadership.

60 employees

## Mandiri Advance First Leaders Program (MAFLP)

A program for top talent at the BOD-3 level (Team Leaders, Branch Managers, or equivalents), focusing on people management, digital mindset, strategy, and innovation.

498 employees

## Graduates Scholarship Program

Postgraduate scholarship programs at leading universities for Level 3 and Level 4 employees, fully funded by Bank Mandiri.

51 employees

## Mission-Based Development

Bank Mandiri's leadership programs focus on Human Capital initiatives to cultivate a culture of Resilient Mandirian Learners. To support this culture, Human Capital employs a gamification approach in employee development through the concept of mission-based development. Each position level at Bank Mandiri is assigned specific missions designed to accelerate the development of competencies and leadership skills.

## Missions for Employees at Different Levels

#### **BOD-1** Mission:

Lead discussions on team development and succession planning, setting an example as a role model in building and enhancing capabilities.

#### **BOD-2** Mission:

Collaborate with supervisors to propose development plans and actively participate in reviewing development strategies to accelerate capability building.

## **BOD-3** Mission:

Work with supervisors to create a development plan and implement capability-building activities according to the agreed-upon plan.

#### **BOD-4** Mission:

Collaborate with supervisors to help plan development and proactively carry out development initiatives.

## Graduate Traineeship/Apprenticeship Programs

In response to the increasingly competitive industry landscape, Bank Mandiri is committed to supporting young generations in preparing for the workforce. The bank provides training and internship programs for recent graduates, designed to equip them with the necessary skills and practical experience in the industry.

The available training programs include:

## Officer Development Program (ODP)

The ODP aims to cultivate future leaders by attracting exceptional talent, particularly fresh graduates or individuals with less than 4 years of work experience, through partnerships with restigious universities in Indonesia and globally.

The ODP entry path is specifically designed to address the following hiring needs:

#### Wholesale Banking

The ODP Wholesale Banking program develops skilled and knowledgeable professionals into leaders and Wholesale Bankers specializing in wholesale funding, lending, and solutions.

#### Regional Business

The ODP Regional Business program prepares professionals to become expert Retail Banker leaders with strong capabilities in funding, lending, transactions, and services.

#### Information Technology and Digital Banking

The ODP IT and Digital Banking program cultivates digital talent into leaders and professionals with the vision and expertise to drive IT and technology transformation.

### Risk Management

The ODP Risk Management program equips individuals with specialized expertise to become leaders and professionals in risk management.

## Business Enabler

The ODP Business Enabler program fosters the development of leaders and professionals across various business enabler functions, including banking operations, finance, strategy, legal, human resources, market research, corporate communication, and real estate management.



Candidates who pass the selection process are appointed as prospective employees and required to complete a ninemonth incentive-based educational program, consisting of:

1 month of classroom learning

5 months of on-the-job training



3 months of placement in a business unit as permanent employee with probationary period In 2024, the ODP enrolled:

827 individuals

## My Digital Academy

Bank Mandiri has established My Digital Academy, a tailored training program designed for early engagement and recruitment. This initiative includes a one-month innovation bootcamp for final-year students and fresh graduates from top universities in Indonesia, focusing on IT capability development. The program equips digital talent with essential skills in application development, data analysis, artificial intelligence, blockchain, and more, supporting Bank Mandiri's Corporate Plan to become the Best Modern Digital Bank.



In 2024, My Digital Academy enrolled:

542 individuals

As part of its commitment to supporting and contributing to government programs that provide young generations with opportunities to explore the professional world and enhance their competencies in preparation for future careers, Bank Mandiri offers various internship programs. These initiatives provide real work experience in the banking industry while helping participants develop essential skills for their professional journey.

## Internship

Bank Mandiri's Internship Program is designed to offer university students and recent graduates the opportunity to broaden their understanding of the professional world and develop the competencies required for a successful career. This program not only provides hands-on work experience but also encourages participants to explore their interests, refine their talents, and acquire new skills. Additionally, the Internship Program enhances Bank Mandiri's reputation as an employer of choice, supporting its employee recruitment strategy.



In 2024, the Internship Program had:

257 participants

## **Field Work Practice**

As part of its social responsibility in education, Bank Mandiri selectively offers Field Work Practice opportunities for high school students or equivalent, enabling them to gain hands-on experience in various Bank Mandiri units. This program equips students with real-world exposure while fostering their interests, talents, and skill development, preparing them for future careers.



In 2024, the Field Work Practice Program had:

19 participants

## Kriya Mandiri: Bank Mandiri's Tangible Contribution to Nation Building

The Kriya Mandiri program is an integrated internship initiative by Bank Mandiri aimed at developing high-quality human resources as key assets for advancing corporate growth and the national economy. Guided by the Employee Value Proposition, "Learn, Synergize, Grow, Contribute to Indonesia," the program provides fresh graduates with opportunities to gain real-world work experience while refining their competencies to excel in the job market. By combining theoretical learning with practical experience, the program equips participants with relevant banking knowledge and skills. Kriya Mandiri offers opportunities for various roles, including front office positions (Teller and Customer Service) at branch offices, as well as back office roles at the Head Office or branches.



The number of participants in the Kriya Mandiri program in 2024 reached:



## Technical Development Program

To ensure employees possess the skills required for their roles, Bank Mandiri offers a variety of job-specific development training programs tailored to technical and role-specific needs. Mandiri University Group manages these competency development initiatives using the Leadership Capability Model (LCM) and Technical Capability Model (TCM). These initiatives include:



#### **Upskilling & Reskilling**

Training for employees impacted by the Smart Branch Program, focusing on upskilling for new roles and reskilling for role transitions.



## Operation Transformation

Training designed to support business transformation and enhance employee competencies, preparing them for the digital era.



## **Beyond Lending**

Training for the commercial business unit (wholesale) to enable employees to offer transaction solutions beyond loans to customers.



## Mandirian Ready to Go Digital

Training aimed at enhancing employees' digital capabilities.

In delivering job-specific training, Bank Mandiri collaborates with institutions, including the National Professional Certification Agency (BNSP), the Banking Professional Certification Institute (LSPP), the Risk Management Certification Agency (BSMR), the Indonesian Mutual Fund and Investment Association (APRDI), and the Indonesian Capital Market Professional Certification Institute (LSPPMI). Additionally, partnerships are also established with other institutions, organizations, and companies with high levels of expertise and competence in their respective fields. Throughout 2024, various training programs have been successfully conducted, including: [F.22]

Banking Technology and Systems	10,762 participants
Certification Programs	41,025 participants
Credit and Financing Management	3,881 participants
Customer Relationship Management	19,711 participants
Digital Transformation and Innovation	11,564 participants
General Banking Skills	712,338 participants
Leadership and Management Skills	28,824 participants

Operational Excellence	2,126 participants
Product Knowledge	1,762 participants
Professional Appraisal and Valuation	66 participants
Risk Management and Regulatory Compliance	15,764 participants
Sales and Marketing Skills	14,256 participants
Cybersecurity and Information Security	73,842 participants



## Bank Mandiri's Training and Certification Institutions

Bank Mandiri operates a Training Institution (Lembaga Pelatihan Kerja - LPK) and a Professional Certification Institution (Lembaga Sertifikasi Profesi - LSP) to support employee competency development through specialized training programs and professional certifications tailored to their roles.



#### Training Institution (LPK)

The LPK is an official training institution licensed by the Jakarta Manpower Office, aimed at enhancing employee competencies through Competency-Based Training. It is designed to meet regulatory standards related to Payment Systems and Rupiah Management (SPPUR), while also developing employees' knowledge, skills, and attitudes. Additionally, the LPK maximizes the use of BTK Training facilities for optimal training outcomes.



## **Professional Certification Institution (LSP)**

LSP Bank Mandiri was established based on the Board of Directors Decree No. KEP.DIR/10A/2023 dated March 6, 2023, and officially licensed by the National Professional Certification Agency (BNSP) under license number BNSP-LSP-2446-ID on March 14, 2024. The establishment of the LSP reflects the implementation of Law No. 4 of 2023 on the Development and Strengthening of the Financial Sector, demonstrating Bank Mandiri's commitment to enhancing employee competencies, competitiveness, and quality in line with nationally and internationally recognized standards.

As a Second Party Professional Certification Institution (P2), the LSP focuses on providing competency certification services for Bank Mandiri employees and its subsidiaries, including Bank Syariah Indonesia (BSI), Bank Mantap, Mandiri Utama Finance Group (MUG), and Mandiri Tunas Finance (MTF). Its certification programs cover various fields, such as General Banking Officer Level I, Work Training for Instructors, Compliance in General Banking, Customer Feedback Management, and Basic Software Development.

LSP Bank Mandiri is supported by a robust organizational structure comprising a Board of Advisors, the Head of LSP, and three main divisions: Administration, Certification, and Quality Management. Additionally, the institution ensures the credibility and objectivity of the certification process through the roles of the Scheme Committee and the Impartiality Committee.

## Support for Scholarship and Certification Programs

Bank Mandiri supports the professional development of all employees by providing financial support for pursuing academic degrees or professional certifications. This initiative ensures equal access to skill enhancement opportunities and the fulfillment of professional requirements, covering all employees, including permanent, contract, outsourced, contractor, and part-time workers.

## Postgraduate Scholarship Program

Bank Mandiri provides selected employees with the opportunity to pursue advanced education at top universities, both domestically and internationally. This program is designed to broaden their knowledge, refine their expertise, and empower them to make meaningful contributions to Bank Mandiri and society.



## Mandiri Executive Scholarship for Postgraduate (MESP)

The MESP is a domestic Master's degree scholarship program designed for top BOD-2 talent to enhance skills aligned with the company's long-term strategies. Currently, Bank Mandiri collaborates with Monash University Indonesia for the MESP program. In 2024, 21 employees participated in the program, focusing on a Master of Business Innovation.



## Overseas Master's Scholarship Program

This scholarship is offered to top BOD-3 talent who meet specific criteria, providing them with opportunities for global exposure, networking, and the development of international perspectives. In 2024, 30 employees pursued advanced degrees at prestigious institutions such as Carnegie Mellon University, NYU Stern, HEC Paris, The University of Manchester, The University of Melbourne, IE University, EDHEC, IMD Business School, and ESADE. Fields of study include Master of Science, Master of Business Administration, and LLM programs.

## Certification Programs

Bank Mandiri offers a range of certification programs designed to meet regulatory and internal competency standards. These certifications are divided into two main categories: Mandatory Certifications and Non-Mandatory Certifications.



## Mandatory Certifications

Mandatory certifications are required by external regulators and Bank Mandiri's internal standards. These certifications ensure that employees in specific roles possess and maintain the necessary competencies for their jobs.

Certification Name	Objective	Target Participants
Mandatory Certifications Requi	red by Regulators	
Risk Management Certification	Demonstrates proficiency in risk management.	Executives, officers, and employees of Bank Mandiri.
Treasury Dealer Certification	Develops competency in treasury activities across three levels: basic, intermediate, and advanced	Officers and staff engaged in treasury activities.
Mutual Fund Selling Agent (WAPERD)	Ensures marketing competency in mutual fund markets, in compliance with regulatory standards (OJK).	Bank Mandiri frontliners.
Broker-Dealer Marketing Agent (WPPEP)	Provides qualifications for selling securities products.	Officers and employees involved in securities sales.
Payment Systems & Rupiah Currency Management Certification (SPPUR)	Competency in payment systems and rupiah currency management.	Bank Mandiri employees in the field of payment systems and rupiah money management.
HR Management Certification (MSDM)	Competency in human resource management.	Employees and officials of Bank Mandiri in the HR department.
Certification Required by Bank	Mandiri's Internal Policies	
Competency-Based Interview (CBI) Certification	Competency in conducting competency- based interviews for recruitment processes.	Leaders with unit head positions and interviewers from the HR department.

In 2024, Bank Mandiri provided financial supports through the Mandatory Certification Program, fully funded by the Bank, benefiting 41,025 participants, consisting of 32,915 participants with permanent worker status and 8,110 participants with contract worker status.



## Non-Mandatory Certification

Certifications tailored to meet the internal needs of Bank Mandiri, aimed at enhancing employees' skills to optimally support various business activities of the company.

Certification Name	Objective	Target Participants
Limited Marketing Securities Broker Representative Certification (WPPEPT)	Training for offering referral services to partner securities firms.	Employees providing referral services to clients for partner securities firms of Bank.
Refreshment of Limited Marketing Securities Broker Representative Certification (WPPEPT)	Advanced training program to update knowledge on the capital market.	Holders of the WPPEPT certification.

Bank Mandiri's certification program is a vital component of the employee development initiative, designed to enhance skills in a measurable manner. During its implementation period, a total of 12,528 employees, equivalent to 32.97% of the workforce, participated in a program, achieving relevant skill improvements in their respective fields. These programs not only strengthen individual capabilities but also generate significant benefits for the company by improving productivity and supporting business objectives.



## Mentorship Program

Bank Mandiri has integrated a mentorship program into its human resource development framework to provide guidance and support for employees. Through this initiative, employees are connected with experienced mentors who offer direction and insights to enhance their professional journeys.

## **Women Empowerment**

The Women Empowerment program, part of the Srikandi Mandiri initiative, focuses on the development of employees, particularly at L3 and L4 levels, through a holistic mentoring approach. Experienced Mandiri leaders (L2, L3+, and L3) serve as mentors in the program, with the following objectives:

- Building a community: Establishing a supportive network among female employees to share experiences and inspire one another.
- Providing Exposure: Facilitating opportunities for participants to connect with career sponsors, thereby opening pathways
  for further development.
- Knowledge Sharing: Organizing discussions between mentors and mentees to transfer practical knowledge, strengthen
  professional skills, and boost the confidence of female employees.



# Development of ESG-Related Competencies

Bank Mandiri actively incorporates Environmental, Social, and Governance (ESG) principles into its human resource development curriculum. The objective is to cultivate employees who are not only skilled but also deeply aware of sustainability in all aspects of business processes. ESG-related learning is delivered through various platforms, including e-learning, online training, and Internal Discussion Forums (FDI). These platforms provide employees with opportunities to deepen their understanding and apply sustainability principles in their daily work.

52

Training on Sustainability

All employees have participated in ESG-related competency development programs

In 2024, Bank Mandiri set a target to increase the number of training participants by 10% of the total workforce. Additionally, we committed to achieving a minimum employee participation rate of 85% in training and development programs, with an average of over 40 training hours per employee planned for the year. These targets were designed to strengthen competencies, enhance digital skills, and ensure employees possess the capabilities necessary to support sustainable business growth. [GRI 404-1]

In its implementation, Bank Mandiri successfully exceeded the established targets. In 2024, the number of training participants reached 949,438, reflecting a 22.7% increase compared to the previous year's 773,920 participants. The employee participation rate in training programs stood at 97.87% of the total active workforce, surpassing the minimum target of 85%. Furthermore, the average training hours per employee reached 107.8 hours, representing a significant achievement compared to the initial target. These results highlight Bank Mandiri's success in optimizing human capital development to support the company's objectives effectively. [GRI 404-1]

## Diversity, Equality, and Inclusion Program [F.18]

Human resource management at Bank Mandiri focuses not only on competency development but also on creating an inclusive and equitable work environment. Bank Mandiri believes that diversity is a key strength in driving innovation and collaboration. Through the Diversity, Equality, and Inclusion program, Bank Mandiri is committed to supporting every individual in realizing their full potential, without limitations, while fostering a workplace culture of respect and competitiveness.

## Commitment to Human Rights and Diversity

As an initial step in creating an inclusive work environment, Bank Mandiri implements a diversity, equality, and inclusion policy based on human rights principles. Bank Mandiri is committed to respecting and adhering to international labor standards outlined in the International Labour Organization (ILO) Conventions. All of our employment policies and practices align with ILO standards, including respect for freedom of association, the elimination of forced labor, child labor protection, and the implementation of non-discrimination in the workplace. [GRI 3-3]

As part of this commitment, the implementation of human rights at Bank Mandiri is governed by the Human Rights Principles in Employment and the Respectful Workplace Policy (RWP). This includes clear guidelines to ensure respect for human rights across all internal operations of Bank Mandiri, including resource management, business activities, and the products and services offered. Moreover, the policy extends to suppliers and business partners, ensuring that human rights principles are consistently applied across Bank Mandiri's value chain and business ecosystem.

Bank Mandiri continually strives to create an equitable and inclusive work environment for all employees. To achieve this goal, equality in all aspects of resource management, free from discriminatory practices is ensured. Bank Mandiri firmly rejects all forms of discrimination based on gender, race, sexual orientation, religion, age, disability, and social status. Every employee is treated equitably and equally in all aspects of the company's operations.

Unethical practices such as human trafficking, forced labor, and child labor exploitation are unacceptable. The right to freedom of association and the right to engage in collective bargaining are fully guaranteed, along with efforts to ensure equal pay for equal work. This commitment is reinforced through the signing of the Integrity Pact and Annual Statement by all levels of the company, including the Board of Directors and the Board of Commissioners.

## Human Rights Risk Identification

Bank Mandiri has developed a human rights risk map aimed Bank Mandiri implements a risk management process for human capital aspects, including risks related to human rights (HR). This process begins with identifying potential risks to ensure effective management. In 2024, Bank Mandiri conducted an employee engagement survey involving 30,717 employees, representing 80.81% of the total workforce. The survey included various questions designed to identify potential risks associated with human capital, including human rights risks within Bank Mandiri's internal operations.

Through this survey, employees can share their

experiences and perspectives anonymously, resulting in valid and representative data. The survey results are then comprehensively analyzed, complemented by an analysis of internal policies to provide in-depth insights into existing risks and to strengthen the mitigation measures taken by Bank Mandiri. Through this identification process, Bank Mandiri has identified several human rights risks as follows:

Scope	Subject	Bank Mandiri's Policy	Human Rights Risk	Vulnerable Groups
Bank Mandiri's Operations	Employees	Human Resource Management Standard Operating Procedures (SPSDM)	<ul><li>Discrimination</li><li>Forced Labor</li><li>Equal Renumeration</li></ul>	<ul><li> Employees</li><li> Women</li><li> Disabilities</li><li> Migrant Workers</li></ul>



## Human Rights Mitigation and Remediation

The human rights assessment, based on the results of the employee engagement survey, covers 80.81% of the total workforce. This assessment identifies various potential human rights risks that may affect employees, such as discrimination and forced labor. All identified risks have been managed through a comprehensive mitigation plan, which includes the following strategic measures:

- Strengthening internal policies that prohibit all forms of discrimination and forced labor. Additionally, all employees reaffirm their commitment each year by completing an integrity pact that underscores their respect for human rights.
- Providing training and education to employees and management to raise awareness of the importance of respecting human rights. The training materials cover topics such as discrimination prevention, diversity and inclusion, and protection against forced labor.
- Offering transparent, secure, and anonymous reporting mechanisms for reporting human rights violations, which are handled by a dedicated team to ensure objective investigations and protection for whistleblowers.
- Conducting regular monitoring through internal audits to ensure that no practices violate human rights. This process also includes the annual reassessment of human rights risks to evaluate potential new risks and adjust mitigation strategies accordingly.

All employees are required to uphold equality, avoid discriminatory behavior, and preserve the dignity of every individual in the workplace. In the event of a human rights violation, employees are provided with access to various reporting channels designed to ensure transparency and protection, as follows:

## **Head of Work Unit**

through the Employee Grievance Handling Mechanism



Whistleblowing System Letter to CEO (WBS-LTC)



**HC4U Service** 



The employee grievance handling mechanism and the HC4U service are managed internally, while the Whistleblowing System is managed by an external party. Further details about these reporting channels can be found on page 228.

The follow-up process for received reports involves several relevant parties, including the HC Engagement & Outsource Management Group, Senior Investigator (SIV)/Regional Business Control (RBC), and the Head of the Work Unit, in accordance with the applicable process flow.

To support employees who are victims of human rights violations, Bank Mandiri provides professional counselors trained in Psychological First Aid (PFA). These counselors assist victims in the reporting process, provide protection, and facilitate mental well-being recovery during the proceedings.

In the event of human rights-related issues, Bank Mandiri is committed to facilitating recovery from the negative impacts caused. Remediation efforts include the following steps:

- Fair and transparent investigations
- Protection for Victims and Witnesses/Whistleblowers
- · Legal and psychological counseling
- · Corrective actions against the perpetrators

Individuals proven to have committed acts of discrimination, violence, bullying, and harassment in the workplace will face sanctions as outlined in the Collective Labor Agreement (CLA), Human Resources Standard Operating Procedures (SPSDM) and their amendments, as well as applicable laws and regulations. Each violation will be followed up in accordance with the Employee Discipline Regulations (PDP), which govern the types of violations and the penalties that may be imposed, including: [GRI 3-3]

- Actions contrary to norms, including immoral conduct, either inside or outside the Bank, may be subject to termination of employment (TOE).
- Failure to respect fellow employees may be subject to a second written warning.
- Arbitrary behavior toward other employees may be subject to a final written warning and termination.
- Violations of work rules or procedures may be subject to termination of employment (TOE).

## Diversity, Equality, and Inclusion at Bank Mandiri

"

Bank Mandiri instills the values of diversity, equality, and inclusion as the foundation of its corporate culture. By respecting differences in backgrounds and perspectives, diversity becomes a driving force for innovation and creativity. Equality is realized through equitable access for all employees to develop without discrimination, while inclusivity ensures that everyone can contribute fully in a work environment that fosters mutual respect.

To ensure these values are consistently applied, Bank Mandiri conducts regular monitoring of diversity through a data-driven approach to ensure gender, age, and other demographic representations reflect the commitment to inclusion and equality. The results of this monitoring are used to identify areas requiring improvement, develop more inclusive strategic measures, and assess the progress of diversity policy implementation across the organization. One outcome is the composition of female employees, which has reached 52.40%, with the number of women in managerial positions now reaching 45.65% in 2024. Additionally, the representation of other groups, such as employees with disabilities, continues to rise through inclusive recruitment programs.

Bank Mandiri has a strict zero-tolerance policy towards any form of harrassment, whether sexual or non-sexual, and discrimination in the workplace or in any work-related activities. This is clearly stated in the Respectful Workplace Policy (RWP), which is designed to protect the dignity of all individuals, promote mutual respect, and ensure a work environment free from discrimination, bullying, harassment, and both physical and mental abuse. Through the RWP, Bank Mandiri is committed to fostering a harmonious, inclusive, conducive, and productive work environment that promotes business sustainability and upholds human rights, ensuring a workplace free from harassment. [GRI 3-3]

The responsibility for diversity and inclusion in the workplace lies with the Director of Compliance and Human Resources, as well as all Heads of Work Units, who ensures the consistent application of this policy across the entire organization. The policy applies to all Bank Mandiri operations, including employees, external partners acting on the bank's behalf, and subsidiaries or affiliated entities.

The implementation of the RWP is periodically monitored by the Board of Commissioners as part of their supervisory function, with reports submitted semiannually to the Minister of State-Owned Enterprises (SOEs). Through this integrated monitoring mechanism, Bank Mandiri ensures the consistent application of policies across all organizational levels.

In addition, Bank Mandiri actively promotes the values of diversity and anti-discrimination through training and outreach programs. In 2024, 21 training sessions were held to further support the implementation of the RWP, including training on anti-discrimination and harassment, gender diversity and inclusion, workplace well-being, and fostering a respectful work environment.



To view an overview of the RWP, please visit: www.bankmandiri.co.id/en/esg-policies



## Training and Dissemination on Discrimination and Violence Prevention



In 2024, Bank Mandiri, through the Industrial Relations Awareness Forum (IRAF), organized a hybrid (offline and online) dissemination of the Respectful Workplace Policy (RWP) to all employees (100%). This session, held at the Head Office and across all Regions and Areas of the bank, aimed to enhance employees' understanding of the importance of maintaining a workplace free from discrimination and violence.

During the same session, Bank Mandiri also disseminated the 2023–2025 Collective Labor Agreement (CLA) to ensure employees understand their rights, obligations, and the policies that foster a conducive work environment. Additionally, discussions covered strategies for implementing anti-fraud measures and addressing the bank's latest operational issues to strengthen integrity and corporate governance.

Bank Mandiri is committed to fostering a work environment free from discrimination, violence, bullying, and harassment. In 2024, a total of 41 incidents related to RWP were reported through the WBS reporting channel, all of which have been addressed and subjected to corrective or disciplinary actions in accordance with applicable standards and procedures, and have been declared resolved. Through prompt and effective complaint handling, as well as the launch of the RWP Guideline, Bank Mandiri continues to strengthen its efforts to create an inclusive workplace culture that promotes diversity and respects human rights. [CRI 406-1]

## Commitment to Freedom of Association and Collective Bargaining

Bank Mandiri is fully committed to ensuring that all employees have the right to form, join, and participate in trade unions, in accordance with applicable laws. This commitment aligns with Law Number 21 of 2000 concerning Trade Unions/Labor Unions, which has been implemented in Article 9 Paragraph (2) of the Collective Labor Agreement (CLA), stating: "Every employee has the right to become a member of the Employee Union by submitting a written application, and the Bank is not allowed to prohibit any employee from becoming or not becoming a member of the Employee Union."

We also support the activities of the Bank Mandiri Employee Union by providing various necessary facilities. This support includes the provision of a workspace equipped with adequate infrastructure, utility assistance, and operational support to ensure the smooth functioning of the Employee Union in fulfilling its role. This policy is also consistent with international principles set forth by the International Labour Organization (ILO) Conventions No. 87 on Freedom of Association and No. 98 on the Right to Organize and Collective Bargaining.

We respect the right of every employee to engage in collective bargaining, addressing important issues such as wages, working conditions, and employee welfare is respected. This bargaining process is conducted through

the Bank Mandiri Employees' Union (SPBM), which currently represents 13,615 members. Bank Mandiri is committed to ensuring that the process is inclusive, free from discrimination, and without intimidation for any employees involved. Bargaining sessions are transparent and include all employees within Bank Mandiri's operations.

As of 2024, all of our employees (100%) are covered by the Collective Labor Agreement (CLA), which governs wages, working hours, and employee welfare. This agreement applies to all employees, both permanent and contract, and was updated on December 5, 2023, to remain in effect until 2025. In accordance with the CLA and Indonesian Labor Law No. 13 of 2003, Bank Mandiri is also committed to prohibiting child labor and forced labor in all of our business operations. Bank Mandiri ensures that all activities, including those of our business partners, comply with these regulations as part of the company's Corporate Social Responsibility. [GRI 408-1, 409-1] [OJK E.19]

To maintain an equitable and inclusive work environment, an internal grievance system is provided that allows employees to report violations of freedom of association or intimidation anonymously and securely. All reports are taken seriously by the Human Capital Engagement & Outsource Management Group – Industrial Relations Department, which ensures that investigations are conducted transparently and thoroughly.

## Formal Talent Pipeline Development Strategy

Talent development is vital for shaping future leaders. At Bank Mandiri, diversity and equality underpin every recruitment process, focusing on candidates' abilities, skills, and experiences. A diverse workforce is fostered through inclusive policies, diversity training, and a workplace culture that respects differences and encourages collaboration. Selection processes is unbiased, ensuring no consideration of race, gender, religion, marital status, or disability. This approach complies with labor laws, including Law No. 13 of 2003, as amended by Law No. 6 of 2023, and Government Regulation No. 35 of 2021. Furthermore, our compensation policies go beyond legal requirements, offering severance packages and long-service awards that exceed statutory mandates. [GRI 3-3]

To further promote diversity, Bank Mandiri prioritizes local community representation in senior management positions at key operational sites. As of 2024, 99,4% of senior management comprises individuals from local communities. Senior management refers to BOD-1, while key operational sites are defined as Our significant operational area, namely Indonesia. By involving local communities in leadership roles, the aim is to enhance strategic perspectives, positively impact local communities, and reflect workplace diversity. [GRI 202-2]

Bank Mandiri continuously refines its talent recruitment programs to align with strategic priorities. To anticipate hiring needs, recruitment forecasts analyze factors such as upcoming retirements, changes in business and operational strategies, and expected employee turnover.





Bank Mandiri implements a talent attraction strategy through strategic collaborations with selected and targeted universities to recruit top talent. This approach seeks individuals who not only meet technical qualifications but also align with the company's values and culture. It primarily targets students and recent graduates with exceptional potential, aiming to prepare them as future leaders at Bank Mandiri.

Currently, Bank Mandiri partners with renowned universities such as University of Indonesia, Gadjah Mada University, Brawijaya University, Padjadjaran University, Bandung Institute of Technology, Sepuluh Nopember Institute of Technology, Telkom University, Bina Nusantara University, and others that meet specific criteria. This collaboration supports the need for high-quality human resources aligned with the vision and mission of Bank Mandiri.

The following are the four key programs forming the core of Bank Mandiri's talent attraction initiatives.



#### **Talent Hunt**

This program focuses on building strong relationships and mutually beneficial collaborations with selected universities. It aims to identify and recruit high-potential candidates, particularly final-year students or recent graduates, who are ready to enter the workforce and adapt to the company's culture.



#### **Future Me**

Targeting first- to fourth-year active university students selected through a rigorous process, this program includes inspirational sharing sessions and career mentoring. The primary objective is to accelerate participants' career readiness, particularly for roles at Bank Mandiri. Additionally, it supports digital transformation, enhances human resource quality, strengthens the company's image, and fosters closer relationships with stakeholders.



#### Visit Mandiri

Engagement initiatives with selected universities and communities, such as the Ikatan Abang None Jakarta, are designed to introduce Bank Mandiri to students through company visit programs. These initiatives aim to raise awareness about the company and inspire students to consider Bank Mandiri as a prospective career destination from an early stage.



## My Digital Academy (IT-Specific)

An exclusive bootcamp program designed to nurture young IT talent. It offers intensive and structured training combined with hands-on learning from experts in digital and technology fields. During the 2023–2024 period, this program successfully attracted 542 participants.

New Talent Pool in 2024

Talent Hunt:

1,234 candidates

Future Me:

148 candidates

Visit Mandiri:

96 candidates

My Digital Academy:

423 candidates

To meet business needs and support talent development, Bank Mandiri has implemented a series of recruitment programs aimed not only at fulfilling hiring requirements but also at fostering individual potential within the organization. These programs include:

#### Officer Development Program (ODP)

A leadership recruitment initiative targeting fresh graduates from universities across Indonesia or individuals with less than four years of work experience. By the end of 2024, a total of 827 candidates had been recruited through this program.

#### Clerical Staff Recruitment

A program designed for fresh graduates or individuals with at least two years of work experience, specifically for clerical positions. By the end of 2024, 356 candidates had been successfully recruited through this initiative.

## Special Regional Leadership Candidates (CPDK)

This program focuses on recruiting and developing talent from specific regions, providing opportunities for local talents. CPDK employees undergo intensive training that includes both in-class and on-the-job components to familiarize them with operational standards and business processes. By the end of 2024, 68 candidates had been selected through this program.

#### Experienced Hire

A recruitment initiative targeting experienced professionals with more than three years of work experience, specifically for roles or segments requiring specialized expertise. In 2024, 128 candidates were placed in key positions through this program.

To streamline the recruitment and selection process, Bank Mandiri utilizes a digital platform called Talentics. Serving as an Applicant Tracking System (ATS), Talentics allows candidates to submit job applications online while enabling the recruitment team to efficiently monitor and screen qualified candidates for required positions. Collaboration with Talentics began in 2023 and encompasses recruitment efforts at the Head Office and regional branches.

## Support for Employees with Disabilities

As part of its commitment to inclusion, Bank Mandiri places special emphasis on employees with disabilities, ensuring they have equal opportunities during the recruitment process. The recruitment of employees with disabilities is conducted independently by each business unit in coordination with the Human Capital Unit and in collaboration with third parties, such as the Forum Human Capital Indonesia. Available positions for employees with disabilities include roles as contact center staff, back-office staff, and information technology staff.

Number and Percentage of Employees with Disabilities by Gender	
Male 74 individuals (81,32%)	
Female 17 individuals (18,68%)	

Number of Employees with Disabilities by Employment Status (Individuals)		
Organic	15	
Kriya 4		
Outsource 72		
Types of Disabilities (Individuals)		
Hearing Impaired	4	
Physically Disabled 18		
Visually Impaired 7		
Speech Impaired 1		
Other Difable 61		



Job Types	Number of Employees (Individuals)
Call Center	15
Back Office	31
Front Office	23
Fields (Lapangan)	20
IT	2



## Support for Difable

The Mandiri Contact Center provides opportunities for difable individuals to join the Kriya Mandiri program. Bank Mandiri ensures accessibility through difable-friendly infrastructure, including ramps, adapted restrooms, and assistive technology tailored to their needs. Through this initiative, Bank Mandiri reaffirms its commitment to ensuring that every individual, regardless of background or physical condition, has equal opportunities to learn, grow, and contribute meaningfully. This initiative underscores Bank Mandiri's dedication to fostering diversity and inclusion in the workplace.

In 2024, 4 difable participants were part of the Kriya Mandiri program.

## **Diversity Composition**

Bank Mandiri consistently strives to enhance the diversity composition across the organization, with a particular focus on improving gender representation as part of its commitment to inclusion and equality. In 2024, Bank Mandiri had a total of 38,874 employees, comprising 18,505 male and 20,369 female employees. Additionally, there were 33,069 non-employee workers, including outsourced personnel in administrative roles, housekeeping, driving, security, sales, collections, and IT support.

All employee-related information is collected and processed through the SAP eHCMS and SPARK System by the Human Capital Services Group and the HC Engagement & Outsource Management Group. Further details on employee diversity are provided in the Sustainability Performance Data section on page 289. [GRI 2-7, 2-8]

## Support for Female Employees

Bank Mandiri ensures equal opportunities for all employees, regardless of gender. Female employees have the same access as their male counterparts to develop their skills and contribute professionally. In 2024, the number of female employees reached 20,369 individuals (52.40%).

## Composition of Female Employees



**Total female employees** 

52.40%

Female employees across all management levels (junior, middle, and top management):

45.65%

Female employees at the junior management level:

46.82%

Female employees at the top management level:

24.52%

Female employees in management positions within revenue-generating functions:

50%

Female employees in roles related to STEM (Science, Technology, Engineering, and Mathematics):

45.65%



## Srikandi Mandiri

As a commitment to creating an inclusive and ideal workplace for women, Bank Mandiri consistently implements the Srikandi Mandiri Program. This program aims to foster a respectful, inclusive work environment that supports women's well-being and contributions to society. To achieve this, Srikandi Mandiri is built upon four key missions:

- 1. Enhancing the holistic well-being of female employees at Bank Mandiri.
- 2. Creating a collaborative space for shared solutions.
- 3. Promoting the development and leadership of female employees.
- 4. Generating social and economic impact for women.

To realize its commitment, Srikandi Mandiri implements various initiatives under four main streams:



#### **Foster Well-Being**

Srikandi Mandiri enhances the well-being of female employees through two key initiatives:

- Physical and mental well-being, which includes promoting a healthy lifestyle and providing teleconsultation services for physical and mental health.
- Financial and social well-being, covering financial consultation programs, financial management seminars, and the Respectful Workplace Program to ensure a safe and inclusive work environment.

To reinforce its commitment to the welfare of female employees, Bank Mandiri has implemented several initiatives, including the Respectful Workplace Policy campaign. This campaign aims to raise awareness of the importance of fostering a respectful workplace. Through internal communication channels and social media, the campaign messages are effectively conveyed to reach all employees.

# Competitive Compensation

Employee welfare is a top priority at Bank Mandiri. Through a performance-based, equitable, and transparent compensation strategy, which includes merit-based salary increases, compensation is determined based on position classification, length of service, and achievements, without

## Connect Women in Circle Srikandi

Bank Mandiri fosters a dedicated space for female employees to exchange aspirations, collaborate on solutions, share inspiring stories, and discuss experiences. This initiative aims to build a supportive community that encourages collective growth.

#### **Lead to The Future**

Through various skill development programs, Srikandi Mandiri empowers female employees by strengthening their digital and leadership capabilities, equipping them to navigate future challenges.

#### **Give Back to Society**

As a form of social contribution, Srikandi Mandiri encourages female employees to create social and economic impact within their communities, whether through empowerment programs or other social initiatives.

As part of these initiatives, Counseling Sessions are available in collaboration with professional psychologists. This program is designed to support female employees in addressing emotional and mental challenges, providing the necessary assistance to create a healthier and more productive work-life balance.

the risk of gender discrimination. Bank Mandiri ensures that all employees are paid in accordance with applicable laws, including the regional minimum wage (UMR) in each operational area, as well as providing additional cost-of-living allowances in specific regions. [GRI 3-3, 405-2]



The entry-level wage at Bank Mandiri is set 4.39% higher than the highest UMR in Indonesia, applicable across all operational locations with ratio between male and female employees is 1:1, indicating that there is no gender-based wage disparity. This competitive remuneration strategy not only aims to attract the best talent but also serves as a key strategy for improving employee retention. [GRI 3-3, 202-11 [E20]

Each year, Bank Mandiri participates in the Annual Salary Survey for the Banking Industry, organized by the independent agency Willis Towers Watson. This survey is conducted by all banks within the Indonesia Business Partner Bank Group (KBMI) IV, the Association of State-Owned Banks (Himbara), and the majority of private banks in Indonesia. Besides serving as a reference for remuneration policies, the survey is also used by Bank Mandiri as part of the gender pay gap audit to ensure that wage policies are applied equitably and free from discrimination.

The salary survey includes projections for inflation, the latest minimum wage data, and various other relevant information, which are used as benchmarks in evaluating the salary structure. During this review process, Bank Mandiri ensures there is no discrimination based on disability, age, sexual orientation, or gender. Bank Mandiri's salary structure matrix is based on market position and performance level, reflecting the results of annual performance evaluations.

Bank Mandiri is committed to ensuring pay equality for all employees, free from gender discrimination. In the

same year, approximately 26.85% of Bank Mandiri's total workforce received promotions, which includes 10,436 employees. Bank Mandiri continuously strives to improve employee welfare through equitable and transparent remuneration policies, in line with sustainability principles. Bank Mandiri uses performance assessment system that mitigates discrimination by evaluating not only based on assessments from the Direct Supervisor (Employee Manager/EM), but also from the Employee Manager's Manager (EMM), complemented by a 360-degree assessment (evaluation by peers and subordinates). The indicators used in performance evaluations also cover aspects closely related to KPIs and Mandirian DNA, where the descriptions of each indicator do not contain gender-based discrimination.

Mitigation measures have been implemented to ensure there is no wage disparity between men and women for positions with the same responsibilities and roles. While no pay gap has been found, regular evaluations are conducted to ensure this equality is maintained. Furthermore, we continue to enhance women's representation in managerial positions as part of our commitment to diversity and inclusion.

As part of the commitment to creating an inclusive work environment and supporting employee welfare, Bank Mandiri provides various non-salary benefits to both permanent and contract employees across all operational areas, including: [GRI 401-2]

Type of Benefits	Program Name	Permanent Employees	Contract Employees
Life Insurance	BPJS Employment, BPJS Health, Grief Compensation	Yes	Yes
Health Insurance	BPJS Health, Mandiri Inhealth	Yes	Yes
Disability and Incapacity Coverage	BPJS Employment, BPJS Health, Mandiri Inhealth	Yes	Yes
Job Loss Guarantee	BPJS Employment	Yes	Yes
Housing Allowance	Housing provided or paid by the company	Yes	Yes*
Leave	Maternity leave, paternity leave, annual leave, and block leave (5 consecutive days as part of annual leave)	Yes	Yes
Retirement Preparation	BPJS Employment, Bank Mandiri Pension Fund, Bank Mandiri Pension Insurance, retirement debriefing, health insurance for Bank Mandiri retirees	Yes	Yes*
Training and Certification Costs **	Training and certification funded or provided by the company	Yes	Yes

<sup>\*</sup> In accordance with the agreement

Sustainability Report 2024

<sup>\*\*</sup> The training and certification undertaken by employees must be aimed at enhancing their competencies in alignment with their job responsibilities.

To support employee well-being, particularly during childbirth, Bank Mandiri provides a maternity leave of 3 months for female employees and a paternity leave of 5 working days for male employees. This provision is also in line with the new Maternal and Child Welfare Law, which will be published in 2024. [GRI 3-3, 401-3]

## **Long-Term Incentive Program**

Bank Mandiri continues to implement initiatives related to the Employee Stock Ownership Program (ESOP) and the Management Stock Ownership Program (MSOP), which have been in place since 2015. These programs are designed for all employees and management who meet specific criteria, utilizing a mechanism of granting shares and a vesting period.

For the Management Stock Ownership Program (MSOP), shares are provided as part of a Long-Term Incentive (LTI) aimed at Non-Independent Directors and Commissioners. This program seeks to encourage improved performance in the future and to reward contributions in sustaining and enhancing the company's share value over time. The LTI awards are calculated based on several key indicators, such as Total Shareholder Return, Return on Equity, and Non-Performing Loans.

Meanwhile, the Employee Stock Ownership Program (ESOP) is designed to foster a sense of ownership among employees while motivating them to contribute at their best. Shares under this program are granted to employees who meet management's criteria, which include individual performance, talent classification, and professional track records. Since 2015, Bank Mandiri has distributed a total of 96,003,800 shares, with a vesting period ranging from three to five years.

Looking ahead, Bank Mandiri remains committed to continuing these stock ownership programs, adjusting their scope to suit employees and management.

## Regular Performance Appraisals and Feedback Process

In 2024, 100% of our employees have completed performance reviews, goal setting, and evaluations to support performance development and goal achievement through various evaluation mechanisms. These processes align with career growth initiatives, ensuring employees receive valuable feedback to unlock their full potential. [GRI 404-3]

Evaluation Type	Methods	Frequency
Individual Performance	Individual KPIs	Conducted twice a year (Mid-Year Review and Year-End Performance Review)
Team-Based Performance	Division KPIs	Conducted twice a year (Mid-Year Review and Year-End Review)
Management by objectives	Goal Setting	Conducted twice a year (Mid-Year Review and Year- End Review), with development dialogues available throughout the year as needed
360-Degree Feedback System	360-Degree Survey	Conducted annually
Ongoing Feedback	Development dialogues	Continuous throughout the year

The 2024 performance evaluation covers all eligible employees, regardless of gender, at all levels, and in line with established procedures. This process is designed to assess performance formally and support ongoing career development. [GRI 404-3]

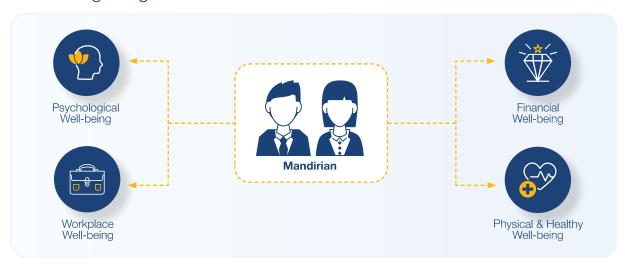




## Support for Employees

Bank Mandiri offers a variety of support programs to ensure the well-being of its employees, both personally and professionally. These initiatives are designed to foster a supportive and productive work environment.

## Well-being Program



Work-life balance is key to creating productive and happy employees. By focusing on employee well-being, Bank Mandiri aims to provide a healthy, safe, and comfortable environment for all staff. The main goal of this initiative is to enhance the Employee Value Proposition (EVP), employee engagement, value creation, and overall performance.

The Employee Well-Being program is a comprehensive initiative that addresses important areas such as mental health, work environment, financial well-being, and physical health.

## Mental Well-Being

## • Online Psychological Counseling

To help employees manage mental health and stress, Bank Mandiri offers online psychological counseling. Employees can access this service through the Bank Mandiri's health facilities. Appointments can be made through the 24-hour Employee Contact Center, and online sessions with a psychologist are available threeAvailable from Monday to Friday from 08:00 AM to 04:00 PM Western Indonesia Time (WIB) by appointment.

## • Social and Community Activities

To encourage employee engagement and support mental well-being, especially in managing workplace stress, Bank Mandiri facilitates Employee Affinity Groups and employee communities that help create an inclusive and harmonious work environment.

Currently, Bank Mandiri supports a variety of communities, including three spiritual groups, seven arts and culture groups, two social groups, and 24 sports communities across 12 operational regions. This initiative strengthens relationships among employees and provides a space for personal expression, promoting a healthy work-life balance.

## Workplace Well-Being

## **Childcare Support**

Bank Mandiri offers lactation rooms and daycare services at the Plaza Mandiri Building to support employees with families. The daycare provides full-time care with early childhood education programs to foster children's physical, psychological, and motor development. Employees can also use carer's leave to care for immediate family members.





## **Parental Leave**

Bank Mandiri supports family well-being with its paid parental leave policy, which caters to various employee needs during childbirth or other personal situations. For primary caregivers, Bank Mandiri provides 3 months of maternity leave under the following conditions:

- Maternity leave can be taken as 1.5 months before the expected delivery date (based on the calculation of an obstetrician
  or midwife) and 1.5 months after delivery; or
- Upon the employee's request, with approval from their spouse and accompanied by a doctor's certificate, maternity leave can be taken as 1 month before delivery and 2 months after delivery.

Meanwhile, for secondary caregivers, Bank Mandiri provides paternity leave of 5 working days to allow fathers to accompany their spouses during childbirth, exceeding the legal minimum of 2 days.

Additionally, to support employees' emotional and physical health, Bank Mandiri grants up to 45 days of leave for employees who experience a miscarriage. Bank Mandiri also offers 5 working days of leave for employees who support a partner during a miscarriage, showing empathy during this difficult time.

Understanding the importance of flexibility, Bank Mandiri's leave policy also includes various family or caregiving leave options beyond parental leave. These include leave for weddings, bereavement, religious ceremonies, and health-related reasons such as illness, check-ups, or menstrual leave for female employees who experience severe discomfort on the first or second day of menstruation. Bank Mandiri also offers personal leave for events such as graduations, approved dispensations, or emergency situations like natural disasters. To enhance convenience, employees can take up to 4 hours of flexible arrival or departure time on the same day, with a maximum of three instances per month.

## Flexible Work Arrangements

Bank Mandiri provides additional flexibility to employees by offering flexible working hours and remote work (working from home) options to support their well-being. Working hours are adjusted based on supervisor approval, taking into account the job's requirements. This arrangement ensures tasks are completed efficiently, maintains the required total working hours, and ensures adequate staffing without needing additional staff or overburdening others. Employees under these arrangements continue to receive the same salary and benefits without changes.





## Financial Well-Being

## **Retirement Program**

To support employees' financial security after retirement, Bank Mandiri offers a range of retirement programs in line with employment agreements. These programs are managed through the Employer Pension Fund (DPPK), including both the Defined Contribution Pension Program and the Defined Benefit Pension Program. Additionally, Bank Mandiri prioritizes the health of employees approaching retirement age by providing access to Mandiri Health Care Cooperative, which offers health services, assistance, and benefits. Membership contributions are 2% from employees and 3% from Bank Mandiri. [3-3, 201-3]

In addition, Bank Mandiri is committed to supporting employee well-being through tailored transition programs designed to assist employees as they approach retirement. These programs include skill-enhancement training to help employees prepare for life after retirement. [GRI

In 2024, Bank Mandiri conducted a Pre-Retirement Preparation Program to support post-employment readiness. The program included training on Retirement Rights and Obligations, Healthy Living in Retirement, Managing Retirement Funds and Assets, Investment Products for Retirees, SME Business Planning, Maximizing Social Media, Mandiri Auctions, and Sharing Sessions with Retiree Communities, including Bank Mantap clients and Bank Mandiri alumni retirees. Additionally, the program featured SME Business Sharing Sessions to provide participants with further insights and inspiration.

A total of 727 participants attended this program, underscoring Bank Mandiri's commitment to preparing employees for a productive and fulfilling retirement.



[GRI 404-2]

## **Employee Welfare Credit**

Bank Mandiri offers the credit facility to support the financial well-being of its employees. This program provides unsecured loans with special interest rates to meet various employee needs.

The facility is available to all eligible employees to enhance their quality of life and covers the following purposes:

- · Acquiring suitable housing according to their needs, including renovations or home construction.
- Obtaining motor vehicles as a means of transportation.
- Addressing multipurpose needs, such as household expenses, education, emergencies, and other necessities.

## Physical Well-being and Healthy Lifestyle

#### • Regular Health Check-ups

Every employee receives an annual health check-up, which includes a thorough physical examination.

## · Health Clinic Facilities

Bank Mandiri operates a health clinic at its headquarters, equipped with medical equipment and staffed by healthcare professionals to support employee health.

## • Mandiri Club Fitness Center

Employees can take advantage of the Mandiri Club fitness center at the headquarters to maintain optimal fitness and health.

As part of its commitment to employee well-being, Bank Mandiri offers equal access to healthcare services, allowing both male and female employees to cover healthcare expenses for their spouses, as well as enabling female employees to extend coverage to their husbands and children.

To enhance knowledge on physical and mental health, financial literacy, and workplace well-being, Bank Mandiri regularly organizes seminars with experts. In 2024, 889 educational programs, including seminars, webinars, and podcasts, were held and attended by employees both inperson and online.

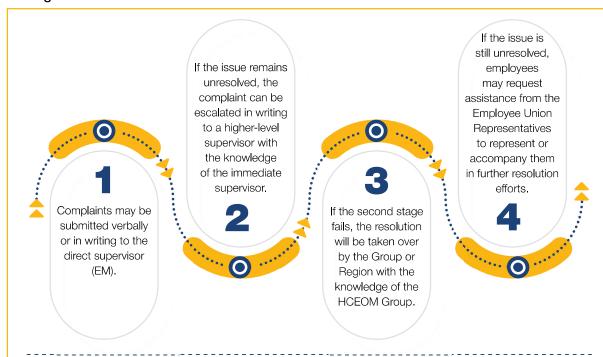
## Formal Grievance Reporting

Bank Mandiri has established a formal mechanism for its employees to voice their grievances concerning the bank's employee management practices and industrial relations implementation. The bank provides multiple reporting channels, ensuring that each complaint is processed in accordance with established procedures. If a violation is

confirmed, appropriate sanctions are applied based on the applicable policies.

All complaints are resolved within 30 days, either verbally or in writing, in compliance with the Collective Labor Agreement (CLA). Available reporting channels include:

## Through the Head of the Unit



If a resolution through the Employee Grievance Mechanism does not result in an agreement, the issue can be addressed through the industrial dispute mechanism in accordance with Law No. 2 of 2004.

## **HC4U Services**

Bank Mandiri offers a channel for employees to report complaints or concerns related to work, personal matters, or family issues. This service includes multiple reporting options such as Call Centers, Email, Walk-in Centers, and Chat, ensuring that employees can easily submit complaints with confidentiality. Reports will be followed up by the responsible Work Unit for Engagement & Outsource Management.

Moreover, Bank Mandiri has implemented policies to provide counseling and support for victims of violations, including human rights violations, harassment, discrimination, violence, bullying, and other forms of abuse. This includes psychological and financial counseling provided by professional third-party consultants. Victims or reporters will also receive support from senior employees or qualified psychologists within Bank Mandiri, who will offer moral support, protect their rights, and assist with handling, protection, and recovery.

#### WhistleBlowing System

Bank Mandiri has established a Whistleblowing System that allows both employees (internal) and third parties (external) to report potential violations. Reports can be submitted via the Whistleblowing System - Letter to CEO (WBS-LTC), which can be accessed through the website, email, PO Box, or SMS/WhatsApp. All reports are managed by a third party to ensure the confidentiality of the whistleblower's identity.



## **Employee Engagement**

In efforts to foster an inclusive and productive work environment, Bank Mandiri regularly conducts an Employee Engagement Survey at the end of the current year as part of its commitment to consistently evaluating employee well-being across all organizational levels. Through the Employee Engagement Survey (EES), Bank Mandiri assesses various aspects contributing to employee well-being and work experience, such as engagement, job satisfaction, work goals and happiness, stress levels, and employee loyalty scores (Employee Net Promoter Score or eNPS), which gauges the likelihood of employees recommending Bank Mandiri as an employer based on their experiences.

In 2024, Bank Mandiri's employee engagement score reached 89.93%, reflecting an increase from the previous year's score of 89.65%. This annual survey had a participation rate of 80.81%. This increase reflects Bank Mandiri's consistent efforts to improve the employee experience by actively listening to feedback and taking meaningful actions. Additionally, Bank Mandiri consistently recognizes and appreciates employee contributions, which

serve as a vital foundation for building strong engagement.

Employee survey also plays an important role in creating job satisfaction at Bank Mandiri. The indicator of this success is reflected in the voluntary turnover rate, which reached 2.63% or a total of 1,024 employees in 2024, a decrease of 2% compared to the previous year, which was recorded at 2.68% or a total of 1,044 employees. This achievement highlights Bank Mandiri's ongoing commitment to retaining employees and maintaining strong retention rates compared to industry standards. [GRI 401-1]

To further enhance employee retention, Bank Mandiri has implemented strategic initiatives such as career development programs, competitive compensation, an inclusive work environment, and support for work-life balance.

The turnover data for Bank Mandiri employees in 2024 can be found in the table below:

Voluntary Turnover Rate	Category	2024 (%)
Total voluntary turnover rate		2.63
Gender	Male	1.05
Gender	Female	1.59
	<30	0.82
Age	30-50	1.64
	>50	0.18
	Top Management	0.01
Position	Middle Management	0.05
POSITION	Junior Management	0.96
	Non-Management	1.62

Turnover Rate	Category	2024 (%)
Total turnover rate		6.06
Oandau	Male	2.82
Gender	Female	3.24
	<30	1.16
Age	30-50	3.01
	>50	1.89
	Top Management	0.06
Position	Middle Management	0.23
	Junior Management	1.90
	Non-Management	3.86

## Occupational Health and Safety (OHS) [OJK F.21]

To support employee well-being, Bank Mandiri prioritizes health and safety in the workplace. This commitment is reflected in the creation of a healthy, safe, and conducive environment that enhances the productivity of employees, customers, and all those involved in operations. Bank Mandiri is dedicated to minimizing workplace risks and ensuring incident-free operations through continuous efforts.

To achieve these goals, the OHS system is implemented consistently in line with national standards and regulations, including:

- Law No. 1 of 1970 on Occupational Safety
- Ministry of Health Regulation No. 48 of 2016 on Occupational Health and Safety Standards for Offices

Building Management, which oversees the implementation of OHS policies, fully supports this initiative. Through a structured approach, safety and health standards are applied effectively in every work area, including throughout the supply chain.

The Safety and Health Committee (P2K3) plays a crucial role in ensuring the successful implementation of OHS policies. The committee engages in active consultation with and participation from both workers and their representatives. P2K3 consists of employee and management representatives, with the committee secretary being an OHS expert. The committee is responsible for coordinating and monitoring OHS programs across all work units, gathering and managing OHS data, reporting quarterly to the Ministry of Manpower and Transmigration, and organizing health education and campaigns.

## Preparedness and Emergency Response

To create a healthy, safe, and productive work environment, Bank Mandiri prioritizes not only the implementation of an Occupational Health and Safety (OHS) system but also the development of strategic measures for emergency preparedness and response. These initiatives are supported by Business Continuity Management (BCM), designed to ensure business continuity, safeguard safety, and minimize the impact of disruptions or disasters. The BCM framework is built on two main pillars:

#### 1. Preparedness

Bank Mandiri ensures operational readiness through the following measures:

- Risk and Threat Assessment (RTA): Identifying and managing risks in work units location to strengthen resilience against disruptions or disasters.
- Business Impact Analysis (BIA): Evaluating the criticality of work units, services, applications, and third-party contributions to operational continuity
- Recovery Strategies: Developing systematic recovery procedures to minimize operational impacts.
- Testing and Drills: Conducting regular simulations and tests to verify the effectiveness of recovery strategies.

To maintain optimal readiness, Bank Mandiri routinely inspects essential facilities such as first aid kits, portable fire extinguishers, hydrant systems, and sprinklers. Additionally, facilities like elevators, emergency staircases, and evacuation systems undergo regular maintenance to ensure reliability during emergencies.

#### 2. Incident Management

When incidents occur, Bank Mandiri implements coordinated emergency response measures, including:

- Crisis Management: Managing disaster response coordination and ensuring effective crisis communication.
- Emergency Response: Executing standardized procedures for evacuating or isolating employees, customers, guests, and third parties.
- Business Continuity: Activating alternative locations to maintain uninterrupted operations.
- Disaster Recovery: Utilizing alternative systems to sustain operations during disruptions.



These procedures are supported by Standard Operating Procedures (SOPs) and Technical Operating Guidelines (TOGs) aligned with applicable standards and regulations. Bank Mandiri employs a comprehensive framework that encompasses five critical aspects:

Building, Equipment, Technology, Human Resources, and Third Parties, collectively referred to as BETH3. This ensures operational preparedness across all areas, from headquarters to branch offices nationwide.

# Hazard Identification, Risk Assessment, and Determining Control (HIRADC)

Bank Mandiri takes proactive measures to ensure workplace safety and health through comprehensive hazard identification and risk assessment processes. The HIRADC framework, implemented using a Risk and Threat Assessment (RTA) approach, is applied across various locations, including the Plaza Mandiri head office building and work units. This process is designed to ensure that

building managers maintain proper control and implement effective mitigation strategies for potential disruptions or disasters. It also includes a thorough assessment of OHS policy implementation to ensure compliance with established standards. The identified risks and their corresponding mitigation measures are presented in the table below.

Risk Categories	Types of Risks	Risk Levels	Mitigation
Natural and Human- Induced Threats	Earthquake	Medium to high	<ul> <li>Structural resilience is improved through repairs to cracked ceilings, organization of rooftop cables, and inspections of antenna poles.</li> <li>Emergency response capabilities are enhanced through training, evacuation simulations, and regular updates of Emergency Response Team (ERT) contact information.</li> <li>Building security procedures involve rearranging unused items, updating the Floor Warden structure, and appointing a Safety Manager.</li> <li>Fire protection equipment maintenance includes inspecting and replacing fire extinguishers, testing smoke detectors, and repairing safety devices.</li> <li>Emergency evacuation plans involve installing clear evacuation signs, ensuring sterile escape routes, and verifying the condition of assembly points.</li> <li>Power supply backup measures include monitoring transformer rooms, repairing leaks, and removing unused equipment.</li> <li>Collaboration with third parties facilitates rapid fire suppression with the Fire Department and secures local areas during riots in coordination with the Police.</li> </ul>
	Flood		
	Fire (Unintentional)	Medium to high	
	Power Failure (Blackout)		
	Mass Riots		
Technological Disruptions	Hardware Damage	Medium to high	<ul> <li>Server configurations use High Availability (HA) setups.</li> <li>Very critical or critical servers are housed at two locations, DC Plaza Mandiri and DRC Rempoa, with active-active or active-standby configurations.</li> <li>Every live application is supported by a backup system.</li> <li>Physical security measures include restricted access, secure areas with layered doors, and supervision by authorized personnel.</li> <li>Continuous monitoring includes CCTV installation, perimeter security devices, and the use of authentication technologies such as digital signatures.</li> </ul>
	Server hang (freeze)		
	Cyber Attacks		

As outlined in the table, mitigation measures have been developed to reduce existing risk levels. The primary focus of these efforts is to manage all risks previously categorized as medium to high, aiming to bring them into the low to medium range.

To enhance the comprehensive implementation of Occupational Health and Safety (OHS), Bank Mandiri has established OHS criteria as part of its procurement requirements. This policy ensures that vendors and business partners comply with strict safety and health standards, fostering synergy between internal and external parties to create a safe working environment. Furthermore, Bank Mandiri remains committed to continuously improving OHS performance by aligning its policies with the latest regulations and best practices.

Bank Mandiri regularly evaluates its progress in reducing or preventing OHS risks by implementing strategic measures, which include:

- Providing emergency response guidelines to employees, guests, and the Building Emergency Response Team through paging messages, evacuation posters, desktop wallpapers on employees' PCs, instructional videos on internal media, safety briefings prior to events, and annual outreach programs with the local Fire Department.
- Conducting emergency response training for Floor Wardens, and the Emergency Response Team (ERT). The training covers topics such as fire suppression, search and rescue (SAR), and handling threats like

- terrorism or bomb incidents. These sessions are held at least once annually.
- Organizing annual fire and disaster evacuation drills, including earthquake simulations for building occupants conducted to evaluate the readiness of the Emergency Response and evacuation durations. These drills involve participation from local Fire Departments and law enforcement agencies.
- 4. Ensuring quick response and smooth communication during emergencies by conducting Call Tree Tests.
- 5. Assessing the Crisis Management Team's readiness to respond to emergencies and recovery efforts through Tabletop Testing exercises.

## Health and Employment Insurance

In addition to strategic measures in managing OHS risks, Bank Mandiri demonstrates its commitment to employee welfare through a range of healthcare facilities and programs, including:

- Providing healthcare coverage for employees and their registered dependents through BPJS Health in compliance with government regulations.
- 2. Offering comprehensive social security and protection programs for employees via BPJS Employment.
- Delivering a wide range of healthcare services, including inpatient and outpatient care, maternity services, dental care, general health check-ups, eyewear, and specialized health insurance for employees and their registered dependents.
- 4. Extending health insurance coverage to employees who have entered retirement.
- 5. Providing accessible health clinics at key locations,

- such as Plaza Mandiri, Menara Mandiri, Wisma Mandiri, and Graha Mandiri.
- Offering life insurance coverage for employees and their registered dependents in collaboration with Mandiri Inhealth.

Bank Mandiri is committed to creating an inclusive work environment and supporting employee well-being through equitable healthcare facilities, regardless of employment status. All employees, whether permanent or contractual, have equal access to these facilities. Bank Mandiri also ensures that employees' spouses receive equal healthcare coverage. Healthcare facilities are routinely promoted and accessible through the Mandiri CLICK platform in the form of booklets and electronic banners. Bank Mandiri also actively fosters health awareness through various media channels and activities, featuring renowned experts to enhance employee health knowledge and engagement.

## OHS Training Program in 2024



Firefighting Training and Certification
Level 1

**Number of Participants** 

31 Employees



- Fire Volunteer Brigade (Balakar) Training at Mandiri Tower Jayapura, Regional XII
- Fire Volunteer Brigade (Balakar) Training at Plaza Mandiri

Engaging the Emergency Response Team (ERT) at each respective site



# Our Operations



# Commitment to Reducing Emissions, Releases, and Waste [OJK F.12]

Bank Mandiri is committed to reducing carbon emissions and achieving carbon neutrality in its operations by 2030, aligned with the aspiration of Net Zero Emission (NZE). This initiative encompasses efficient energy usage, the implementation of renewable energy, and sustainable mobility strategies across all of the company's operational office buildings to support a transition toward being more environmentally friendly.

Bank Mandiri is fully dedicated to responsibly managing environmental impacts, guided by the environmental policy outlined in the Sustainable Finance Operational Procedure Standards approved by the relevant Directors. This policy serves as the primary framework for our operations and includes strategic measures to maintain environmental balance while supporting the transition toward sustainable operations. The policy also reflects Bank Mandiri's commitment to energy efficiency, water resource optimization, waste reduction, the use of environmentally

friendly materials, and regular monitoring of environmental performance.

Bank Mandiri integrates best practices in energy efficiency and resource management by implementing an environmental management system that encompasses the entire company's operations. In 2024, Bank Mandiri aimed to reduce operational carbon emissions by 25% from baseline through energy efficiency measures, optimization of renewable energy usage, and the application of best environmental management practices. As part of our commitment to environmental stewardship, Bank Mandiri actively engages with stakeholders to identify, understand, and respond to relevant environmental issues, ensuring our approach aligns with the needs and expectations of all related parties.

To achieve the carbon neutrality target by 2030 in line with the NZE aspiration, Bank Mandiri has developed a mediumand long-term strategy focused on three key initiatives:

**Green Business Mindset** 

Measurement and monitoring of operational carbon emissions

Carbon neutrality initiatives through energy efficiency and carbon offsetting

## Green Business Mindset

The active involvement of all Bank Mandiri employees is a key factor in realizing environmentally friendly operational transformation and ensuring the integration of sustainability principles into all business processes. By fostering a green business mindset, Bank Mandiri aims to shift the mindset and behavior of all employees, from operational levels to management, towards more sustainable business practices.

To support an environmentally friendly work culture, Bank Mandiri encourages employees to prioritize digitalization in work processes by optimizing infrastructure such as the use of Microsoft Teams for inter-departmental document preparation and hybrid coordination. Bank Mandiri also promotes organizing events across all units by prioritizing

the use of environmentally friendly materials and products that support community empowerment, such as reducing the use of single-use plastics/paper, waste management, and involving Bank Mandiri's fostered MSME partners.

Throughout 2024, Bank Mandiri has embedded a sustainable work culture through various strategic initiatives, including:

- Mandatory E-Learning: Driving Sustainable Change, participated in by 29,084 Bank Mandiri employees.
- Regular digital campaigns, consistently disseminating sustainability messages through office devices.
- In-person campaigns, engaging employees through events such as Happy Hour.

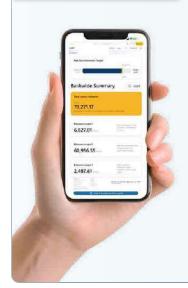
# Measurement and Monitoring of Operational Carbon Emissions [GRI 3-3, 305-1, 305-2, 305-3, 305-4, 305-5, 305-6, 305-7] [OJK F.11, F.12]

Bank Mandiri, through its ESG Group as the unit responsible for emissions reporting, monitors operational carbon emissions by calculating Scope 1 and 2 greenhouse gas (GHG) emissions in accordance with the Greenhouse Gas Protocol (GHG Protocol) methodology and applicable national methodologies. Scope 1 includes fuel consumption for 4,857 operational vehicles and generators from 138 locations while Scope 2 emissions derive from electricity consumption in 1,793 operational office buildings, including usage by tenants. Bank Mandiri has designated 2019 as the baseline year for Scope 1 and Scope 2 emissions,

representing operational activities prior to the COVID-19 pandemic.

During the reporting period, Bank Mandiri's total operational emissions were recorded at 239,594 tCO<sub>2</sub>e, reflecting a 33% or 119,159 tCO<sub>2</sub>e from 2019 and 19% or 56,119 tCO<sub>2</sub>e from 2023. This reduction highlights Bank Mandiri's ongoing commitment to reducing operational carbon emissions in alignment with its NZE aspirations. All GHG emission calculations (Scope 1 and 2) have been verified by PT Superintending Company of Indonesia (Sucofindo).

## Digital Carbon Tracking



In support of achieving its NZE commitment, Bank Mandiri became a pioneer in Indonesia by launching a Digital Carbon Tracking platform in 2023. This platform represents Bank Mandiri's adoption of climate change mitigation technology, enabling transparent monitoring of all operational carbon emissions. It is accessible to stakeholders via the corporate website (esg. bankmandiri.co.id).

The platform tracks carbon footprints and emissions reductions, covering operations from the head office to branch offices. Emission recording through the Digital Carbon Tracking platform adheres to the Greenhouse Gas Protocol (GHG Protocol) standards and has adopted ISO 14064.







#### Notes:

- The emission factors used in the emission calculations for 2019–2023 for Scope 1 refer to the emission factors issued by the Ministry of Energy and Mineral Resources in 2020, while the emission factors for Scope 2 refer to the Electricity Sector of the Ministry of Energy and Mineral Resources in 2019. In 2024, adjustments were made in the use of emission factors for Scope 1, considering the type of fuel used, and for Scope 2, the Operational Margin was applied based on the reference from the Ministry of Energy and Mineral Resources. These adjustments contributed to an increase in Scope 1 emissions and a decrease in Scope 2 emissions. The adjustments were made based on recommendations from the verification body, PT Superintending Company of Indonesia (Sucofindo).
- Scope 1 emissions are calculated to include carbon dioxide (CO<sub>2</sub>) gas using an activity-based approach, based on fuel consumption data from 4,857 operational
  vehicles and generators across 138 locations. Methane (CH<sub>4</sub>) and nitrous oxide (N<sub>2</sub>O) gases are not disclosed, as their contribution is less than 1%.
- Scope 2 emissions are calculated using a location-based approach based on electricity consumption data from PLN (Indonesia's state-owned electricity
  company) according to customer IDs for 1,793 operational buildings, including tenants.
- Emission intensity is calculated using the denominator of all organic employees, outsourced workers (TAD), and kriya (including adjustments to the 2023 calculations)
- The calculation of Scope 1 and 2 emissions only includes carbon dioxide (CO<sub>2</sub>) based on the operational control consolidation approach.
- In accordance with internal regulations, Bank Mandiri has not calculated Ozone Depleting Substances (ODS), biogenic emissions, Nitrogen Oxides (NOx), Sulfur
  Oxides (SOx), and other pollutants in its emissions calculations, as the Bank's operations do not significantly involve the use of these substances, making them
  irrelevant to its business activities. [GRI 905-6, 305-7]
- There was a 16% increase in Scope 1 emissions from the set target due to the addition of operational vehicles.
- The 2024 Scope 2 emissions target was successfully achieved, exceeding the target by 17%.
- In the coming periods, Bank Mandiri plans to add operational buildings to support business expansion, which is expected to contribute to an increase in Greenhouse Gas (GHG) emissions. However, Bank Mandiri remains committed to achieving its GHG emission reduction targets as reported to the Financial Services Authority (OJK).

## Carbon Neutral Initiatives

Bank Mandiri's carbon neutral initiatives represent strategic measures to support carbon neutrality target in its operations. These efforts are realized through various carbon emission reduction initiatives, including energy efficiency, the use of environmentally friendly technologies, and carbon offset

mechanisms through the purchase of 3,027 Verified Carbon Units (VCUs) in the carbon market. Additionally, it includes the initiation of climate change mitigation projects in collaboration with carbon professionals and academics.

## Energy Reduction [GRI 302-1, 302-2, 302-3, 302-4, 302-5] [OJK F.6, F.7]

Bank Mandiri is committed to reducing energy consumption through various initiatives designed to enhance energy efficiency across all banking operations. The largest sources of energy consumption come from electricity usage for daily operational needs and fuel for transportation and backup power, such as generators. To conserve energy, Bank Mandiri implements timers to turn off lights during breaks and holidays. [GRI 3-3]

To reduce dependence on fossil fuels, Bank Mandiri continues to promote the use of electric vehicles, including

cars and motorcycles, as part of its operational fleet. Bank Mandiri is also expanding the installation of charging stations in various operational areas. Additionally, Bank Mandiri is committed to increasing the use of renewable energy in its operations through the installation of solar panels.

In 2024, electricity consumption reached 239,728,902 kWh, while fuel usage for transportation and generators was recorded at 18,741,519 liters. Overall, total energy consumption showed a decrease of 8.2% compared to 2023.

## Adoption of Climate Change Mitigation Technologies [GRI 302-1] [GRI 305-5]

As part of its commitment to achieving carbon neutrality, Bank Mandiri has adopted various climate change mitigation technologies. These initiatives include the installation of solar panels to increase the use of renewable energy and electric and hybrid vehicles in operations, and the implementation of green building concepts. Through these efforts, Bank Mandiri successfully reduced GHG emissions by 33% compared to the baseline year.



404 units

electric and hybrid vehicles



8 station

electric vehicle (EV) charging stations



26 units

charging units installed



**870** units

solar panels installed across 4 operational buildings

## Green Buildings

Acknowledging that every building has an impact on the environment, Bank Mandiri is committed to designing and operating green buildings that are not only environmentally friendly but also promote the well-being of their users. One concrete example of this commitment is Plaza Mandiri, which achieved a Gold-level green building certification from the Green Building Council of Indonesia (GBCI) in 2024. Additionally, the Mandiri Digital Tower, inaugurated in September 2024, earned a platinum certification in the Design Recognition category, while the Mandiri Indjoko Surabaya building received a Gold certification for Design Recognition from GBCI.

Bank Mandiri also continues to implement other sustainability initiatives across its operational buildings such as:

- Utilizing natural lighting by increasing the use of glass panels;
- Replacing standard lighting with LED lights in operational buildings and 241 Smart Branch offices;
- Upgrading air conditioning (AC) systems and adopting inverter technology in main buildings;
- Installing glass with Iow Overall Thermal Transfer Value (OTTV) to reduce AC usage;

- Installing solar panels in various buildings, including Plaza Mandiri, Menara Mandiri Medan, Menara Mandiri Palembang, and Mandiri Indjoko Surabaya;
- Implementing water recycling systems with reverse osmosis technology, enabling treated wastewater to be reused for watering plants.

During the reporting period, Bank Mandiri's sustainability initiatives contributed to energy efficiency totaling 49,370,154 kWh or 177,733 GJ compared to 2023. These efforts support Bank Mandiri in reducing its carbon footprint and achieving more environmentally friendly operations. [GRI 302-4, 305-5]





## Reverse Vending Machine

As part of its commitment to environmental sustainability, Bank Mandiri has implemented a range of ESG programs through relevant initiatives, including a strategic partnership with Plasticpay to install Reverse Vending Machines (RVM) at several Bank Mandiri offices. This program demonstrates Bank Mandiri's responsibility in managing plastic bottle waste more effectively and contributing to carbon footprint reduction, aligning with the Sustainable Development Goals (SDGs) of the United Nations.

Awareness of the environmental impact of plastic waste serves as the primary driver behind this initiative. Indonesia is one of the largest contributors to plastic waste globally, with over 3 million tons of unmanaged plastic annually. This situation not only threatens marine and terrestrial ecosystems but also contributes to climate change through greenhouse gas emissions from non-degradable waste. Recognizing these challenges, Bank Mandiri steps forward to be part of the solution by integrating innovation and sustainability through RVM technology, making it easier for employees to recycle plastic.

Since December 2023, Bank Mandiri has launched a special program for its customers and employees to support this initiative, called "Livin'poin bonus for every plastic bottle deposited in RVM machines." The program has shown significant results as of December 31, 2024. Through the use of RVMs, Bank Mandiri and Plasticpay have engaged 826 users, including customers, and recorded 8,435 transactions. To further support the initiative, the program offers Livin'poin as bonuses for every plastic bottle exchanged via RVMs. From these transactions, a total of 49,150 Livin'poin have been distributed to 1,217 customers who participated, resulting in the collection of 49,150 plastic bottles.

Through the RVM program, Bank Mandiri goes beyond its role as a financial institution, positioning itself as a catalyst for sustainability. The program exemplifies how the synergy of technology, education, and environmental awareness can create a positive impact. With such collaborations, Bank Mandiri remains committed to building a greener and more sustainable future for generations to come.



Successfully prevented environmental pollution by collecting

78,811 plastic bottles, weighing a total 1,473.7 kg



This program also successfully provided economic benefits amounting to

## Rp4.4 million\*

\*) Each plastic bottle collected earns 56 Plasticpay Points, with each point redeemable for the equivalent of one Rupiah.



Emission reduction of

7.8 ton CO, eq



Land savings from plastic waste accumulation equivalent to

1,245.2 m<sup>2</sup>



# Use of Environmentally Friendly Materials

[OJK F.5]





As part of its sustainability commitment, Bank Mandiri has taken significant steps in incorporating environmentally friendly materials into its products and services. One of these initiatives is the production of prepaid, debit, and credit cards made from recycled PVC. These recycled-material cards represent Bank Mandiri's effort to reduce the environmental impact of its banking operations.

## Waste Management [GRI 3-3, 306-1, 306-2, 306-3, 306-4, 306-5] [OJK F.13, F.14]

Given its significant impact on the environment and public health if not addressed properly, waste management is a global challenge also taken on by Bank Mandiri. In its operations, Bank Mandiri generates various types of waste, including paper waste from administrative processes, domestic waste from office activities, and electronic waste from obsolete equipment. To address this challenge, Bank Mandiri is committed to reducing waste generation and managing waste efficiently in compliance with applicable environmental standards. Through a responsible approach, Bank Mandiri ensures that every type of waste is identified, managed, and handled appropriately to minimize any negative environmental impacts.

To mitigate waste-related impacts, Bank Mandiri actively identifies waste with significant risks, such as hazardous waste (B3), and implements appropriate mitigation measures. Bank Mandiri collaborates with licensed third parties responsible for managing hazardous waste such as used oil, batteries, and light bulbs. This partnership ensures that waste is processed according to applicable regulations and does not harm the environment. For domestic waste, Bank Mandiri partners with licensed third-party organizations to sort waste generated from its operational activities, ensuring proper handling and compliance with environmental standards.

To monitor waste management, Bank Mandiri conducts periodic waste recording managed by the Corporate Real Estate Group. During the reporting period, 1961 kg of B3 hazardous waste and 151,8582 kg of domestic waste was transported by licensed third parties.

To minimize waste ending up in landfills, Bank Mandiri focuses on managing plastic waste, particularly PET bottles. Bank Mandiri has partnered with third-party providers to install Reverse Vending Machines (RVMs). Through these machines, the public can exchange their plastic bottles and earn points via the Livin' App. These points can be redeemed for various purposes, incentivizing the public to engage actively and responsibly in plastic waste management.

During the reporting period, Bank Mandiri successfully implemented several waste management initiatives, including:

- Implementation of paperless policies and digitalization initiatives through Livin' Super App, Kopra, and branchless banking (laku pandai).
- Diverting plastic waste from landfills through RVMs, totaling 1,473.7 kg.



- 1. Scope: Plaza Mandiri
- 2. Scope: Menara Mandiri, Sentra Mandiri, Plaza Mandiri



## Water Management [GRI 3-3, 303-1, 303-2, 303-3, 303-4, 303-5] [OJK F.8, F.13, F.14, F.15, F.16]

Bank Mandiri manages water usage with a focus on reducing consumption and increasing recycling to support environmental sustainability. Clean water sourced from third parties, supplied by external providers, is used minimally and only for specific purposes to reduce environmental impact and preserve water resources. Bank Mandiri also ensures that the water used does not come from water-stressed areas. This policy reflects Bank Mandiri's commitment to responsible water management in compliance with applicable environmental policies.

As part of its sustainability initiatives, Bank Mandiri implements water recycling systems in several buildings, including Wisma Mandiri, Plaza Mandiri, and MM Wijayakusuma. Recycled water from these systems is reused for various purposes such as flushing toilets and maintaining plants, significantly reducing the use of clean water in daily operations. To monitor consumption and ensure efficient water use, Bank Mandiri records water usage on a monthly basis. In 2024, water consumption from third-party sources reached 574,376¹ m³, while recycled water usage amounted to 88,788² m³, representing 13% of the total water consumption. There was a decrease in the use of recycled water in 2024 due to the need for replacement parts for the Reverse Osmosis system, resulting in reduced utilization.

In managing water impact, Bank Mandiri employs a sewage treatment plant (STP) to ensure that effluents meet environmental standards before being discharged into water bodies. A portion of the treated water is also reused for watering plants, while a reverse osmosis process further treats the water into potable water. Effluent quality is tested monthly by accredited laboratories, with the results reported to relevant authorities to ensure compliance with environmental regulations. In 2024, Bank Mandiri recorded liquid waste discharge of 81,400³ m³, with 32,134⁴ m³ managed through reverse osmosis.

Bank Mandiri has also constructed biopore holes and infiltration wells in green open areas to maintain groundwater balance and prevent water pollution. These efforts help increase rainwater absorption into the soil, supporting water conservation around the company's operational areas. At Mandiri University in Wijayakusuma, Bank Mandiri built a 1.8-hectare artificial lake that serves as a water reservoir and is the primary water source for buildings in the area after the stored water is processed into raw water. This ensures a sustainable water supply while reducing dependence on external water sources.

With these various initiatives, throughout 2024, there were no incidents of effluent spills from Bank Mandiri into the environment, nor any complaints from the public regarding environmental issues.

## Environmental Conservation Costs [OJK F.4, F.9, F.10]

In 2024, Bank Mandiri's total environmental expenses amounted to Rp54.11 billion, consisting of Rp52.51 billion for CSR activities focused on nature conservation and environmental preservation, Rp1.4 billion for solar panel installation as part of energy efficiency efforts and carbon footprint reduction in company operations, and Rp198 million for the RVM program, demonstrating a tangible commitment to plastic waste management and environmental sustainability.

Although Bank Mandiri's operations do not directly impact conservation areas or regions with high biodiversity, Bank Mandiri remains committed to environmental preservation. During the reporting period, Bank Mandiri planted 100,000 trees as part of its conservation initiatives. Bank Mandiri's credit policies integrate biodiversity aspects to ensure that every project with potential environmental impacts adheres to strict sustainability standards, supports nature conservation, and maintains ecosystem balance.

<sup>1.</sup> Scope: Sentra Mandiri, Menara Mandiri, Plaza Mandiri, Wisma Mandiri

<sup>2.</sup> Scope: Menara Mandiri, Plaza Mandiri, Wisma Mandiri

<sup>3</sup> Scope: Plaza Mandiri

<sup>4.</sup> Scope: Plaza Mandiri