

2. LTI phase 2/2nd vesting in 2021, provided at maximum 25% of the total stock purchase budget for 3 years with 15,936,000 shares purchased on an average price of Rp1,566.62/share and distributed to 599 LTI recipients.
3. LTI phase 3/3rd vesting in 2022, provided at maximum 25% of the total stock purchase budget for 3 years and to be used for BBTN share purchase in 2022.

Whistleblowing System

The Company's Violation Reporting System (WBS) policy was guided by the Minister of BUMN Regulation No.PER-2/MBU/03/2023 dated March 3, 2023, concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises and the OJK Regulation (POJK) No. 39/POJK.03/2019 dated December 19, 2019 regarding the Implementation of Anti-Fraud Strategy for Commercial Banks. The Company's WBS is part of the internal control system in preventing the occurrence of irregularities and purposes to detect early and prevent the occurrence of irregularities or violations and gradually create an open, sincere, honest and responsible work climate in the Company.

Submission Mechanism of Violation Reports and WBS Channel

The mechanism for submitting violation reports through WBS is carried out by reporting/ disclosing complaint and sending it based on indications who is the violator, including:

1. In case the Reported Party is the Company's employee up to 2 (two) levels below the Board of Directors and is not a member of the Company's WBS Team, the Independent WBS Manager will submit a report to the Company's WBS Team.
2. In case the reported party is a Bank employee 1 (one) level below the Directors and is not part of the WBS Team, the Independent WBS Manager will submit a report to the President Director.
3. If the reported party is the WBS Team, then the Independent WBS Manager will submit a report to the Main Director.
4. If the reported party is the Board of Directors, the Independent WBS Manager will submit a report to the Board of Commissioners and WBS Manager of the Ministry of State-Owned Enterprises (BUMN).
5. In case the reported party is a commissioner and/or committee under the Board of Commissioners, the Independent WBS Manager will submit a report to the Commissioners and Committee Members under the Board of Commissioners who are not related to the complaint and the WBS Manager of the Ministry of State-Owned Enterprises (BUMN) (specifically when the reported party is the Commissioner).
6. In case the reported party is a joint Commissioner, the Independent WBS Manager will submit a report to the WBS Manager of the Ministry of State-Owned Enterprises (BUMN).
7. In case the reported party is the Directors and/or Commissioners of a Subsidiary Company, the Independent WBS Manager will submit a report to the President Director of the Bank.

The Company also builds supporting infrastructure in implementing WBS policy in which reporters can submit their reports through the following media:

1. PO Box 2828 JKP 10028
2. Website: <https://idn.deloitte-halo.com/btinsiips>
3. Email: 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 is committed to protect to every whistleblower. Protection to the Whistleblower is provided to support the courage of the Whistleblower in reporting alleged violations and/or if there is retaliation from the Reported Person. For whistleblowers who submit WBS reports that are recognized for their accuracy and good faith, the Company can provide protection guarantees as follows :

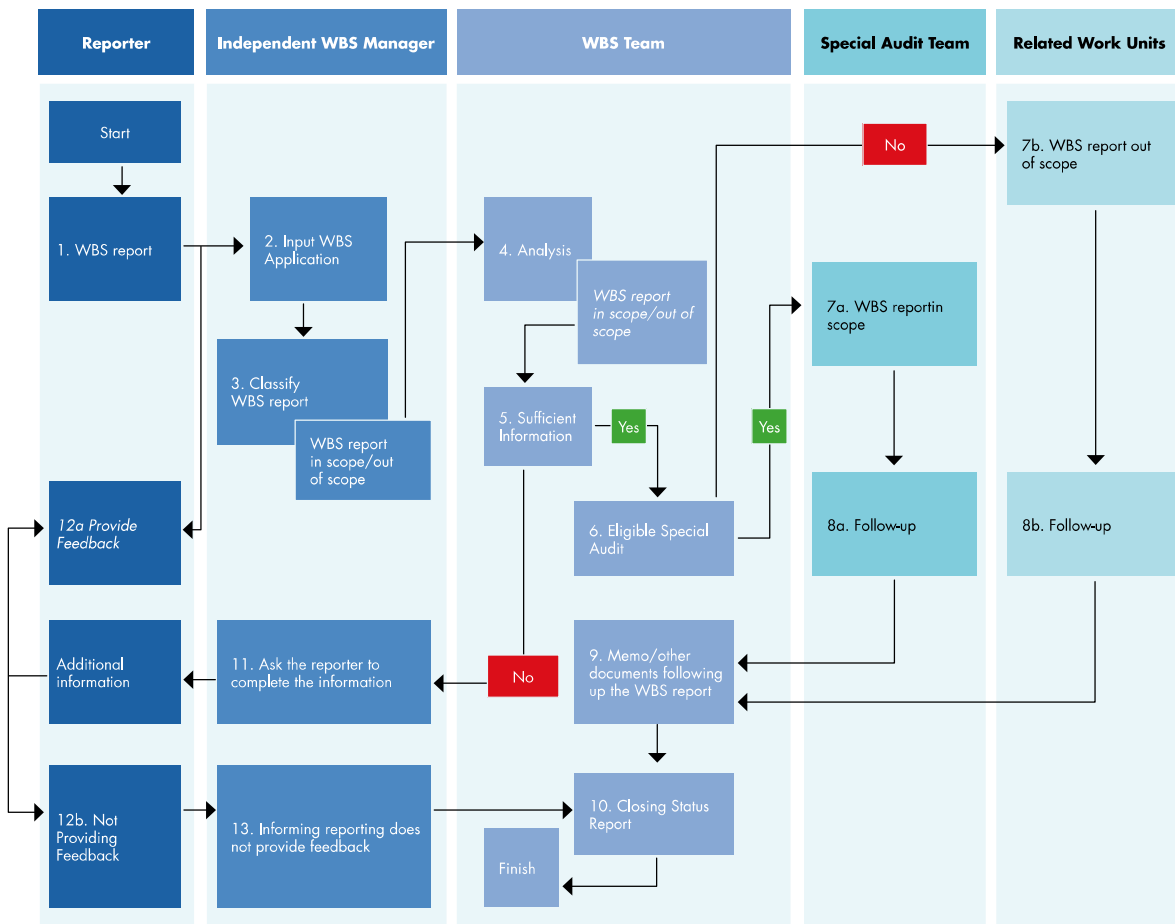
1. Provision of free and confidential WBS Reporting Media. The reporter will get information on the status of the WBS report submitted by the Independent WBS Manager through the designated media.
2. Guarantee of confidentiality of the Whistleblower's identity, except if there is a lawsuit that requires this identity to be disclosed before a judge.
3. Protection from countermeasures from the Reported Person. This protection may include:
 - a. Physical and/or psychological protection of both oneself and one's family.
 - b. Protection of their property and family property against terror or retaliation that must be experienced.
 - c. Administrative protection in the form of postponement of promotion, dismissal, exclusion from the workplace, inappropriate transfers, including job security, etc.
 - d. Legal protection, in terms of litigation process based on the applicable provisions.

The Handling of Complaints

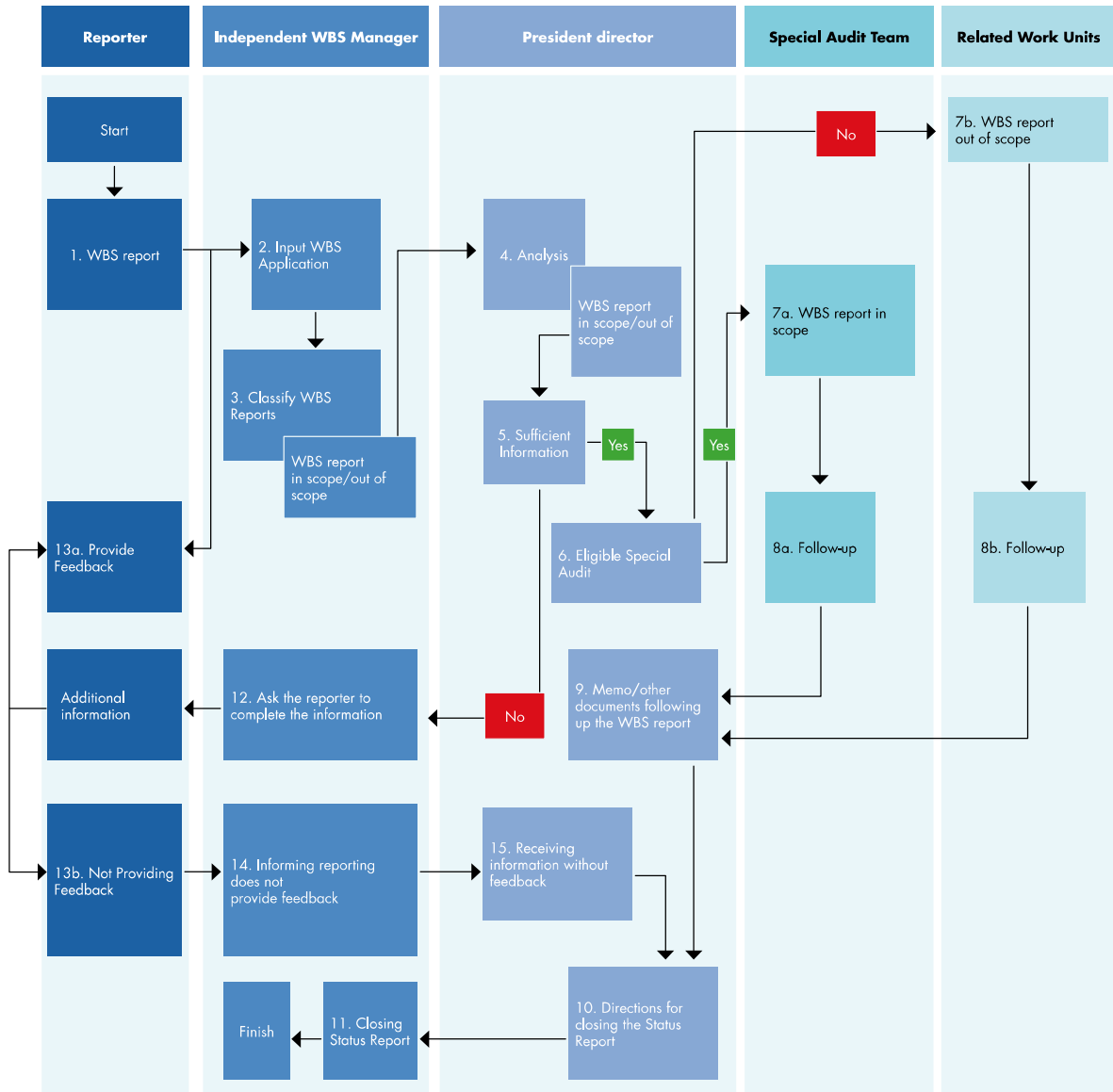
The Company has collaborated with Corruption Eradication Commission (KPK) of the Republic of Indonesia regarding WBS handling in an effort to eradicate corruption. The collaboration purposes to build and improve the effectiveness and efficiency of handling complaints both internally and externally that are integrated in a professional, transparent, accountable manner by prioritizing confidentiality in the context of optimizing the eradication of corruption

Every coming reports will be followed-up by WBS Team with the following mechanism:

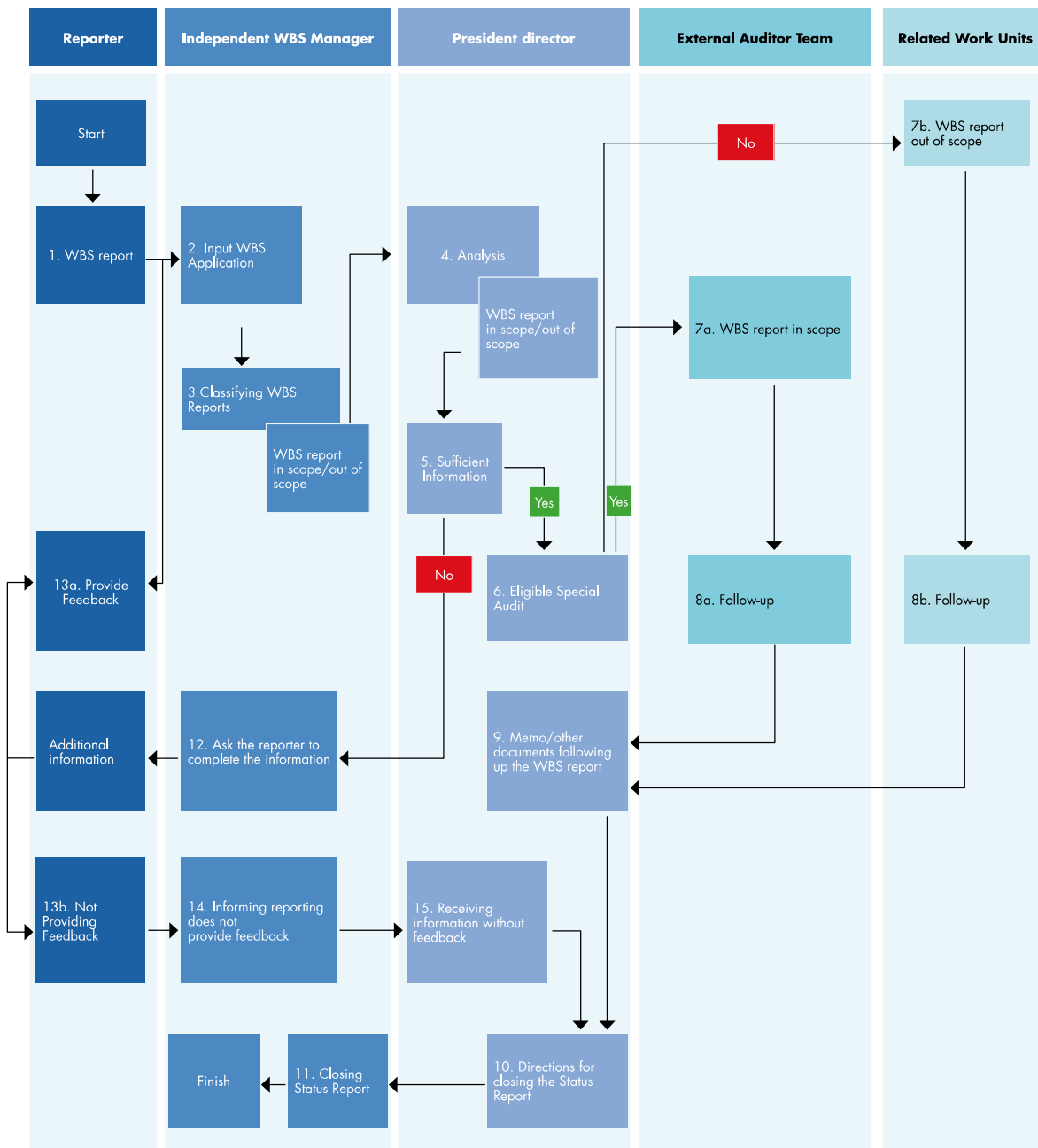
1. If the Reported person is a Bank employee (up to 2 levels below the Board of Directors and not the WBS Team



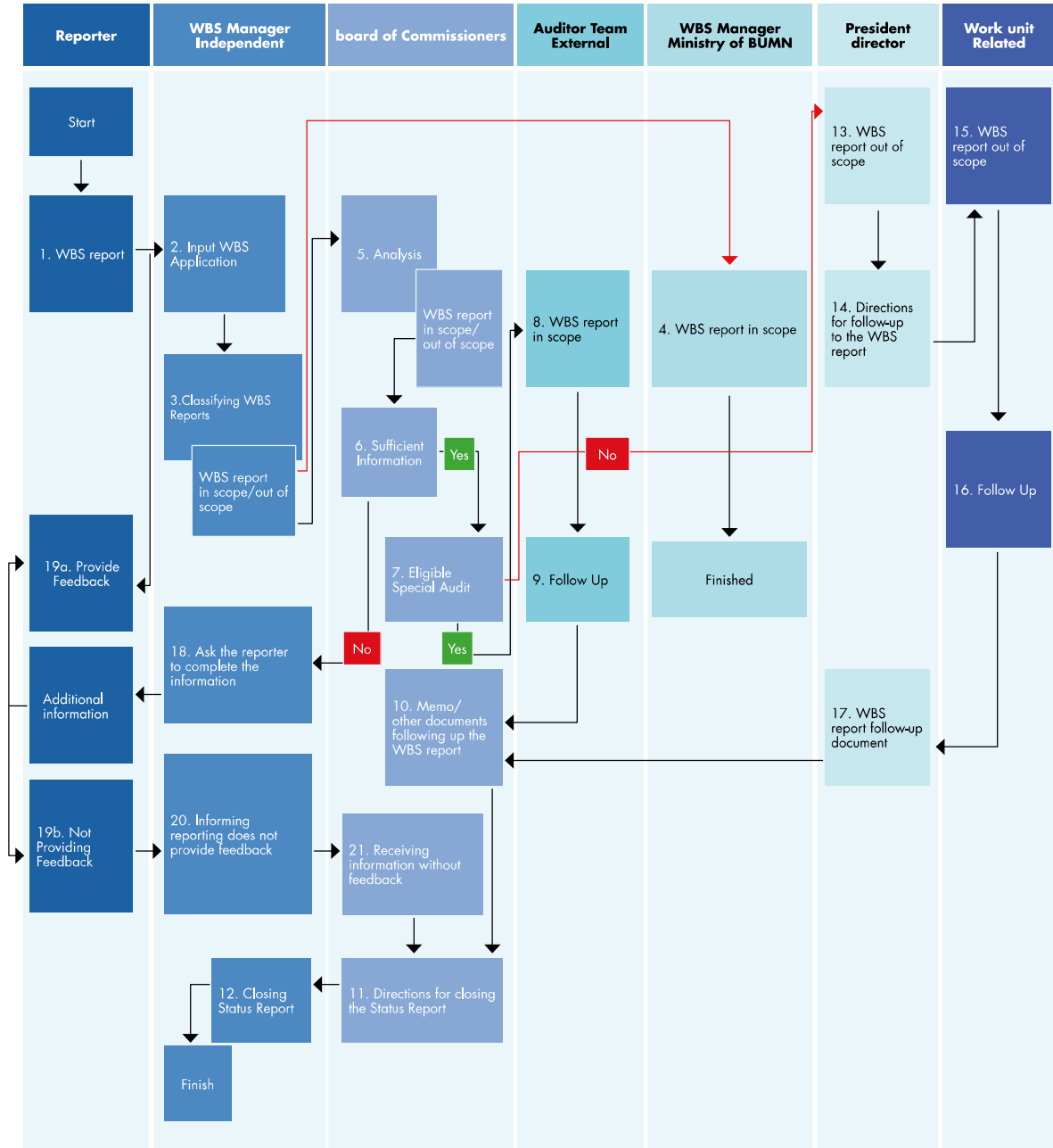
2. If the Reported Person is a Bank employee (1 level below the Board of Directors) and not the WBS Team



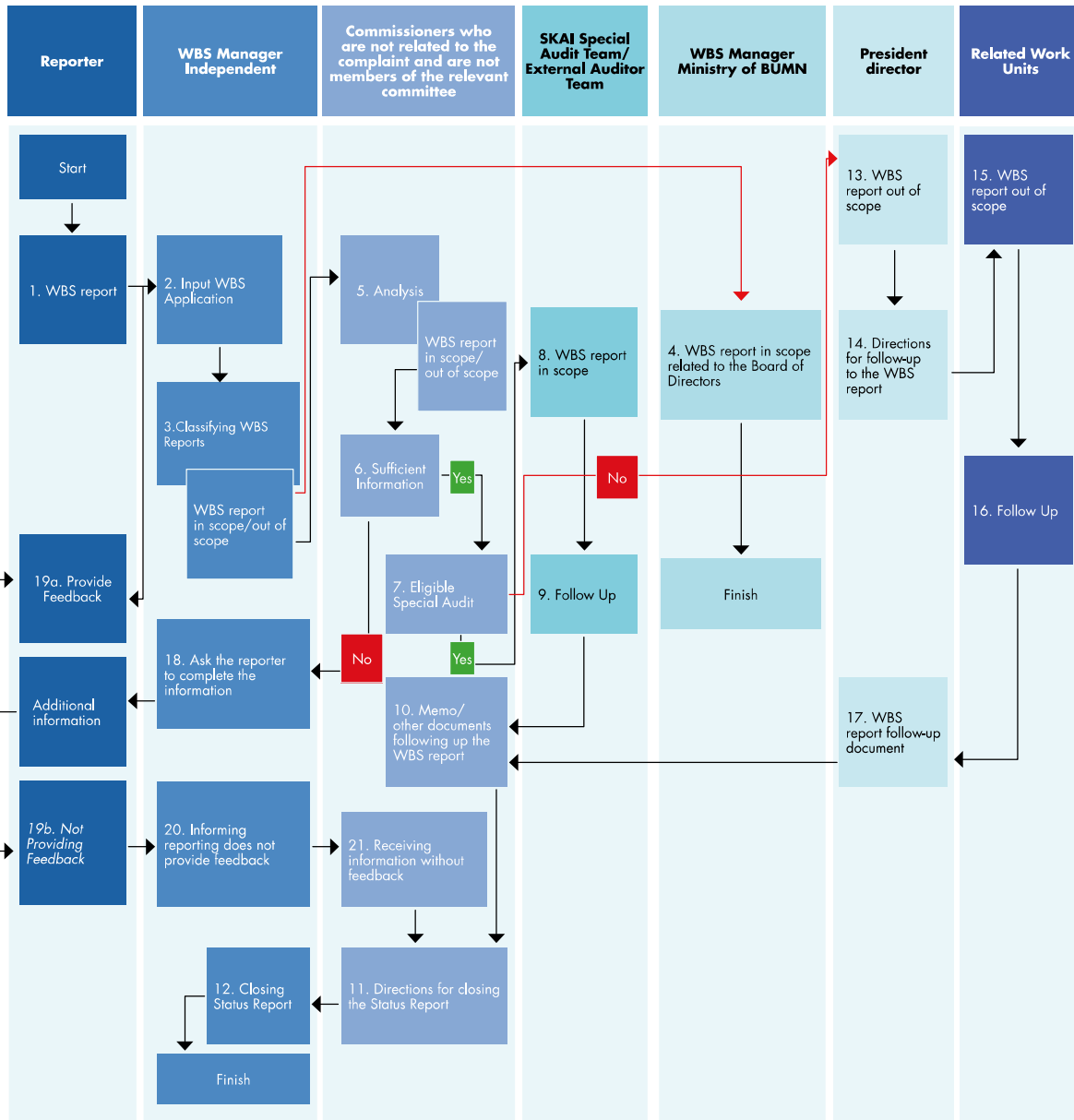
3. If the Reported Person is the WBS Team



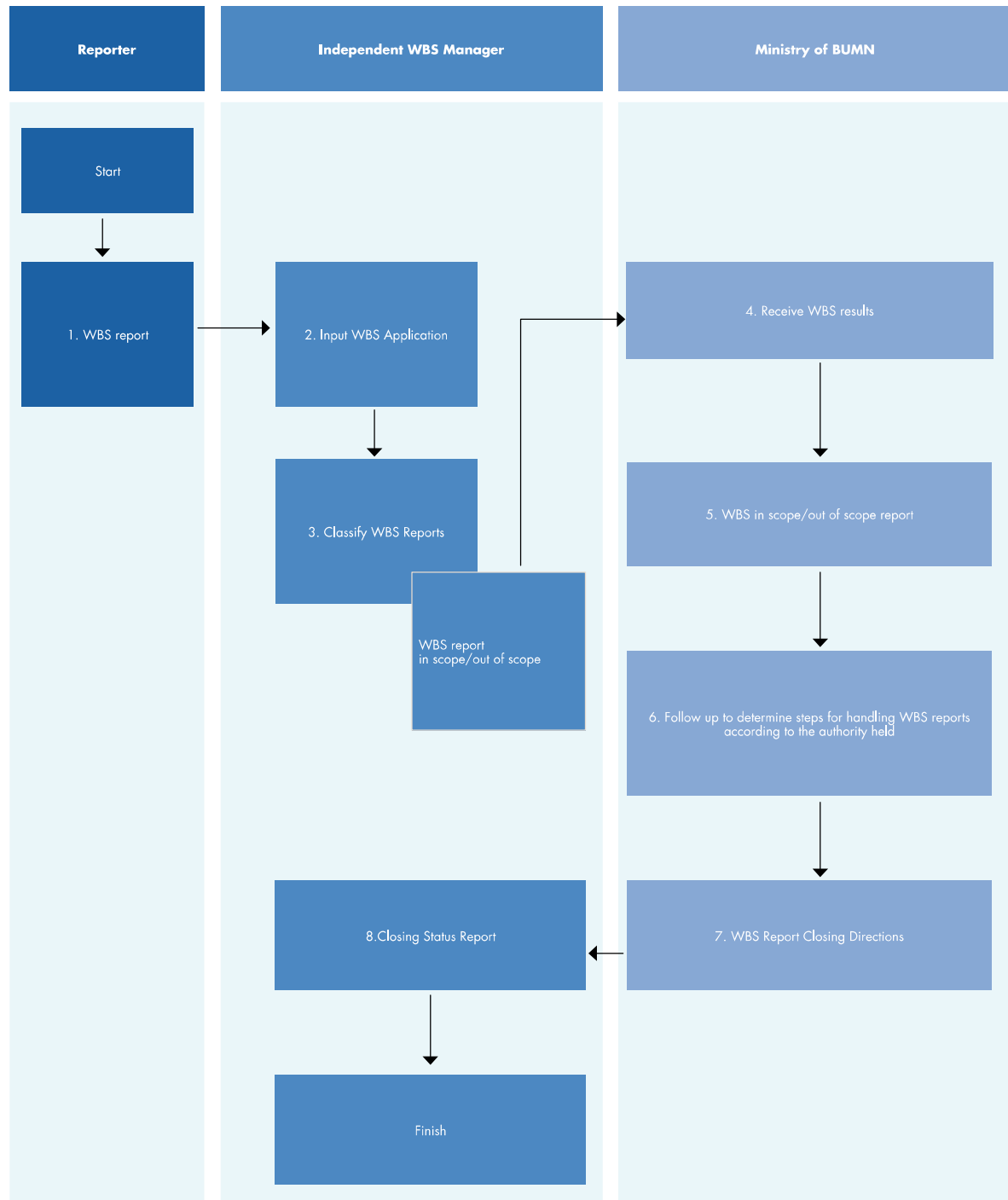
4. If the Reported Person is a Director



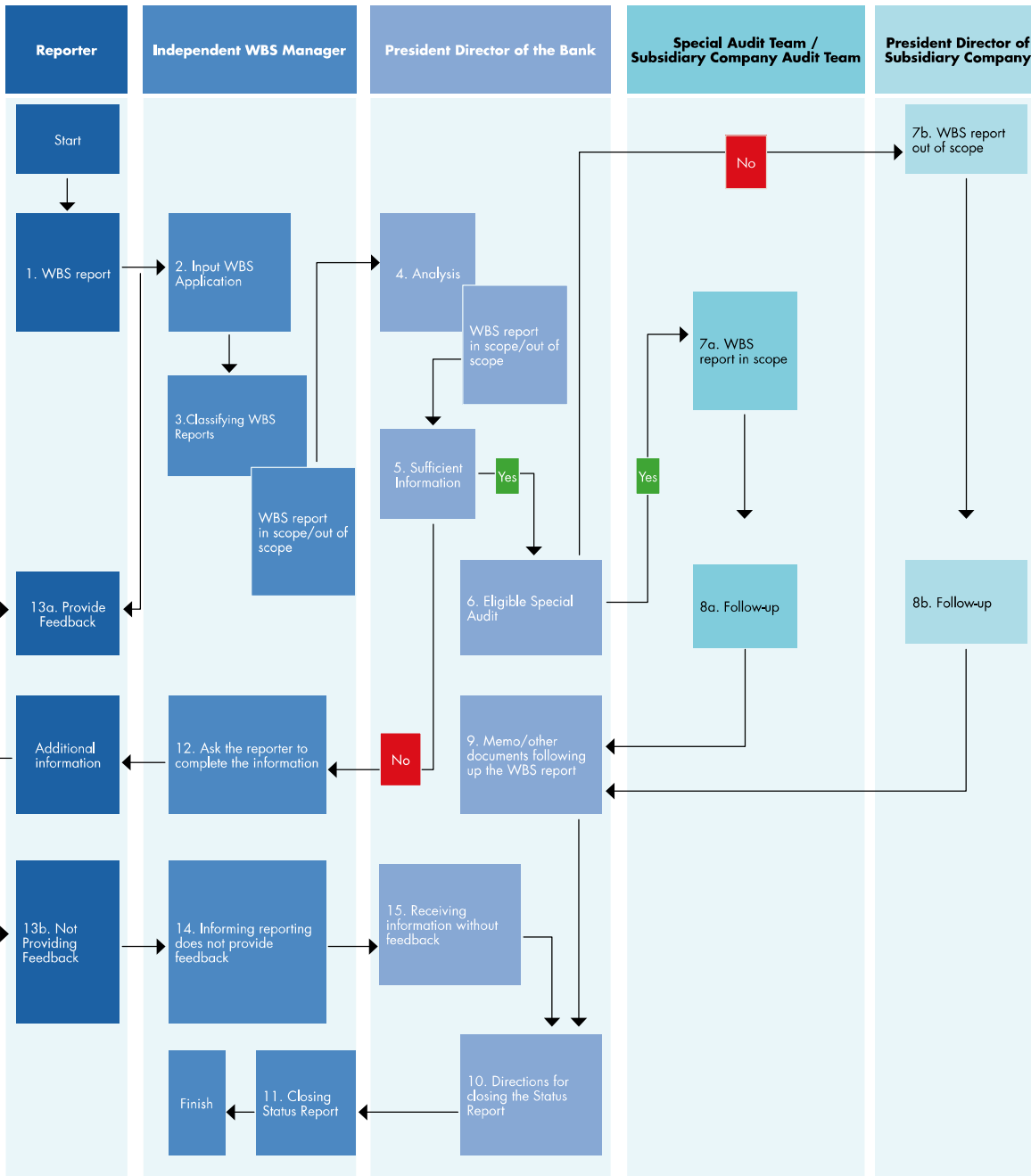
5. If the Reported Person is a Commissioner and/or Committee below the Board of Commissioners



6. If the Reported Person is a Joint Commissioner



7. If the Reported Person is a Board of Directors and/or Commissioner of a Subsidiary



Types of Violations That May be Reported

The violation in question is an act that is against the law, unethical/immoral acts or other actions that can harm the organization or stakeholders. Several examples of violations and/or irregular practices that may be reported based on the WBS policy include the following:

1. Behavior - Lifestyle
2. Fraud
3. Conflict of Interest
4. Abuse of Authority
5. Bribery/Bribery
6. Gratuity
7. Blackmail
8. Miscellaneous Violations of Law

Violation Report Management

The WBS Management Structure consists of the Person in Charge of implementation and the WBS Team. The Person in Charge of implementation is the President Director while the WBS Team consists of:

1. Head of Internal Audit Work Unit
2. Deputy Head of Internal Audit Work Unit
3. WBS management Unit led by a Head of Department in the Internal Audit Work Unit

WBS Management Unit is a unit under the Internal Audit Work Unit in charge of handling all processes of implementing WBS duties in the Company's organization. In addition, in managing complaints received on the WBS channel, the Company is assisted by an independent third party.

Whistleblowing System Socialization

The Bank 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 Bank. In addition, to reach all of the Bank's stakeholders, the Whistleblowing System socialization was also carried out through the Bank'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

The incoming complaints during 2023 amounted to 106 complaints consisting of 30 complaints via SMS/Phone/Whatsapp, and 76 complaints via Email/Website. Based on the number of incoming complaints, 79 complaints were not proven, 6 complaints were still in the process of collecting information/follow-up, and the remaining 21 complaints had been processed and/or had been sanctioned. In detail, the number of complaints forwarded to the audit process in recent years is as follows:

Table of WBS Complaints Forwarded to the Audit Process

Year	Submission Method			Follow-up			
	Letter/ PO BOX	SMS/ Telepon/ / WA	Email/ Website	Report closed (not proven)	Report still in the process (Audit Process/ Reporting Process/ Cross Division Process)	The report has been processed and/or has been completed given sanctions (including sanctions administrative)	Report forwarded to Investigators (related to criminal acts general or Corruption)
2019	5	2	3	0	1	9	0
2020	3	2	9	0	4	10	0
2021	0	2	3	0	0	5	0
2022	0	1	1	0	2	0	0
2023	0	1	4	0	0	5	0