



Gratuity Policy PT Bank Mandiri (Persero) Tbk.

Bank Mandiri realizes that gratuity control is an important activity to keep business processes in line with business ethics that uphold the value of integrity. Therefore, since 2013, Bank Mandiri has had a Operating Technical Guideline namely Gift Disclosure Statement that regulates the prohibition on receiving gratuity for all Bank Mandiri employees. In addition, Gratuity control aims to build the values of Good Corporate Governance and create integrity values for all Bank Mandiri employees. Therefore, in carrying out daily business activities with customers, vendors, partners and all stakeholders, Bank Mandiri always based on ethics, mutual trust, and to be responsible. Thus business interests continue to run well and ethically but do not conflict with the provisions on the prohibition of gratuity. Until now, Bank Mandiri has tried to make continuous improvements in the implementation of its gratuity controls.

As a follow-up to directions from KPK related to establishment of fair value limits and adjustments to the current condition where Banks needs to maintain good partnership with all stakeholders in the course of their daily operations, Bank Mandiri had made improvements to the Operational and Technical Guidelines for Gratuity Control, which have taken into effect on November 2, 2020.

Anti-Bribery Management System

In order to continuously support the Gratuity Control program, specifically on Anti-Bribery Management System, which is in accordance with ISO 37001:2016 standard of Anti-Bribery Management System, Bank Mandiri has established the following things:

1. Prohibits bribery and similar practices within the corporate environment;
2. Comply with anti-bribery policies and related regulations;
3. Synchronizes anti-bribery policies with corporate objectives;
4. Good Corporate Governance that supports the achievement of anti-bribery objectives;
5. Commitment to satisfy Anti-Bribery Management System requirements;
6. Encourages the enhancement of anti-bribery awareness to all Stakeholders;
7. Implements sustainable improvement principles in Anti-Bribery Management System;
8. Provides the responsibility, authority and independency to the Anti-Bribery Compliance Function;
9. Sanctions the violator of the policy of Anti-Bribery Management System.

Integrity Pact

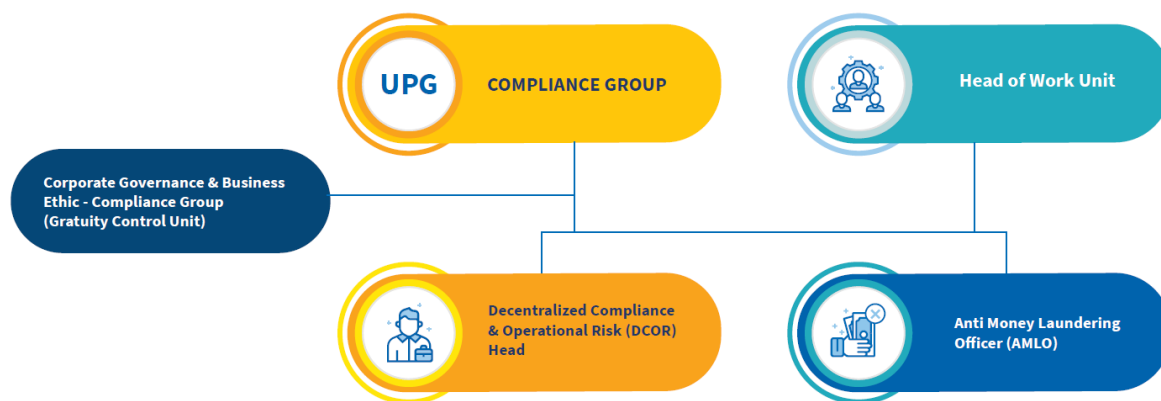
In order to support the gratuity control program, Bank Mandiri has a program to sign the Integrity Pact which is a statement of all levels of Bank Mandiri to commit to upholding moral and integrity, protecting and maintaining the image, credibility and interests of Bank Mandiri by not requesting or receiving gratuities from parties who have conflict of interest.

Management Of Gratification Control

Organizational Structure Of Gratification Control Units

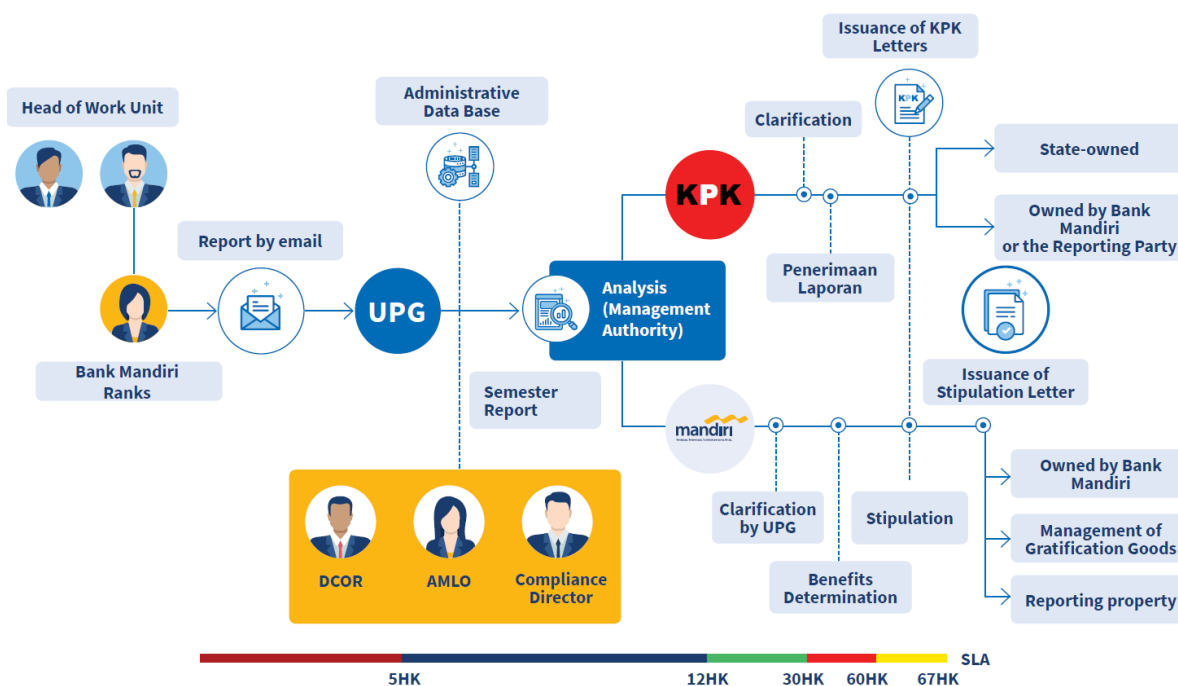
The Bank Mandiri Gratuity Control Unit (UPG) is managed by the Compliance Unit (Compliance Work Unit) at the Company, i.e. the Compliance & AML – CFT Group. The UPG functions to control gratuities within Bank Mandiri, which in carrying out their duties are assisted by Decentralized Compliance & Operational Risk (DCOR) and Anti Money Laundering Officer (AMLO). The organizational structure of Bank Mandiri UPG is as follows :

UPG Structure of BANK MANDIRI



Gratification Reporting Mechanism

Bank Mandiri has a gratuity reporting mechanism that is adjusted to the KPK reporting mechanism, with the following paths :





Socialization Of Gratification Policy

Socialization related to gratification control was carried out continuously to all levels of the organization to increase awareness where in its implementation UPG coordinated with Head of DCOR and Risk Business Control -AMLO. The socialization was carried out directly to the Working Units at Headquarters, Regional Offices, Branch Offices and through regular ODP/SDP classes.

Throughout the year of 2020, online socialization was carried out to Bank Mandiri employees. Other media used in disseminating gratification control policies are through the installation of Gratuity Control Posters at the Regional Offices and Headquarters, sending Email Blasts, Screen Savers, Mandiri Magazine, making gratification display cabinets and urge all Bank Mandiri partners/fellows not to provide gratification related to religious celebrations and new year through national newspaper media.