

## Gratuity Policy And Anti-Bribery Management PT Bank Mandiri (Persero) Tbk.

### Gratuity Policy

Gratuity control is a pivotal activity to maintain business processes in line with business ethics that uphold the value of integrity. To that end, Bank Mandiri has in place the Operating Technical Guideline of Gratuity Control that regulates the prohibition on receiving gratuity for all Bank Mandiri employees.

In addition, gratuity control aims at building the values of GCG and embed integrity values for all employees, thereby, in carrying out daily business activities with customers, vendors, partners and all stakeholders, it's always based on ethics, mutual trust, and to be responsible. As such, business interests continue to perform well and ethically but do not conflict with the provisions on the prohibition of gratuity. Currently, Bank Mandiri strives to make continuous improvements in the implementation of its gratuity controls.

### Anti-Bribery Management System

To foster Gratuity Control program continuously, specifically on antibribery that in line with the ISO 37001:2016 Standard of Anti-Bribery Management System, Bank Mandiri has stipulated the following matters :

1. Prohibits bribery practices and its kinds in the company's environment;
2. Compliance with laws and regulations and other prevailing rules related to anti-bribery;
3. Align the anti-bribery policies with the company's objectives;
4. Corporate governance that fosters the achievement of antibribery goals;
5. Commitment to fulfil the requirements of Anti-Bribery Management System;
6. Promote the improvement of anti-bribery awareness to related stakeholders;
7. Carry out sustainable improvement principles in the Anti-Bribery Management System;
8. Provide responsibility, authority, and independency to Anti- Bribery Compliance Functions;
9. Sanctions to the violators of the rules in the Anti-Bribery Management System.

Bank Mandiri has received ISO 37001:2016 Certificate of Anti-Bribery Management System for the scope of Procurement & Vendor Management since 10 August 2020.

### Gratuity Control Management

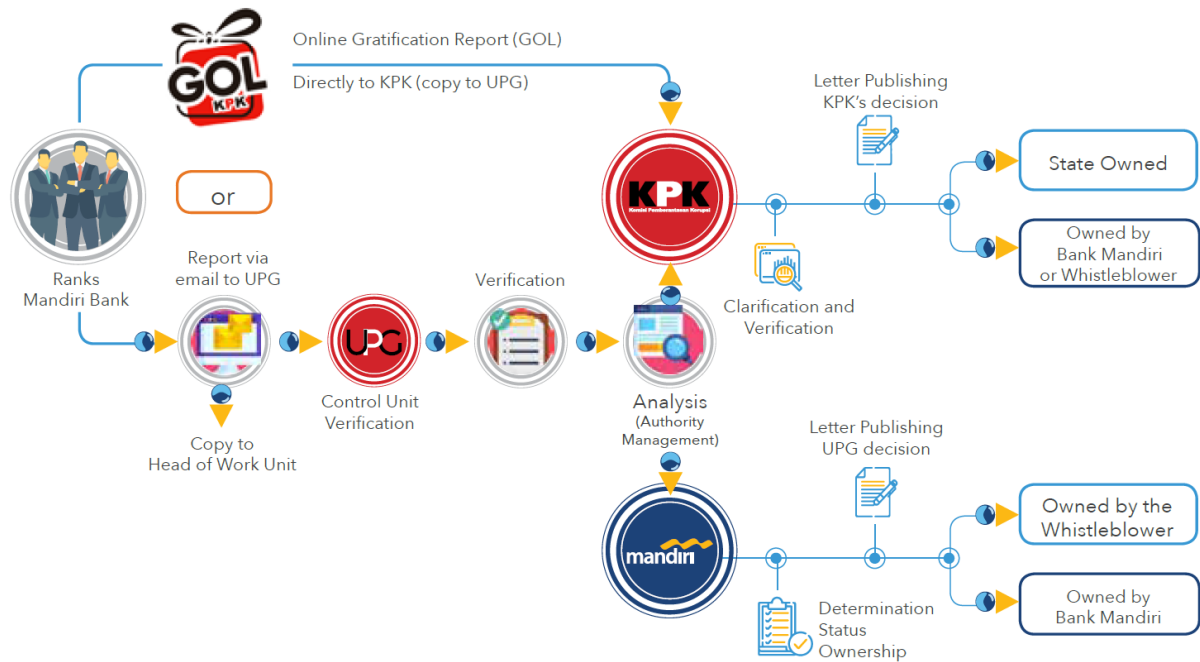
The Organization Structure of Gratuity Control Unit (UPG) is managed by the Compliance Unit, namely the Compliance & AMLCFT Group. The UPG is established according to the Board of Directors Decree No.KEP.DIR/64/2021 dated 8 December 2021.

The UPG functions to control gratuities within Bank Mandiri, which in carrying out their duties are assisted by Senior Operational Risk (SOR) and Regional Business Control (RBC) – Anti Money Laundering Officer (AMLO).



## Gratuity Reporting Mechanism

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



## Socialization of Gratuity Policy

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

During 2021, online dissemination was carried out for the Bank's employees. Other media used in disseminating gratuity control policies were through the installation of Gratuity Control Posters, sending Email Blasts, Screen Savers, Mandiri Magazine, Short Video, gratification display cabinets and urge all Bank Mandiri partners/vendors not to provide gratuity related to religious celebrations and new year through national newspaper media.

## Gratification Reports in 2021

Bank Mandiri employees who accept/reject gratuities are required to report their acceptance/refusal directly to the KPK via the GOL (Gratifikasi Online) with the address <http://gol.kpk.go.id> application or via UPG using the email [upg@bankmandiri.co.id](mailto:upg@bankmandiri.co.id).

During 2021, the number of reports of acceptance/refusal of gratuities received by the UPG was 112 reports. The acceptance of reported gratuities includes bribery gratuities, perishable food/goods, official goods, official honoraria and marriage.

