

EFFORT IN IMPLEMENTATION AND ENFORCEMENT OF THE CODE OF CONDUCT

The employees can report alleged violations of the implementation of the code of conduct to superiors using Letter to CEO (LTC). Any action that has been proven as a violation of the code of conduct will be subject to sanctions in accordance with applicable regulations

Efforts to implement and enforce the Bank Mandiri code of conduct are carried out with full awareness in the form of commitments, attitudes and actions, which include:

1. Statement of Compliance with the Bank Mandiri Code of Conduct
Bank Mandiri Personnel are required to read, understand well and are required to sign a "Statement of Compliance with the Bank to the Code of Conduct".
2. Commitment of Management and Entire Bank Mandiri Employees
Management's commitment and entire employees of Bank Mandiri to not receive money and / or items of gratuity and / or gifts related to their obligations or duties are published through the mass media and the Company's website.
3. Internal Disclosure of Conflict of Interest
Bank Mandiri personnel are required to make annual

disclosures related to conflicts of interest each year, and each work unit is required to submit a transaction / decision report containing a conflict of interest every quarter.

4. Integrity Pact
The integrity pact is signed by officials holding authority and all partners / partners of Bank Mandiri who are involved in the process of granting credit, procurement of goods and services, and accreditation of partners. In addition, the signing of the Annual Integrity Pact was carried out by all Board of Commissioners, Directors, and Executive Officers of Bank Mandiri in an effort to implement gratuity control. All Bank Mandiri employees also sign the Integrity Pact for the application of gratuities in every 2 (two) years.
5. Awareness Program
New Bank Mandiri employees will get the Bank Mandiri Code of Conduct induction program called the jump start program, as well as continuous and consistent policy socialization.

TYPES OF SANCTIONS FOR CODE OF CONDUCT VIOLATION

Sanctions for Code of Conduct violation are categorized into 3 (three) types, namely sanctions of light, medium and serious. Every violation of the Code of Ethics will be subject to sanctions in accordance with the Employee Discipline Regulations in force at Bank Mandiri, including criminal sanctions stipulated in the applicable laws and regulations.

Table of Types of Sanctions for Code of Ethics Violation

Type of Violation	Penalty
Light Sanction	First Written Reprimand Second Written Reprimand
Medium Sanction	First Written Warning Second Written Warning Written and Last Written Warning
Serious Sanction	Termination/Termination of Employment

TOTAL VIOLATIONS OF CODE OF ETHICS

During 2019, there were 606 (six hundred and six) violations of the code of ethics with the following details:

Table of Number of Code Violations

Sanctions Types of Sanctions	2019
First Written Rebuke	204
Second Written Reprimand	72
First Written Warning	142