

| <b>CODE OF CONDUCT</b><br><b>PT Bank Mandiri (Persero) Tbk.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>CODE OF CONDUCT</b><br><b>PT Bank Mandiri (Persero) Tbk.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| <p><i>Code of Conduct</i> merupakan pedoman perilaku Jajaran Bank dalam menjalankan tugas dan kedinasan sehari-hari serta dalam melakukan hubungan bisnis dengan para nasabah, rekanan maupun rekan sekerja.</p> <p><i>Code of Conduct</i> merupakan pedoman perilaku terkait Benturan Kepentingan, Kerahasiaan, Penyalahgunaan Jabatan, Perilaku <i>Insiders</i>, Integritas dan Akurasi Data Bank serta Integritas Sistem Perbankan.</p> <p><b>1. Benturan Kepentingan (<i>Conflict of Interests</i>)</b></p> <p>Benturan kepentingan adalah suatu kondisi dimana Jajaran Bank dalam menjalankan tugas dan kewajibannya mempunyai kepentingan di luar kepentingan dinas, baik yang menyangkut kepentingan pribadi, keluarga maupun kepentingan pihak-pihak lain sehingga Jajaran Bank tersebut dimungkinkan kehilangan obyektivitas dalam mengambil keputusan dan kebijakan sesuai kewenangan yang telah diberikan Bank kepadanya. Oleh karenanya :</p> <ol style="list-style-type: none"> <li>Seluruh Jajaran Bank wajib menghindari kegiatan yang dapat menimbulkan benturan kepentingan. Apabila satu dan lain hal tidak dapat dihindari, maka yang bersangkutan wajib melaporkannya kepada atasan langsung.</li> <li>Seluruh Jajaran Bank dilarang memberikan persetujuan dan atau meminta persetujuan atas fasilitas kredit, serta tingkat bunga khusus maupun kekhususan lainnya untuk: <ol style="list-style-type: none"> <li>Dirinya sendiri</li> <li>Keluarganya</li> <li>Perusahaan dimana ia dan atau keluarganya mempunyai Kepentingan.</li> </ol> </li> </ol> | <p>A Code of Conduct is a behavioral guide for the Bank's Staffs in carrying out their day-to-day duties and official services and in establishing business relationship with customers, partners and fellow workers.</p> <p>The Code of Conduct is a behavioral guide to deal with Conflict of Interest, Confidentiality, Misuse of Power, Insiders' Behavior, Integrity and Accuracy of Bank Data and Banking System Integrity.</p> <p><b>1. Conflict of Interest</b></p> <p>A Conflict of Interest is a condition in which a Bank's Staff in carrying out his/her duties and obligations has an interest outside the company's interest, be it involves their personal interest, family's or other parties' interest so the relevant Bank's Staff may miss out on the objectivity in making decision and policy according to the power the Bank has vested in him/her. Therefore:</p> <ol style="list-style-type: none"> <li>All Bank's Staffs shall be obliged to refrain from engaging in activity that may lead to a conflict of interest. If a matter is unavoidable, then the relevant Bank's Staff shall be obliged to report the matter to his/her immediate boss.</li> <li>All Bank's Staffs shall be prohibited from approving and or asking approval for a credit facility, and a special interest rate or such other specialty for: <ol style="list-style-type: none"> <li>Him/herself</li> <li>His/her family</li> <li>A company at which he/she or his/her family has an interest.</li> </ol> </li> </ol> |



| CODE OF CONDUCT<br>PT Bank Mandiri (Persero) Tbk.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | CODE OF CONDUCT<br>PT Bank Mandiri (Persero) Tbk.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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| <p>c. Seluruh Jajaran Bank dilarang bekerja pada perusahaan lain baik sebagai direksi, karyawan, konsultan atau anggota komisaris, kecuali apabila telah mendapatkan penugasan atau ijin tertulis dari Bank. Khusus untuk anggota Dewan Komisaris dan Direksi, perangkapan jabatan mengikuti ketentuan regulator mengenai <i>Good Corporate Governance</i>.</p> <p>d. Seluruh Jajaran Bank dilarang menjadi rekanan secara langsung maupun tidak langsung, baik rekanan untuk barang atau jasa bagi Bank.</p> <p>e. Seluruh Jajaran Bank dilarang mengambil barang-barang milik Bank untuk kepentingan sendiri, keluarga ataupun kepentingan pihak luar lainnya.</p> <p>f. Seluruh Jajaran Bank hanya diperkenankan melakukan transaksi sekuritas, perdagangan valuta asing, logam mulia, transaksi derivatif dan barang lainnya untuk kepentingan sendiri apabila tidak terjadi benturan kepentingan, pelanggaran peraturan <i>insider trading</i> dari Otoritas Pasar Modal, dan peraturan lainnya.</p> | <p>c. All Bank's Staffs shall be prohibited from working for another company, be they as board of directors, employees, consultant or members of the board of commissioners, except the relevant staff is assigned or at the written approval of the Bank. Specifically for member of the Board of Commissioners and Board of Directors, the appointment to a position shall comply with the provision of regulating body on Good Corporate Governance.</p> <p>d. All Bank's Staffs shall be prohibited from becoming business partner, directly or indirectly be they deal with goods or service for the Bank.</p> <p>e. All Bank's Staffs shall be prohibited from taking the Bank's goods for their personal interest, family's or outsider's.</p> <p>f. All Bank's Staffs shall only be allowed to make a transaction of security, foreign exchange, precious metal, derivative and other goods for their own interest as long as there is no conflict of interest, violation of insider trading regulation issued by Capital Market Authority and such other regulation.</p> |
| <p><b>2. Kerahasiaan</b></p> <p>a. Seluruh Jajaran Bank wajib memahami dan menjaga kerahasiaan setiap informasi, baik informasi mengenai nasabah maupun informasi lainnya sesuai ketentuan yang berlaku.</p> <p>b. Seluruh Jajaran Bank menggunakan informasi yang diterima hanya untuk kegiatan Bank, dan tidak untuk keuntungan pribadi, keluarga dan lainnya atau kegiatan di luar Bank.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <p><b>2. Confidentiality</b></p> <p>a. All Bank's Staffs shall be obliged to understand and maintain the confidentiality of any information, be it information on customer or such other information in accordance with prevailing provision.</p> <p>b. All Bank's Staffs shall use any information they received only for Bank's activities, and not for their personal benefit, family's or activities outside the Bank.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

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| <p>c. Dalam memberikan informasi, setiap Jajaran Bank harus bertindak sesuai ketentuan yang berlaku.</p> <p>d. Untuk menghindari penyalahgunaan, penyebaran informasi nasabah di lingkungan internal Bank dilakukan secara hati-hati dan hanya kepada pihak yang berkepentingan.</p> <p>e. Seluruh Jajaran Bank dilarang menyebarluaskan informasi kepada pihak luar mengenai:</p> <ol style="list-style-type: none"> <li>1) Kegiatan Bank dengan Pemerintah Republik Indonesia</li> <li>2) Kebijakan internal serta prosedur kerja Bank</li> <li>3) Manajemen Sistem Informasi, Data dan Laporan</li> <li>4) Data karyawan, baik yang masih aktif maupun tidak</li> <li>5) Kegiatan bisnis Bank, termasuk kegiatan dengan nasabah dan rekanan.</li> </ol> <p>Kecuali atas persetujuan pejabat Bank yang berwenang atau karena perintah berdasarkan peraturan perundangan yang berlaku.</p> <p>f. Kewajiban untuk menjaga hal-hal khusus yang harus dirahasiakan, tetap berlaku bagi mantan pegawai Bank.</p> | <p>c. In releasing information, each Bank's Staff shall act in accordance with the prevailing provision.</p> <p>d. To avoid any misuse, dissemination of customers' information within the Bank shall be carried out carefully and only to those authorized.</p> <p>e. All Bank's Staffs shall be prohibited from disseminating information to outside party with respect to:</p> <ol style="list-style-type: none"> <li>1) Bank's Activities with the Government of the Republic of Indonesia.</li> <li>2) Bank's internal polity and working procedure.</li> <li>3) Information System Management, Data and Report.</li> <li>4) Data of employees, be they active or non-active.</li> <li>5) Bank business activity, including activity with customer and business partner.</li> </ol> <p>Except at the approval of authorized Bank's official or instruction under prevailing laws and regulation.</p> <p>f. The obligation to keep special matters that must be treated confidential, shall continue to apply to former Bank's employees.</p> |
| <p><b>3. Penyalahgunaan Jabatan dan Gratifikasi</b></p> <p>a. Seluruh Jajaran Bank dilarang menyalahgunakan wewenang dan mengambil keuntungan baik langsung maupun tidak langsung, dari pengetahuan yang diperoleh dari kegiatan bisnis Bank untuk :</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p><b>3. Misuse of Position and Gratification</b></p> <p>a. All Bank's Staffs shall be prohibited from misusing their power and taking advantage either directly or indirectly, from knowledge they acquired from the Bank's business activities for:</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |



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| <p>1) Keuntungan pribadi.<br/>2) Keuntungan bagi anggota keluarganya.<br/>3) Keuntungan bagi pihak-pihak lainnya.</p> <p>b. Seluruh Jajaran Bank dilarang meminta atau menerima, mengizinkan atau menyetujui untuk menerima gratifikasi yang berhubungan dengan jabatannya dan berlawanan dengan kewajibannya sesuai peraturan perundang-undangan yang berlaku.</p> <p>Termasuk pula larangan meminta atau menerima, mengizinkan atau menyetujui untuk menerima suatu hadiah atau imbalan dari pihak ketiga yang mendapatkan atau berusaha mendapatkan fasilitas dari Bank dalam bentuk fasilitas kredit (<i>cash loan</i> dan atau <i>non cash loan</i>), atau dalam rangka pembelian atau pendiskontoan surat-surat wesel, surat promes, cek dan kertas dagang atau bukti kewajiban lainnya, ataupun fasilitas lain yang berkaitan dengan kegiatan operasional Bank.</p> <p>Jenis-jenis gratifikasi dan mekanisme pelaporannya akan diatur dalam ketentuan tersendiri.</p> <p>c. Seluruh Jajaran Bank dilarang meminta atau menerima, mengizinkan atau menyetujui untuk menerima suatu hadiah atau imbalan dari pihak ketiga yang mendapatkan atau berusaha mendapatkan pekerjaan yang berkaitan dengan pengadaan barang maupun jasa dari Bank.</p> <p>d. Dalam hal nasabah, rekanan, dan pihak lain memberikan bingkisan berupa barang atau dalam bentuk lainnya pada saat-saat tertentu seperti pada Hari Raya, perayaan tertentu, musibah dan lain lain, apabila:</p> | <p>1) Personal benefit.<br/>2) Family member's benefit.<br/>3) Other parties' benefit.</p> <p>b. All Bank's Staffs shall be prohibited from asking or receiving, permitting or approving to receive gratification having to do with their position and are contradictory to their obligation according to the prevailing laws and regulation.</p> <p>This also includes asking or receiving, permitting or approving to receive a gift or reward from a third party who got or try to get facility from the Bank in the form of credit facility (cash loan and or non cash loan), or in respect of purchase or arranging discount of draught, promissory note, check and commercial paper or other obligatory voucher, or other facility having to do with the Bank's operational activity.</p> <p>Types of gratification and its reporting mechanism will be provided in a separate provision.</p> <p>c. All Bank's Staffs shall be prohibited from asking or receiving, permitting or approving to receive a gift or reward from a third party who got or try to get job having to do with goods or service of the Bank.</p> <p>d. In the event of a customer, partner and other parties give a gift in the form of goods or such other form at certain moments such as Hari Raya, certain celebration, goodwill, etc, if:</p> |



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| <p>1) Akibat penerimaan bingkisan tersebut diyakini menimbulkan dampak negatif dan mempengaruhi keputusan bank, dan</p> <p>2) Harga bingkisan tersebut di luar batas yang wajar,</p> <p>maka Jajaran Bank yang menerima bingkisan tersebut harus segera mengembalikan bingkisan tersebut dengan penjelasan secara sopan bahwa Jajaran Bank tidak diperkenankan menerima bingkisan.</p> <p>e. Dalam hal pemberian bingkisan sebagaimana disebutkan dalam butir d di atas karena satu dan lain hal sulit dikembalikan, anggota Jajaran Bank yang menerima bingkisan tersebut harus segera melaporkan kepada atasannya untuk mengambil tindak lanjut sesuai dengan peraturan yang berlaku.</p> <p>f. Dalam hal nasabah, rekanan, dan pihak-pihak lain memberikan barang promosi, maka sepanjang akibat penerimaan barang promosi tersebut diyakini tidak menimbulkan dampak negatif dan mempengaruhi keputusan Bank, Jajaran Bank dimungkinkan untuk menerima barang promosi tersebut.</p> <p>g. Dalam rangka pengadaan barang dan jasa dari pihak ketiga untuk keperluan dinas Bank, Jajaran Bank harus berusaha mendapatkan harga terbaik dengan potongan harga maksimal. Potongan harga (diskon) yang diperoleh harus dibukukan untuk keuntungan Bank.</p> <p>h. Jajaran Bank dilarang menggunakan jabatannya untuk meminjam dari nasabah atau berhutang kepada nasabah</p> | <p>1) The effect of the receipt of the gift is believed to result in a negative impact and may affect the bank's decision, and</p> <p>2) The gift's price is unreasonable,</p> <p>then the Bank's Staff who received the gift shall immediately return the gift along with some decent explanation that Bank's Staff is not permitted to receive any gift.</p> <p>e. In the event that the returning of the gift as referred to in the above item d is, due to a certain reason, difficult, the Bank's Staff who got the gift must immediately report the same to his/her boss for further action in accordance with prevailing laws and regulation.</p> <p>f. In case of customer, business partner and other parties who give a promotional goods, then as long as the effect of the receipt of the promotional goods is believed not to result in a negative impact nor does it affect the decision of the Bank, it is possible for the Bank's Staff to have the promotional goods.</p> <p>g. With respect to the procurement of goods and service from a third party for the purpose of the Bank's service, the Bank's Staff shall attempt to find the best price at maximum discount. The discount received must be recorded for the benefit of the Bank.</p> <p>h. Bank's Staff shall be prohibited from using his/her position to borrow from customer or got indebted to customer.</p> |



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| <p>i. Seluruh Jajaran Bank dilarang memanfaatkan kesempatan menggunakan fasilitas Bank untuk keuntungan sendiri di luar yang telah disediakan oleh Bank .</p> <p><b>4. Perilaku <i>Insiders</i></b></p> <p>a. Jajaran Bank yang memiliki informasi rahasia tidak diperkenankan menggunakan informasi tersebut untuk mengambil keuntungan bagi dirinya sendiri, keluarganya atau pihak ketiga lainnya, dengan:</p> <ol style="list-style-type: none"> <li>1) Mempengaruhi nasabah atau individu atau institusi dalam melakukan transaksi dengan Bank.</li> <li>2) Menyebarkan informasi tersebut kepada nasabah atau individu atau institusi.</li> </ol> <p>b. Seluruh Jajaran Bank dilarang menggunakan informasi internal untuk melakukan pembelian, atau memperdagangkan sekuritas, kecuali jika informasi tersebut telah diketahui oleh publik secara luas.</p> <p>c. Jajaran Bank dilarang menyalahgunakan posisinya dan mengambil keuntungan baik langsung maupun tidak langsung bagi dirinya sendiri, anggota keluarganya ataupun pihak-pihak lainnya dan/atau mempengaruhi proses keputusan yang berhubungan dengan dirinya</p> <p>d. Pengambilan keputusan untuk menjual atau membeli aset Bank serta jasa lainnya harus dilakukan dengan mengutamakan kepentingan Bank tanpa dipengaruhi oleh <i>Insiders</i>.</p> | <p>i. All Bank's Staffs shall be prohibited from taking the opportunity to use the Bank's facility for their own benefit outside the facility the Bank has provided for them.</p> <p><b>4. <i>Insiders' Behavior</i></b></p> <p>a. A Bank's Staff who has confidential information shall not be allowed to use the information for his/her own benefit, family's or other third parties' by:</p> <ol style="list-style-type: none"> <li>1) Influencing customer or individual or institution in making transaction with the Bank.</li> <li>2) Disseminating the information to customer or individual or institution.</li> </ol> <p>b. All Bank's Staffs shall be prohibited from using internal information to purchase or trade security, except the information has been in the public domain.</p> <p>c. All Bank's Staffs shall be prohibited from misusing their position and taking advantage either directly or indirectly for their benefit, family member's or other parties' and/or otherwise by influencing the process of a decision related to themselves.</p> <p>d. Decision making for selling or purchasing assets and other service for the Bank shall be made by prioritizing the Bank's interest without any influence of any insiders.</p> |



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| <p><b>5. Integritas dan Akurasi Data Bank</b></p> <ul style="list-style-type: none"> <li>a. Seluruh Jajaran Bank harus menyajikan data yang akurat dan dapat dipertanggungjawabkan</li> <li>b. Seluruh Jajaran Bank, tidak diperkenankan membukukan dan/atau mengubah dan/atau menghapus pembukuan, dengan maksud untuk mengaburkan transaksi.</li> <li>c. Seluruh Jajaran Bank hanya diperkenankan melakukan perubahan atau penghapusan data berdasarkan otorisasi pejabat berwenang sesuai prosedur yang telah ditetapkan Bank.</li> <li>d. Seluruh Jajaran Bank tidak diperkenankan memanipulasi dokumen.</li> </ul> <p><b>6. Integritas Sistem Perbankan</b></p> <ul style="list-style-type: none"> <li>a. Seluruh Jajaran Bank harus senantiasa mawas diri dan menghindari keterlibatan Bank dalam kegiatan kriminal di bidang keuangan dan perbankan.</li> <li>b. Jajaran Bank wajib mencurigai adanya transaksi yang tidak biasa dan wajib melakukan tindakan <i>preventif</i> dalam mendeteksi rekening-rekening yang dicurigai telah digunakan untuk kegiatan seperti <i>money laundering</i>, <i>terrorism financing</i>, korupsi dan tindak kejahatan lainnya.</li> </ul> | <p><b>5. Integrity and Accuracy of Bank Data</b></p> <ul style="list-style-type: none"> <li>a. All Bank's Staffs shall present accurate and accountable data.</li> <li>b. All Bank's Staffs shall not be allowed to record and/or change and/or write off records, with a view to make a transaction obscure.</li> <li>c. All Bank's Staffs shall only be allowed to make a change or removal of data under authority of authorized official, in accordance with the Bank's established procedure.</li> <li>d. All Bank's Staffs shall not be allowed to manipulate any document.</li> </ul> <p><b>6. Banking System Integrity</b></p> <ul style="list-style-type: none"> <li>a. All Bank's Staffs must, at all times, have a self-introspection and prevent the Bank from being implicated in a criminal act in the area of finance and bank.</li> <li>b. All Bank's Staffs shall be obliged to have suspicion of an improper transaction and be obliged to take preventive action in detecting any suspicious accounts that have been used for such activities as money laundering, terrorism financing, corruption and other acts of crime.</li> </ul> |