

Ownership is when Bank Management and/or Employees became a shareholder in other companies that have a relationship in the context of the bank's business to become the controlling shareholder and/or control the company.

(3) Financial Relationship

Financial relationship is when Bank Management and/or Employees receive income, financial assistance or loans from shareholders, customer/debtor, vendor, business partner and other parties in the framework of the bank's business.

(4) Management Relationship

Management relationship is when Bank Management and/or Employees served as Board or Executive Officers at other companies that have a relationship in the context of the bank's business.

**3.2.2. Principles in Conflict of Interest Handling**

In the event of any conflict of interest, Bank Management and Employees shall implement the following principles:

- a. Shall give priority to economic interests of the Bank and prevent the Bank from possible losses or the possible decreasing bank profits;
- b. Must disclose the conflict of interest conditions.
- c. The owner conflicts of interest shall not be involved in all phases/decision-making activities in question.