

# Sustainable Growth for Green Indonesia



In addition, the Company adheres to Special Policy No. KK1.A regarding the Commercial Loan Procedure for credit disbursement to avoid conflicts of interest. The policy stipulates that the Company is prohibited from providing loans, whether in Indonesian Rupiah or foreign currency, to:

- Nightclubs;
- Horse racing;
- Casinos;
- Turkish baths;
- Massage rooms; and
- Other businesses prohibited by the government and regulators.

The company can also provide project financing for several project categories, namely:

- Toll roads;
- Power plants;
- Airports;
- Monorails; and
- Telecommunications.

## ANTI-FRAUD

The Company pays close attention to the level of public trust in the integrity of the Company. With a strong determination, the Company is committed to conducting business activities with full honesty, fairness, and zero tolerance for corruption or bribery. It is crucial for the Company to be aware that any actions violating these values will have a negative impact on reputation, name, and business sustainability. Therefore, the Company not only considers the financial impact but also understands the immeasurable value of maintaining trust.

The Company emphasizes that any violation of anti-corruption and anti-fraud policies is a serious matter and must be dealt with firmly in accordance with applicable policies and regulations. Circular Letter of the Board of Directors No. 22/DIR/IAD/2014 dated May 28, 2014, regarding the Standard Operating Procedure for Anti-Fraud Strategy, serves as a guide in implementing anti-corruption and anti-fraud strategies. This policy is comprehensive and covers all layers of employees, whether with permanent or contract employment status, including top management such as the Board of Commissioners and Directors acting on behalf of the Company. The Company ensures that every step taken reflects high integrity to create a solid foundation for sustainable relationships with stakeholders. [GRI 3-3]

Referring to Bank Indonesia Circular Letter No. 13/28/DPNP dated December 9, 2011, the Company implements the Zero Tolerance to Fraud and Zero-Defect program referring to the Financial Services Authority Regulation No. 39/POJK.03/2019 concerning the Implementation of Anti-Fraud Strategies for Commercial Banks. The Company has an Anti-Fraud Team that consistently conducts socialization on the anti-fraud program to maintain BTNers' awareness of compliance aspects. These efforts are continuously improved to ensure that every step-in mitigating fraud risks can be effectively implemented. The Company also organizes a series of training sessions related to anti-corruption and anti-fraud, including:

Training Name	Number of Participants	Training Date
Implementation of AML CFT & PPPSPM Program 2023	315	August 25, 2023
Penerapan Program AML, CFT, and CPWMD 2023	3	August 24-25, 2023
Enhancing Understanding of KPK Gratification	29	October 12-14, 2023