

## Code of Ethics and Code of Conduct

Maybank Indonesia has and implements both Code of Ethics and Code of Conduct that offer guidelines to all Maybankers doing their work and fulfill their responsibilities. Both codes form the basis for employees' attitudes and actions to work in a professional and ethical manner on the basic principles that have been referred to the Bank's vision, mission, and core values as well as applicable internal and external regulations. Maybank Indonesia always upholds integrity. To support this, in the implementation process the Bank has and is applying standard guidelines for behaviors, namely the Code of Ethics and the Code of Conduct that serve as the standards, business behavior, and ethical personal behavior for all employees and stakeholders in behaving at work. The Bank is committed to applying high standards of both codes that clearly describe sound business practices and an effective application Corporate Governance (GCG) principles.

### POINTS OF CODE OF ETHIC AND CODE OF CONDUCTS

Policies referred to for the Bank's Code of Ethics and the Code of Conduct are:

1. Circular Letter No.SE.2016.002/PRES DIR on Code of Ethic and Code of Conduct of Maybank Indonesia
2. No.SE.2018.009/DIR HC - Conflict of Interest Policy
3. NO.PER.DIR.2018.002/DIR HC Employee Disciplinary Measures
4. The 2017 -2019 Collaborative Agreement of PT Bank Maybank Indonesia, Tbk.

### STATEMENT OF CODE OF ETHICS AND CODE OF CONDUCT FOR IMPLEMENTATION AT ALL ORGANIZATIONAL LEVELS

The Bank has made it obligatory to all of its employees, key executives, BOC, BOD, and all business partners to read and have a proper comprehension of its Code of Ethics and Code of Conduct and apply each stipulation in the codes in their respective roles and responsibilities.

The Code of Ethics and Code of Conduct are the behavior standards for all Maybankers in doing business activities including how to interact with stakeholders. The Bank imposes an obligation for them to comply with the Code of Ethics and Code of Conduct, and this also applies to members of both the Boards of Directors and of Commissioners. Employees are required to study the codes and have a good comprehension of their contents.

Updates on Code of Ethics and Code of Conduct have also been made yearly to make the necessary adjustments in a consistent and sustainable manner.



#### **CODE OF CONDUCT AND CODE OF ETHICS DISSEMINATION/ SOCIALIZATION, IMPLEMENTATION AND ENFORCEMENT**

All employees, either permanent or contracted, trainees, and sub-contracted staff, are obliged to participate in the Bank's Code of Ethics and Code of Conduct socialization and their attendance is certified with an attendance list. Regional unit leaders and high-ranking officials are responsible for communicating these policies in their work environment. Random checking will be done by Human Capital Directorate on the implementation of the codes' socialization, and the reports will be directly sent to President Director and Director of Compliance.

#### **TYPES OF CODE VIOLATION SANCTIONS AND CODE OF CONDUCT**

In order to enhance awareness of the implementation and enforcement of its code of conducts, Maybank Indonesia imposes sanctions on employees for the violations of its Code of Ethics and Code of Conduct in accordance with all applicable regulations. The types of sanctions include:

1. Reprimand Letter
2. Warning Letter 1
3. Warning Letter 2
4. Warning Letter 3
5. Employment Termination.

#### **NUMBER OF VIOLATIONS OF CODE OF ETHICS AND BEHAVIORAL GUIDELINES AND SANCTIONS GIVEN IN 2019**

Throughout 2019, a small portion of the Bank's employees were given sanctions with During 2019, there were employees to whom sanctions were imposed, with a total of 203 sanction letters issued including Reprimand Letters, Warning Letter 1 Sanction letters issued that included Warning Letter, Warning Letter 1, Warning Letter 2, Warning Letter 3 and Employment Termination. In 2018, 239 letters of reprimand were issued. The table below illustrates the trend of violation of the Code of Ethics and Code of Conduct in the past two years:

No	Sanction	Sanction Issued in 2019	Sanction Issued in 2018	Total Employees
1	Reprimand Letter	111	134	7.188
2	Reprimand Letter 1	66	71	7.188
3	Reprimand Letter 2	20	22	7.188
4	Reprimand Letter 3	6	12	7.188