



## FINANCIAL REVIEW

### TRANSACTIONS WITH A CONFLICT OF INTEREST

A conflict of interest arises when an employee of a Bank, in performing their duties and obligations, have interests outside work, such as personal, familial, or external ones imposed by outside parties that make them lose objectivity when making decisions and policies according to the authority that is given to them by the Bank.

Therefore:

1. All employees of the Bank must avoid any activity that may cause a conflict of interest. If anything seems unavoidable, then employees must report it to their superior directly.
2. All employees of the Bank are not allowed to give or seek approval regarding credit facilities, special interest rates, or other particularities to be used by:
  - themselves
  - their family
  - the companies in which they or their family have an interest
3. All employees of the Bank are not allowed to work for other companies as directors, employees, consultants, or members of a board of commissioners unless seconded or approved via a written permit by the Bank. Specifically for members of the Board of Commissioners and Directors, concurrent positions follow regulatory provisions on Good Corporate Governance..

4. All employees of the Bank are not allowed to be direct or indirect partners, whether it relates to the procurement of goods or services for the Bank.
5. All employees of the Bank are not allowed to take possession of the Bank's inventories for personal, familial, or external use..
6. All employees of the Bank are only allowed to trade securities, foreign exchanges, precious metals, derivatives, and other goods for personal interest if there is no conflict of interest, violation in the form of insider trading from the Capital Market Authority, and other regulations.

Bank Mandiri employees must make an annual disclosure of conflicts of interest, and every work unit must submit a transaction report/decision that may contain a conflict of interest every quarter. By the end of 2021, there was not any transaction with a conflict of interest.

### RELATED PARTIES TRANSACTIONS

Bank Mandiri and its Subsidiaries conduct transactions with related parties as defined in PSAK No. 7 concerning "Related Party Disclosures" and Bapepam and LK Regulation No. KEP-347/BL/2012 dated 25 June 2012 concerning "Presentation and Disclosure of Financial Statements of Issuers or Public Companies"

A related party is a person or entity that is related to the entity that is preparing its financial statements (the reporting entity). Related party includes the following:

- 1) A person who:
  - a. has control or joint control over the reporting entity;
  - b. has significant influence over the reporting entity;
  - or
  - c. is a member of the key management personnel of the reporting entity or a parent of the reporting entity.
- 2) An entity is related to the reporting entity if any of the following conditions apply:
  - a. The entity and the reporting entity are members of the same group;
  - b. One entity is an associate or joint venture of the other entity;
  - c. Both entities are joint ventures of the same third party;
  - d. One entity is a joint venture of a third entity and the other entity is an associate of the third entity;
  - e. The entity is a post-employment benefit plan for the benefit of employees of either the reporting entity or an entity related to the reporting entity;
  - f. The entity is controlled or jointly controlled by a person identified in point (1); or