

3. Site Visit led by Investor Relations Officer.
4. Investor Relations shall coordinate with Bank Branch Office that will be visited.
5. Information submitted at Site Visit is information that has been published.
6. Investor Relations documenting Site Visit activity.

CHAPTER VII

INSIDER TRADING

Article 22

Insider Policy

1. Insider includes is:
 - a. Commissioner, Director, or Employee;
 - b. The main shareholder of the Bank;
 - c. Individuals who because of their position or profession or because its relation with the Bank allows people obtain insider information; or
 - d. The parties within 6 (six) months is no longer a party referred to in letters a, b, or c of this paragraph.
2. Insider who have Inside Information is prohibited from buying or selling Securities of
 - a. Bank; or
 - b. Other companies that conduct transaction with Bank.

3. Prohibition for Insider who have Insider Information to make a purchase or sale of securities the Bank is based on consideration their transparency principle in the capital markets should result in the creation of equality of information for each party in making investment decision.
4. Insider from Bank who conducting transaction with other companies are also subject to prohibition to make transactions on the securities of another company, the person concerned is not Insider of such other companies. This is because information about other companies that typically obtained for Insider position in the Bank conducting transaction with other company.

Article 23

Insider Trading Policy

1. Insider is prohibited from trading in securities when the Bank knows Insider Information or Material Facts.
2. Prohibition as referred to in paragraph 1 of this Article does not apply to "Insider" that comply with Bapepam-LK Number XI.C.1 on Securities Transactions What Not Prohibited For Insider the following amendments if any.
3. Insider who knowing Material Facts, can trade securities after the Material Fact published.
4. The Securities Transaction not included in the securities transaction that is prohibited as referred to in paragraph 1 of this Article if:

1.1. The Securities transaction is made between Insider who have the same Material Facts and implemented in Outside of Stock Exchange;

1.2. Securities transaction conducted by Insider who have Inside Information to Insider who are not Insider upon Securities or other companies that conduct transactions with the Bank and implemented in Outside of Stock Exchange with the following conditions:

4.2.1. The Insider has given all insider information to the Party who is not the Insider;

4.2.2. The parties are not Insider are not using the inside information in addition to the Securities transaction with the Insider;

4.2.3. the party is not Insider gives a written statement to Insider who give such information stating that the information received will be kept confidential and will not be used for any other purpose other than to conduct Securities transaction with the referred Insider; and/or

4.2.4. The Parties who are not Insider does not conduct Bank Securities transactions or other companies that conduct transactions with the Bank within 6 (six) months period after the information obtained, in addition to the Securities transaction with the Insider in question.

5. Insider is prohibited to influence other parties to make purchases or sales of securities of the Bank or provide Material Facts to any party who reasonably suspected could use such information to make a purchase or sale of Bank Securities.
6. Insider is prohibited to disclose Material Facts, except as part of daily task of such Insider and approved by Spokesman.
7. In circumstances where the Material Facts have been disclosed to outside parties, the Bank will take the necessary steps to keep confidentiality of Material Facts, including requesting outside parties to agree in writing to adhere to the provisions of this policy and/or to sign Confidentiality agreement.
8. All inquiries from outsider regarding Material Facts must be forwarded to Investor Relations, in coordination with Corporate Secretary.
9. In addition to those mentioned in paragraph 1 of this Article, Insider is prohibited:
 - 9.1. Perform securities trading of other public companies if the Insider know Material Facts of other public companies.
 - 9.2. Disclose to any material facts concerning the other public companies.
 - 9.3. Provide trading advice to anyone on various matters relating to other public companies in the state Insider know the Material Facts that other public company.

10. Prohibition on Insider Trading and restrictions of this policy is applied to all sales of securities obtained from the application of stock-based compensation (MESA Program and MESOP Program) provided by the Bank in accordance the Bank's internal regulations, but not to the acquisition of securities in connection with the adoption of the stock-based compensation (MESA Program and MESOP Program).

Article 24

Sanctions

1. Violation of Insider Trading is a Capital Markets criminal offense with penalty at most IDR 15,000,000,000 (fifteen billion rupiah), which is punishable with 10 (ten) years imprisonment.
2. In addition to paragraph 1 above, Insider Trading offense is an offense of Discipline Employees with crimes category that could lead to lawsuits and termination of employment.
3. The imposition of sanctions under paragraph 2 did not abolish the enactment of the provisions of Capital Market as referred to in paragraph 1.
4. Every person in violation of this policy or Capital Markets regulation regarding the Insider Trading, or aware of any violations by other Insider must report the violation immediately to the Spokesman.
5. After studying these violations, spokesman consult with legal consultant to determine what to do with the Bank in

this case publishing Material Fact information, or to report violations to the Bapepam or other Capital Market Authority.

CHAPTER VIII

REPORT SUBMISSION TO REGULATOR POLICY

Article 25

Reports

1. Report submission that to be submitted to the Regulator has been set on Directors Regulation concerning Procedures for Delivery of Information to the Public, along with its amendments if any.
2. As long as not contrary to the Board of Directors Regulations, the report submission to the regulatory policy are subject to the provisions contained in the Directors Regulation concerning Procedures for Delivery of Public Information along with its amendments if any.

CHAPTER IX

CLOSING

Article 26

Closing

1. The matters that are not/have not been sufficiently regulated by this regulation will be determined later by the Board of Directors.