

## Anti Corruption Program

### Anti-Bribery Management System Certification ISO 37001

Based on the SOE Circular Number S-17/S.MBU/02/2020 dated February 17, 2020, it stated that all SOE were required to carry out ISO 37001: 2016 certification concerning Anti-Bribery Management System (SMAP) and obtained this certification before August 17, 2020.

ISO 37001: 2016 was an international standard that regulated the Anti-Bribery Management System (Anti-Bribery Management System). On August 11, 2020 the Company had successfully obtained the SNI ISO 37001: 2016 certificate in the field of Commercial Credit (Commercial Lending) & the field of Procurement (Procurement), meaning that the Company had received recognition that in the business process in the commercial credit and procurement sectors, it has followed SNI standards. ISO 37001: 2016 Anti Bribery Management System. It was hoped that the achievement of ISO 37001: 2016 would further strengthen the implementation of a culture of integrity, implementation of GCG principles at the Company and at the same time confirmed the Company's commitment to compliance with the implementation of the Law on the eradication of corruption, collusion and nepotism. The achievement of SNI ISO 37001: 2016 at the commemoration of the 75<sup>th</sup> Indonesian Independence Day was very meaningful for Bank BTN in its transformation towards the **Best Mortgage Bank in Southeast Asia in 2025**.

In an effort to obtain the SNI ISO 37001: 2016 certificate, the Company carried out a series of processes, including: ISO 37001: 2016 Awareness Training; Gap Analysis & Bribery Risk Assessment on existing conditions at BTN with the required ISO standards; Development of Policies and Procedures for the ABMS (Anti-Bribery Management System) according to ISO standards; Implementation of SMAP in 3 Divisions namely Commercial Banking Division (CMBD), Corporate Syndication & Transaction Banking Division (CSTD) and Procurement and Fixed Asset Management Division (PFAD); Internal Audit of the SMAP by the Internal Auditor (Internal Audit Division) and the certification audit by the External Auditor (Certification Body ISO 37001: 2016).

In running a business, the Company would continue to be based on the principles of GCG and would continue to make continuous improvement in implementing ISO 37001: 2016 Anti-Bribery Management System (SMAP) in order to create a the Company that is clean from corruption, collusion and nepotism. For this reason, the Company would always invite business partners/partners to support the implementation of the ISO 37001: 2016 SMAP at the Company by not practicing gratification,

bribery or other actions that violate the prevailing laws and regulations. The Company would also encourage business partners/partners to implement ISO 37001: 2016 in their respective companies so that there was similarity with the values and policies in implementing the anti-bribery system.

The Company basically had several rules including Guidelines for Corporate Governance Policies, Guidelines for Business Ethics and Conduct (Code of Conduct), Anti-Gratification Control, Anti-Fraud Strategy and providing a channel for complaints to the Whistleblowing System (WBS BTN SIIPS). With the establishment of anti-bribery policies and procedures at the Company in accordance with ISO 37001: 2016 standards since August 11, 2020, it would further strengthen the anti-bribery management system that the Company had so far.

With the implementation of the Anti-Bribery Management System, it was hoped that the trust of all the Company stakeholders, including business partners/work partners in establishing cooperation would increase and can increase the efficiency of the Company's business processes. The Company as a financial institution really needed to improve its reputation with efficient business processes, GCG and following international standards such as ISO 37001: 2016. The final result that would be obtained by the Bank with the application of ISO 37001: 2016 was an increase in the competitiveness of the Bank in the long term so that the Company would be healthier and grow in a sustainable manner.

The Company had also implemented SNI ISO 9001: 2015 Quality Management System, namely the audit process in the Internal Audit Division, the KPR process in the Non Subsidized Mortgage & Consumer Lending Division, business processes in the Enterprise Risk Management Division, Compliance & Governance Division and Learning Center Division.

### Certification Participation Implementation of Integrity Builder Expert (API)

It was a manifestation of one of the 2020 initiative strategies regarding Tone of the Top Compliance Culture Awareness (leadership and senior managers become role models) and following up on the commitment and cooperation of the Bank with the Corruption Eradication Commission (KPK) in the Professional Integrity (PROFIT) and Prevent program. Corruption (CEK) was specifically related to the participation of the Integrity Building Expert Certification (API). Along with the conditions of the Covid-19 pandemic and the readiness of the P-II KPK IDIC regarding the Integrity Building Expert Certification (API), currently API participants were only focused on the Central Office Organ as many as 13 (thirteen) people consisting of IAD, ERMD and CMGD Divisions and 26 (twenty six)

people consisting of Heads of Regional Offices I and II as well as Heads of Branches under Regional Offices I and II would be implemented in 2021.

As for what has been done in preparation for the Integrity Building Expert (API) certification program from October to December 2020 were as follows:

1. Preparatory meetings for the implementation of the Integrity Building Expert Certification (API) with LCD and PFAD related to the preparation of participant debriefing, participant appointment, participant verification, requirement gathering and competency file collection and API certification implementation.
2. The stages of the Integrity Building Expert Certification (API) program were as follows:

No	Type of Activity	Implementation
1.	Appointment of Participants	October 19, 2020
2.	Implementation of e-learning and collection of registration files	October 20-27, 2020
3.	Technical guidance	November 4, 2020
4.	Implementation of collecting 8 (eight) competency units	October 26 till November 6, 2020
5.	Implementation of assessment	December 1-2, 2020
6.	Announcement of results	December 5, 2020

3. Based on the KPK Invitation Letter No. UND/1295/DKM.00.05/17/22/2020 dated November 17, 2020 regarding the Invitation to Participate in the Competency Test of the Integrity Builder Expert Certification Scheme, that there were 13 (thirteen) participants who meet the registration requirements and follow the Integrity Builder Expert (API) certification.
4. On 1 and 2 December 2020, an Integrity Building Expert (API) certification assessment was carried out by all participants and based on the results of the plenary meeting of the Corruption Eradication Committee and the Assessor Team on December 5, 2020, all participants were declared competent and announcements were made to each of them. each participant.

## Code of Conduct

For the Company, Code of Conducts is an indicator of the Company's commitment to warrant the application of the high standards of GCG that refers to the best practice of credible and trusted banking institutions. Credibility and Public Trust, Shareholders, and Customers are aspects that are essential for the development and continuity of the Company's business. The Company performs business activities in compliance with all applicable rules and regulations and also fulfills the expectations regarding the norms and ethics. Awareness of implementing good ethics will enhance and strengthen the Company's constructive image and recognize the Company as a Good Corporate Citizen. Therefore, the Company always upholds its integrity by preserving and applying Ethical and Behavioral guidelines that form the basis of the attitudes and actions of all the Company's personnel in order to perform their duties professionally and ethically by exercising basic principles as quantified in the Company's Vision, Mission and Values and the prevailing regulations.

## Contents of Ethical Codes

The Code of Conduct contains Ethical and Behavioral standards for the Company as a business entity and all its elements in interacting both internally and externally with stakeholders. The enforcement of the Code of Conduct aims to accomplish the creation of ideal behavior that develops into a work culture based on honorable values. The Code of Conduct is summarized in 4 chapters which are briefly described as follows:

### 01. Introduction

This Code of Conduct is the codification or a compilation of policies, employee regulations, and agreements that have been jointly established between the Company and employees who will influence, shape, and set forth the standards of behavior, both for Management and employees in performing all business activities.

The implementation of the Code of Conduct, whether Compliance or Non-Compliance forms one aspect of the employee's performance appraisal. Therefore, this Code of Conduct will always be used as a guideline in the formulation of policies, manuals/procedures and management practices in the Company. The application of the Code of Conduct that will consistently reflect the Company is the Company that upholds honorable business values and ethics in conducting business, while simultaneously upholding the principles of Good Corporate Governance.

<p><b>02. Standards of Business Ethics</b></p>	<ol style="list-style-type: none"> <li>1. Etika Bank dengan Pegawai Adanya Keadilan perlakuan terhadap pegawai, kedisiplinan pegawai, serta adanya larangan keterlibatan pegawai dalam aktivitas bisnis surat berharga Bank.</li> <li>2. Etika Bank dengan Nasabah Bank mengutamakan kepuasan dan kepercayaan nasabah dan pegawai wajib mendukung Bank dalam upaya untuk mencapai kepuasan nasabah.</li> <li>3. Etika Bank dengan penyedia barang dan jasa Pemilihan penyedia barang dan jasa harus didasari atas penilaian kemampuan, prestasi, dan berdasarkan kepatuhan serta obyektifitas di bidang standar harga, kualitas, ketersediaan, persyaratan serta pelayanan yang diberikan oleh rekanan/pemasok.</li> <li>4. Etika Bank dengan Pesaing Bank menempatkan pesaing sebagai pendorong peningkatan kinerja secara berkesinambungan.</li> <li>5. Etika Bank dengan Mitra Kerja Bank menjunjung tinggi sikap saling percaya dan menghargai, serta menjunjung tinggi kebersamaan dengan mitra kerja sesuai dengan kaidah-kaidah bisnis yang berlaku.</li> <li>6. Etika Bank dengan Pemerintah Bank berkomitmen mematuhi peraturan perundang-undangan yang berlaku.</li> <li>7. Etika Bank dengan Masyarakat Bank berkomitmen untuk memberikan kontribusi positif dalam pengembangan ekonomi yang berkelanjutan dengan memperhatikan tanggung jawab sosial dengan menitikberatkan pada keseimbangan terhadap aspek ekonomi, sosial dan lingkungan.</li> <li>8. Etika Bank dengan Media Massa Bank menjadikan media masa sebagai mitra kerja dan media dalam melakukan promosi dalam rangka membangun citra yang baik.</li> <li>9. Etika Bank dengan Organisasi Profesi Bank membina hubungan kerja sama yang baik dengan organisasi profesi dan regulasi dalam rangka sharing informasi, pengalaman dan berdiskusi tentang perkembangan bisnis, serta mencari solusi terbaik dalam menyelesaikan permasalahan yang menjadi kepentingan bersama.</li> </ol>
<p><b>03. Standards of Conduct Policy</b></p>	<ol style="list-style-type: none"> <li>1. Employees are at all times to avoid conditions, situations or the impression of any Conflict of Interest and the inappropriate use of position.</li> <li>2. Each member of the Board of Commissioners, Board of Directors, and Bank employees are prohibited from giving and/or receiving something for their own benefit, directly or indirectly, from a business partner who can influence decisions.</li> <li>3. The Company's constituents and Bank employees must comply with all State laws and regulations.</li> </ol>
<p><b>04. Application and Enforcement</b></p>	<p>Each Bank employee must report any evidence of a deviation from the Corporate Code of Conduct to the Human Capital Management &amp; Culture Specialist Division and the identity of the reporter is to be protected. The Human Capital Management &amp; Culture Specialist Division follows up on each report and submits the results of the study to the Board of Directors and/or the Board of Commissioners in accordance with the scope of their responsibilities. Finally, the Board of Directors and Board of Commissioners will make a decision regarding the various actions available of coaching, disciplinary sanctions and/or corrective and preventive actions that are required to be performed by superiors directly in their respective work environments.</p>

### Compliance With Codes of Conduct

The Code of Conduct applied to all Managers (formerly the Board of Commissioners, Directors) as well as employees in carrying out every business activity of the Company and interacting between Commissioners, Directors and Employees with all stakeholders. The statement on the application of the Code of Conduct for all levels of the organization was formally stated in the Board of Directors Regulation No. 16/PD/CMPPD/2015 dated December 31, 2015 concerning Guidelines for Business Ethics and Conduct. The Company required the signing of a statement on the attitude of the Company's personnel towards the Code of Conduct which was called the Integrity Pact for further implementation as well as possible. The successful implementation of the Code of Conduct was the responsibility of all leaders in their respective work units. For this reason, all unit leaders were required to provide understanding regarding the application of the Code of Conduct to employees in their respective work units.

### Code of Conduct Dissemination

The Code of Conduct was socialized to all Company personnel through the Digital Room for E learning Modules (DREAM) media and a quiz was held on the Code of Conduct to find out employees' understanding of the Code of Conduct. Commitment to the implementation of the Code of Conduct was also stated in the Integrity Pact which must be signed by all Directors, Board of Commissioners and Employees of the Company. In addition, the Code of Conduct could also be accessed by all of the Company's Stakeholders through the Company's website.

### Efforts To Implement And Enforce The Code Of Conduct

The Company provides strict and consistent sanctions against violations of the Code of Conduct. Enforcement of the Code of Conduct through the Board of Commissioners and Board of Directors along with its sanctions is based on

the Company's Articles of Association and the decisions of the GMS. Throughout 2020, the efforts made by the Company in implementing and enforcing the Code of Conduct included the following:

1. Completing and signing of Integrity Pact by all employees in accordance with Code of Conduct values.
2. Doing socialization of Code of Conduct and Gratification Control through the Digital Room for e-learning Modules (DREAM).
3. Cooperating with the Corruption Eradication Commission (KPK) in disseminating the gratification control program and the Code of Conduct.
4. Managing reports of receipt of gratuities from all work units and report to the KPK according to the provisions.
5. Implementing the Anti-Bribery Management System as a form of implementation of Business Ethics and Behavior as stated in the Code of Conduct.
6. Implementing the Whistleblowing System (WBS) program.
7. Giving punishment for employees who violated business ethics.

### Category of Sanctions Regarding Code Of Conduct Violations

The Company has set forth the various types of sanctions in relation to each violation of the Code of Conduct in the following two nature of sanctions:

1. Administrative sanctions
  - a. Light, i.e.: Verbal reprimands; written warning, and dissatisfaction statement. The employee guidance sanction period is 3 (three) months.
  - b. Medium, i.e.: No leave benefits; no periodic salary promotion and Employee Grade diminution by 1 (one) grade (salary downgrade). Employee guidance sanction period is 1 (one) year.
  - c. Heavy, i.e.: Employee Grade diminution by at least 2 (two) grades (basic salary adjustment); Employment termination and legal proceeding.

The validity period of sanctions as guidance for employees is for 2 (two) years
2. Financial Sanctions
 

Financial sanctions are to recuperate all Financial Losses that have arisen as a result of the disciplinary violations committed.

### Total of Violations and Sanctions Given

In 2020, the number of Code of Conduct violations was 216 (two hundred and sixteen) violations. The sanctions imposed in relation to these violations include minor sanctions as many as 79 (seventy nine) people, moderate sanctions as many as 102 (one hundred and two) people, serious sanctions as many as 35 (thirty five) people.

The quality trend in the Code of Conducts implementation is presented through the increasing number of the Code of Conduct violations as shown in the table and chart below.

### Trend of Implementation Quality of Code of Conduct

Sanction Category	2020	2019	2018
Light	79	46	77
Medium	102	154	37
Heavy	35	44	27
<b>Total</b>	<b>216</b>	<b>240</b>	<b>141</b>

## Gratuity Policy

For the Company, Gratuity Control is an important aspect to preserving business activities in line with Business Ethics, which highlights the significance of Integrity. The Company enforces Gratification Control policies aimed at developing the principles of GCG values and instilling the importance of Integrity with all employees, so that business activities are constantly founded on Ethics and Responsibility. Gratification Control is likewise compulsory so that the business interests are well maintained ethically and do not conflict with the provisions regarding the prohibition of Gratification.

The Company emphasizes the point that its personnel do not give or accept any gift or reward from Customers, Debtors, Vendors, Partners, and other Third-Parties regarding the service provided by the Employees in performing their duties, especially gifts or rewards that may create a Conflict of Interest. This is usually experiences its peak in the days leading up to Religious Holidays (Eid Mubarak, Christmas/ New Year). The Company always makes an announcement in a widely distributed national newspaper, stating that the Board of Commissioners, the Board of Directors, and the Employees of Company are fully committed to declining the receipt of and/or requesting any gifts or presents in any form either from or to our customers, debtors, partners/ vendors, and other related thirdparties.

The Company also persuade all customers, debtors, partners/vendors/work partners and other parties who have or intend to conduct business relations with the Company to support this commitment by not giving gifts or gifts of any kind, whether directly or indirectly directly. The Company also notifies the company through written letters to each customer, debtor, vendor, partner, business partner and other third parties who conduct business relations with the Company.

## Management of Gratuity Control

### Gratuity Control Policy

Bank BTN's sincerity in supporting the eradication of corruption proved on June 25, 2014, in collaboration with the KPK to sign a commitment to implement the Gratuity Control Program within Bank BTN. Based on this commitment, in 2015 Bank BTN had internal guidelines and the Gratuity Control Unit (UPG) which played an active role in disseminating awareness and understanding of Gratuity and Anti-Corruption Control.

To support the implementation of the Gratuity Control program, the Company established policies that guide the implementation of the Company's gratification control through the Board of Directors Circular Letter No. 68/DIR/ CMPD/2017 regarding Gratification Control Guidelines as an initiative in supporting Gratification Control. The circular regulates the following matters:

1. General Provisions on Gratuity.
2. Basic Principles of Controlling Gratuity.
3. Gratuity Category.
4. Gratuity Control Manager.
5. Gratuity Reporting Mechanism.
6. Gratuity Control Implementation.

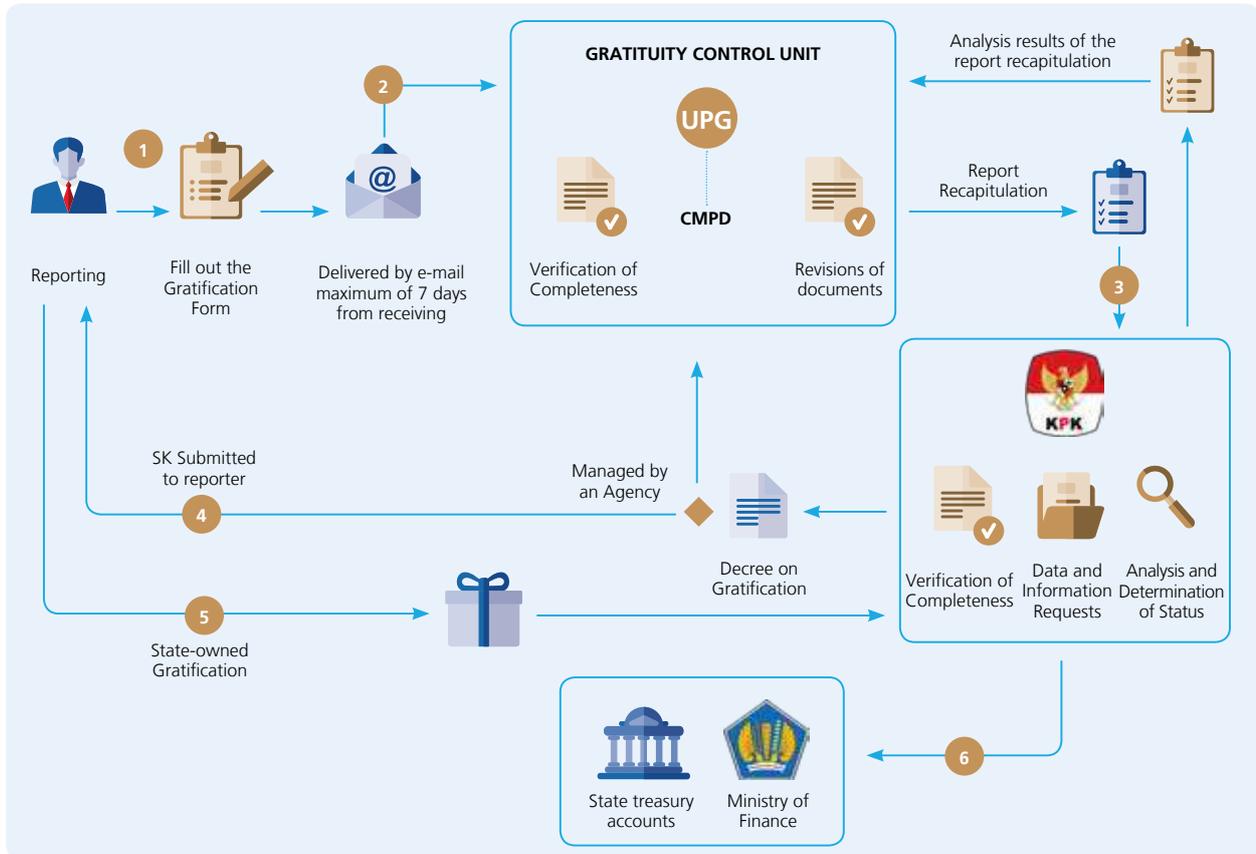
Coinciding with the commemoration of the 2018 World Anti-Corruption Day (Hakordia) held by the KPK, Bank BTN received an award as a State-Owned Enterprise/ Regional-Owned Enterprise with the Best Gratuity Control System in 2018. As for the assessment criteria, among other things the completeness of the Gratuity Control System including commitments, rules and Units Gratuity Control (UPG); Innovation of internal and external dissemination as well as reporting processes and management quality; the quantity and quality of gratuity reports.

Since 2019, Bank BTN had collaborated with the Corruption Eradication Commission (KPK) in the Professional Integrity movement (PROFIT) through the following activities:

- a. Participation in training as an Integrity Builder (API) to oversee corruption prevention efforts.  
Until now there are 21 (twenty-one) participants who have taken the API certification exam and have been declared competent by the KPK.
- b. Participation in campaign collaboration programs with the KPK on Anti-Corruption through various communication media channels  
The Bank has screened KPK films through several videotrons of the Bank located in Menara BTN Bank BTN Head Office, Bank BTN Solo Branch Office, SCBD Jakarta, Soekarno International Airport-Hatta, Kualanamu International Airport and Bandung West Java Polrestabes
- c. Self Assessment of Corruption Prevention Guidelines Checklist for Adequate Corporations (CEK).  
The Bank has completed and submitted a Corruption Prevention Guide (CEK) to the Corruption Eradication Commission (KPK).

**Gratuity Reporting Mechanism**

The Company has in place a Gratuity Reporting Mechanism as detailed in the following flowchart:



Description of the Gratuity Reporting Mechanism:

- Employees report the receipt of Gratuity to the Corruption Eradication Commission (KPK) through the UPG (d. CMPD) by filling out forms prior to 7 working days from the date the Gratuity was received, Gratuity received by the Reporting Entity are to be kept by the Reporting Party until a Decree from the KPK regarding the ownership status of the intended Gratuity.
- Submission of the form is sent via UPG e-mail address: upq.btn@btn.co. id  
The form used in this Circular Letter is adjusted to the type of gratuity received, with the following explanation:
  - Use form 1, if gratuity are in the form of cash and include bribery Gratuity;
  - Use form 2, if gratuity are obtained from official activities with values above the limits of gratuity as stipulated in item 6.1 of this Circular Letter;
  - Use form 3, if the gratuity is in the form of food/ drinks/parcels in order to welcome the holiday season. But if the gratuity obtained in the framework of the holiday season are provided in the form of money/ vouchers/goods then continue to use the form 1.

Other aspects that must also be considered in completing the data on the form is the inclusion of Work Units, positions, detailed descriptions regarding the chronology/events of the Gratuity referred to as well as any contact telephone numbers and e-mail addresses provided the process of clarifying reports by the UPG and KPK.

- The UPG continues the Gratuity report to the KPK within 14 working days after the Gratuity report was received by the UPG. Then the KPK handles the Gratuity report which includes (1) verification of the comprehensiveness of the Gratuity report; (2) request for additional data and information from the related parties; (3) analysis of the receipt of Gratuity; and (4) the determination of the ownership status of the Gratuity. The process implemented through the Corruption Eradication Commission to determine the status regarding the receipt of Gratuity reports are within 30 working days after the Gratuity report was received by the KPK in full.
- The KPK issues a Decree regarding the status of the receipt of the Gratuity to the recipient/reporter of the Gratuity and copies it to the UPG no later than 7 working days from the date the decree is stipulated.

In the event that the ownership status of the Gratitude is determined to be managed by the agency, the Gratitude is submitted by the Bank to the UPG for management.

5. In the event that the Corruption Eradication Commission determines the Gratitude as state property, the Reporting/Recipient renders the Gratitude received to the Corruption Eradication Commission no later than 7 working days from the date the decree was issued. Proof of the rendering to the KPK is to be submitted to UPG
6. In the case of Gratitude in the form of cash, then the KPK will deposit the cash that has been rendered by the reporter to the account of the State Treasury and then submits the evidence of its deposit to the Reporting Party. Whereas if the Gratification rendered is in the form of goods, the KPK will submit it to the Directorate General of State Assets and submit the evidence of submission to the Reporting Party.

### Gratitude Control Policy Implementation

#### Integrity Pact

The Company had an Integrity Pact signing program that was in line with Bank BTN's commitment to the implementation of ISO 37001: 2016 certification on Anti-Bribery Management System (SMAP). The Integrity Pact was a statement by all levels of the Company to be committed to upholding morale and integrity, protecting and maintaining the Company's image, credibility and interests by not asking for or accepting bribes or gratuities from parties with conflicts of interest. The Integrity Pact was always implemented as well as possible to support the ABMS program and control gratuities.

#### Gratitude Control Program

1. Socialization of anti-gratuity through the screening of the Corruption Eradication Commission (KPK) video about anti-gratuity at several BTN Videotrons such as BTN Tower, Soekarno Hatta Airport and Bandung Police, as well as viewing anti-gratuity videos on TV/ LED in Banking Hall all BTN Outlets.
2. Internalization to all employees regarding anti-bribery and gratuity control through the Digital Room for E Learning Modules (DREAM) media.
3. Socialization of gratuities to all employees through the screening of the Corruption Eradication Commission (KPK) video on the understanding of gratuities and rejection of illegal gratuities on videotron elevators for the BTN Tower office and the BGATE application.
4. In commemoration of World Anti-Corruption Day 2020 (Hakordia 2020) which falls on December 9, 2020 with the delivery of a message on the theme Hakordia 2020 as in the KPK Circular Letter No. 30 of

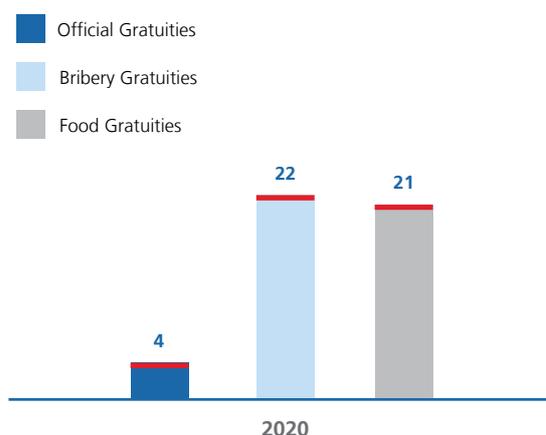
2020, namely: "Building Awareness of All Elements of the Nation in Anti-Corruption Culture", BTN carries out the following activities:

- a. Showing a video on the Hakordia theme as well as anti-gratification videos by the KPK through several BTN Videotrons/LEDs located at BTN Tower, Soekarno Hatta Airport, Jl. Pemuda Surabaya, Jl. Transyogi Cibubur.
  - b. Delivering the Hakordia 2020 theme message through social media BTN (Instagram).
  - c. Broadcast anti-gratuity video of KPK through Videotron lift at Head Office and Videotron Banking Hall at Branch Offices.
  - d. Delivering the Hakordia 2020 theme message via email Blast and SMS Blast to all BTN employees.
5. Circulating appeals to all work units at the Head Office and Branch Offices and posting notifications on Newspapers in the context of controlling gratuities in connection with Holidays and New Years to be obliged to refuse/not accept/request/give gratuities from/to anyone (partners/debtors/notary/work partner) in the form of money, gifts, parcels or other facilities related to his/her position and contradicts his obligations/duties and is prohibited by applicable regulations, contradicts the code of conduct of the Bank, creates a conflict of interest or constitutes an acceptance that inappropriate/inappropriate.

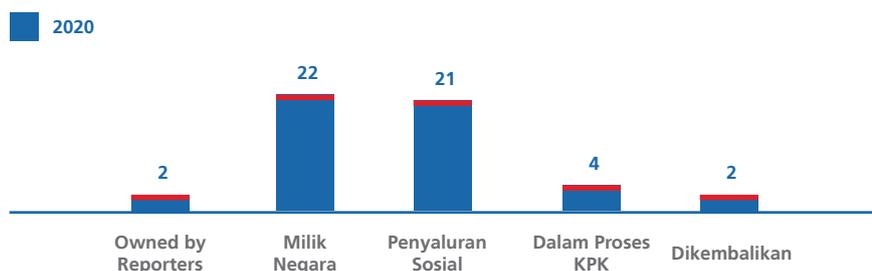
### 2020 Gratitude Report

During the period of 2020, the total number of gratification reports that came from the head office and branch offices was 47 reports, consisting of reports of gratuities on bribes, official services and gratuities in the form of food before religious holidays.

#### Gratitude Report Base on Type of Gratitude



### Gratuity Report Base on Ownership Status



### Whistleblowing System

The Company's Whistleblowing System (WBS) policy is guided by Bank Indonesia Regulation No. 5/8/PBI/2003 amended by PBI Number 11/23/PBI/2009 and the Bank Indonesia Circular Letter No. 13/28/DPNP concerning the Anti-Fraud Policy. The Company's WBS forms an integral part of the Internal Control System in preventing the occurrence of irregularities with the aim of both detecting and preventing the occurrence of irregularities or violations and to gradually create an open, sincere, honest and responsible work climate in the Company.

### Submission And Media of Violation Reports

The mechanism for submitting a violation report through the WBS was carried out by making a complaint/disclosure report and sending it based on an indication that the violation was committed by whom, including:

1. If the related party was a BTN employee up to 2 (two) levels below the Board of Directors and not a BTN WBS Team, then WBS Manager by an independent party would submit a report to the BTN WBS Team.
2. If the related party was a member of the BTN WBS Team and or BTN employees 1 (one) level below the Board of Directors, WBS Manager by an independent party would submit a report to the President Director.
3. If the related party was the Board of Directors, then WBS Manager by an independent party would submit a report to the Board of Commissioners.
4. If the related party was a Commissioner and/or Committee under the Board of Commissioners, WBS Manager by an independent party would submit a report to an unrelated member of the Commissioner who was also not a member of the Committee concerned.
5. If the related party was the Commissioner together, WBS Manager by an independent party would submit a report to the Series A Dwiwarna Shareholder.

The Company also built supporting infrastructure in implementing WBS policies wherein the reporter could submit their reports through the following media:

1. PO Box 2828 JKP 10028
2. Website : <https://btinsiips.tipoffs.info>
3. Email : [btinsiips@tipoffs.info](mailto:btinsiips@tipoffs.info)
4. SMS : +62 813 8870 1117
5. Whatsapp : +62 813 8870 1117
6. Telepon : +62 21-50928882
7. Faximili : +62 21-50928883

### Whistleblower Protection

The Company guarantees the protection of the WhistleBlower who shows a good intention of reporting any violations that may risk causing a loss for the Company. The protections included are the following:

1. Reporting communication channel (verbally, telephone, email) that is free and confidential or an independent and confidential Ombudsman. The Informant will receive followup information from the communication channel regarding the report submitted concerning the alleged violations.
2. Guaranteeing the Informant's anonymity, unless there is a legal requirement that requires the identity to be disclosed in the presence of the judge.
3. Protection from retaliation from the Informant or the Organization being reported. This protection may include the following measures:
  - a. Physical protection either against himself/herself or his/her family.
  - b. Protection of his/her property and his/her family against terror or retaliation.
  - c. Administrative protection in the form of promotion delays, dismissal, exclusion in the workplace, infeasible transfers, including job security, etc.
  - d. Legal protection, in the litigation process in the District Court, including the cost, and if necessary, including protection through the Witness and Victim Protection Agency (LPSK).