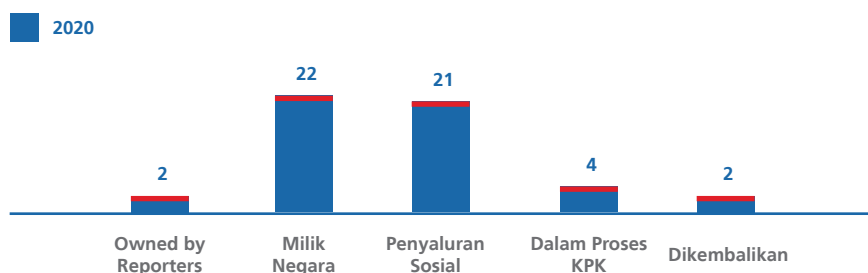


### Gratuity Report Base on Ownership Status



### 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

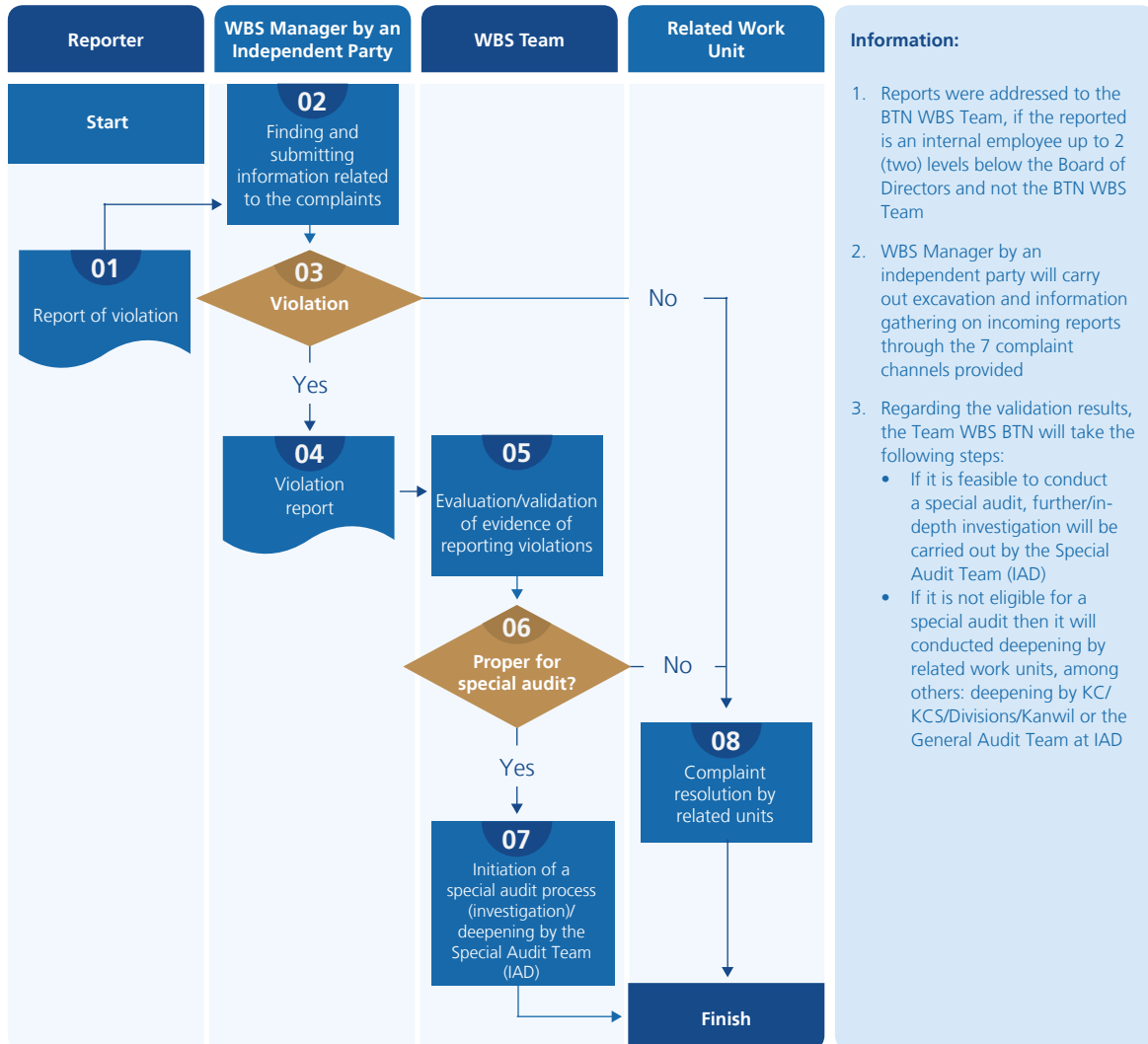
The Company guarantees the protection of the WhistleBlower who shows a good intention of reporting any violations that may risk causing a loss for the Company. The protections included are the following:

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).

### Handling Complaints

Every incoming report, is followed up by the WBS Team with the following procedure:

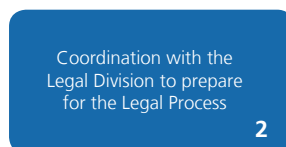
#### Flowchart (1) If the Reported Party was a BTN Employee (2 Levels below the Board of Directors) and not the WBS Team



#### Anti Fraud Committee



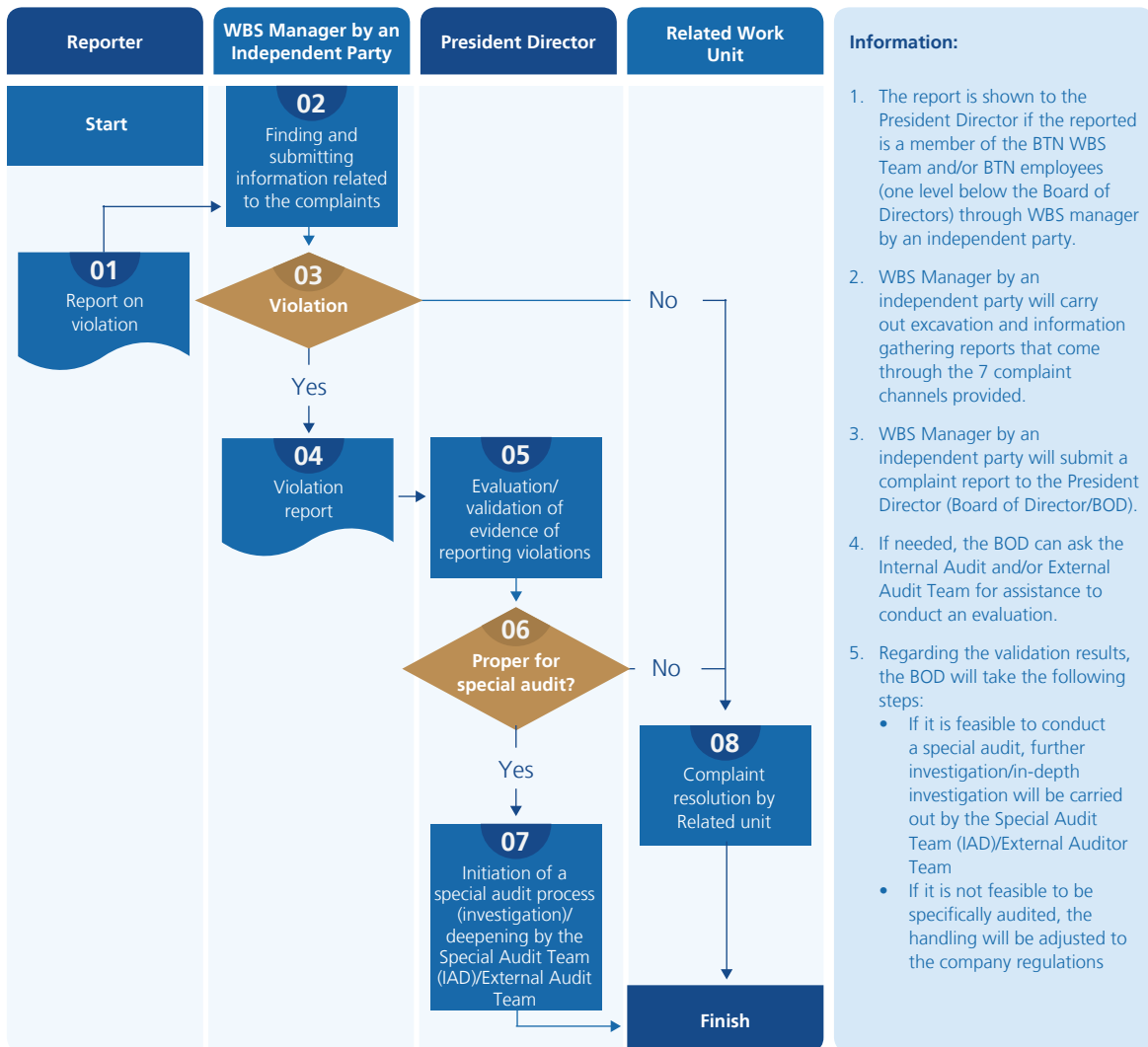
#### Human Capital Management & Culture Specialist Division



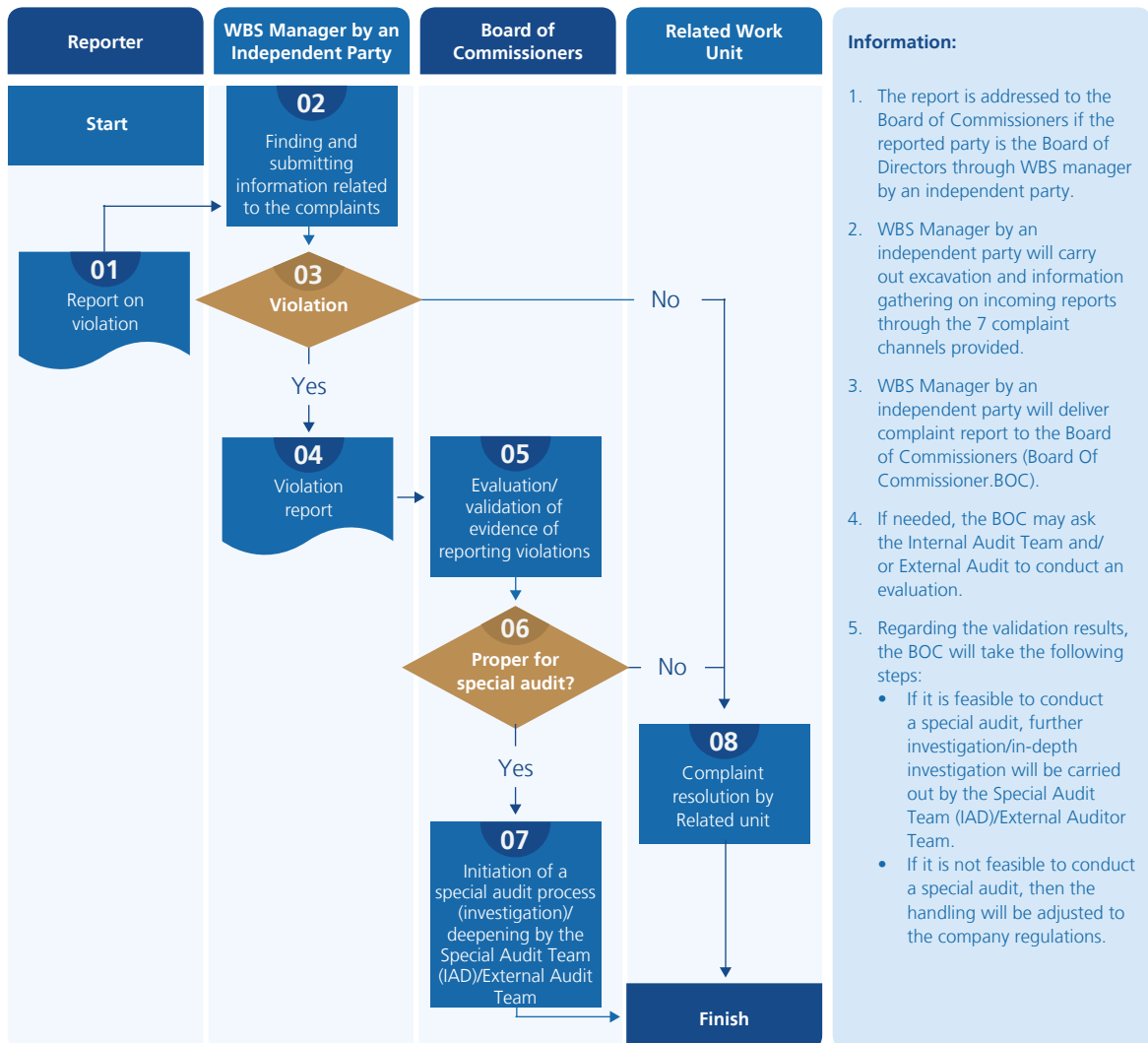
#### Legal Division



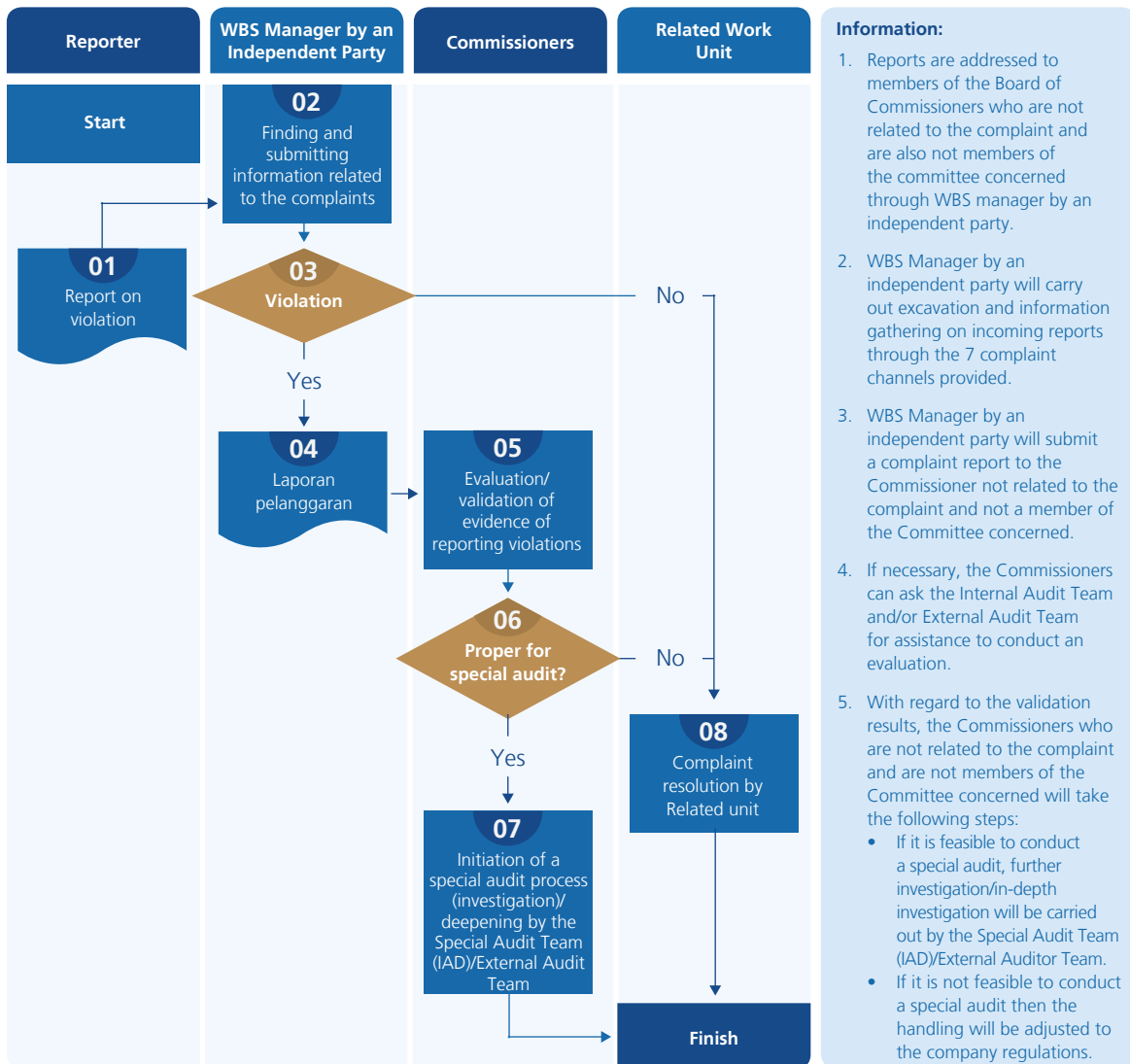
**Flowchart (2) If the Reported Party was a WBS Team and/or BTN Employees (1 Level below the Board of Directors):**



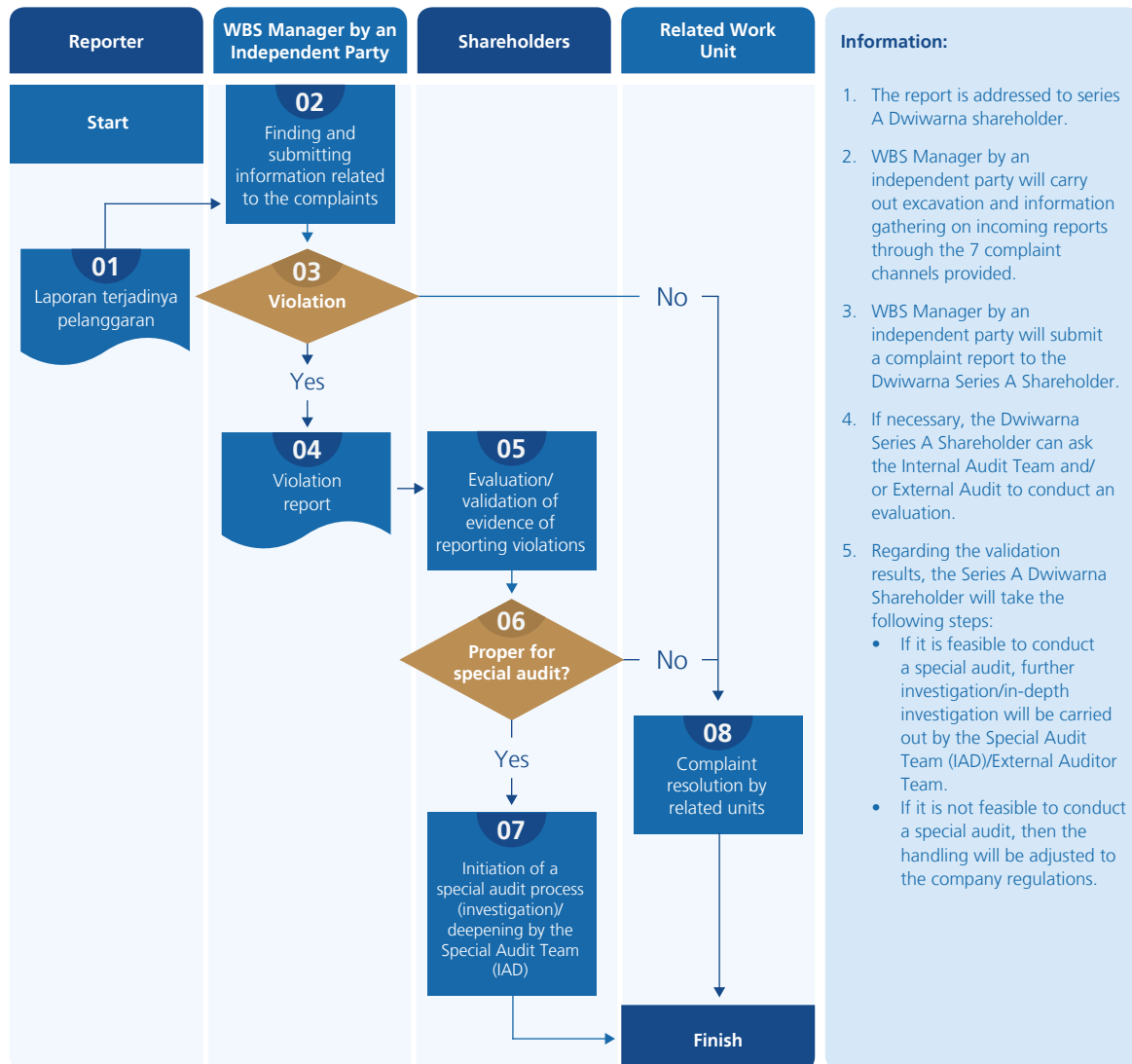
**Flowchart (3) If the Reported Party was the Board of Directors**



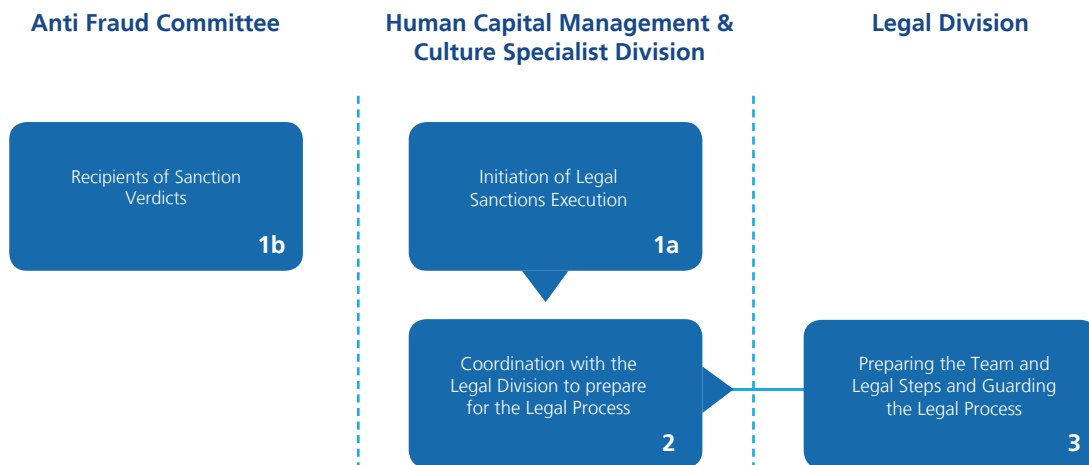
**Flowchart (4) If the Reported Party was a Commissioner and/or Committee under the Board of Commissioners**



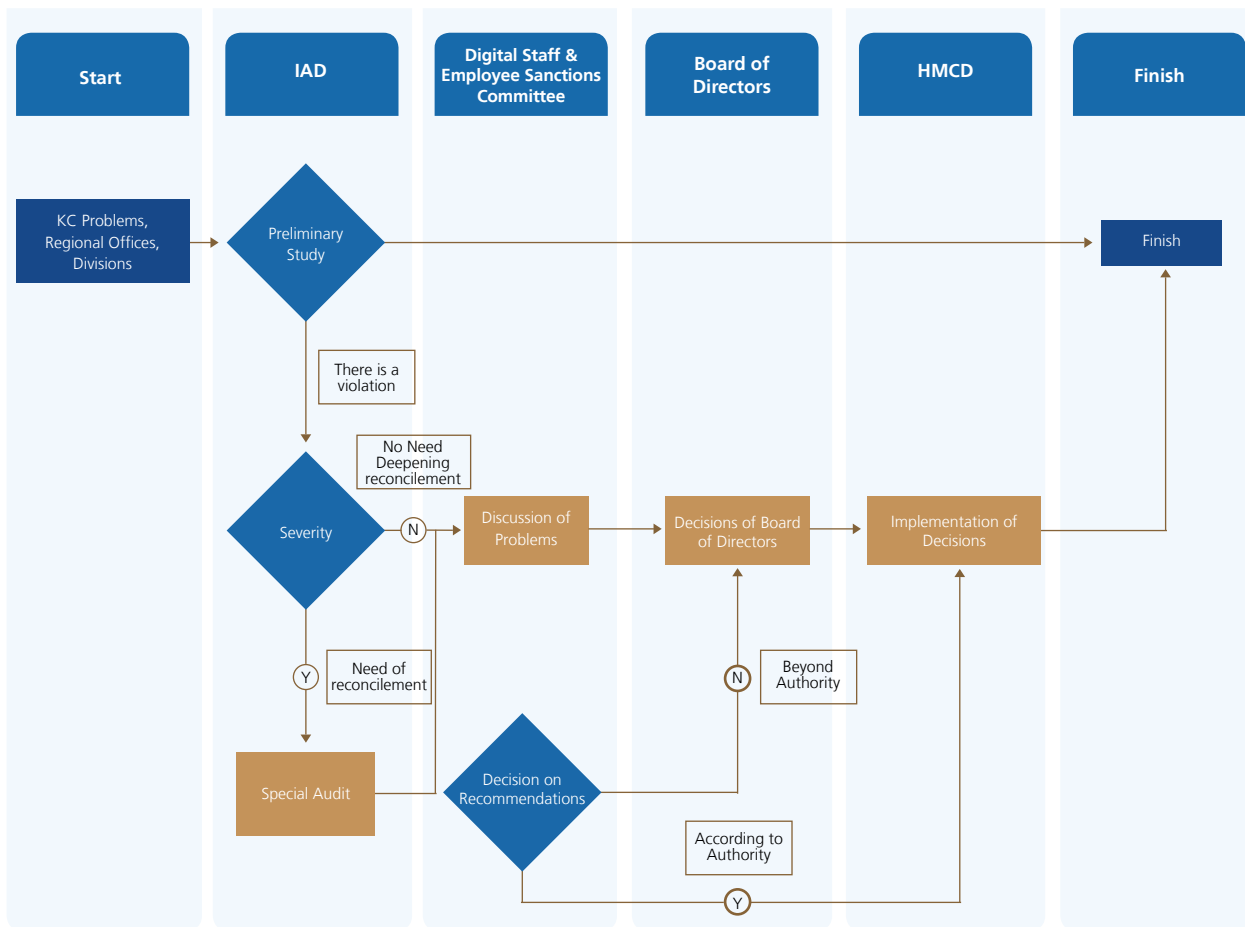
**Flowchart (5) If the Reported Party was a Commissioner together**



**Sanction Process Flowchart - Legal Pathways**



**Flowchart of the Sanction Process at the Bank**



**Types of Violations That May be Reported**

Violations or deviations are any form of action that significantly interferes with the business continuity or threatens the safety of the Company. Several examples of violations and/or irregular practices that may be reported based on the WBS policy include the following:

1. Fraud.
2. Theft/Taking/Embezzlement/Fraud.
3. Conflict of Interest.
4. Bribery/Gratuities.
5. Abuse of Authority.
6. Code of Conduct Violation/Unethical Behavior.
7. Information Leaks.
8. Violation of Applicable Provisions/Laws.

**Violation Report Management**

The Company formed a WBS Team which managed all WBS report complaints which consisted of:

1. Head of Internal Audit Division.
2. Deputy Head of Internal Audit Division.
3. WBS Unit in the Fraud Investigation & Whistleblowing System (IWBS) Department in the Internal Audit Division.

**Whistleblowing System Socialization**

The Company internalized the WBS by distributing guidelines for the Implementation of the Whistleblowing System (WBS) Policy which was stipulated based on a Directors Circular Letter as well as direct sharing session presentations to all leaders and employees of the Company. In addition, in order to reach all of the Company's stakeholders, the Whistle Blowing System socialization was also carried out through the Company's website and various media, such as internal newsletters, posters, standing banners, customer gatherings, live presentations of ethical guidelines and WBS policies.

**Total Complaints and Complaints Processes**

There were 115 complaints received during the 2020 period consisting of 8 (eight) complaints via Mail/PO BOX, 53 (fifty-three) complaints via SMS/Mobile/Direct Coming/Whatsapp and 54 (fifty four) complaints via Email/Website. Based on the number of complaints received 101 (one hundred and one) complaints have been resolved without further audit process (clarification audit and/or special audit) and 14 (fourteen) complaints are forwarded to the audit process (clarification audit and/or special audit). In detail, the number of complaints forwarded to the audit process in the last 5 (five) years are as follows:

Year	Media Channel			Follow-up			
	Letter/ PO BOX	SMS/HP/ Direct Reporting/ WA	Email/ Website	Closed Reports (not proven)	On Going Reports (Audit process/ Reporting process/ Interdivision process)	Report that were issued with sanctions (including administrative sanction)	Reports forwarded to investigators (Related to Public Crimes or Corruption)
2015	7	3	9	7	0	12	1
2016	5	2	1	0	0	8	0
2017	1	0	4	0	0	5	1
2018	1	0	5	0	0	6	0
2019	5	2	3	0	1	9	0
<b>2020</b>	<b>3</b>	<b>2</b>	<b>9</b>	<b>0</b>	<b>12</b>	<b>2</b>	<b>0</b>

### Sanctions/Follow Up on Complaints in 2020

There were 2 (two) reports that had been processed during 2020 and had been sanctioned following the provisions of sanctions and employee discipline.

### Diversity Policy of the Board of Commissioners and Directors

The policy on the diversity of the composition of the Board of Commissioners and the Board of Directors of the Company is regulated in the Articles of Association and Board Manual which stipulates that the Board of Commissioners and the Board of Directors are a mix of professionals who have the knowledge and experience the Company needs to enable an effective, efficient and immediate decision-making process. In determining the members of the Board of Commissioners and Directors of Bank BTN, they always strive to ensure that the composition of the Board of Commissioners and Directors is diverse. The diversity of composition adapts to the needs, level of complexity and the Company's strategic plans so that it is hoped that the development and resolution of a problem can be considered from various perspectives of education, competence and experience.

### Composition Diversity of the Board of Commissioners

The diversity policy for the Board of Commissioners and the Board of Directors has not specifically regulated gender diversity. This is because the Company places more emphasis on professionalism regardless of gender.

The diversity of the composition of the Board of Commissioners based on age, gender, education, work experience and expertise can be seen in the table below.

**Table of Diversity in the Composition of the Board of Commissioners**

Name	Position	Age	Gender	Education	Working experiences	Expertise
Chandra M. Hamzah	President Commissioner / Independent	53 years old	Male	Bachelor of Law	Have work experience in law	Law
Armand Bachtiar Arief	Independent Commissioner	68 years old	Male	<ul style="list-style-type: none"> <li>Bachelor of Business Administration</li> <li>Master of Business Administration</li> </ul>	Have work experience in banking	Business Administration
Ahdi Jumhari Luddin	Independent Commissioner	66 years old	Male	<ul style="list-style-type: none"> <li>Bachelor of Economics majoring in Accounting</li> <li>Master of Science in Policy Economics</li> </ul>	Have work experience in banking	Accounting, Economics



Name	Position	Age	Gender	Education	Working experiences	Expertise
Eko D. Heripoerwanto	Commissioner	59 years old	Male	<ul style="list-style-type: none"> <li>Bachelor of Engineering Planology,</li> <li>Master in City Planning,</li> <li>Doctorate in Natural Resources and Environmental Management</li> </ul>	Have work experience in the government sector	Engineering, Urban Planning
Heru Budi Hartono	Commissioner	55 years old	Male	<ul style="list-style-type: none"> <li>Bachelor of Economics majoring in Management</li> <li>Master of Management</li> </ul>	Have work experience in the government sector	Financial management
Andin Hadiyanto	Commissioner	56 years old	Male	<ul style="list-style-type: none"> <li>Bachelor of Economics majoring in Development</li> <li>Master of Art</li> <li>Doctor (S3) of Philosophy</li> </ul>	Have work experience in the government sector	Economy

### Diversity Composition of the Board of Directors

The diversity of the composition of the Board of Directors based on age, gender, education, work experience and expertise can be seen in the table below.

**Table of Diversity Composition of the Board of Directors**

Name	Position	Age	Gender	Education	Working experience	Expertise
Pahala Nugraha Mansury*	President Director	50 years old	Male	<ul style="list-style-type: none"> <li>Bachelor Degree in the Faculty of Economics</li> <li>Master MBA Finance</li> </ul>	Have work experience in mining and aviation	Economics, Finance
Nixon L. P. Napitupulu**	Plt. President Director Director of Finance, Planning, and Treasury	51 years old	Male	Bachelor of Economics	Have work experience in banking	Economics
Hirwandi Gafar	Director of Consumer and Commercial Lending	52 years old	Male	Civil engineer	Have work experience in banking	Civil Engineering
Yossi Istanto	Director of Human Capital, Legal, and Compliance	47 years old	Male	<ul style="list-style-type: none"> <li>Bachelor of Law</li> <li>Master of Law</li> </ul>	Have work experience in banking	Law
Elisabeth Novie Riswanti	Director of Remedial and Wholesale Risk	53 years old	Female	Bachelor of Law in Civil	Have work experience in banking	Law
Andi Nirwoto	Director of Operation, IT, and Digital Banking	51 years old	Male	<ul style="list-style-type: none"> <li>Bachelor of Engineering</li> <li>Master of Finance</li> </ul>	Have work experience in banking	Teknik, Keuangan
Jasmin	Director of Distribution and Retail Funding	55 years old	Male	<ul style="list-style-type: none"> <li>Bachelor of Economics/Accounting</li> <li>International Business degree</li> </ul>	Have work experience in banking	Accounting, Business
Setiyo Wibowo	Director of Enterprise Risk Management, Big Data, and Analytics	44 years old	Male	<ul style="list-style-type: none"> <li>Bachelor of Electrical Engineering</li> <li>MBA degree in Finance &amp; Banking</li> </ul>	Have work experience in banking	Engineering, Finance

\* Stop serving as President Director since December 23, 2020.

\*\* Starting to serve as Plt. President Director since December 23, 2020.