

Whistleblowing System (WBS)

PT Bank Mandiri (Persero) Tbk.

Based on SE BI No.13/28/DPNP about Anti Fraud Strategy Implementation for Commercial Banks, Bank Mandiri has carried out various efforts to monitor and mitigate fraud risk through implementation of 4 pillars, namely:

1. Prevention
2. Detection
3. Investigation, Reporting and Sanction
4. Monitor, Evaluation, and Follow Up

In order to monitor and control fraud on detection pillar, Bank Mandiri provides policy of whistleblowing system which is called "Letter to CEO (LTC)". LTC is a means to report fraud complaints either from employees or third party to President Director to focus on revelation on the complaints to improve the effectiveness of fraud control system implementation. LTC program is one of the Anti Fraud Strategy (SAF) programs that aims to:

1. Mendeteksi kejahatan fraud atau indikasi fraud dengan adanya laporan pegawai atau pihak ketiga Bank Mandiri, yang dapat disampaikan dengan mencantumkan baik secara jelas identitasnya maupun anonymous, yang selanjutnya dapat dilakukan proses investigasi ataupun tindakan tindak lanjut.
2. Mendorong awareness atau kepedulian seluruh pegawai untuk turut serta menjaga unit kerjanya dari kerugian akibat fraud sehingga kualitas pengawasan lebih baik dan rasa ikut memiliki (sense of belonging) pegawai menjadi lebih tinggi.
3. Meningkatkan reputasi perusahaan khususnya dalam konteks GCG yang akan meningkatkan citra perusahaan karena memiliki kelengkapan perangkat anti fraud yang memadai.

Management of Whistleblowing System

Internal Audit Division is a Work Unit that manages the complaints in which reports received by Group CEO are followed up by the related work unit. If needed, that work unit will perform further investigation.

Submission of Violation Reports and Handling of Complaints

Indication of fraud/fraud can be submitted by Reporter through the following mechanisms :

1. Submitting the complaints via reporting media, i.e:
 - a. Email to lettertoceo@bankmandiri.co.id
 - b. Letter to PO BOX 14000 JKTM 12700
 - c. SMS to 0811900777
 - d. Website, by typing lettertoceo to the browser (intranet).
2. The reporter will get Random Unique Number (RUN) for the reports of fraud/indication of fraud.
3. Complaints reports are directly received by CEO Group and are followed up by related unit.





4. The related work unit follows up the reports and if needed will perform further investigation.
5. The reporter will get feedback status on the complaints reported.

Protection for Whistleblower

Each of the reporting parties will be given protection from Bank Mandiri by maintaining the confidentiality of the reporting identity (name, address, telephone number, email and work unit/company). Moreover, the reporters are allowed to not give their identities (anonymous).

Types of Violation to be Reported

1. Complaints received through the LTC of Bank Mandiri are reports that are related to fraud/fraud indication with the following definitions:
 - a. Deliberate deviation or omission acts to deceive, cheat, or manipulate Bank, customers, or other parties that occur in the Bank environment and/or;
 - b. Using the Bank facilities that cause Bank, customers, or other parties suffer a loss, and/or;
 - c. Perpetrators of fraud obtain financial gain either directly or indirectly.
2. Types of fraud
 - a. Corruption which means receiving/soliciting rewards and/ or misappropriation or misuse of Bank's money for personal interest or the interest of others and/or having others or making plans that harms the Bank.
 - b. Deceit which means cheating on Bank, customer or third party and/or forging documents, signature, physical evidence and/or all authentic evidences.
 - c. Theft which means taking some part and/or all Bank's assets and data illegally.
 - d. Omission which means ignoring the procedures or responsibilities as the employee of the Bank intentionally and deliberately.
 - e. Violation which means violating the internal or external regulations of the Bank or defrauding the Bank with the cyber crime technology and/or without technology, including manipulating financial statement or committing banking crime as regulated by Banking Law and any other acts equivalent hitherto.

Submission Scheme of Violation Report

Flowchart of Violation Reporting Submission and Complaint Handling



Sosialization of Whistleblowing System

In order to improve the understanding about Whistleblowing System in all organizational levels, Bank Mandiri consistently socializes in related to this system in various ways, namely placing brochure or poster around the office environment, doing various presentations and using internal printed media Mandiri Magazine.

Number of Violation and Follow Up

Violation complaint reports received through the LTC submission media via letter, email or website are as follow:

Table of Number of Violations and Its Follow Up

Submission Media					Report Classification		Followed up Report	Completed Report
Letter	Email	Website	SMS	Miscellaneous (direct letter to Internal Audit)	Fraud (F)	Non Fraud (NF)		
0	8	0	0	0	5	3	8	8