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| D.1.4. | **Recommendation 21:** The Public Company has a policy on fulfilling creditors' rights. | c. Partner Monitoring includes:  
1) Monitoring Partner Data  
2) Partner Performance Monitoring, which consists of:  
a) Evaluation of Partner Performance Periodically  
b) Evaluation of Partner Performance based on Contract  
3) Increasing Partner Competence  
4) Sanctions for Associates  
Description: Comply |
| | **Explanation:** The policy on fulfilling creditor rights is used as a guide in making loans to creditors. The purpose of this policy is to maintain the fulfillment of rights and maintain creditor trust in the Public Company. The policy includes considerations in entering into agreements, as well as follow-up actions in fulfilling Public Company obligations to creditors. | The policy regarding the fulfillment of creditors' rights is regulated in:  
SPD for Fund Products, Product Manuals and SPD for Customer Complaint Management, which briefly regulates:  
1. The right to obtain an adequate explanation of the characteristics of the product.  
2. The right to be able to access the terms and conditions of fund products through the Bank Mandiri website.  
3. Convenience for transactions via branches, e-banking services or other means as determined by the Bank.  
4. Receive interest in the amount according to the applicable Bank regulations.  
5. Procedures for handling and resolving customer complaints.  
Bank Mandiri Treasury, Funds and Services Policy, Article 240 Customer Protection.  
In raising funds and providing services, the Bank observes the principles of customer protection.  
To protect customers, the Bank pays attention to the rights and obligations of the customer while still taking into account the interests of the Bank. The rights and obligations of the parties are stated in documents both application documents, agreement documents and other document forms.  
Banks are required to ensure that customers understand the rights and obligations of customers as stated in these documents before conducting Bank transactions.  
Operational Policy [KOPR] article 219 Services and Cooperation with Third Parties.  
The Bank implements customer protection by prioritizing the principles of transparency, fair treatment, reliability, confidentiality and security of customer data/information and handling complaints and dispute resolution in a simple, fast, and affordable cost.  
Description: Comply |
| D.1.5. | **Recommendation 22:** Public Company has a whistleblowing system policy.  
A well-developed whistleblowing system policy will provide assurance of protection to witnesses or reporters for indications of violations committed by employees or management of the Public Company.  
The application of this system policy will have an impact on the formation of a culture of good corporate governance. The whistleblowing system policy covers, among others, the types of violations that can be reported through the whistleblowing system, how to complain, protest and guarantee the confidentiality of the reporter, the handling of complaints, the party who manages the complaint, and the results of the handling and follow-up of complaints. | 1. Implementation of the Whistleblowing system at Bank Mandiri is called the Letter to CEO (LTC). LTC is a facility for reporting fraud or indications of fraud from Bank Mandiri employees and stakeholders to the President Director with an emphasis on disclosure of complaints to increase the effectiveness of the implementation of the internal control system within Bank Mandiri.  
2. Bank Mandiri’s LTC has been implemented since 2009 with the LTC arrangement in the Letter to CEO (LTC) Technical Operational Manual which is continuously updated with the latest update on 7 December 2020.  
3. Since its revitalization in 2018, LTC management has involved independent parties to provide a safe-environment that encourages employees and stakeholders to dare to report. The reporter can include his complete identity or anonymously (the identity is only known by independent parties).  
4. Submission of LTC reports can be submitted through the following media:  
- Website https://whistleblowing.tips/wlbs@bmti-lettertoceo  
- Email to bmti-lettertoceo@rsm.id  
- Letter to PO BOX 1007 JKS 12207  
- SMS and WA to 0811-9017777  
Description: Comply |