

COMPANY CODE OF CONDUCT

Introduction

The Company's Code of Conduct is formulated as a reference for the Company personnel in making decisions and act. This guideline provides a reference on what is expected of the Company's personnel in their relationship with customers, shareholders, other employees, suppliers/partners, the Government and the communities in which we are located.

Dissemination

In order to implement the Company's Code of Conduct both inside and outside the work environment, all personnel of the Company are required to read and understand the Code of Conduct. Therefore, the Company's Code of Conduct is disseminated to the Company's personnel.

Main Principles of the Company Code of Conduct

The Company's Code of Conduct is an elaboration of the Company's culture which has been formulated based on positive values that grow and develop in all Company personnel, to achieve common goals and as a reference for their decision making and actions.

The Company's Code of Conduct is the basis for various policies, day-to-day decision making, and operations. Every decision and action of the Company's personnel as representation of the Company is required to have the highest standards of integrity, including if these standards are not covered by the existing laws and regulations in the Republic of Indonesia.

The main principles in the Company's Code of Conduct are:

1. Professional;
2. Integrity;
3. Team excellence;
4. Service excellence;
5. Social awareness.

Meanwhile, the core of the Code of Ethics of Company Personnel includes:

1. Comply with and adhere to the prevailing laws and regulations.
2. Protect the reputation and safeguard the assets of the Company.
3. Protect the confidentiality of customer and Company data.
4. Ensure that there are no conflicts of interest between personal interests and the bank or customer interests.
5. Record all transactions accurately in accordance with applicable regulations.
6. Maintain and foster a harmonious work environment and fair competition
7. Do not abuse position and authority for personal or family interests.
8. Do not commit any misconduct that may harm his/her professional image or the image of the Company in general.
9. Avoid any forms of gambling or speculation.
10. Continuously improve knowledge and insight, by keeping abreast of developments in the banking industry in particular and the business world in general.

Value Framework and Ethical Standards

The Company's Code of Conduct provides a framework for values and ethical standards. Compliance with these values and ethical standards is the personal responsibility of the Company personnel

Compliance with the Code of Conduct

The following principles must be applied by the Company's personnel in performing their daily work:

1. All decisions and actions must comply with the prevailing laws and regulations, as well as Company policies.
2. Every Company personnel is an honest and trustworthy person in all actions and relations for and on behalf of the Company.
3. Situations in which the personal interests and interests of the Company or customers have the potential to conflict should be avoided. If it cannot be avoided, then it must be disclosed or resolved in accordance with the applicable regulations.
4. Human dignity is always respected in any relations between the Company personnel and other parties.
5. Honest and accurate communication is a characteristic of the Company's personnel.
6. Exercise confidentiality in appropriate matter and proportion.
7. The Code of Conduct is recognized, appreciated, and applied by all Company personnel.
8. Violation of the Company's Code of Conduct may be subject to disciplinary action, termination of employment, and legal action in accordance with applicable regulations.

Confidentiality of Information

The company has 3 (three) levels of information:

1. Internal Use
Can be accessed by all Company personnel.
2. Confidential
Can only be accessed by the Internal Audit and/or the Board of Directors and the Board of Commissioners.
3. Highly Confidential
Can only be accessed by the person who is referred to from the information, Internal Audit, the Board of Directors and the Board of Commissioners.

Every information is treated with caution and in accordance with the duties and responsibilities of the Company's personnel. The Company's personnel shall refrain from disclosing the Company's secrets, whether intentionally or not, including customer information, management information system, Company personnel data, information on suppliers/partners, and information on agreements with the Government.

Leadership

As part of the leadership function, the Company's work unit head is responsible for ensuring the understanding and consistent application of the values in the Company's Code of Conduct by the staff members.

The Company's work unit head is required to optimize the performance and develop the competence of the staff, through involvement in planning, task delegation, coaching, training and so on. Each Head of Work Unit always directs the power and efforts to achieve the Company's business targets.

The head of the Company's work unit is a role model for his/her staff in both work performance and day to day behavior

Name and Property Rights of the Company

Company Name

The name and reputation of the Company are considered as assets and can only be used in the Company's business development. The name of the Company must be maintained and protected by each of the Company's personnel from being used for the benefit of other parties or associated with illegal acts.

Property Rights of the Company

In the event of a termination of employment, the Company has full rights over the property, ideas, information (customers, product designs, systems and procedures, contracts) generated during the term of the employment relation.

Company Personnel

Equal Opportunity

The Company strives for positive actions to ensure equal opportunities for the Company's personnel and a work environment that is free from all forms of discrimination. The Company has a commitment towards personal integrity and respect for each individual.

The Company recruits, develops, and retains the best Company's personnel. The Company believes in the importance of diversity among the Company's personnel in achieving the organization's significant success. The Company respects the diversity of discourses, backgrounds, and experiences which is needed in the globalization era.

The Company provides equal opportunities to the Company's personnel in recruitment, training and development activities, regardless of ethnicity, religion, sect, gender, race or country of origin.

Responsibilities of Company Personnel

The Company Personnel are expected to act in accordance with high standards of behavior, integrity and professionalism in all aspects of their work and maintain compliance with laws and regulations, internal rules and Company policies, including the Company's Code of Conduct.

The Company also requires all of the Company personnel to uphold ethics in their work and actions.

The Company's Code of Conduct is not a form of work contract nor is it a guarantee for work continuity.

The main responsibility of the Company's personnel is to support efforts in meeting the Company's business targets, by:

1. Carry out their duties and responsibilities with high integrity and honesty.
2. Pursue to achieve high standards of performance.
3. Establish a mutual trust in interpersonal relations among the Company's personnel.
4. Maintain the Company's reputation.
5. Respect work time and discipline at work.

Compensation and Career

The Company values each individual based on integrity, quality of performance, achievement of business targets, and cooperation.

The Company encourages the Company personnel to pursue achievements with high motivation.

The Company will provide training facilities and continuous development in order to give every personnel of the Company full opportunity to achieve effectiveness in their duties and careers.

The Company also provides a fair career development system, through an objective evaluation process of the competence and personality of every personnel in the Company who has the potential to carry out greater duties and responsibilities.

Welfare of the Company Personnel

To increase motivation and sense of security at work, the Company provides:

1. Health facilities, loans, and occupational safety guarantees for the Company personnel.
2. A healthy, comfortable and safe workplace.
3. Various allowances, in accordance with Government regulations and Company policies.
4. Pension Fund Program and preparation for retirement.

Open and Honest Communication

Every Company personnel has open, sincere and honest interpersonal relationship. The Company prioritizes the atmosphere of togetherness and kinship at work.

Duties and Authorities

Every Company personnel makes decisions and carries out their duties in accordance with the assigned authority of the position. This authority is clearly established by the Company.

Drug-Free Workplace

Every Company personnel is prohibited from being involved in the abuse of narcotics and illicit drugs, such as the sale, production, distribution, possession and use of them.

Security, Safety and Health of the Work Environment

The Company prioritizes the security, safety and health of the work environment. With a safe and healthy office environment, every employee can work optimally and give the best service to customers.

Reimbursement

The Head of the Company's Work Unit is responsible for ensuring reimbursement of expenses incurred by the Company personnel in accordance with the provisions set by the Company, including compliance with the provisions stipulated in the Collective Labor Agreement between the Company Personnel and the Company.

Abuse of Position

The Company personnel are not allowed to use their information and authority for personal gain or their family or other people.

Social/Political Activities

As citizens of the Republic of Indonesia, the Company personnel have the freedom to take part in social and/or political process. In exercising this right, the Company personnel are responsible for maintaining office facilities or other matters related to the identity of the Company from any disruption, and to avoid abuse of position and authority to influence other Company personnel in exercising their political rights.

Each participation in these activities is personal and cannot represent the Company. Every statement, stance and action that reflects the Company's position, must be approved by the Board of Directors.

Expenditures in the form of donations on behalf of the Company, for social and/or political activities, must be approved by the Board of Directors.

Inter Company Personnel Relationship

The Company prohibits harassment and intimidation in the work environment. The Company and every Company personnel always take positive actions to ensure a work environment that is free of harassment, intimidation and violations of the norms of decency. If the Company personnel feel that they have been harassed and/ or intimidated or see behavior that violates the norms of decency, they can report to their immediate supervisor or Human Resources work unit at the Regional Office/Head Office.

Asset Security and Risk Management

Every asset of the Company must be protected by the Company personnel and is fully utilized for the Company's business. Every office equipment is not allowed to be used for personal interest. Head of Work Unit of the company is responsible for monitoring the staff behavior in this matter.

The Company always manages risks properly and performs reliable internal control in every business process and must be supported by every Company personnel.

The Company makes business decisions and implements them clearly and prudently with a minimum bureaucracy and can be implemented properly and relatively easily by all Company personnel.

Customer

The Company's existence cannot be separated from the trust of the public as customers, which is one of the most important factors in the banking business.

Know Your Customer

The Company personnel pay special attention in selecting parties in business relations, whether as customers, suppliers or partners. Every operational, credit or non-operational transaction, must undergo a process of checking the integrity of the external parties involved. The introduction was also followed by continuous monitoring of customers to detect unusual transactions during the period of the business relationship.

Responsibility towards Customer

The Company personnel build sustainable relationships and the best quality products and services to every customer. In this relationship, the Company recognizes and respects customers as business partners. The Company personnel are committed to quality, and always strive to achieve and exceed the expectations of our customers, by:

1. The Company personnel maintain customer trust by carrying out transactions that apply the principles of bank prudence and bank confidentiality principles as well as implementing a security and control system through separation of powers.
2. The Company personnel shall continue to show respect, courtesy and hospitality in dealing with or serving customers and fellow Company personnel (internal customers).
3. The Company personnel must have extensive knowledge and understand customer needs.
4. The Company personnel always work together well, are full of enthusiasm and support each other for customer satisfaction.
5. Integrity and honesty will be reflected in every individual of the Company.
6. Individual service (Personal Service) will become signature feature in providing services to customers.
7. The Company's facilities are always clean and comfortable for each customer.

8. The Company personnel will always be easily contacted anytime and anywhere.
9. The Company will always have a reliable system that provides convenience and comfort for customers in making transactions.
10. The policies, systems and procedures, as well as the delegated authority, enable the Company's personnel to properly resolve any customer problems.

Investor

Interaction with investors is carried out by providing good and accurate information and applying equal treatment in the provision of information and not carrying out activities in the capital market that are intended to harm or benefit certain investors and/or shareholders.

Suppliers and Vendors

The Company purchases equipment, materials, products and/or services based on an evaluation of the quality, benefits and prices offered by suppliers/ vendors.

Objective Evaluation

Purchasing decisions must be based on an objective assessment of the quality, reliability and integrity of suppliers/partners, and the value of the short-term and long-term offerings in accordance with the Company's business targets.

Implementation of the Company Code of Conduct towards Suppliers

Suppliers and partners must comply with the Company's Code of Conduct that is relevant in their business relationship with the Company, such as: documents and data provided by the Company as part of cooperation must be kept confidential.

Obligation to Report on Violations of the Company Code of Conduct**Compliance with Laws and Regulations**

The Company personnel comply with the prevailing laws and regulations of the Republic of Indonesia. Violation of laws and regulations may be subject to disciplinary action, termination of employment, and actions in accordance with applicable legal provisions.

Reporting of Code of Conduct Violations

Company personnel who have information regarding violations of the Company's Code of Conduct, should immediately report it to the Anti-Fraud Bureau for follow-up.

Reports that can be followed up are reports that have convincing initial evidence along with the identity of the whistleblower.

Protection towards whistleblowers

Company personnel who report the irregularities will be kept confidential, to prevent them from experiencing moral and material damage as a result of the report.

**Code of
Conduct related
to vendors and
internal user**

In performing their duties, the Company personnel frequently interact with vendors and internal users. Its implementation is guided by the applicable internal rules or policies.

Relationship with Vendors

1. Every Company personnel in performing their duties must maintain the good name and reputation of the Company, including but not limited to :
 - a. Maintain personal appearance and act according to ethics and good manners (actions and words).
 - b. Do not make excessive compromise in pre-qualifying vendors and verifying bills from vendors.
 - c. Avoid meetings that will influence or be perceived as influencing decisions in his/her duties and work.
2. Must avoid situations in which vendor can offer personal benefits and/or cause damage to the Company.
3. Must maintain the confidentiality of Company and vendor information obtained while conducting their duties and do not use it for personal gain.
4. Proactively provide information to management or the authorities if they have family ties or affiliation with vendors that could potentially affect objectivity in carrying out work.
5. Must not take advantage of vendor mistakes.
6. Do not ask for or receive any form of money/presents/gifts/service facilities and do not commit to debt transactions.
7. Must return all gifts in the form of money/presents/gifts/ service facilities in accordance with the applicable rules and can prove the return with a letter signed by the Head of the Work Unit and a Return of Goods Receipt.
8. Always prevent conflicts of interest in dealing with vendors

Relationship with the Company's internal users

1. Fair treatment to all users in all aspects, and do not differentiate between personal status in business relationships.
2. Follow up, fairly and based on priority needs, development opportunities detected by authorized work units and through user requests (related work units of the Company).
3. Maintain good relations with all users.
4. Maintain the completeness and orderliness of documents submitted from work units/other parties to be archived, borrowed or returned.
5. Maintain the confidentiality of circulated documents.

Professional Ethics

1. Carry out development and administrative tasks in accordance with the objectives of the Company and the Company's mission to be responsible and professional, and prioritizing the interests of the Company in carrying out its development and administrative functions.
2. Provide innovative contributions in the development of concepts, systems and methodologies related to the Company's projects.

Personal Ethics

1. Continuous personal development to improve competence.
2. Avoid things that can create a conflict of interest situation, by:
 - a. Avoiding all forms of personal business or professional activities that are relevant to the Company's duties.
 - b. Refrain from nominating/recommending relatives/acquaintances to become vendors.

Responsible for acting in a professional manner, and applying good personal ethics and values (honest, responsible, thorough and careful).