

## **CODE OF CONDUCT**

### **PT BANK SYARIAH INDONESIA Tbk**

The Code Of Conduct and Business Ethics are ethical and behavioral standards that must be adhered to by all members of the Bank in carrying out their daily duties and in conducting business relationships with customers, partners, and colleagues. The general aim of the conduct guidelines is to establish a framework to ensure that any violations of the Code of Conduct and business ethics by Bank personnel are detected swiftly. The banking industry is a business based on mutual trust and public confidence, and it must be operated in an ethical and responsible manner. Proper conduct and business ethics are expected to prevent the development of improper relationships with customers or among Bank staff. These regulations promote the realization of Good Corporate Governance, which ultimately enhances the Bank's image and reputation.

#### *1. Code of Conduct*

##### *a. Purpose*

*The purpose of the Code of Conduct is to provide behavior guidelines that are Sharia-compliant, professional, responsible, fair, appropriate, and trustworthy for the Bank's personnel in conducting business relationships with customers/prospective customers, partners/prospective partners, colleagues, and other stakeholders.*

##### *b. BSI Fundamentals*

*In carrying out business activities and interacting with stakeholders, the Bank's personnel must be guided by the Bank's Fundamentals, which currently consist of The 7 (Seven) Fundamentals of BSI: Spiritual Foundation, Vision, Mission, Shared Values, Employee Value Proposition, Leadership Characteristics, and Tagline, as outlined in BSI's internal regulations.*

##### *c. Company Culture*

*Company culture encompasses the values, behaviors, and actions that support the realization of the company's vision, mission, and spiritual foundation. Company values can be interpreted as shared values, while behaviors and actions refer to activities and interactions with stakeholders that are aligned with these shared values.*

Provisions Covered in the Code of Conduct

## **1. Conflict of Interest**

A Conflict of Interest occurs when a member of the Bank's personnel has interests outside of their official duties that could affect their objectivity, including personal, family, or third-party interests. The scope of this is as follows:

- a. **Avoiding Conflicts of Interest:** Members of the Bank's personnel must avoid activities that could create a conflict of interest.
- b. **Acting Honorably and Responsibly:** Members must act honorably and responsibly, free from influences that could impair their objectivity in performing their duties or cause the Bank to lose business and/or reputation.
- c. **Prohibition of Misusing Corporate Identity:** Members are prohibited from misusing the Bank's corporate identity. Corporate identity can only be used for the Bank's interests and with the Bank's authorization.

The Bank must have a conflict of interest management policy that includes, at a minimum:

- a. **Identification, Mitigation, and Management:** Identifying, mitigating, and managing conflicts of interest, including those arising from transactions with affiliated parties and intra-group transactions.
- b. **Prohibition on Directors and Commissioners:** Directors and Commissioners are prohibited from taking actions that could harm or reduce the Bank's benefits.
- c. **Disclosure Obligations:** Members must disclose any conflicts of interest that arise in decision-making processes.

## **2. Prohibition of Bribery (Gratification)**

Bank personnel must take firm steps to neither give nor receive bribes from customers/prospective customers, partners/prospective partners, public officials, or state organizers in relation to their role within the Bank.

### **3. Confidentiality**

a. **Maintaining Confidentiality:** Bank personnel must maintain the confidentiality of all data or information related to the Bank or its customers and use it solely for the Bank's interests.

b. **Disclosure of Information:** Dissemination of data or information related to the Bank and its customers may only occur according to applicable regulations.

### **4. Abuse of Power**

Bank personnel are prohibited from abusing their authority for personal gain or for the benefit of others, whether by acting alone or by influencing/coercing other personnel to engage in activities that are not in compliance with regulations and could cause harm to the Bank.

#### **1. Insider Behavior**

Bank personnel who have access to information about the Bank are prohibited from using such information for personal gain or the benefit of others in a way that could harm the Bank.

#### **2. Integrity and Accuracy of Bank Data**

a. **Maintaining Integrity and Accuracy:** Bank personnel must maintain the integrity and accountability of all Bank data shared with internal or external parties, ensuring it is not influenced by any external parties.

b. **Compliance with Regulations:** Bank personnel must present Bank data in accordance with applicable regulations.

#### **3. Integrity of the Banking System**

a. **Avoiding Undermining the Banking System:** Both individually and collectively, Bank personnel must strive to avoid involvement in activities that could weaken or diminish the integrity of the banking system in Indonesia.

b. **Preventing Criminal and Illegal Activities:** Bank personnel must take firm steps to ensure they are not exploited for criminal activities and/or other illegal actions.

c. **Preventing Money Laundering and Terrorism:** Bank personnel must remain vigilant to avoid the Bank's involvement in money laundering activities and must not individually participate in drug trafficking or terrorism.

#### 4. Management of Employee Accounts

Bank personnel must manage their employee accounts wisely and not use these accounts for illegal activities.

#### 5. Annual Disclosure

Bank personnel must complete the annual disclosure statement honestly and in a manner that can be accounted for.

#### 6. Sanctions for Violations/Non-Compliance

Bank personnel must adhere to the Code of Conduct as a behavioral guideline, both within and outside the Bank, with full responsibility for maintaining the Bank's image. Sanctions for violations or non-compliance with the Code of Conduct will be in accordance with applicable personnel regulations.

#### 7. Oversight of Implementation and Updates

a. **Responsibility of HR Director:** The Director responsible for Human Resources is accountable for the implementation and documentation of the Code of Conduct provisions.

##### Adjustments to the Code of Conduct

If, due to internal factors, the Code of Conduct becomes irrelevant, the Central Office Unit responsible for Human Resources must coordinate with the Central Office Unit responsible for Corporate Secretary to propose adjustments and updates to the Board of Directors and the Board of Commissioners.

a. **External Factors:** If external factors cause the Code of Conduct to become irrelevant, the Central Office Unit responsible for Compliance will propose adjustments and updates to the Board of Directors and the Board of Commissioners.

## Code of Conduct Violations

During the year 2020, there were instances of Code of Conduct violations at the merging banks, as follows:

1. **PT. Bank BRIsyariah Tbk** The number of Code of Conduct violations at Bank BRIsyariah was 7 (seven) violations.
2. **PT. Bank Syariah Mandiri** The number of Code of Conduct violations at Bank Syariah Mandiri was 6 (six) violations.
3. **PT. Bank BNI Syariah** The number of Code of Conduct violations at Bank BNI Syariah was 4 (four) violations.