

Whistleblowing System (WBS)

PT Bank Syariah Indonesia Tbk.

Ref: Corporate Governance Policy & Whistleblowing System Operating Procedure (PTO WBS) of PT Bank Syariah Indonesia Tbk, Year 2023

BSI is committed to building a healthy and integrity-driven business environment, aiming to become a trusted Sharia Bank in delivering quality services.

To uphold this commitment, BSI provides a Whistleblowing System (WBS) as a channel for reporting. WBS offers you the opportunity to report suspected fraud or legal violations, breaches of the code of ethics, or conflicts of interest committed by internal parties of BSI.

As a form of protection for whistleblowers, Bank BSI is committed to ensuring the confidentiality of the whistleblower's data and the content of the report.

Reports of alleged violations submitted by the whistleblower will be easier to follow up on if they meet the following elements:

1. The whistleblower must provide initial information, namely:
 - a. **What:** The suspected violation that has been identified
 - b. **Who:** The individuals involved in the act
 - c. **Where:** The location where the act was committed
 - d. **When:** The time when the act occurred
 - e. **Why:** The motive behind the violation and the cause of its occurrence
 - f. **How:** How the act was carried out (modus operandi, methods, etc.)
2. To expedite the follow-up process, the whistleblower should include initial evidence of the alleged misconduct, namely:
 - a. **Written evidence**, including financing documents, letters, notarial deeds
 - b. **Written testimony from witnesses**
 - c. **Written testimony from the perpetrator**
 - d. **Indicative evidence**, such as electronic documents and/or printed versions, CCTV footage, voice recordings, text messages, etc.

The evidence of alleged misconduct submitted by the whistleblower must not be obtained through means that violate applicable laws and regulations.
3. To facilitate communication, the whistleblower is encouraged to provide personal

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identification information, namely:

- a. **Name of the whistleblower** (anonymous reporting is allowed)
- b. **Phone number or email address** that can be contacted.

Scope of Violations

The scope of violations that can be reported through the Whistleblowing System includes:

1. **Fraud**

Fraud is dishonest conduct or deception, including but not limited to cheating, extortion, forgery, concealment, or destruction of documents or reports, or the use of falsified documents, committed by an individual or a group of individuals that may result in potential or actual financial loss to the Bank.

2. **Asset Embezzlement**

Asset embezzlement is a type of fraud intentionally committed by Bank personnel to unlawfully possess an item/object, whether in whole or in part, belonging to the Bank, in violation of the Bank's internal regulations.

3. **Information Leakage**

Information leakage refers to deliberate actions by Bank personnel involving the disclosure, forwarding, or distribution of data, transactions, or other confidential information protected by Bank policies, laws, or authorities to third parties, causing financial or non-financial harm to the Bank.

4. **Banking Crime**

Banking crime includes any acts prohibited by banking laws committed by Bank personnel.

5. **Violation of Company Regulations**

Engaging in actions that are subject to sanctions according to the prevailing company policies.

6. **Conflict of Interest**

A situation in which Bank personnel (including the Board of Directors and Commissioners) have interests outside of official duties—whether personal, familial, or other external interests—that may impair their objectivity in making decisions or policies in line with the authority given by the Bank.

7. **Bribery and/or Gratuities**

Accepting anything of value from other parties related to one's position/authority that conflicts with their responsibilities or duties.

8. **Fraud** (*repetition – see point 1*)

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Dishonest conduct or deception, including cheating, extortion, forgery, concealment or destruction of documents/reports, or the use of falsified documents, committed by individuals or groups resulting in potential or actual losses to the Bank.

9. **Asset Embezzlement** (*repetition – see point 2*)

Intentional misappropriation of the Bank's property by Bank personnel, in violation of internal regulations.

10. **Information Leakage** (*repetition – see point 3*)

Deliberate sharing or disclosure of confidential Bank information to unauthorized parties, causing harm to the Bank.

11. **Banking Crime** (*repetition – see point 4*)

Acts against banking laws committed by Bank personnel.

12. **Violation of Company Regulations** (*repetition – see point 5*)

Actions that breach company rules are subject to disciplinary sanctions.

13. **Conflict of Interest** (*repetition – see point 6*)

Situations where personal interests interfere with professional duties and decision-making.

14. **Bribery and/or Gratuities** (*repetition – see point 7*)

Receiving items of value that conflict with professional responsibilities.

15. **Unethical Conduct**

Acts or behavior by Bank personnel that are ethically unacceptable.

16. **Violation of Sharia Compliance**

Actions that do not fulfill Sharia compliance standards and do not bring holistic benefit, potentially causing harm.

17. **Other actions equivalent to violations**

Any other acts that can be classified as violations based on their nature or impact.

Protection Principles

Whistleblower Protection

In the receipt and follow-up of WBS (Whistleblowing System) reports at the Bank:

- a. **Maintaining the confidentiality** of the whistleblower's identity and the contents of the report submitted.
- b. **Protection is only provided** to whistleblowers who disclose their identity and provide contactable information.

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c. **Providing protection** to whistleblowers who experience adverse treatment from the reported party, including:

1. Unfair dismissal
2. Demotion or reduction in rank
3. Harassment/discrimination in any form
4. Threats of physical harm
5. Harmful notations in personal records

Under certain circumstances, the Bank may also protect the whistleblower's family.

a. The Bank's protection for the whistleblower does not apply if:

1. The whistleblower is proven to have failed in maintaining the confidentiality of their identity and report.
2. The report submitted by the whistleblower is found, through audit, to be false, defamatory, or the whistleblower is found to be involved in the same or a different violation and/or fraud.

Reports can be submitted to:

Website : <https://whistleblowing.tips/wbs/@E-WBSI>
Email : e-wbsi@rsm.id
Call/WA/SMS : 08117-851-851