

PT BANK MAYBANK INDONESIA TBK**PIAGAM KOMITE TATA KELOLA WHISTLEBLOWING/
WHISTLEBLOWING GOVERNANCE COMMITTEE CHARTER****1. Pendahuluan**

PT Bank Maybank Indonesia Tbk (“Bank”) berkomitmen menjalankan prinsip *Good Corporate Governance* untuk meningkatkan kinerja Bank, melindungi kepentingan *stakeholder* dan meningkatkan kepatuhan terhadap peraturan perundang-undangan serta nilai-nilai etika yang berlaku.

Salah satu hal yang bertentangan dengan prinsip *Good Corporate Governance* adalah adanya praktek kecurangan (*fraud*) dan merupakan kewajiban seluruh karyawan untuk melakukan langkah-langkah yang diperlukan guna mencegah terjadinya fraud, pelanggaran kebijakan dan prosedur serta isu terkait integritas. Pencegahan fraud dan pelanggaran adalah sangat penting, maka setiap karyawan diwajibkan untuk selalu peka dan waspada terhadap lingkungan di sekitarnya. Dalam hal karyawan mengidentifikasi atau menemukan adanya indikasi pelanggaran maupun perbuatan fraud yang dilakukan oleh karyawan lain atau pihak terkait Bank yang merugikan atau berpotensi merugikan Bank, maka karyawan memiliki sarana penyampaian informasi tersebut melalui saluran whistleblowing.

Bank telah membentuk Komite Tata Kelola *Whistleblowing* guna mendukung efektivitas fungsi tata kelola *Whistleblowing*.

1. Introduction

PT Bank Maybank Indonesia Tbk (“Bank”) is committed in implementing the principles of Good Corporate Governance in order to improve the Bank’s performance to protect the stakeholder interests and to improve the compliance to the law, regulations and ethical values.

One of the elements that is contrary to the principles of Good Corporate Governance is the practice of fraud and it is the obligation of all employees to take the necessary steps to prevent fraud, violation of policies and procedures, and integrity-related issue. The prevention of fraud and violations is crucial, therefore employees are required to always be sensitive and cautious to the surrounding environment. In the event that an employee identifies or detects any indication of a violation or fraudulent act committed by another employee or any Bank-related parties that is detrimental or potentially detrimental to the Bank, the employee has the means to convey the information through the whistleblowing channel.

The Bank has established a Whistleblowing Governance Committee, in order to support the effectiveness of whistleblowing governance function.

<p>Piagam Komite Tata Kelola <i>Whistleblowing</i> disusun dengan mengacu pada:</p> <ol style="list-style-type: none"> a. Peraturan OJK Nomor 39/POJK.03/2019 tanggal 19 Desember 2019 tentang Penerapan Strategi Anti Fraud bagi Bank Umum; b. Peraturan OJK Nomor 17 Tahun 2023 tanggal 14 September 2023 tentang Penerapan Tata Kelola Bagi Bank Umum; c. Surat Edaran OJK Nomor 13/SEOJK.03/2017 tanggal 17 Maret 2017 tentang Penerapan Tata Kelola Bagi Bank Umum; d. Peraturan Direksi Maybank Indonesia tentang Kebijakan <i>Whistleblowing</i>. 	<p><i>The Whistleblowing Governance Committee Charter was set referred to:</i></p> <ol style="list-style-type: none"> <i>a. OJK Regulation No. 39/POJK.03/2019 dated 19 Desember 2019 regarding Implementation of Anti Fraud Strategy for Commercial Banks;</i> <i>b. OJK Regulation No. 17 Year 2023 dated 14 September 2023 regarding Implementation of Good Corporate Governance for Commercial Banks;</i> <i>c. OJK Circular Letter No.13/SEOJK.03/2017 dated 17 March 2017 regarding Implementation of Good Corporate Governance for Commercial Banks;</i> <i>d. Directors Regulations regarding Whistleblowing Policy</i>
<p>2. Tujuan Pembentukan Komite</p> <p>Komite Tata Kelola <i>Whistleblowing</i> melakukan pengawasan untuk memastikan laporan <i>whistleblowing</i> ditindaklanjuti dengan perhatian yang semestinya, independensi, investigasi dan tindakan perbaikan, bila diperlukan.</p>	<p>2. Purpose of Establishing the Committee</p> <p><i>The Whistleblowing Governance Committee provides oversight to ensure whistleblowing reports are followed up with adequate attention, independence, investigation and remedial action, where necessary.</i></p>
<p>3. Tugas & Tanggung Jawab</p> <ol style="list-style-type: none"> a. Mengkaji ulang dan menilai kecukupan kebijakan dan prosedur terkait <i>whistleblowing</i>. b. Melakukan evaluasi terkait tindak lanjut atas laporan <i>whistleblowing</i> dalam hal: tindak lanjut investigasi, penutupan kasus, dan dapat memberikan rekomendasi apabila diperlukan. c. Melakukan review terkait indikator <i>whistleblowing</i>, antara lain: statistik laporan yang diterima dari saluran 	<p>3. Duties & Responsibilities</p> <ol style="list-style-type: none"> <i>a. Review and assess the adequacy of the Maybank Indonesia's Whistleblowing Policies and Procedures.</i> <i>b. Evaluate the follow up of whistleblowing reports in terms of steps of investigation, the closure, and to make recommendations, where required.</i> <i>c. Review whistleblowing indicators such as the statistic on reports received from the whistleblowing channels,</i>

<p>whistleblowing, jenis laporan, analisis tren, laporan yang sedang dalam proses investigasi dan laporan yang ditutup.</p>	<p><i>nature of the reports received, trend analysis, reports under on-going investigation and closure of reports.</i></p>
<p>4. Wewenang</p> <ul style="list-style-type: none"> a. Mengakses dokumen, data dan informasi Bank perusahaan tentang karyawan, dana, asset serta sumber daya Bank yang diperlukan dan relevan dengan pelaksanaan tugasnya. b. Berkomunikasi langsung dengan Direksi dan karyawan. c. Melakukan kewenangan lain yang diberikan oleh Dewan Komisaris. 	<p>4. Authority</p> <ul style="list-style-type: none"> a. <i>To access Bank's documents, data and information related to employees, funds, assets, and other Bank's resource which are required and relevant to its duties.</i> b. <i>To communicate directly with Directors and employees.</i> c. <i>To implement other duties as assigned by Board of Commissioners.</i>
<p>5. Struktur & Keanggotaan Komite</p> <p>Komposisi keanggotaan Komite Tata Kelola Whistleblowing adalah sebagai berikut:</p> <ul style="list-style-type: none"> a. Ketua (merangkap anggota): Komisaris Independen b. Ketua Pengganti (merangkap anggota): Komisaris Independen/Komisaris Non Independen c. Anggota: <ul style="list-style-type: none"> i. Komisaris Independen/Komisaris Non Independen ii. Direktur Legal, Compliance, Corporate Secretary & Anti Fraud iii. Direktur Human Capital iv. Direktur Risk Management 	<p>5. Structure & Membership of Committee</p> <p><i>Membership composition of the Whistleblowing Governance Committee is as follows:</i></p> <ul style="list-style-type: none"> a. <i>Chairman (concurrently a member): Independent Commissioner</i> b. <i>Alternate Chairman (concurrently a member): Independent Commissioner/Non-Independent Commissioner</i> c. <i>Members:</i> <ul style="list-style-type: none"> i. <i>Independent Commissioner/Non-Independent Commissioner</i> ii. <i>Director Legal, Compliance, Corporate Secretary & Anti-Fraud</i> iii. <i>Director Human Capital</i> iv. <i>Director Risk Management</i>

<p>6. Kualifikasi</p> <p>Anggota Komite Tata Kelola Whistleblowing harus memenuhi kualifikasi berikut:</p> <ol style="list-style-type: none"> a. Memiliki integritas yang tinggi, kemampuan, pengetahuan dan pengalaman yang memadai. b. Mampu berkomunikasi secara efektif dan memiliki kemampuan untuk memberikan saran yang konstruktif. 	<p>6. Qualification</p> <p><i>Whistleblowing Governance Committee members shall met qualification as follows:</i></p> <ol style="list-style-type: none"> <i>a. Shall have high integrity, capability, adequate knowledge and experiences.</i> <i>b. Shall have effective communication skill and able to provide constructive recommendations.</i>
<p>7. Prosedur Kerja dan Rapat</p> <p>Prosedur Kerja dan Rapat Komite Tata Kelola Whistleblowing, dilakukan sebagaimana berikut:</p> <ol style="list-style-type: none"> a. Seluruh materi yang akan dipresentasikan dalam rapat akan disampaikan kepada Komite Tata Kelola Whistleblowing melalui e-mail ataupun dalam bentuk hardcopy dalam 2 (dua) hari sebelum rapat dilakukan. b. Komite Tata Kelola Whistleblowing dapat memberikan tanggapan dan/atau pertanyaan melalui e-mail terkait materi rapat, sebelum dilaksanakannya rapat, agar pelaksanaan rapat lebih efisien. c. Komite Tata Kelola Whistleblowing menghadiri rapat dengan unit/pihak terkait. d. Ketua Komite Tata Kelola Whistleblowing berwenang untuk melibatkan pihak di luar anggota Komite Tata Kelola Whistleblowing untuk membantu pelaksanaan tugas Komite Tata Kelola Whistleblowing dan melaporkan hasilnya kepada Dewan Komisaris. 	<p>7. Working and Meeting Procedure</p> <p><i>Whistleblowing Governance Committee Working Procedures and Meetings are carried out as follows :</i></p> <ol style="list-style-type: none"> <i>a. All materials that will be presented in the meeting shall be submitted to Whistleblowing Governance Committee via e-mail or hardcopy, at least 2 (two) days before meeting.</i> <i>b. Whistleblowing Governance Committee may give comments and/or ask questions via e-mail related to meeting materials before the meeting for the efficiency of the meeting.</i> <i>c. Whistleblowing Governance Committee shall attend the meeting with related unit.</i> <i>d. Whistleblowing Governance Committee Chairman is authorize to involve an independent party's out of Whistleblowing Governance Committee member to help Whistleblowing Governance Committee performing their duty and report the result to Board of Commissioners .</i>

<p>8. Frekuensi Rapat</p> <ul style="list-style-type: none"> a. Rapat reguler Komite Tata Kelola Whistleblowing dilakukan setiap kuartal. b. Komite Tata Kelola Whistleblowing dapat setiap saat mengadakan rapat lain jika diperlukan. c. Rapat Komite Tata Kelola Whistleblowing harus dihadiri oleh mayoritas anggota Komite, termasuk Ketua Komite/Ketua Pengganti. 	<p>8. Meeting Frequency</p> <ul style="list-style-type: none"> a. <i>Regular meetings of the Whistleblowing Governance Committee are held on quarterly basis.</i> b. <i>Whistleblowing Governance Committee may hold additional meetings as necessary.</i> c. <i>Whistleblowing Governance Committee meeting shall be attended by majority of Committee Members, including the Chairman/Alternate Chairman.</i>
<p>9. Agenda Rapat</p> <ul style="list-style-type: none"> a. Agenda setiap rapat harus ditetapkan dengan jelas dan didistribusikan kepada anggota Komite Tata Kelola Whistleblowing sebelum pelaksanaan rapat . b. Untuk rapat yang bersifat rutin agenda rapat diawali dengan pembahasan tindak lanjut rapat sebelumnya c. Untuk agenda rapat yang bersifat adhoc dapat diajukan oleh anggota komite atau unit kerja terkait 	<p>9. Meeting Agenda</p> <ul style="list-style-type: none"> a. <i>Meeting agenda shall be determined prior to the meeting and materials shall be distributed to the Whistleblowing Governance Committee member before the meeting.</i> b. <i>For regular meetings, the first agenda shall include information of follow-up taken on the previous meeting.</i> c. <i>Adhoc meeting agendas can be proposed by committee member or related working unit</i>
<p>10. Ketua dan Peserta Rapat</p> <ul style="list-style-type: none"> a. Ketua Komite Tata Kelola Whistleblowing memimpin rapat dan dapat mengundang anggota Direksi, pejabat dan karyawan Bank maupun pihak-pihak lainnya yang terkait dengan agenda rapat yang hendak dibicarakan. 	<p>10. Meeting Leader and Participants</p> <ul style="list-style-type: none"> a. <i>Chairman of Whistleblowing Governance Committee shall lead the meeting and may invite Directors or employees and other relevant parties whom relevant to the meeting agenda discussion.</i>

<p>b. Dalam hal Ketua Komite Tata Kelola Whistleblowing tidak hadir, Ketua Pengganti Komite Tata Kelola Whistleblowing akan memimpin rapat.</p> <p>c. Peserta Rapat Komite Tata Kelola Whistleblowing</p> <p>Anggota: Komite Tata Kelola Whistleblowing</p> <p>Undangan Tetap:</p> <ul style="list-style-type: none"> - Head, Anti Fraud - Head, Employee Relations & Health Safety - Head, Business Human Capital 1 - Head, Business Human Capital 2 <p>Sekretaris: Head, Fraud Prevention and Detection</p>	<p><i>b. In the absence of Chairman of Whistleblowing Governance Committee, Alternate Chairman of Whistleblowing Governance Committee shall lead the meeting.</i></p> <p><i>c. Meeting Participant Whistleblowing Governance Committee</i></p> <p>Members: <i>Whistleblowing Governance Committee</i></p> <p>Permanent Invitee:</p> <ul style="list-style-type: none"> <i>- Head, Anti Fraud</i> <i>- Head, Employee Relations & Health Safety</i> <i>- Head, Business Human Capital 1</i> <i>- Head, Business Human Capital 2</i> <p>Secretary: <i>Head, Fraud Prevention and Detection</i></p>
<p>11. Hasil dan Risalah Rapat</p> <p>a. Keputusan rapat berdasarkan musyawarah mufakat.</p> <p>b. Dalam hal tidak terjadi musyawarah mufakat, pengambilan keputusan dilakukan berdasarkan suara terbanyak.</p> <p>c. Hasil rapat wajib dituangkan dalam risalah rapat.</p> <p>d. Perbedaan pendapat (<i>dissenting opinions</i>), wajib dicantumkan dalam risalah rapat beserta alasannya.</p>	<p>11. Result and Minutes of Meeting</p> <p><i>a. Meeting decision shall be achieved unanimously.</i></p> <p><i>b. When via the consensus mechanism the decision cannot be reached unanimously, the decision is reached by the simple majority vote.</i></p> <p><i>c. Meeting decision shall be documented in a minutes of meeting.</i></p> <p><i>d. Dissenting opinions along with the reason shall be clearly documented in the minutes of meeting.</i></p>

<p>e. Risalah rapat dibuat oleh sekretaris Komite Tata Kelola Whistleblowing dan harus ditandatangani oleh seluruh anggota Komite Tata Kelola Whistleblowing yang hadir.</p>	<p><i>e. Minutes of meeting shall be prepared by the Secretary of Whistleblowing Governance Committee and signed off by Whistleblowing Governance Committee members who attended the meeting.</i></p>
<p>12. Pelaporan</p> <p>a. Komite Tata Kelola Whistleblowing wajib menyampaikan laporan kegiatan kepada Dewan Komisaris segera setelah rapat Komite Tata Kelola Whistleblowing.</p> <p>b. Seluruh laporan yang dibuat Komite Tata Kelola Whistleblowing harus ditandatangani oleh Ketua Komite Tata Kelola Whistleblowing.</p>	<p>12. Reporting</p> <p><i>a. Whistleblowing Governance Committee is required to submit an activity report to the Board of Commissioners after every Whistleblowing Governance Committee meeting.</i></p> <p><i>b. All reports made by the Whistleblowing Governance Committee shall be signed by the Chairman of the Whistleblowing Governance Committee.</i></p>
<p>13. Masa Tugas</p> <p>a. Masa tugas anggota Komite Tata Kelola Whistleblowing tidak boleh lebih lama dari masa jabatan Dewan Komisaris sebagaimana diatur dalam Anggaran Dasar.</p> <p>b. Pengangkatan, pemberhentian dan penggantian anggota Komite Tata Kelola Whistleblowing wajib dilakukan oleh Direksi berdasarkan keputusan Dewan Komisaris dengan mempertimbangkan rekomendasi dari Komite Nominasi dan Remunerasi.</p>	<p>13. Term of Service</p> <p><i>a. Whistleblowing Governance Committee's term of service shall not be longer than Board of Commissioners 's term of service as stipulated in the Bank's articles of association.</i></p> <p><i>b. The appointment, dismissal and replacement of members of the Whistleblowing Governance Committee must be carried out by the Board of Directors based on the decision of the Board of Commissioners by considering recommendations from the Nomination and Remuneration Committee.</i></p>
<p>14. Mekanisme Evaluasi Kinerja</p> <p>a. Ketua Komite Tata Kelola Whistleblowing perlu mengevaluasi kinerja masing-masing Anggota Komite Tata Kelola Whistleblowing setahun sekali.</p>	<p>14. Performance Evaluation Mechanism</p> <p><i>a. Chairman of Whistleblowing Governance Committee shall evaluate each Whistleblowing Governance Committee member performance on a yearly basis.</i></p>

<p>b. Komite Tata Kelola Whistleblowing perlu melakukan <i>self-assessment</i> atas pelaksanaan Piagam Komite Tata Kelola Whistleblowing, paling tidak sekali setiap tahun.</p> <p>c. Hasil <i>self-assessment</i> perlu didiskusikan bersama dengan Dewan Komisaris untuk menetapkan langkah-langkah perbaikan.</p>	<p>b. <i>Whistleblowing Governance Committee shall perform self-assessment on the implementation of Whistleblowing Governance Committee Charter, at least once a year.</i></p> <p>c. <i>Self-assessment result shall be discussed with BOC to determine the necessary improvements.</i></p>
<p>15. Periode Reviu</p> <p>Peninjauan Piagam ini dilakukan oleh Komite Tata Kelola Whistleblowing setiap 3 (tiga) tahun atau ketika ada perubahan material yang harus dilakukan.</p>	<p>15. Review Period</p> <p><i>This Charter review is carried out by the Whistleblowing Governance Committee every 3 (three) years or when there are material changes that must be made.</i></p>
<p>16. Sekretariat Komite</p> <p>Sekretariat Komite Tata Kelola Whistleblowing adalah Unit Kerja Anti-Fraud. Seluruh komunikasi dapat dilakukan melalui email: whistleblowing@maybank.co.id</p>	<p>16. Committee Secretariat</p> <p><i>The Whistleblowing Governance Committee Secretariat is Anti-Fraud Working Unit. All communications can be made via email: whistleblowing@maybank.co.id</i></p>
<p>17. Persetujuan atas Piagam</p> <p>Penerbitan dan perubahan atas Piagam ini harus mendapatkan rekomendasi dari Komite Tata Kelola Whistleblowing yang diputuskan oleh Dewan Komisaris dan kemudian ditetapkan melalui Surat Keputusan Direksi.</p>	<p>17. Charter Approval</p> <p><i>Issuance and amendments to this Charter must receive a recommendation from the Whistleblowing Governance Committee and be approved by the Board of Commissioners and determined through a Decree of the Board of Directors.</i></p>

<p>18. Kerahasiaan</p> <p>Setiap anggota Komite Tata Kelola Whistleblowing wajib menjaga kerahasiaan dokumen, data dan informasi Bank.</p>	<p>18. Confidentiality</p> <p><i>All Whistleblowing Governance Committee member shall maintain confidentiality on Bank's documents, data and information.</i></p>
<p>19. Lain-Lain</p> <p>Dalam rangka mempertahankan dan meningkatkan kualitas kinerja, maka Komite Tata Kelola Whistleblowing dapat mengikuti program orientasi, pengembangan, pendidikan dan pelatihan dengan menggunakan anggaran biaya pendidikan Bank.</p>	<p>19. Others</p> <p><i>In order to maintain and improve the quality of performances, Whistleblowing Governance Committee may attend orientation, development, and training programs by using budget of training of Bank.</i></p>

Piagam ini disetujui oleh Dewan Komisaris pada 18 Januari 2024
This Charter is approved by Board of Commissioner on January 18th 2024

No.	Nama/Name	Tanda tangan/Signature
1.	Dato' Khairussaleh Ramli Presiden Komisaris/ <i>President Commissioner</i>	
2.	Edwin Gerungan Komisaris/ <i>Commissioner</i>	
3.	Datuk Lim Hong Tat Komisaris/ <i>Commissioner</i>	
4.	Dato' Zulkiflee Abbas Abdul Hamid Komisaris/ <i>Commissioner</i>	
5.	Putut Eko Bayuseno Komisaris Independen/ <i>Independent Commissioner</i>	
6.	Hendar Komisaris Independen/ <i>Independent Commissioner</i>	
7.	Budhi Dyah Sitawati Komisaris Independen/ <i>Independent Commissioner</i>	

<p>Piagam ini disetujui oleh Dewan Komisaris pada 24 November 2023 <i>This Charter is approved by Board of Commissioner on November 24th 2023</i></p>		
No.	Nama/Name	Tanda tangan/Signature
8.	Achjar Iljas Komisaris Independen/ <i>Independent Commissioner</i>	