

ANTI CORRUPTION POLICY

As a commitment to improve practices and culture of anti-corruption, BCA has established several following policies related to corruption preventions:

1. BCA's Code of Ethics that related to Anti-Corruption (details information can be seen in Code of Ethics sections page 492-493 of this Annual Report).
2. Application of Anti Fraud Strategy Guidelines (details information can be seen in Application of Anti Fraud Strategy section page 466-468 of this Annual Report).
3. Gratification Control Policy (details information can be seen in Anti-Gratuity Policy section page 471 of this Annual Report).
4. Conflict of Interest Policy (details information can be seen in Affiliated Transactions and Conflict of Interests section page 473-475 of this Annual Report).

These policies aim to provide guidance which are related to prevent the corruption in BCA, and it can be seen in BCA website under Governance section (<https://www.bca.co.id/en/Tentang-BCA/Tata-Kelola-Perusahaan/Tata-kelola>).

Implementation of Anti-Corruption Practices

BCA continuously strive to enhance anti-corruption culture in BCA through various practices as follow:

1. Annual Disclosure

In order to prevent the corruption, all members of the Board of Commissioners, the Board of Directors, and BCA employees are required to declare the Annual Disclosure that contains of all circumstances or situations which allow conflicts of interest. Details information regarding Annual Disclosure can be seen in Internalization section page 311-313 of this Annual Report).

2. Internalization of Anti-Corruption Values

The implementation is carried out through sharing sessions, socialization, articles posted on internal portal, plasma TV, info magazine of BCA and other internal communication media.

3. Reporting on Corruption

In order to support the implementation of anti-corruption policy, BCA has had reporting channel named Whistleblowing System for internal or external BCA. During 2020, there is no cases regarding corruption violations that have been received through Whistleblowing System. Details information of Whistleblowing System can be seen in Whistleblowing System section page 468-470 of this Annual Report.

Furthermore, during 2020 BCA never made any political donations/contributions or voluntary donations that lead to corruption or bribery. Provisions of politic or social donations have been regulated in Corporate Governance Guidelines in Code of Ethics sections, as follow:

- Every participation of BCA personnel in social and/ or political activities is on personal behalf and can not represent BCA. Each attitude and action that reflects position of BCA must be approved by Board of Directors.
- Every donation on behalf of BCA, either for social or political activities, must be approved by Board of Directors.

AFFILIATED TRANSACTIONS AND CONFLICT OF INTERESTS

Policy of Affiliated Transactions and Conflict of Interests

BCA has implemented policies related to affiliated transactions and conflict of interests, as stipulated in Board of Directors Decree No. 214/SK/DIR/2019 dated December 27, 2019 concerning Affiliated and Conflict of Interest Transactions and Circular Letter No.319/SE/POL/2019 dated December 27, 2019 on Guidelines for the Implementation of Affiliated and Conflict of Interest Transactions and Decree of the Chairman of Bapepam and LK no. Kep.12/BL/2009.

The Policy of Affiliated Transactions and Conflict of Interests is cover the following items:

1. Definition of affiliated and conflict of interest transactions.
2. Affiliated parties.
3. Affiliated transaction category.
4. Reporting mechanism and approval of affiliated transactions plan.
5. Mechanism flow and reporting period and/or disclosure of information.

BCA continuously ensure the suitability of internal policy to development of prevailing regulations. Based on OJK Regulation No. 42/POJK.04/2020 dated July 1, 2020 concerning Affiliated Transactions and Conflict of Interest Transactions, BCA is currently conducting an analysis to improve internal policy related to Affiliated Transactions and Conflict of Interest Transactions.

Review Mechanism and dan Approval of Affiliated Transactions and Conflict of Interest Transactions.

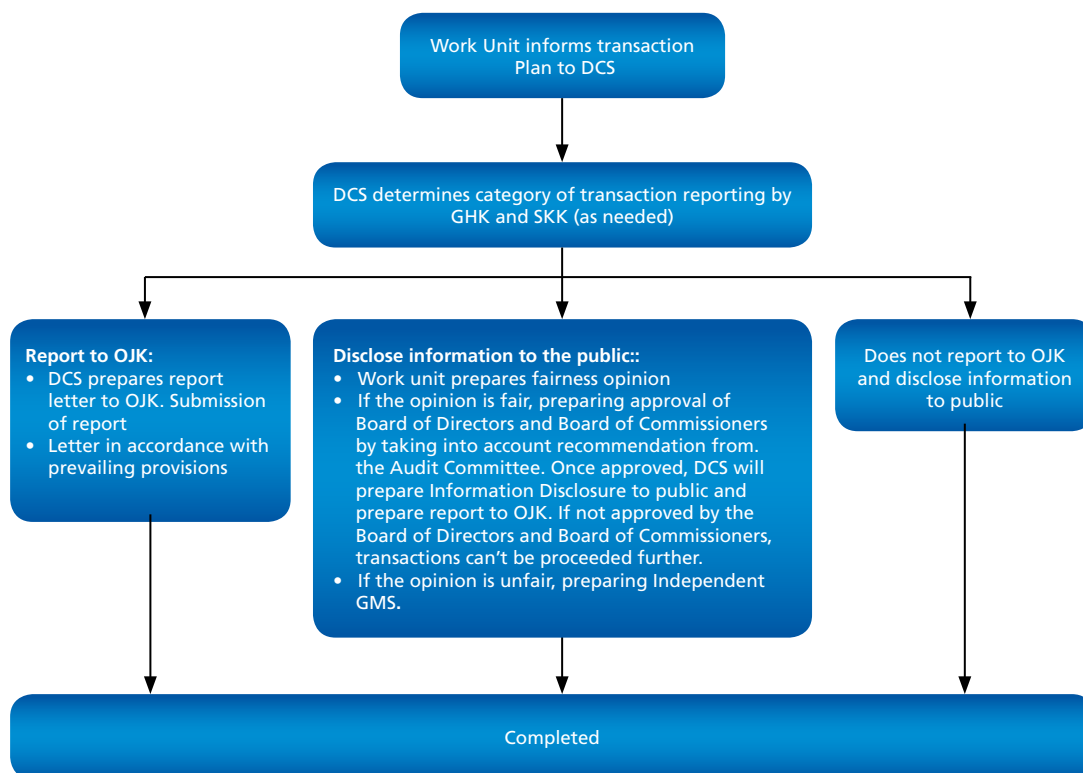
In real case, every work unit who conduct transactions with affiliated parties is required to inform in written to Division of Secretariat and Corporate Communication accompanied by required data. Division of Secretariat and Corporate Communication is coordinating with others work unit to analyze in determining category of transactions. In order to

improve quality of disclosure of information on affiliated transactions and conflict of interest, in 2020, BCA conduct review on mechanism and reporting flow of affiliated transactions and conflict of interest, affiliated transaction reporting system, and analyzation and socialization of affiliated transactions in accordance with OJK Regulation No. 42/POJK.04/2020 concerning Affiliated Transactions and Conflict of Interest Transactions.

To ensure that each transaction is made in the best interests of BCA and to prevent conflicts of interest from affiliated transaction, particularly in material Related Party Transactions that has been proposed to management, therefore Audit Committee is authorized to review and provide advices regarding those transactions to the Board of Commissioners.

Flow of Affiliated Transactions and Conflicts of Interest Reporting

The following illustrates the flow of affiliated and conflict of interest transactions reporting in BCA:



Note:
 DCS : Secretariat and Corporate Communication Division
 GHK : Legal Group
 SKK : Compliance Work Unit

1. Affiliated Transactions

Affiliated Parties of BCA are as follows:

1. Employees, Directors, and Commissioners of BCA.
2. Major shareholders of BCA, who are the person or the entities that own at least 20% (twenty percents) of BCA's shares with voting rights, or own less than that, directly or indirectly, as has been regulated by OJK.

3. Company Controlled by BCA, is company that has been controlled by BCA, either directly or indirectly.
4. Companies that have one or more Board of Directors or Board of Commissioners who are also be the members of Board of Directors or Board of Commissioners of BCA.
5. Companies that have been controlled by Major Shareholders of BCA.
6. Anyone who has a familial relationship due to marriage or family lines of up to the second degree, either horizontally or vertically with members of the Board of Directors, Board of Commissioners, and/or major shareholders of BCA.

Details of disclosure of BCA affiliated parties, nature of relationship, nature of transactions, and details of significant balances and transactions with related parties are in accordance with PSAK 7 (Revision 2015) that can be seen on Consolidated Financial Statements – Audited on Notes No. 49 which it is part of this Annual Report.

Realization of Affiliated Transaction in 2020

Throughout 2020, BCA has 9 (nine) affiliated transactions with the following details:

No	Date	Type of Transaction	Affiliated Party	Transaction Value	Nature of Relationship
1	February 12*	Rental Bali Room – Hotel Indonesia Kempinski for Lunch Together Management	PT Grand Indonesia	Rp151,915,500.-	
2	February 20*	Rental Bali Room – Hotel Indonesia Kempinski for Analyst Meeting Q4 2019	PT Grand Indonesia	Rp128,742,000.-	
3	November 10	Application of Maintenance Service of Static Document OCR (Optical Character Recognition)	PT Darta Media Indonesia	Rp45,000,000.-	
4	November 23	Implementation of Software Enhancement Chatbot Human Capital Inspire	PT Darta Media Indonesia	Rp2,400,000,000.-	Transaction between BCA and company controlled by BCA's controlling shareholder
5	November 23	Maintenance Service for Software Enhancement Chatbot Human Capital Inspire	PT Darta Media Indonesia	Rp312,000,000.-	
6	November 27	Buy and Sell Software OCR Context Dynamic and its implementation	PT Darta Media Indonesia	Rp800,000,000.-	
7	December, 11	Penetration Test Service	PT Darta Media Indonesia	Rp5,000,000.- /Many days with a range of transaction values Rp880,000,000.- for 1 (one) year,	
8	December, 14	Affiliated Transaction related to merger of PT BCA Syariah and Bank Interim	PT BCA Syariah and Bank Interim	Share Conversion	Transaction between 2 (two) companies controlled by BCA
9	December,30	Manage Service Support System	PT Akar Inti Teknologi	Rp4,818,000,000.-	Transaction between BCA and company controlled by BCA's controlling shareholder

* Affiliated Transaction according to Decree of the Chairman of Bapepam and LK no. Kep.12/BL/2009.

Nature of Affiliated Relationship

The transactions in the table above are affiliated transactions in accordance with Article Number 1 on OJK Regulation No. 42/POJK.04/2020 concerning of Affiliated Transactions and Conflict of Interest Transactions.

Fairness of Transaction

The principles that must be observed when conducting transactions with affiliated parties are as follows:

1. Have to pay attention to the principles of Good Corporate Governance, which are transparency, accountability, responsibility, independency dan fairness.
2. The appropriateness and fairness of transactions' value and requirement (arm's length transaction).

All affiliated transactions that have been carried out by BCA during 2020 are fair and at arms' length transaction.

Compliance of Affiliated Transactions with the Applicable Procedures

Transactions that have been conducted with affiliated parties are implemented in context of normal business activities for business interests of BCA. All affiliated transactions that took in place in 2020 have been through the procedures related to affiliated transactions established by BCA.

2. Conflict of Interests Transactions

Policy Related to Conflicts of Interest

In accordance with Code of Ethic of BCA, decision making process is not influenced by other parties and any conflicts of interest. The results of decision making and existing conflicts of interest are always recorded and documented as evidence.

Conflict of intrest policy of BCA has regulated to all BCA personnel to know and avoid the activities that may contain any conflicts of interest. In order to

manage the potential of conflicts of interest, all of BCA employees of echelon 5 and above are required to sign the Annual Disclosure (details information can be seen in Internalization page 311-313 of this Annual Report).

In relation to Integrated Governance, Board of Directors of BCA ensure that implementation of risk management for intra-group transactions in Financial Conglomerate are independent from conflict of interest that may occur between each individual of Financial Service Intitutions.

Policy of Conflict of Interest for Board of Directors and Board of Commissioners

Provisions related to conflicts of interest for Board of Directors and Board of Commissioners are regulated in Corporate Governance Guidelines, with details as follow:

- Members of Board of Commissioners and/or Board of Directors who have conflicts of interest are prohibited to make any decisions and/or any actions and/or being involved in process of executing transactions that brings disadvantage for BCA or reduce BCA profit, and he/she has to disclose condition of conflicts of interest in each decision.
- Members of Board of Directors are not authorized to represent BCA, in cases where he/she has conflicts of interest with BCA.

Throughout 2020, members of Board of Directors and members of Commissioners of BCA have no any conflicts of interest and have managed any potential of conflicts of interest that have been regulated in accordance with prevailing provisions.

Disclosure of Conflicts of Interest Transactions

Throughout 2020, BCA did not have any conflicts of interest transactions.

Name and position of parties who have conflicts of interest	Name and position of decision makers	Types of Transaction	Value of Transaction	Description
-	-	-	-	-

Independent Parties in Affiliated and Conflicts of Interest Transactions

In accordance with BCA policy, if there is a tansaction with affiliated party that required to be disclose to public and to be reported to OJK, then BCA will appointed independent appraiser to evaluating fairness of the transaction values.

If the independent appraiser states that the transaction is unfair, therefore the transaction is considered as having conflicts of interest, then it is required to collect approval from Independent Shareholders of BCA via Independent GMS.