

Transactions Containing Conflict of Interest

During 2019, there were no transactions that contained conflicts of interest as stated in the OJK Circular Letter No. 13 / SEOJK.03 / 2017 and BAPEPAM-LK No. IX.E.1 concerning Conflicts of Interest.

Names and Position of Parties having Conflict of Interest	Name and Position of Decision Maker	Transaction Type	Transaction Value (millions of Rupiah)	Information
Nil	Nil	Nil	Nil	Nil

Internal Dispute of Bank Mandiri

During 2019, there were no internal disputes at Bank Mandiri relating to owner intervention, remuneration policies and other causes.

Prevention of Insider Trading

Internal provisions related to Insider Trading actions are implemented by Bank Mandiri contained in the Bank Mandiri Policy Architecture and Standard Corporate Secretary Guidelines. As for the Bank Architecture Policy, Bank Mandiri has stipulated that "all Bank Offices are only permitted to conduct securities transactions, foreign exchange trading, precious metals, derivative transactions and other goods for their own interests if there is no conflict of interest, violation of Insider Trading regulations from the Capital Market Authority and other regulations."

In the Standard Corporate Secretary Guidelines, the provisions governing Insider Trading actions are regulated in Chapter III number 5 letter d, covering:

1. Insiders who have insider information, such as information in the form of information about the Bank's financial situation, Bank activity plans and/or other unpublished material information which should be expected to influence the decisions of investors or shareholders, are prohibited from buying and/or selling Bank shares.
2. In-person who has insider information is prohibited from influencing any party including the Insider's family to make a purchase or sale of shares.
3. Insiders other than the Board of Directors and Board of Commissioners who commit violations as stipulated above and proven to conduct transactions and/or provide insider information will be the subject to disciplinary sanctions as stipulated in the Human Resources Guidelines Standard.
4. The Board of Directors and the Board of Commissioners and parties due to their position, profession/relationship with the Bank that carries out insider trading liability in accordance with applicable regulations.
5. Annual Disclosure/Annual Statement includes a ban on insider trading. The obligation to give an annual statement to the Bank's ranks is regulated in the code of conduct and/or Human Resources Guidelines Standard.

During 2019, there will be no insider trading on Bank Mandiri.

Transparency of Financial and Non Financial Conditions

Bank Mandiri fulfills the obligation of transparency and publication of financial and non-financial conditions in accordance with applicable regulations, through the delivery and publication of information through the print media and the Company's website as follows: