

## Policy Highlights: Whistleblowing System

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The whistleblowing system is a means of communication for both internal and external stakeholders of the Company to report any indication of fraud or violation committed by any personnel of the Company. The report must be made in good faith and must not constitute personal grievance or an act based on bad faith/slander.

### Aims of the Whistleblowing System

The implementation of the whistleblowing system in the Company is aimed at :

- encouraging the stakeholders (employees, customers, etc.) to report any indication of fraud or violation that may be perpetrated within the Company without fear and worry, knowing that their confidentiality is protected.
- detecting and preventing potential fraud or violations as early as possible through information from the whistleblowers.

### Reporting Mechanism

#### 1. Media

The whistleblower can report any indication of fraud to the Company by using the Company's website ([www.bca.co.id](http://www.bca.co.id)). The report made by the whistleblower will be directly received by the party in charge of managing the whistleblowing system.

#### 2. Eligibility Criteria for Reports:

a) For ease of contact and immediate follow-up action, the whistleblower needs to fulfill the following criteria for reporting.

- 1) Providing sufficient information on his/her identity, including at least the following:
  - Name of the whistleblower (the whistleblower is permitted to remain anonymous)
  - Whistleblower's telephone number/e-mail address

- 2) Providing preliminary information on the indication of fraud or violation, for which the whistleblower can be held accountable. The report must satisfy the 4W1H criteria and must be accompanied by relevant supporting data (if any), including:
  - the fraudulent act/misconduct (*What*)
  - the alleged perpetrators (*Who*)
  - the time at which the fraud was committed (*When*)
  - the location at which the fraud was committed (*Where*)
  - a description of how it occurred (*How*)

b) Types of fraud/violations that can be reported :

<b>Fraud</b>	<p>An intentional violation or omission to do something for the purpose of misleading, deceiving, or manipulating the Company, customers, or other parties, which takes place within the Company and/or by means of the Company's facilities, causing the Company, customers or other parties to suffer losses or the fraudster to obtain financial benefits, whether directly or indirectly.</p> <p>The following acts can be categorized as fraud:</p> <ol style="list-style-type: none"> <li>1. Deception,</li> <li>2. False representation,</li> <li>3. Embezzlement of assets,</li> </ol>
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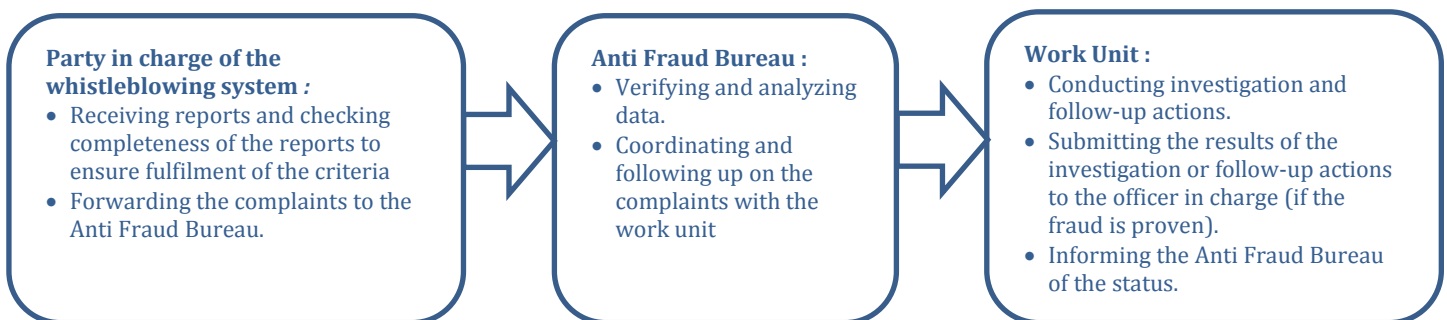
	4. Unauthorized disclosure of information, 5. Banking Crime ( <i>tindak pidana perbankan</i> or <i>tipibank</i> )
<b>Violation of code of ethics</b>	Any action not reflecting the Company's corporate culture, which has been formulated based on positive values that grow and develop within all of the Company's personnel, to achieve common goals and to serve as reference for the Company's personnel in making decisions and taking actions. (attachment to the Company's banker's code of ethics)
<b>Violation of conflict of interest</b>	Any action that may lead to a condition in which a person in carrying out his/her duties and obligations has certain interests beyond his/her professional interests, such as personal interests, family interests and other parties' interests, causing the Company to lose its objectivity in making decisions and policies according to the authority granted by the Company to him/her.
<b>Violation of law</b>	Any action in violation of the prevailing law in Indonesia.

### Protection for the Whistleblowers

In implementing the whistleblowing system, the Company will protect the confidentiality of the whistleblower's identity and the contents of the report submitted to the Company.

### Complaint Handling

Below is the process flow diagram for handling complaints in connection with the whistleblowing system at BCA:



### Party in Charge of the Whistleblowing System

Follow-up on the complaints will be carefully handled by an internal team appointed by the Company's management with reference to the provisions applicable in the Company and the prevailing laws and regulations in Indonesia.

### Imposition of Sanctions

If the results of the investigation show that the alleged perpetrator is proven to have committed the fraud or violation, the officer in charge will impose sanctions in accordance with the applicable provisions of law.