

HUMAN RESOURCES POLICY			
Policy	:	Employee Discipline & Ethics	
Sub Policy	:	Code of Ethics and Conduct	
Other related policy	:	-	
No Policy	:	A.07.01	Effective Date : 1 st September 2019 Version : 004

Preface

Bank as business of trust builds its foundation on people's trust. Its reputation also relies mainly on the trust it builds. Both trust and reputation can only be established through integrity and high professionalism of each individual in the Bank.

Besides as entity of trust, Bank is also known as "Highly Regulated Institution" which is an institution bound by regulations in operating its business. Every behaviour or matters which do not comply with regulations will impact on people's trust, reputation and Bank's business sustainability.

Therefore, each employee, including Board of Commissioner and Board of Directors must maintain integrity, behaviour and compliance towards prevailing regulations, which cannot be negotiated and is the Company's main priority in implementing Code of Ethics and Conduct as an effort in creating High Compliance and High Performance Culture in the Company.

For achieving common objectives, maintaining the Company reputation and advancing the Company, Bank Management Committee (BMC) expects employees to know, understand and implement those principles in executing daily jobs and responsibilities.

Tigor M. Siahaan
President Director

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1. Vision, Mission and Core Values

1.1. Vision

To be the Leading ASEAN Company

1.2. Mission

To provide universal banking services in Indonesia as a high-performing, institutionalized and integrated company located in ASEAN and key markets beyond, and to champion and the acceleration of ASEAN integration and the region's links to the rest of the world.

1.3. Core Values

1.3.1. Customer Centric

We exist to serve our customers and we sell products and services that our customers understand and value.

1.3.2. High Performance

We work hard and we work strategically for customers, staff and other stakeholders.

1.3.3. Enabling People

We encourage our people to think big and look wide and we ensure that they are appropriately empowered to deliver value.

1.3.4. Strength in Diversity

We have respect for different cultures, we value varied perspectives and we recognise diversity as a source of strength

1.3.5. Integrity

We are honest, respectful and professional in everything we do because integrity is the founding value of CIMB Niaga.

2. Objectives

2.1 Code of Ethics and Conduct ("the Code") sets out the behaviour, conduct and responsibilities of Employees and Associated Persons working for and on behalf of the Company in upholding the corresponding conduct to achieve a high standard of professionalism and ethics. The Code is an integral part of Good Corporate Governance and Employees must adhere to the Code, as guidance in decision making and formulating policies, procedures and management practices in the Company.

2.2 The Code of Ethics outlines the Company's set of principles that guides decision making. It provides the statement of overarching principle telling Employees what is right and what is wrong.

2.3 The Code of Conduct outlines specific behaviours and conduct that are required or prohibited within the Company as a condition of ongoing employment and also the expected conduct in interaction with various key stakeholders.

3. Application of the Code of Ethics & Conduct

3.1. The Code is applicable to Employees, including Board of Commissioners and Board of Directors.

3.2. Adherence to the Code is a condition of employment with the Company. Employees are required to learn, thoroughly understand and acknowledge this Code by signing Commitment Statement Form ("*Formulir Pernyataan Komitmen*") on an annual basis as directed by Human

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Resources Directorate. The Statement Form is binding and Employees must abide by it, in addition to other internal policies and procedures.

- 3.3. The Code will be deemed to be terms and conditions of employment for Employees who have and yet to acknowledge the Code by signing Commitment Statement Form (*"Formulir Pernyataan Komitmen"*). Employees who are in violation of the Code and related policies or any applicable laws or regulations, will be subject to disciplinary action, which may include termination of service.
 - 3.4. This Code sets the minimum standard that the Company expects of Employees. As such, the Code must be read in conjunction with the Company's other applicable internal policy and procedures and regulatory guidelines.
 - 3.5. Where there is a discrepancy or conflict between the Code, the Company's policy and procedures and/or regulatory guidelines, the more specific requirement applies.
 - 3.6. Human Resources Directorate shall be the custodian of this Code. This Code may be revised from time to time. Notice of any such revision will be published in means of communication deemed suitable by Human Resources Directorate. Should Employees have any queries as to the interpretation or applicability of the Code, they can seek guidance from Human Resources Directorate.
 - 3.7. Implementation of this Code is the responsibility of Employees, including Board of Commissioners and Board of Directors.
4. References
- References used in this policy are:
1. UU No. 7 Tahun 1992 tentang Perbankan jo UU No. 10 Tahun 1998 tentang Perubahan atas UU No. 7 Tahun 1992
 2. UU No. 13 Tahun 2003 tentang Ketenagakerjaan
 3. UU No. 37 Tahun 2004 tentang Kepailitan dan Penundaan Kewajiban Pembayaran Utang
 4. UU No. 8 Tahun 1995 tentang Pasar Modal
 5. PBI No. 11/1/PBI/2009 tentang Bank Umum
 6. PBI No. 8/14/PBI/2006 tentang Perubahan atas PBI No. 8/4/PBI/2006 tentang Pelaksanaan Good Corporate Governance bagi Bank Umum
 7. SEBI No. 13/28/DPNP/2011 tentang Penerapan Strategi Anti Fraud bagi Bank Umum
 8. POJK No. 60/POJK.04/2015 tentang Keterbukaan Informasi Pemegang Saham Tertentu
 9. Collective Labour Agreement PT. Bank CIMB Niaga, Tbk
 10. Conflict Management Policy
 11. Anti Fraud Policy
 12. Consumer Protection Policy
 13. Whistle Blowing Policy

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5. Definition

<u>Terms</u>	<u>Definition</u>
Employees	All individuals working at all levels, grades and capacity including permanent, contract, probationers, trainees and interns.
Company	PT. Bank CIMB Niaga, Tbk
Management	Board of Directors or individual trusted with authority from Board of Directors to take actions on behalf of the Board of Directors
Family	Person with relationship due to marriage, blood relations, and/or step-relationships: <ul style="list-style-type: none"> • husband/wife • biological/step-/adopted child • biological/step-/adopted parent • biological/step-/adopted parent-in-law • biological/step-/adopted sibling • aunt/uncle (biological/step-/adopted sibling from parent or parent-in-law) • biological/step-/adopted niece or nephew
D-1 Related Unit	Employee who reports directly to related Director
Fraud	Non-compliance or negligence done in purpose to mislead, cheat or manipulate the Company, customers, or third party that taking place in Company environment and/or using Company facilities which cause Company, customers or third party suffer from loss and/or fraudster receives monetary benefits whether directly or indirectly.
Conflict of Interest	Conflict or potential conflict between personal/family/group interests with Company interests, including use of position/role to advance their personal/family/group benefits, whether directly or indirectly on the basis of information, assets and other resources gained during employment.
Money Laundering	The act of placing, transferring, paying, purchasing, granting, donating, entrusting, taking to overseas, exchanging, or other criminal conducts against wealth that known or suspected to be sourced from criminal actions in the purpose to conceal, or disguise source of wealth so it appears as legitimate wealth
Information	Information includes inside information and proprietary information. Inside information is all non-public information whether it is written or verbally received from customers, prospective customers, employee personal data, supplier, and other third party including but not limited to policies, procedures, working instructions, internal manuals, minutes of meetings, daily balance sheets, limits and delegations, internal memos, internal financial and credit related information. Proprietary information is all information related to business strategy, business research, new product plans, non-published financial or price information, business practices and plans, and others.

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6. Code of Ethics

The Company is committed to the observance and practice of the highest ethical standards and therefore Employees must continuously uphold and abide by the following 6 (six) guiding ethical principles which are the foundation of our professional dealings.

6.1. Integrity

6.1.1. Integrity is the Company's founding value and most valuable assets, therefore Employees must protect this asset at all times by being honest, respectful and professional.

6.1.2. Employees must be honest and open in all their dealings. Employees must behave in an accountable and trustworthy manner, and avoid any acts that might damage the reputation of, or bring discredit to the Company at any time.

6.2. Confidentiality

6.2.1. Information confidentiality is paramount in maintaining the Company's reputation. All information regarding employee personal data, business or affairs of the Company or of a customer which was acquired in the performance of duties shall be treated as confidential. Employees must protect the confidentiality and sensitivity of information provided to them. This includes using it for its intended purposes only and not divulging information to any unauthorised persons without consent from those involved unless disclosure is required by law and regulation. This requirement shall continue to exist even after Employee's employment with the Company.

6.2.2. Employees must comply with the Company's policies and applicable laws concerning the protection of information confidentiality, including the protection of customers' personal data.

6.3. Competence

Employees shall develop and maintain the relevant knowledge and skills to ensure that their activities are conducted professionally and proficiently. This includes consistently improving and regularly updating appropriate skills and qualifications.

6.4. Conflict of Interest

Employees must avoid any situation and condition that may lead to conflict of interest. All matters which could impair objectivity should be declared in compliance with applicable Conflict Management policy.

6.5. Fairness

6.5.1. Employees must act responsibly and embrace a culture of fairness and transparency in all our dealings with all stakeholders.

6.5.2. Actions, at all times, must reflect fair and proper business practices and are in compliance with internal policies and procedures or regulatory requirements.

6.5.3. Employees should never take actions that are against relevant regulatory requirements, including but not limited to taking unfair advantage of anyone or anything through manipulation, concealment, abuse of confidential information, or any other unfair dealing practice.

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6.6. Respect

- 6.6.1. The Company treat Employees with fairness, dignity, and respect.
- 6.6.2. The three (3) critical behaviours which is the foundation to build A Better CIMB culture shall be the guiding principles in our interaction with fellow Employees.
- 6.6.3. Good relations with our stakeholders are one of the keys to Company success. Employees can help build good relationships by behaving and conducting themselves with honesty, integrity and respect.

7. Code of Conduct

- 7.1. The Company, being a leading financial services provider, is involved in a people-driven business. Everyone has a role in serving our clients and customers.
- 7.2. In pursuit of the Company's vision, the Company has established a set of standards that reflect exemplary conduct and our obligation towards the Company, fellow employees, customers, regulators, business associates and society. Employees have an important responsibility to ensure that their own conduct meets the highest standards of personal and corporate integrity in compliance with core values and ethical principles of the Company. The Code should be viewed as an essential guide on how Employees are expected to conduct and interact with all key stakeholders.

8. Relationship with Stakeholders

8.1. Company

8.1.1. The Basic Rule

Employees must uphold the interest and integrity of the Company at all times and ensures no conflict of interest.

8.1.2. Preserving the Reputation of the Company

It is the duty of Employees to preserve the Company's reputation. Activities which could represent conflict of interest, cause internal or external regulatory breach or adversely affect the Company's reputation shall not be permitted. In dealing with third party, no Employee shall present himself an as employee of the Company for any purpose unless it is permitted and authorized by the Company. The Company's interests must always prevail.

8.1.3. Anti-Bribery and Corruption

The Company promotes a zero tolerance policy against all forms of bribery and corruption committed by Employees to third party or vice versa.

Employees must avoid any activity that might lead to, or suggest, bribery and other forms of corruption. This include but not limited to giving or taking of bribes, making of facilitation payments or offer rewards and accept payments or benefits illegally in whatever form.

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Employees are responsible of prevention, detection and reporting of bribery and other forms of corruption through governance set by the Company, such as escalation to Direct Supervisor, whistle blowing or other media channels provided by the Company.

8.1.4. Integrity and Accuracy of Records and Reports

Accounting and other records and reports must accurately, completely and properly describe the transactions they record. All transactions, contracts, assets, liabilities, revenues, expenses and employee benefit's claims of the Company must be recorded in its regular books of account and records, and all commitments must be accurately, completely and properly reported.

Employees are prohibited in any way manipulate, alter, conceal and delete any account, record or document of the Company for any purposes. Disposal or destruction of the Company's records shall only be done in accordance with applicable policies.

8.1.5. Proprietary Information

All data and information related to business process and financial information concerning the Company, customers, employees, programs, materials and documentation relating to all financial models and products, computer and telecommunications systems, software, hardware and applications developed by Employee for the Company are proprietary to the Company.

Employees are prohibited from using, keeping, deleting, transferring, copying, uploading, downloading or divulging such information except as permitted or required in connection with their work on behalf of the Company, and they may not use it for their personal benefit, or for the benefit of any other person or entity, during or after their employment with the Company.

8.1.6. Insider Trading

In securities trading activities, employees are prohibited from creating or disclosing sensitive and confidential information that may affect the financial value of the securities directly or indirectly to other employees including to family members and other third parties.

All employees shall comply with all applicable laws, Conflict Management policy and other regulations in relation to insider trading.

8.1.7. Fraudulent Activities

Employees must not engage in any conduct involving fraud or dishonesty in whatever form or commit any act which reflects lack of integrity and professionalism.

Employees are obligated to fully cooperate in all investigations, which may be conducted by the Company or any regulatory bodies by providing true information and statements, neither deceptive nor misleading.

Employees are also required to comply with internal policies and procedures or regulatory requirements in relation to fraud.

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8.1.8. Managing Conflict of Interest

Employees must not place themselves in situations that cause conflicts or potential conflicts of interest with fellow employees, customers, and any other relevant stakeholders.

Employees are prohibited from using their position to advance their own personal gain or advantage derived from misuse of information, assets and other resources or facilities gained during their employment in the Company or from other stakeholders, including gaining benefits for their family or party that has connection to them.

In the event that an employee faces a conflict of interest whether it is occurring or potentially occur, the employee must escalate the circumstances to his direct supervisor and next higher authority to mitigate potential conflicts of interest in accordance with Company's policies.

8.1.9. No Gift Policy

Employees and their family members are not allowed to accept and receive souvenirs, gifts, service, entertainment, "sponsor for outing, gathering, training, seminar, and workshop", business trip which are financed or organised by vendors or other Company's business associates or from those who are currently involve in a bidding process, or receive any special treatments from customers, business associates, partners, vendors or any third party. In the event that the offer cannot be rejected, avoided and may impacted to the good relationship, then the offer may accepted with the following approval as follows:

- a. The offer of food or other form which has value equivalent \leq Rp 1.000.000,- (maximum one million rupiah) must be approved by Direct Supervisor and Next Higher Authority.
- b. The offer other than food which has value equivalent $>$ 1.000.000,- (above one million rupiah) must be approved by Director of related unit.

The submission for seeking the approval as above must specify the terms of accepted gift by choosing two options below:

- a. Kept by the related unit to be utilized together within the team for the common goals.
- b. Submit to the Bank to be utilized for Bank's activities (social charity) for the common goals.

Employees are prohibited from providing souvenirs, entertainments, gifts, or any other form of it to any third party which may influence or cause potential conflict of interest. Any kind of grant which is still within reasonable value and has been through mutually beneficial business considerations shall be approved by Director in the related unit in accordance to the applicable internal policies and procedures.

8.1.10. Outside Financial Interest

Where an Employee, either directly or indirectly, receives financial interest from customers, whether as a sole proprietor, partner or shareholder, such an interest

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must be disclosed immediately to Direct Supervisor and Next Higher Authority or any third party who is concerned if it may cause conflict of interest. Afterwards, Employees are prohibited from directly involved in the deal between Company and customers as long as the financial interest still exists, unless permitted by the Company. Such report must also be made if Employee has holdings of 5% or more of other company/entity

8.1.11. Outside Employment/External Business Interest

Employees must devote their time and attention to the fulfilment of their obligations to the Company.

Employees must not take up other employment agreement, neither part-time nor full-time, or be involved in any outside business activities, whatever the capacity is (including being involved as a management or board of director), except the employee gets the assignment from company or have the written consent from Direct Supervisor and Next Higher Authority with the acceptable and reasonable justification.

Employees may engage on a voluntary basis in lawful non-profit public service organizations, such as religious, educational, cultural, social, welfare, philanthropic or charitable institutions, provided the participation does not conflict with office hours and interfere with the Employee's ability to perform their duties for the Company and there is no conflict of interest, or appearance of a conflict, resulting from any relationship between the organization and the Company.

Employees are prohibited from using data, assets or attributes of the Company for political activities or using political party attributes and campaigning within the Company. The Company does not provide any assistance, compensation or reimbursement related to political activities whether directly or indirectly.

8.1.12. Confidentiality

Employees must take every precaution to protect the confidentiality of information and uses it in accordance with applicable internal policies, internal procedures and regulatory requirements

Employees who have access to any document or information relating to the affairs or account of any customer/business associates of the Company must not disclose the information to any third party in any form which may give opportunity of misuse or conflict of interest or potential conflict of interest.

Employees are prohibited from informing account blockages or other Company actions towards customer under investigation or response on behalf of the Company, without the prior specific permission of the relevant parties of the Company.

Employees are prohibited to use confidential information through any methods, such as altering, removing, keeping, taking, concealing, transferring, uploading or downloading any customer or personal information for the interest of personal, family or any third party.

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Employees are prohibited from disseminating confidential personal information including but not limited to amount of salary, incentive, bonus, rewards, tax and third party information obtained during the course of employment to other employee(s) or any third party who do not require such information.

Obligations and prohibitions stated above shall continue to exist even after Employee's employment with the Company, unless the information used and/or disclosed is permitted by relevant internal policies and procedures or regulatory requirements.

8.1.13. Use of the Company's Assets

Employees are only allowed to use the Company assets (including the Company symbol and logo), facilities, or services for purposes and interest of the Company.

Employees are responsible for the protection of Company and customer assets (whether tangible or intangible), including for safekeeping of Company and customer's documents which are but not limited to certificates, *Izin Mendirikan Bangunan* (IMB), *Pajak Bumi dan Bangunan* (PBB), business/work plans, customers information, intellectual properties (computer programs, models and others), physical buildings, office facilities, *Asset Yang Diambil Alih* (AYDA), and others.

The Company's email facilities shall only be used for business purposes and Employees must ensure its usage does not expose the Company to any legal or business risks.

8.1.14. Acting Responsibly and within Authority

Employees are expected to perform their duties diligently and responsibly by taking into consideration the risk from each set of activities and taking action within authority in accordance with applicable policies.

8.1.15. Compliance with the Company's Policy and Procedures

Employees are required to maintain ongoing compliance with all statements of policies, procedures and standards of the Company and with lawful and ethical business practices. Such compliance shall not be by form of written statement only but need to take consideration on the substance and purpose of the policy and procedures. Non-compliance or breach will be subject to disciplinary action in accordance with applicable disciplinary policies.

8.1.16. Whistle Blowing

It is imperative that Employees be vigilant about the on-goings of the Company's immediate operating environment. An Employee who becomes aware of any wrongdoings, malpractices, non-compliances or irregularities, whether such activity involves Employees or external parties, should promptly and in good faith, report the matter through whistle blowing report channels provided by the Company.

8.1.17. Use of Social Media

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Employees must not post, upload, or disseminate any negative information, issues or news which the accuracy are yet to be guaranteed and any other content that is likely to provoke, attack, defame or offend any fellow colleagues, managers, the Company and its customers/business associates or any third party on any media channels including social media.

Employees who discover any negative information above must report to unit appointed by the Company.

8.1.18. Speaking on Behalf of the Company

All requests for speeches, interviews or comments for use in broadcasts, newspapers, magazines or other media relating to the affairs of the Company should be referred to representative or person appointed by the Company. All release of company information or company statement must be reviewed and approved by President Director and/or related Director.

Further, Employees, irrespective of whether in their personal or professional capacity, must not make any public statements on the Company's policies and decisions, in any form or method without approval of the Company.

8.1.19. Employee Discipline

Employees are expected to abide by the Company's standards in terms of attendance, performance and conduct to ensure a high standard of work ethics is maintained. Employees are also expected to abide by the Company's dress code to reflect high level of professionalism.

8.1.20. Workplace Safety

Employees are jointly responsible to ensure the workplace is clean, safe, conducive and comfortable in accordance with policies related to workplace safety.

8.1.21. Financial Conduct

Employees are expected to manage their personal finances responsibly to avoid any financial issues. Employees must immediately report to Human Resources Directorate if they are subject to any bankruptcy actions based on court verdict filed by creditors or employee's own claims. The Company reserves the right to determine the suitability of the Employee for continued employment.

8.1.22. Personal Conduct

Employees are also expected to maintain proper and professional personal conduct to avoid bringing any disrepute or causing any action which may tarnish or undermine the Company's reputation or affect their suitability for continued employment in the Company.

8.1.23. Unlawful Conduct

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The Company's policy prohibits Employees from engaging in unlawful conduct. Any Employee convicted of such crime will be subject to disciplinary action, including dismissal.

Employees are prohibited from unauthorized sale, manufacturing, consumption, possession, distribution, purchase or being under the influence of any drugs.

8.1.24. Skill and Competency

Employees must continuously strive to improve their qualifications, skills and competencies and must attend all mandatory training programmes, whether conducted via classroom, e-learning or discussion session, as determined by the Company.

8.1.25. Abuse of Employee Facilities

Any facilities provided to the Employees arising from his employment in the Company are to be used strictly in accordance with purpose and the applicable terms. This includes but not limited to banking account facilities, various financial interest, waiver of charges for various products and services provided by the Company, health facility and other facilities or benefits. Employees must not misuse such benefits provided to them or conduct the operations of such benefits in violation of any relevant internal policies and procedures or regulatory requirements.

8.1.26. External Training/Guest Speaker/Author

Employee may accept invitation(s) to be an external trainer give talks or participate in seminars, symposiums or events of similar nature organized outside the Company.

In the condition where the activity is conducted within working hours and/or where the topics sourced or relates to matters involving the Company, the Employee must first obtain written approval from D-1 related unit and not allowed to receive fee or emoluments in form of money. Such approval must also be obtained even when the Employee receives fees or emoluments in any other forms.

8.1.27. Responsibilities Subsequent to End of Employment

The Company reserves the right to take appropriate legal action in the event an Employee who has left employment is found to have committed any improprieties during the course of his employment with the Company. The duty of confidentiality of all data and information related to Employee, customers or the Company extends beyond an Employee's employment with the Company.

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8.2. Fellow Employees

8.2.1. The Basic Rule

All dealings with fellow Employees must be consistent with the Company's three (3) critical behaviours to build A Better CIMB. In dealings with fellow Employees and colleagues, Employees are expected to act professionally and treat fellow Employees and colleagues with the utmost respect and ensure our communication with each other are appropriate.

8.2.2. Respect each other

The Company values diversity and provide the equal working opportunities for all employees. Therefore, the mutual respect among of the employee must not be affected by diversity of racial, gender, ethnic, religion, physical condition or other bias

The Company do not tolerate any form of discrimination, bullying, intimidation or harassment of any kind, including towards certain tribe, religion, race, physical condition and class (*suku, agama, ras, dan antar golongan/SARA*).

Employee is prohibited to conduct any acts of violence or threats of violence as well as must avoid any acts of sexual harassment, either verbally or physically.

Employees can report discrimination, harassment and intimidation to Direct Supervisor, Next Higher Authority or Human Resources Directorate.

The Company do not tolerate any form of discrimination, bullying, intimidation or harassment of any kind, including towards certain tribe, religion, race and class (*suku, agama, ras dan antar golongan/SARA*)

Employee is prohibited to conduct any acts of violence or threats of violence as well as must avoid any acts of sexual harassment, either verbally or physically.

Employees can report discrimination, harassment and intimidation to Direct Supervisor, Next Higher Authority or Human Resources Directorate.

8.2.3. Recognise Each Other's Efforts and Always Back Each Other Up

Employees must encourage each other, work together and participate in setting directions and solving problems, and pay attention to opinions and suggestions on a fair basis without discrimination.

8.2.4. Supervision

All business activities in the Company must be subject to appropriate supervision by supervisor or any authorized party. The supervisor or the authorized party can delegate their responsibilities to other Employees only if that such other Employees possess the necessary skills and experience to properly fulfill the responsibilities assigned.

The supervisor or the authorized party must also provide adequate training and guidance to the employees who received the delegation of authority therefore they can perform their responsibilities in accordance with applicable policies and

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procedures. The supervisor or person with authority must understand and monitor consistently and thoroughly the performance of employees who received the delegation of authority.

8.2.5. Executing Legitimate Instructions by a Supervisor

Employees shall diligently perform and execute legitimate instructions given by their Direct Supervisor at all times. Legitimate instruction refers to order/request/assignment to perform tasks/jobs which are not in contravention or in violation of any existing policy and established rules and regulations.

8.2.6. Preferential Treatment

No Employee should give or receive any preferred conditions of employment because of family or personal relationships. Any decisions related to Personnel issue must be based on sound management practices and not cause potential conflict of interest.

8.2.7. No Smoking Policy

Employees must not smoke in or on the immediate perimeter of any of the Company's buildings apart from the designated areas. Smoking includes the use of all simulated smoking devices such as electronic cigarettes, etc.

8.3. Customers

8.3.1. The Basic Rule

The Company is committed to offer and deliver quality products and services to our customers. All dealings with customers of the Company and with others must be handled fairly, with honesty, integrity and high ethical standards and in accordance with applicable Consumer Protection policy.

Employees can only sell or offer official products and programs approved by the Management and Employees must have adequate product knowledge and must know and understand the Company's customers regarding their needs, financial circumstances and risk profile to decide product impacts and whether the products suit the customers' needs. Employees are prohibited to offer any products or services outside of company's business to the customers.

Employees who sell and offer the products and programs must ensure that they provide the customers understanding of the products and services they propose to purchase and the alternatives, and all costs and downside risks related to the products or services. Transparency in the fees and charges must be employed to avoid taking unfair advantage of the customers.

Employees are prohibited from providing and/or promising incentives/gifts to customers whether from Employees personally and/or behalf of illegitimate product/program.

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8.3.2. Dealings or Transactions on Customers' Accounts or Monies

Any dealings or transactions on customers' behalf or accounts may only be conducted based on proper instruction from the customers based on the requirements stipulated in the respective policies and procedures. Any instruction from customers must be in written and must be verified for the legitimacy. No Employees may perform any such dealing or transaction without the consent and authorisation from the customer.

Misappropriation of customers' monies is a serious misconduct and a violation of the trust and confidence placed by our customers as custodian of their monies.

Employees are prohibited from providing and/or disseminating information/data/reference of the Company's customers to marketing relative/friend outside the Company where there is no partnership in term of providing reference between product owners with the Company. Employees are also prohibited from using their Company accounts for customers' needs.

8.3.3. Personal Dealings with Customers

To avoid any situation which may bring disrepute to the reputation of the Company, Employees must not have any personal dealing (including borrowing or lending transaction) with customers. Employees must also conduct themselves with proper and professional decorum.

8.3.4. Handling Customer Complaints

Customer complaints, disputes or dissatisfaction with the products or services of the Company must be addressed fairly and promptly. Employee who handles a complaint better not be the subject of the complaint. All complaints should be investigated and replied to as soon as possible. Customer complaints of a severe nature that may affect the overall reputation of the Company should be immediately be followed up by the Customer Service unit and other related person.

Customer complaints, disputes or dissatisfaction must be handled in accordance with internal policies and procedures or regulatory requirements.

8.4. Regulators

8.4.1. The Basic Rule

The Company shall deal with regulators in a responsive, open and cooperative manner.

8.4.2. Compliance

Employees are responsible to understand and adhere to all applicable laws, rules and regulations.

HUMAN RESOURCES POLICY			
Policy	:	Employee Discipline & Ethics	
Sub Policy	:	Code of Ethics and Conduct	
Other related policy	:	-	
No Policy	:	A.07.01	Effective Date : 1 st September 2019 Version : 004

8.4.3. Regulatory Licences

It is the duty of Employees to ensure that they are licensed, registered, certified or hold appropriate licenses to legally perform their job functions in accordance with internal policies and procedures or regulatory requirements.

8.4.4. Regulatory Reporting

Employees are responsible on the regulatory reporting regarding the data and information on an accurate, timely and regular basis to ensure the business operations are in line with the principle of Good Corporate Governance and in accordance with relevant regulatory requirements.

8.4.5. Money Laundering Activities

Employees should not engage in any money-laundering activity or terrorism financing.

Employees must conduct appropriate due diligence to understand the business and background of the Company's prospective business counterparties and to determine the origin and destination of money, property, and services.

Employees must be aware of money laundering risks and report any suspicious transactions or suspected incidents of money laundering to person with authority (Anti Money Laundering Head Office) in accordance with Anti Money Laundering policy.

Employees are prohibited from informing the suspicious transactions to customers or third party who do not require such information (anti-tipping off). Any breach may expose the Company to legal sanctions, financial penalty and disrepute to the reputation of the Company.

Employees must also ensure they do not allow their personal banking accounts to be used in facilitating money laundering or terrorism financing or similar activities in any forms.

8.5. Business Associates

8.5.1. The Basic Rule

The Company adheres to operating its business with integrity on the basis of Good Corporate Governance policy and under business conditions which are fair and equitable.

8.5.2. Anti-Competitive Conduct

All businesses of the Company must be conducted in fair and open competition. Under no circumstances should an Employee discuss or commit the Company to any arrangement with any competitors or other counterparties (whether affecting pricing or marketing policies or otherwise) or behave in any way which results in a breach of any competition laws.

Employees must comply with applicable regulatory requirements, other policies related to business competition. Violation of such policies could subject the Company and employee to civil and criminal penalties.

HUMAN RESOURCES POLICY			
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Other related policy	:	-	
No Policy	:	A.07.01	Effective Date : 1 st September 2019 Version : 004

8.5.3. Objective and Fair Evaluation in Procurement

Employees shall comply with transparency principle in selecting and partnering with trade partners in accordance with the Company's procurement policies and procedures.

Decision making of the Company's equipment and tools procurement (procurement, repair, maintenance, building facilities, equipment and tools of the Company) must be based on evaluation of quality, price, post-sales service and other ease/benefits obtained by the Company from the transaction. Policies that must be taken in consideration include:

a. Offer Price Information

Transaction between the Company and vendor must be conducted through tender in order to obtain quality product or service as well as optimum and efficient purchase through comparing quality and offer price by the Company vendors. Price confidentiality must be guaranteed.

b. Price Deduction/Discount/Commission

All price deduction/discount/commission granted by the Company vendor, whether recorded on behalf of Employee or Company, must be recorded as the Company gains and not benefit for Employee or persons in the Employee business units.

Purchase of each good and service for the Company needs is based on compliance and objectivity in price standard, quality, availability, requirements or services provided by partner or supplier

8.5.4. Consultation or lobby activities with vendors must be based on principle and criteria of objectivity.

Consultation, lobby and negotiation by the Company must be conducted by official person appointed or on behalf of vendor or supplier interest. Dealing with third party outside vendor interest is prohibited with excuse "for our good" or "returning favor" from vendor.

8.6. Society

8.6.1. The Basic Rule

The Company has a duty to society to uphold and maintain a high level of integrity and professionalism.

8.6.2. Sustainability Culture

All employees must consider the harmony of environment, social, and economic aspects include the impact which may occur from any process and decision includes product and services as well which provide to community to ensure that company business activities have the positive sustainability impact for the Company's stakeholders and communities.

HUMAN RESOURCES POLICY			
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Other related policy	:	-	
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8.6.3. Corporate Social Responsibility (CSR) Culture

Employees are encouraged to active participated to support the Company's responsibility activities to environment, economy, and social community.

This policy nullifies the previous policy "A.07.01 perihal Kebijakan Kode Etik dan Perilaku Kepegawaian tanggal 16 Juni 2017."



APPROVAL FORM /REPORTING CODE OF ETHIC AND CONDUCT

Hereby I sign below,

NIK : _____	Grup/branch : _____
Name : _____	Sub-Directorate : _____
Position : _____	Directorate : _____

Seek approval for/ report that,

- | | |
|--|---|
| <input type="checkbox"/> Give a gratification*
<input type="checkbox"/> Accept a gratification*
<input type="checkbox"/> Conflict of interest
<input type="checkbox"/> Stated Bankruptcy* | <input type="checkbox"/> Have occupation or external business related
<input type="checkbox"/> Accept financial profit from customers
<input type="checkbox"/> Have stocks >5%
<input type="checkbox"/> Be a speaker/guest speaker/writer for external activities* |
|--|---|

(*require D-1 approval)

With an explanation as follows:

Full name & Signature

Date :

Gratification is gift in broad meaning, including giving money, goods, discount, commission, loan without interest, travel ticket, accommodation, travel tour, free medication, and other facility. The gratification either accept in domestic or overseas and conduct by using electronic or without electronic.

Recommendation : <input type="checkbox"/> approve <input type="checkbox"/> not approve	Direct Supervisor <i>Full name & Signature</i> Date :
Reason/note:	Next higher supervisor <i>Full name & Signature</i> Date :
Recommendation: <input type="checkbox"/> approve <input type="checkbox"/> not approve	D – 1 (Official 1 level under Director) <i>Full name & Signature</i> Date :
Reason/note:	D – 1 (Official 1 level under Director) <i>Full name & Signature</i> Date :

Original form document kept by Direct Supervisor and copy keep by related employee also inform to HRBP

COMMITMENT STATEMENT ACCEPTANCE OF
CODE OF ETHICS AND CONDUCT

The person signed below declares in fact:

1. I have read and understood the content of Code of Ethics and Conduct and agree to comply and implement all the conditions and directly report if I know, see or find any violation of Code of Ethics and Conduct.
2. I have no employment relation or involve in any outside business activities within working hours not reported and approved or involve in any sort of activity which may lead to potential conflict of interest, interrupt with my jobs and responsibilities or damage the reputation of the Company.
3. In performing duties and responsibilities, I do not own any personal interest nor conduct in the purpose of advancing personal, family or other affiliated person interest, nor am I currently in a situation which may lead to potential conflict of interest.
4. I am not under any inquisition or investigation of the authorities for any unlawful acts.
5. As an Employee of the Company, I uphold integrity, courtesy, friendliness, fairness and professionalism in dealing with fellow Employee, customers, Direct Supervisor and all other stakeholders including general public to preserve personal as well as the Company reputation.
6. In carrying out duties, I work responsibly and within authority and make decision with accuracy, objectivity and circumspection for the interest of the Company.
7. I understand and accept that violations of Code of Ethics and Conduct, other applicable policies and procedures can lead to disciplinary actions, including termination of service or legal charges.

Acknowledged by,

Date :
Name :
Employee ID (NIK) :
Position :
Directorate :