

Policy Highlights: Anti-Corruption and Anti-Graft Policy

To support the implementation of BCA's Good Corporate Governance (GCG) and strengthen the internal control system at BCA in an effort to prevent and curb practices of Corruption and Bribery within BCA, BCA has established the Anti-Corruption and Anti-Graft Policy at BCA as laid down in Decision Letter of the Board of Directors No. 269/SK/DIR/2021 dated 31 December 2021. This Anti-Corruption and Anti-Graft Policy is in line with the other policies and procedures at BCA, which constitute BCA's commitment to the implementation of the Anti-Corruption and Anti-Graft Policy at BCA.

Policy implementation principles

The principles adopted by BCA in its Anti-Corruption and Anti-Graft Policy are as follows:

1. All Personnel of BCA:
 - are prohibited from conducting business activities in violation of the applicable legal, moral, and ethical norms; and
 - are obligated to take the necessary measures to prevent and/or curb the acts of Corruption and Bribery in accordance with the applicable rules and regulations.
2. BCA is committed to complying with the applicable laws and regulations on Anti-Corruption and Anti-Graft.

BCA's commitment to the implementation of the policy

BCA's commitments to cultivating an Anti-Corruption and Anti-Graft culture and implementing the Anti-Corruption and Anti-Graft Policy within BCA include, among other things, the following:

- Performing any acts that promote core values such as integrity, transparency, and accountability with reference to BCA Code of Ethics for Bankers.
- Conducting a risk assessment to identify and determine the measures to be taken to overcome or reduce the risk of Corruption and Bribery.
- Implementing the Anti-Corruption and Anti-Graft Policy.
- Conducting dissemination events and/or training for BCA's internal and external parties to enhance their understanding of the Anti-Corruption and Anti-Graft Policy.
- Overseeing the implementation of the Anti-Corruption and Anti-Graft Policy by imposing a sanction on each violation of the applicable regulations, if proven.
- Incorporating the provisions concerning an Anti-Corruption and Anti-Graft commitment in agreements on the procurement of goods and/or services between BCA and its vendors and the credit documentation, as mutually agreed by the parties.

Appointment of the Graft Control Unit (*Unit Pengendalian Gratifikasi*, UPG)

To perform the Graft control function within BCA, BCA has appointed the Compliance Work Unit (*Satuan Kerja Kepatuhan*, SKK) as the Graft Control Unit (UPG), which has the following main duties and functions:

- Formulating the Anti-Graft policies and procedures.
- Coordinating dissemination activities to introduce and disseminate the Anti-Graft Policy to all Personnel and stakeholders of BCA.
- Receiving and administering Graft reports from BCA's Personnel.
- Submit reports on the implementation of the Graft control to the Board of Directors on a regular basis, at least once a year.