

Trust plays a central part in the banking business. In fact, it is a necessary element to foster and maintain business relationships with customers and other parties having a certain relationship with the Company. The trust of the general public and the market participants towards the Company is strongly influenced by the ethical behavior of all personnel of the Company, from the Board of Commissioners, the Board of Directors, the management to all employees.

In connection with the foregoing, in order to build public trust and to support Law No. 20 of 2001 on the Amendment to Law No. 31 of 1999 on the Eradication of Corruption and the implementation of the principles of good corporate governance, the Company needs to have a policy to provide the personnel at all levels of the Company with the guidelines for dealing with customers, partners and fellow workers.

The anti-graft policy must contain at least the following stipulations:

1. The personnel at all levels of the Company are not permitted to give approval for any credit facilities, transactions, special interest rates or other privileges for personal gain and for the benefit of their family members or the companies in which they and/or their family members have interests.
2. The personnel at all levels of the Company must avoid or refrain from involving themselves in any activities related to an organization and/or individual if such activities potentially lead to future conflicts of interest.
3. The personnel at all levels of the Company are not permitted to become vendors that supply goods or services for the Company, whether directly or indirectly, in which such personnel of the Company have interests.
4. The personnel at all levels of the Company may conduct securities transactions, foreign exchange transactions, derivative transactions and other transactions in their own interests only to the extent that there is no conflict of interest or violation of any insider trading regulations laid down by the regulatory bodies and other applicable laws and regulations.
5. The personnel at all levels of the Company are prohibited from using/misusing their authority and position to take advantage, whether directly or indirectly, from the knowledge obtained from the Company's business activities for personal gain, or for the benefit of their family members and other parties.
6. The personnel at all levels of the Company are prohibited from requesting or receiving, permitting or agreeing to receive any gift or reward from a third party who in return obtains or purports to obtain any facilities or privileges from the company in relation to the company's operational activities.
7. The personnel at all levels of the Company are prohibited from requesting or receiving, permitting or agreeing to receive any gift or reward from a third party who in return obtains or purports to obtain a certain job or order from the company in relation to the procurement of goods or services.
8. If a customer, partner, or any other party gives holiday parcels/gifts on certain occasions such as Idul Fitri Holiday or other festive holidays, and if:
 - as a result of receiving the parcels/gifts it is believed that the Company will be adversely affected and the Company's decision may be affected, and
 - the value of the parcels/gifts are unreasonably high,then the relevant personnel receiving such parcels/gifts must immediately return the

- parcels/gifts along with an explanation that the personnel at all levels of the Company are prohibited from receiving such parcels or gifts.
9. If the parcels/gifts as described in point 8 above, for one reason or another, are difficult to return, the Company's personnel that receive the parcels/gifts must immediately submit a written report to their supervisor for the necessary follow-up actions according to the applicable regulations.
 10. If a customer, partner or any other party gives certain promotional items to the Company's personnel, so long as the receipt of the promotional items is believed to have no adverse effect on the Company nor affect the Company's decisions, the Company's personnel are allowed to receive such promotional items.
 11. For the purpose of procuring goods and services from third parties for the Company's needs, the personnel at all levels of the Company must use their best endeavour to get the best price and maximum discount. All discounts obtained from the procurement of office supplies and equipment, airplane/train tickets, and/or reductions in insurance premiums, and/or discounts obtained from notaries, lawyers, legal consultants, appraisers, independent accountants, and/or other similar reductions must be recorded for the benefit of the Company.
 12. The personnel at all levels of the Company are prohibited from abusing their authority or position to borrow funds or obtain loans from customers/partners or borrow certain facilities from customers/partners.
 13. The personnel at all levels of the Company are prohibited from taking advantage of any opportunity to use the Company's facilities and resources and equipment for personal gain, for the benefit of their family members or other external parties, unless they have obtained prior approval or permission from the Company (through their direct supervisor or leader), along with the proper recording thereof.

This anti-graft policy is valid and binding and must be well understood and seriously implemented by the personnel at all levels of the Company as part of the Banker's Code of Ethics in order to support the implementation of the principles of good corporate governance. In the event of any violation of or non-compliance with this policy, the non-complying party may be sanctioned according to the level of his/her violation.