

Principle	Recommendation	Remarks of OJK's Recommendation	Elaboration of Implementation at Bank Mandiri
<b>Aspect 4: Stakeholder Engagement</b>			
<b>Principle 7</b> Improving Corporate Governance Aspects through Stakeholder Engagement.	18. Public Listed Company have policy(ies) in place to prevent insider trading.	Any individual in possession of insider information is prohibited from conducting Stock transactions using such insider information as specified in the Law on Capital Market. Public Listed Company can minimize the risk of insider trading by taking preventive measures, e.g. By explicitly separating confidential data and/or information from public data/information, and by making proportional, efficient delegation of duties and responsibilities related to the management of such information.	<p>Insider trading prevention policy has been set forth in the Human Resources Procedure Standard.</p> <ul style="list-style-type: none"> <li>- Chapter III.D. 2 regarding Code of Conduct and Business Ethics, which constitutes the ethical standards to be used as a guideline by all of the bank's personnel in carrying out their respective day-to-day duties and tasks and when conducting business dealings with customers, associates, or colleagues.</li> <li>- Chapter III.D.4 regarding Employee Discipline, which governs the obligations, prohibitions, and sanctions of employees.</li> </ul> <p>Standards Procedure Guidelines of Corporate Secretary Chapter III.A.5 regarding the Principle of Information Transparency, which governs the following matters:</p> <ul style="list-style-type: none"> <li>- Any Insider in possession of insider information is prohibited from influencing any parties, including any Insider's families, to perform share purchase or sales.</li> <li>- Any Insider other than the Board of Directors and Board of Commissioners who is found to violate the abovementioned provision and is proven to having conducted any transaction and/or provided insider transformation shall be charged with disciplinary action as specified in the Human Resources Guideline Standard.</li> <li>- Any member of the Board of Directors and Board of Commissioners and other parties who, due to their position or relationship with the Bank, is found to conduct insider trading shall be held accountable in accordance with the applicable provisions.</li> </ul> <p><b>Remarks: Comply</b></p>
	19. Public Listed Company has anti-corruption and anti-fraud policy in place.	Corruption policy serves to ensure that a Public Listed Company's business activities are carried out in a legal, prudent manner, and in accordance with good governance principles. Such policy may be a part of the code of conduct or set separately. The policy may include, among others, programs and procedures implemented to address corruption, kickback, fraud, bribery, and/or gratification within a Public Listed Company. The scope of the policy should reflect the respective Public Listed Company's prevention of any forms of corruption, either giving to or receiving from, any parties.	<p>Bank Mandiri has had an Anti-fraud Strategy policy in place, effective as of 2 May 2012, as a follow-up of Bi's Circulating Letter No. 13/28/DPNP dated 09 December 2011 on Implementation of Anti-fraud Strategy (SAF). The SAF governs, among others, organizations and 4 SAF Pillars within Bank Mandiri, i.e.:</p> <p>Pillar 1: Prevention Pillar 2: Detection Pillar 3: Investigation, Reporting, and Sanction Pillar 4: Monitoring, Evaluation, and Follow Up</p> <p>Bank Mandiri has delivered SAF Implementation Report to OJK regularly every semester, as well as incidental reports concerning any cases that may interfere with the Bank's operation, in accordance with the applicable provisions.</p> <p><b>Gratification Control</b> Bank Mandiri has had a Gratification Control PTO and a Gratification Control Unit (GCU) in place to perform gratification control function in accordance with the Decree (SK) of the Board of Directors effective as of 3 July 2015.</p> <p><b>Remarks: Comply</b></p>