Whistleblowing System

In implementing GCG, BRI is transparent and fair in receiving and managing violation reports through the Whistleblowing System.

Whistleblowing System (WBS) is a reporting tool for BRI personnel in particular and the public to report any behaviour or actions that are indicated to violate the code of ethics, GCG principles and applicable regulations both internal to BRI and applicable legislation carried out by BRI personnel.

**WBS Policy**

The BRI Whistleblowing System policy has been regulated in BOD BRI Circular Letter No. S.08-Dir / KPT / 05/2018 which regulates the system, mechanism and procedures for handling reports of indication of violations that are managed confidentially and independently.

**Report Filing**

Any indication of violation can be filed as a report through the following:

a. SMS: 0811-8200-600
b. Written Letter: PO BOX
c. Email: whistleblower@corp.bri.co.id
d. Website: www.bri.co.id/whistleblowing-system

**WBS Socialization**

BRI WBS socialization has been implemented to Internal Parties (BRI Employees) and External Parties, such as:

1. WBS policy information to all employees through BRI internal portal.
2. Poster campaign on WBS information at the Branch Offices, Sub Branch Offices and BRI Units.
3. Disseminate WBS materials the in-class training of Employee Development Program pengembangan.
4. Implement WBS e-learning to all BRI employees.
5. WBS information through the Bank's website.
6. Onsite WBS dissemination to Work Units.
7. Install Pop Up on the Bristars application dashboard (BRI internal portal).

**Whistleblowers Protection**

BRI provides protection to whistleblower for confidentiality of personal data and information reported. Provision of protection is also given to internal reporters from pressure, postponement of promotions, discrimination, dismissal, and physical actions.

**Handling and WBS Reporting Mechanisms**

**WBS Handling**

1. The reporter submits a report on indication of violation through a WBS facility.
2. Report is received by the WBS Management Unit.

3. The WBS officer will verify and analyse the initial indication of violation information at the latest 20 working days then submit it to the WBS Management Unit Leader.
4. Check and confirm report of indication of violation according to WBS report criteria. Then decide the follow-up to the WBS report to the Investigation Work Unit. If the report does not match the criteria, the report on the indication of violation will not be followed up.
5. The Investigation Work Unit investigates information on violation indications. Then submit the report of the investigation results and recommendations to the WBS Management Unit.
6. The WBS Management Unit will write to the Authorized Work Unit to carry out follow-up repairs and sanctions on recommendations from the Investigation Work Unit.
7. Authorized Work Unit carry out follow-up repairs and sanctions to the Reported Party.
8. The WBS Management Unit monitors the follow-up improvements made by the Authority.
9. The Authorized Work Unit submits a report on the realization of improvements to the WBS Management Unit.
10. The WBS Management Unit ensures adequate follow-up of mitigation.
11. The WBS Management Unit reports recapitulation and evaluation to the President Director and Audit Committee every Quarter.
Whistleblowing System

**WBS Reporting Mechanism**
1. The reporter submits a report on indications of violation through a determined facility.
2. Report on indication of violation are accepted by the Whistleblowing System Management Unit to be followed up to the Investigation Work Unit.
3. The Investigation Work Unit investigate reports of indication of violation and the result of the investigation is returned to the Whistleblowing System Management Unit.
4. The Whistleblowing System Management Unit will report periodically to the President Director.

**Complaint Management**
The WBS manager is under the President Director and monitored by the Board of Commissioners through the Audit Committee. The President Director forms a WBS Management Unit that is responsible for managing and following up reports of indications of violations.

**WBS Report**

**Recapitalituation WBS Reports**
The number of reports of complaints of violations received during 2018 were 124 complaints of reporting consisting of 180 sub complaints of indications of violations.

<table>
<thead>
<tr>
<th>Year</th>
<th>Total Reports</th>
<th>Submission Media</th>
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<tbody>
<tr>
<td></td>
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<td>SMS</td>
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<tr>
<td>2016</td>
<td>99</td>
<td>84</td>
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<td>2017</td>
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<td>48</td>
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<tr>
<td>2018</td>
<td>124</td>
<td>77</td>
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</table>

Of the 124 complaints reporting that entered during the year 2018 can be identified into 180 sub complaints indication of violation of the following categories:

<table>
<thead>
<tr>
<th>No</th>
<th>Types of Reports</th>
<th>Total</th>
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<tbody>
<tr>
<td>1</td>
<td>Violation of accounting and financial reporting processes BRI</td>
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<tr>
<td>2</td>
<td>Fraud Measures</td>
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<tr>
<td>3</td>
<td>Unlawful acts</td>
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<tr>
<td>4</td>
<td>Company SOP violations</td>
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<tr>
<td>5</td>
<td>Code violations BRI and GCG</td>
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<tr>
<td>6</td>
<td>Ethics violations</td>
<td>3</td>
</tr>
<tr>
<td>7</td>
<td>Harmful actions</td>
<td>13</td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td>180</td>
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