# CONFLICT MANAGEMENT POLICY

(version: 12.2016)

PT BANK CIMB NIAGA Tbk

Policy Name : Conflict Management Policy

Sub Policy Name : Table of Contents

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Sub Policy Name : 1. Definitions

#### 1. DEFINITIONS

Bank or CIMB PT Bank CIMB Niaga Tbk, a legal entity

Niaga established under the Indonesian law

and domiciled in South Jakarta.

Conflict of The difference between the Bank's

Interest economic interests and the personal

economic interests of the owner, a

member of the Board of Commissioners,

a member of the Board of Directors,

Executive Officer, and / or a party

who is related to the Bank.

CCS (Corporate The Bank's organisational units that

Client Solution) handle corporate transactions such as

IPOs, mergers and acquisitions.

Chinese Wall Policy that is used to

Policy prevent the spread and misuse of Non-

Public Information, which must be

adjusted from time to time.

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CIMB Group CIMB Group Sdn. Bhd. And / or CIMB

Group Holdings Berhad a legal entity

incorporated in Malaysia, domiciled in

Kuala Lumpur, as well as companies

within such group as set forth in the

organisational structure maintained by

the Group Company Secretary from time

to time.

CIMB Securities A Company within the CIMB Group that

engages in investment banking,

companies' Securities trading, retail

Securities trading, research and

corporate advisory services.

Control Room A Control Room that is formed to

CIMB Group monitor (a potential) for a conflict

of interests that may occur in CIMB

Group environment including in CIMB

Niaga. The Control Room's function is

performed by the Group Compliance

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Department of CIMB Group.

Control Room

CIMB Niaga

A Control Room that is formed to monitor (a potential) for a conflict of interests that may occur in the Permanent Insider. The Control Room's function is performed by CIMB Niaga Corporate Affairs.

Covered Action

CIMB Niaga's corporate actions including, but not limited to the issuance of new shares and others, among others;

- a) Rights Issue (Limited Public Offering with preemptive rights),

  Private Placement (Limited public offering without preemptive rights).
- b) Execution of options under the stock option plan, accompanied by simultaneous sales of the underlying shares.

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Policy Name : Conflict Management Policy

Sub Policy Name : 1. Definitions

c) Conversion, exchange or execution of all Securities that can be converted or exchanged with Securities.

d) Withdrawal of Securities units under the CIMB Niaga Shares Ownership Scheme that is executed in a personal account.

Covered Division Units in the Bank pursuant to

Attachment 3 that are obtaining information concerning the corporate transaction (covered transaction) of the Bank's customers and/or CIMB Niaga, such as mergers, acquisitions, and others, as well as a corporate action (covered action) such as stock issuance and others.

Covered

Transactions that are related to Securities from companies that become the Bank's customers in the Indonesia

Transaction

Policy Name : Conflict Management Policy

Sub Policy Name : 1. Definitions

Stock Exchange or the Stock Exchange outside Indonesia, including, but not limited to the different jurisdictions where CIMB Group and CIMB Niaga operate, and futures transactions on the futures market.

The Board of Commissioners Directors

The Board of Commissioners is an organ of the Bank who is responsible for and The Board of conducting a general and/or specific supervision in accordance with the articles of association and advising the Board of Directors.

> The Board of Directors is an organ of the Bank who is authorised and fully responsible for the Bank's management for the Bank's interests, in accordance with the purpose objective of the Bank and to represent the Bank either within or outside the

Policy Name : Conflict Management Policy

Sub Policy Name : 1. Definitions

court in accordance with the provisions of the articles of association (Limited Liability Company Law).

CIMB Niaga Group PT Bank CIMB Niaga Tbk and its subsidiaries.

Insider

Non-Public Information about a company

that is a customer of the Bank and the

Bank's transactions/information that

has not been disclosed to the public

as further stipulated in the Capital

Market Law.

Employee

An individual who has a direct working relationship with the Bank through the signing of a work agreement (definite period or indefinite period) by receiving wages or other forms of remuneration (except for the

outsourced employees). In this Policy,

Policy Name : Conflict Management Policy

Sub Policy Name : 1. Definitions

the definition of Employees includes
the Board of Directors and Board of
Commissioners, and the Independent
Party (a member of the Committee at
the Board of Commissioners level).

Policy CIMB Niaga's Conflict Management

Policy including its attachments.

Immediate Family Spouses (husband/wife), children,
adopted children, stepchildren,
siblings and parents / in-laws of the
Board of Directors and Board of
Commissioners of CIMB Niaga

Odd Lots

An amount below or less than one trading unit of shares in Indonesia

Stock Exchange where one (1) Lot equals to 100 shares.

Insiders are:

a. The Board of Commissioners
(including the Sharia Supervisory

Policy Name : Conflict Management Policy

Sub Policy Name : 1. Definitions

Board), the Independent Party,
Board of Directors, and Employees
of the Bank;

- b. The ultimate shareholder of the
   Bank;
- c. An individual who, by virtue of his/her position or profession or because of his/her business relationships with the Bank allows such individual to obtain the Inside (non-public) Information;
- d. Members of the Committee at the
   level of the Board of
   Commissioners;
- e. A Party who within the last six (6)

  months no longer becomes a Party as

  referred to in letter a, letter b,

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Policy Name : Conflict Management Policy

Sub Policy Name : 1. Definitions

or letter c above.

#### Use of Customer

Data

The granting and/or dissemination of personal data, financial data, and business data of the customers to other parties who cooperate with the Bank, including in the definition and/or dissemination of personal data of customers that requires a written consent.

#### Blackout Period

(1) The period commencing fifteen

(15) calendar days prior to the disclosure of CIMB Niaga's quarterly financial statements, and 30 calendar days prior to the disclosure of the annual financial performance results and ending two (2) working days from the date on which the disclosure is made; or

Policy Name : Conflict Management Policy

Sub Policy Name : 1. Definitions

(2) Other time period as determined by the Board of Directors at any time in connection with the Covered Transaction and/or Covered Actions by CIMB Niaga or CIMB Group.

#### Permanent

Is the Covered Person, which consists

#### Insider of:

- 1) The Board of Commissioners (including the Sharia Supervisory Board), the Board of Directors and Bank Management Committee {BMC}
- 2) Independent Party (in this case a member of the Committee at the Board of Commissioners level).
- 3) All the top officials (head of) in the Covered Division

Policy Name : Conflict Management Policy

Sub Policy Name : 1. Definitions

4) The individuals who are identified by the Control Room of CIMB Niaga who are determined as Insiders who obtain information on certain transactions conducted by CIMB Niaga and/or CIMB Group, who have been informed to the Control Room of CIMB Niaga.

Personal Account A transaction/trading made by an Employee [including the joint account (s)] for the benefit/personal benefit of the Employee concerned.

#### Proprietary

Trading

Dealings

A Securities Transaction that conducted on behalf of CIMB Niaga and for the benefit of CIMB Niaga (not for the customers).

#### Restricted List

A list of companies in which CIMB Niaga and the Permanent Insider are prohibited from conducting Securities

Policy Name : Conflict Management Policy

Sub Policy Name : 1. Definitions

transactions with such companies.

Securities

All forms of stock, bonds, debenture, or other evidence of debt including senior debt, subordinated debt, commercial papers, investment contracts, commodity contracts, futures and all derivative instruments such as options, warrants and stock index futures, including but not limited to Securities of CIMB Niaga.

Capital Market

Law

Law of the Republic of Indonesia

Number 8 of 1995 concerning the

Capital Market including its

amendments and/or addendums.

Banking Law

Law of the Republic of Indonesia number 7 of 1992 in conjunction with Law of the Republic of Indonesia number 10 of 1998 concerning Banking including its amendments and/or

Policy Name : Conflict Management Policy

Sub Policy Name : 1. Definitions

addendums.

The Company Law of the Republic of Indonesia

Number 40 of 2007 concerning Limited

Liability Companies including its

amendments and addendums.

Policy Name : Conflict Management Policy

Sub Policy Name : 2. Introduction

#### 2. INTRODUCTION

#### 2.1. Objective

- a) The main objective of this document is to establish the Policy, identify, prevent and manage the potential Conflict of Interests that may arise within the Bank or CIMB Group as a result of the Covered Division's activities who obtains the information on the customers of CIMB Niaga and CIMB Group.
- b) This policy is also intended to reaffirm the prohibition on the use of the Insider Information in Securities transactions by CIMB Niaga Employees.
- c) In the event of any discrepancy between this Conflict Management Policy and the prevailing laws and regulations in Indonesia, the applicable terms shall be the stricter requirements to the extent

Policy Name : Conflict Management Policy

Sub Policy Name : 2. Introduction

permitted by applicable laws and regulations in Indonesia.

d) This policy aims to provide basic principles and guidance for the Employees in engaging in their personal investment activities.

#### 2.2. Regulations Reference

This policy is based on the following law and regulatory references:

- 1. Company Law.
- 2. Banking Law.
- 3. Capital Market Law.
- 4. Rule of Financial Services Authority

  (formerly Bank Indonesia-Supervisor of

  Bank) "OJK" No.8/4/PBI/2006 and

  No.8/14/PBI/2006 concerning the

  Implementation of Good Corporate Governance

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Policy Name : Conflict Management Policy

Sub Policy Name : 2. Introduction

at Commercial Bank and its implementing

regulations and amendments.

5. The Articles of Association of CIMB Niaga.

2.3. Policy Approval

Every revision that is made on this Policy

shall obtain the approval of the Board of

Directors in accordance with the internal

regulations.

2.4. Policy Maintenance

The unit under the Corporate Secretary

(Corporate Affairs) at the Bank is responsible

for updating this Policy and each revision of

this Policy shall be incorporated into the

electronic manual (e-manual).

2.5. Policy Review

This Policy will be reviewed every two (2)

years or on other periods if deemed necessary

Policy Name : Conflict Management Policy

Sub Policy Name : 2. Introduction

before such period expires. The Board of Directors may also request a revision of this Policy at any time.

#### 2.6. Employee Affirmation

- (1) Every Employee is required to comply with this Policy.
- (2) A Permanent Insider other than having to comply with this Policy also has to make a statement by using **Attachment 4** form that must be done once when he/she is declared as a Permanent Insider and submitted to the Corporate Affairs.
- (3) Specifically for the Board of Directors and the Board of Commissioners the updating of the statements to be used as the data for the special register and affiliated parties by using the Attachment 4 form shall be conducted once every six

the

every

<u>end</u> 17

months namely at

(6)

Policy Name : Conflict Management Policy

Sub Policy Name : 2. Introduction

position in June and December or if there is a change, and submitted to the Corporate Affairs.

#### 2.7. Policy Breach

If there is any allegation or known breach or any deviation of this Policy it must be immediately reported to the CIMB Niaga Control Room to be relayed to the Compliance Director and/or President Director. In the event such allegation/ breach concerns the Board of Directors, it must be reported to the Board of Commissioners. In the event such allegations/ breach concerns the Board of Commissioners and/or an Independent Party, it must be reported to the President Commissioner.

#### 2.8. Sanctions and Others

(1) Any violation of this Policy may be subject to sanctions in accordance with

Policy Name : Conflict Management Policy

Sub Policy Name : 2. Introduction

the applicable employment regulations of the Bank up to sanctions in the form of termination of employment. The Bank reserves the right at any time to restrict the trading of Securities by any Employee or to request the cancellation of any trade (sale/purchase) through the personal account concerned. Any restriction, cancellation or liquidation of a personal trading shall be the burden and risk of the person concerned. The Bank may at any time specify the special conditions or limitations on the trading of Securities through personal accounts.

(2) For the immediate family of CIMB Niaga's

Employees who, on the basis of their work,

require that they perform Securities

transactions that are not in accordance

with this Policy, then such CIMB Niaga's

Employee shall immediately contact the

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Sub Policy Name : 2. Introduction

CIMB Niaga Control Room to obtain a guidance.

#### 2.9. Transition Period

A Permanent Insider who already has a personal trading account other than in CIMB Securities then within a period of at the latest two (2) months after this Policy applies is required to transfer his/her account to CIMB Securities if he/she wants to carry out a personal trading.

Policy Name : Conflict Management Policy

Sub Policy Name : 3. Types of Conflict of Interest

3. TYPES OF CONFLICT OF INTEREST

a)

Types of Conflict of Interest are:

The companies in CIMB Niaga and CIMB Group may provide various Investment Products

financial services to its customers. Such

services shall include, but not limited to

corporate finance, corporate banking, capital

market and financial advisory services;

The provision of the above services may cause an b)

Employee to have a confidential (non-public) or

sensitive information on the price of Securities

that are relating to the customers, suppliers or

third parties who are partnering with CIMB Niaga

and CIMB Group.

From the internal perspective, the Covered C)

Division also engages in activities for the

interest of the Bank and may be in conflict with

the interests of its customers and may also

Policy Name : Conflict Management Policy

Sub Policy Name : 3. Types of Conflict of Interest

potentially breach a fiduciary duty obligation towards its customers.

That as long as it does not violate this Policy, an Employee is permitted to carry out a transaction through his/her personal account from time to time. Such transaction is very likely to pose a risk of Conflict of Interests with the interests of customers. In this regard, this Policy is required to ensure that any CIMB Niaga Employee's Personal Transaction is not in conflict with their terms and responsibilities to CIMB Niaga and its customers.

d) The confidential (non-public) information that is sensitive to the price of Securities and/or which might result in the Employees under such division to be in a conflict position or potential conflicts of interests may be categorised as follows:

Policy Name : Conflict Management Policy

Sub Policy Name : 3. Types of Conflict of Interest

i. A conflict of interests between the interests of two (2) or more units that are dealing with the same customer;

- ii. A conflict of interests between the
   interests of two (2) or more customers who
   is served by the same unit;
- iii. A conflict of interests between the
   interests of the Covered Division and/or
   the Employee of such division and the
   interests of one or more customers;
- iv. A conflict of interests between the
   interests of two (2) units or more in a
   division and/or two (2) or more divisions.

If the Employee is in doubt whether there is a Conflict of Interests or a potential Conflict of Interests, the Employee must promptly convey the circumstances to the CIMB Niaga Control Room to obtain appropriate instructions before a further action is taken.

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Policy Name : Conflict Management Policy

Sub Policy Name : 4. Confidential Information (Non-

Public) that is Sensitive to the

Price of Securities

# 4. CONFIDENTIAL INFORMATION (NON-PUBLIC) THAT IS SENSITIVE TO THE PRICE OF SECURITIES

Each Employee is required to maintain the confidentiality of all information that he/she known and obtained during his/her employment, specifically the confidential (non-public) information. An Employee is not allowed to provide the confidential (non-public) information that is sensitive to the price of the Securities to any other person, either to other Employees or third parties, directly or indirectly in accordance with this policy and/or the Chinese Wall Policy.

Restrictions in relation to the Confidential Information (Non-Public) and Sensitive to the Price of Securities.

Policy Name : Conflict Management Policy

Sub Policy Name : 4. Confidential Information (Non-

Public) that is Sensitive to the

Price of Securities

a) An Insider Information that is non-public and sensitive to the price of Securities is a confidential information that for an investor in general (a reasonable investor) can be considered important to be used in considering the decision to buy, sell or hold a company's Securities.

- b) Each Employee shall manage the Insider Information and that is sensitive to the price of Securities in accordance with the necessity of his/her work and shall not disclose such information, except to the Employees who require such information provided that such information is subject to the provisions of Chinese Wall in this Policy.
- c) Every Employee is prohibited from seeking such information in point (a) above, except:

Policy Name : Conflict Management Policy

Sub Policy Name : 4. Confidential Information (Non-

Public) that is Sensitive to the

Price of Securities

- (i) Such Employee requires the information to perform his/her tasks in accordance with the business objectives of CIMB Niaga; and/or
- (ii) The obtaining of this information does not violate the confidentiality/service agreement towards the customer; and/or
- (iii) Such Employee has followed the appropriate

  Policy in accordance with the applicable

  Chinese Wall Policy.

Policy Name : Conflict Management Policy

Sub Policy Name : 5. Insider Trading

5. INSIDER TRADING

5.1. Restriction of Trading

All Employees are prohibited from trading in

Securities, instructing other person in

connection with the trading of Securities,

entering into agreements in relation to the

Securities of a company if such Employees have

Insider Information that is sensitive to the

Securities of a company in which it may

materially affect the price of the Securities

of that company.

5.2. Restriction to Disclose

An Employee with Insider Information is

prohibited to communicate such information to

other parties except in accordance with the

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applicable regulations.

Policy Name : Conflict Management Policy

Sub Policy Name : 5. Insider Trading

5.3. Special Register and Affiliated Party

The Board of Directors and the Board of

Commissioners are obliged to report the data by

using the statements form of Attachment 4,

namely:

(1) Share ownership and its amendments either

in the Bank or other companies at the

latest within two business days since such

ownership and/or its amendment, including

shares owned by the children, husband/wife

of each of the Board of Directors and

Board of Commissioners.

Such share ownership shall be updated as

set forth in point 2.6 regarding th

Employee Affirmation in this Policy. The

share ownership will be recorded in the

Special Register that is managed by the

Corporate Affairs of the Bank.

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Policy Name : Conflict Management Policy

Sub Policy Name : 5. Insider Trading

(2) The affiliated party's data namely the family data up to the second degree of both horizontally and vertically including from the spouse side(husband/wife) either biological, step, or adopted.

In accordance with the provisions of the Financial Services Authority (Otoritas Jasa Keuangan- OJK) the related party data shall be reported to the OJK for December and June positions (if there is any amendment) by the Corporate Affairs.

Policy Name : Conflict Management Policy

Sub Policy Name : 6. Chinese Wall

#### 6. CHINESE WALL

#### 6.1. Meaning and Illustration of Chinese Wall

a) Chinese Wall is a policy that is designed to control and limit the flow of confidential information in the CIMB Group or CIMB Niaga so the Insider Information that is sensitive to the price of Securities or confidential (non-public) information is not disseminated (including by accident) to other Units in CIMB Niaga or in CIMB Group included to the public.

Policy Name : Conflict Management Policy

Sub Policy Name : 6. Chinese Wall

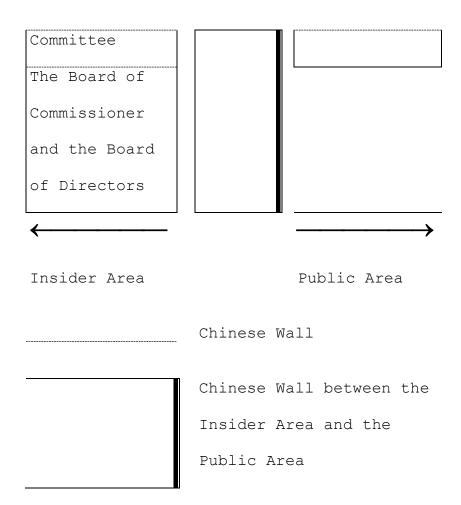
b) The illustration of a Chinese Wall is described as follows:

Credit Review		CIMB
Committee		Securities
Corporate		CIMB Principle
Client		Asset
Solution		Management
Corporate		The Bank's
Banking		Subsidiaries /
	CHINESE	Affiliation
Customer	WALL	Private
Client Service		banking /
		Preferred
		Circle
Executive		Treasury -
Officer and		Financial
Members of the		Institution
Executive		

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Policy Name : Conflict Management Policy

Sub Policy Name : 6. Chinese Wall



Definitions of the Insider Area and Public Area shall be in accordance with the clause c) and d) below.

Policy Name : Conflict Management Policy

Sub Policy Name : 6. Chinese Wall

- c) The Insider Area is an area that is in the ordinary course of business, is receiving confidential (non-public) information that is sensitive to the price of Securities. An Employee in that area shall not disclose the confidential information (non-public) including Insider Information to other Employees, unless they comply with this Policy and/or the Chinese Wall Policy.
- d) The Public Area is an area, which in the normal course of business activities relies on public information and uses that information to provide information on the transaction of Securities that are publicly traded. An Employee in this Public Area is prohibited from receiving and/or attempting to obtain the Insider Information and/or contacting customers of the Covered

Policy Name : Conflict Management Policy

Sub Policy Name : 6. Chinese Wall

Division including obtaining the Insider Information.

- e) It is the responsibility of the CCS to immediately notify the CIMB Niaga Control Room regarding all information (potential) of a new transaction that causes the information to become confidential (non-public) that is sensitive to the price of Securities and when such information becomes a public information.
- f) This matter will allow the CIMB Niaga
  Control Room to determine whether the
  Employees are in the Permanent Insider
  category. The Information that should be
  provided to the Control Room is as follows:

Policy Name : Conflict Management Policy

Sub Policy Name : 6. Chinese Wall

- (i) The ongoing transactions that contain confidential information (non-public) and/or sensitive to the price of Securities that are carried out by a unit/department/division.
- (ii) Names of the Employees in each
   unit/department/ division who are
   involved in such transactions.
- (iii) Names of the Employees that will be included or have been included for crossing the Chinese Wall based on the performed transactions.
- (iv) Any other information or documents as
   required by the CIMB Niaga Control
   Room for a specified period of time.

Policy Name : Conflict Management Policy

Sub Policy Name : 6. Chinese Wall

#### 6.2. Crossing the Chinese Wall

a) For operational reasons, the Insider Information that is sensitive to the price of Securities that is provided in crossing the areas that are separated by the Chinese Wall. This process is referred to as the crossing of the Chinese Wall ("crossing the wall"). To comply with this Policy, such crossing shall be strictly monitored and recorded.

b) Before a related Employee is crossing the Chinese Wall, that Employee is required to complete the Attachment 1 form. After the Employee has crossed the Chinese Wall and received the Insider Information that is sensitive to the price of Securities, the Employee is categorised as a Permanent Insider so all regulations that are related

Policy Name : Conflict Management Policy

Sub Policy Name : 6. Chinese Wall

to the Permanent Insider shall apply on such Employee.

c) The Board of Directors shall not be categorised as violating the Chinese Wall if in their actions the Board of Directors prioritises the Bank's objective to prevent any or further losses because of a Securities transaction.

Policy Name : Conflict Management Policy

Sub Policy Name : 7. Control Room

#### 7. CONTROL ROOM

#### 7.1. Control Room

All transactions (dealings) of a Unit that is included in the Covered Division shall be notified to the Corporate Affairs as the CIMB Niaga Control Room.

All transactions (dealings) of an Employee or a Unit that is referred to as Covered Division in CIMB Niaga shall be reported to the Control Room of CIMB Niaga prior to carrying out the transaction. The CIMB Niaga Control Room will conduct a review on the compliance towards this Policy. In the event that there is no breach or no indication of a breach of this provision, the CIMB Niaga Control Room will relay the report to the CIMB Group Control Room to conduct a review to ensure the presence/absence of any indication of a breach of a transaction

Policy Name : Conflict Management Policy

Sub Policy Name : 7. Control Room

that is using the Insider Information and/ or a Conflict Interests. The confirmation of transaction from the CIMB Group Control Room will be informed to the Employees or the Covered Division through the CIMB Niaga Control Room.

#### 7.2. Scope of CIMB Niaga Control Room

- a) Responsible for managing the Chinese Wall Policy including monitoring its implementation.
- b) Manages the Restricted List based on the information received through the Deal Team Summary Sheet that is prepared by the Covered Division.
- c) Handles the personal trading approval requests.
- d) Becomes a party who can provide a direction on the implementation of this Policy.

Policy Name : Conflict Management Policy

Sub Policy Name : 7. Control Room

e) Maintains the Permanent Insider list and issues notices to the Permanent Insider under the relevant regulation.

- f) Reports any transactions conducted by the Board of Directors and the Board of Commissioners to the OJK of the Capital Markets and the Indonesia Stock Exchange by no later than two (2) business days after receiving the transaction report from the concerned party.
- g) Carries out maintenance of this Policy in accordance with the applicable internal regulation.

Policy Name : Conflict Management Policy

Sub Policy Name : 8. Employee Personal Account

Dealing

8. EMPLOYEE PERSONAL ACCOUNT DEALING

As a general rule for a personal transaction, all Employees shall not be permitted to trade a company's Securities, if the relevant Employees have the Insider Information and/or confidential information that is sensitive towards the price of such Securities. Including the relevant Employees who have such information shall not be permitted to ask another person, enter into agreement, or provide information to a third party to purchase or sell such company's Securities.

8.1. Personal Trading Account

An Employee is permitted to carry out investment activities within their own private account, provided it is not speculative in nature. However, the following prohibitions

shall apply;

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Policy Name : Conflict Management Policy

Sub Policy Name : 8. Employee Personal Account

Dealing

a. A transaction that causes losses or distracts the Employee from his/her duty and responsibility as an Employee of CIMB Niaga.

- b. An Employee who involves or potentially involves in a Conflict of Interests situation. A Conflict of Interests takes place if the Employee's personal interest contradicts or conflicts with the customer's interest.
- c. An Employee of CIMB Niaga violates prevailing laws and regulations including involves in a behavior that might affect market fraud or manipulation (including a behavior that is intended or similar to making a fake or misleading appearance of an active trading or maintaining a fabricated/fake price).

Policy Name : Conflict Management Policy

Sub Policy Name : 8. Employee Personal Account

Dealing

d. An Employee who carries out short selling, Margin trading, or futures trading.

#### 8.2. Personal Trading Account Maintenance

A Permanent Insider must maintain his/her own Personal Account in CIMB Securites if he/she wants to carry out all personal trading activities.

#### 8.3. Covered Transactions Approval

a) A Permanent Insider must obtain a prior written approval from CIMB Niaga Control Room and CIMB Group Control Room if he/she wants to carry out a transaction (buying/selling) of Securities from a company mainly for a transaction that is related to the Securities of CIMB Niaga, CIMB Group, and specific companies as specified in the future by the Board of

Policy Name : Conflict Management Policy

Sub Policy Name : 8. Employee Personal Account

Dealing

Directors. Implementation of such transaction shall be conducted through the CIMB Securities.

b) The approval can be obtained through the sending of the Employee Transaction Approval form (ETA) (Attachment 2 form).

If approved, the CIMB Niaga Control Room would forward such form to the CIMB Group Control Room on the same day and the CIMB Group Control Room would give their response to the Employee who requested the approval through the CIMB Niaga Control Room within 1 x 24 hours.

c) The term for the Control Room's approval (validity period) shall be ended on the fifth (5<sup>th</sup>) business days after the approval has been given by the CIMB Niaga Control Room and CIMB Group Control Room.

Policy Name : Conflict Management Policy

Sub Policy Name : 8. Employee Personal Account

Dealing

d) If a Permanent Insider is not approved to carry out a transaction, the relevant party is prohibited to inform such matter to any other person or to advise or assist another person who is related to such Securities transaction.

# 8.4. Trading of CIMB Niaga's Securities during the Blackout Period

During the Blackout Period, all employees or management of CIMB Niaga are prohibited to carry out a trading or transaction of CIMB Niaga's Securities.

This Policy shall also be applicable for Securities that are originating from the Employees or Management Stock Option Plan (EMSOP) program, Long Term Compensation Plan,

Policy Name : Conflict Management Policy

Sub Policy Name : 8. Employee Personal Account

Dealing

or other similar programs that are accompanied with a transaction on such Securities.

The Corporate Affairs shall inform this Blackout Period to all Employees of CIMB Niaga, including to the CIMB Group Control Room.

#### 8.5. The Control Room Administration

The Administration that is conducted by the CIMB Niaga Control Room shall be:

#### a. The Making of a Statement

A Statement of the Board of Commissioners (including the Sharia Supervisory Board), Independent Party, the Board of Directors, the Bank Management Committee (BMC), and all of the top officers (the Head Of) in the Covered Division shall use the

Policy Name : Conflict Management Policy

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Dealing

"Personal Statement Letter" form (the Attachment 4 form).

#### b. Monitoring

- transaction on the CIMB Niaga's
  Securities must notify the Corporate
  Affairs at least in two (2) business
  days prior to the transaction is
  conducted (the Attachment 2 form), and
  report to the Corporate Affairs in two
  (2) business days after the
  transaction takes place (the
  Attachment 5 form).
- 2) A member of the Board of Commissioners and the Board of Directors who carries out a buying and selling activity on <a href="mailto:another">another</a> company must submit for a disclosure to the Corporate Affairs

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within two (2) business days after the transaction takes place (the Attachment 5 form).

- 3) A Securities transaction of CIMB Niaga
  Group by an Immediate Family member of
  the Board of Directors and Board of
  Commissioners, must be reported to the
  Corporate Affairs within two (2)
  business days after having knowledge
  of such transaction (the Attachment 5
  form).
- 4) The Corporate Affairs will analyse the notification submitted by the relevant Permanent Insider. If the Corporate Affairs suspects any action that is not in line with this Policy, the Corporate Affairs would instruct a suspension of the transaction to be reported to the Compliance Director

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and/or the President Director of CIMB Niaga.

- 5) For analysis purposes, Permanent
  Insiders must provide information (if
  requested) among others, a copy of
  every note of contract, confirmation,
  statement from a broker, bank, in
  relation to their Personal
  Transactions.
- and/or analysis that is conducted by the Corporate Affairs, the Compliance Director, and/or the President Director shall not absolve the Permanent Insider's responsibility to comply with the prevailing laws and regulations including that are set out in this Policy, and shall be liable to bear the legal implications.

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# c. Authority of the Compliance Director, President Director and President Commissioner.

The Compliance Director and/or the President Director could cancel the plan to buy and/or sell the CIMB Niaga's Securities or another company that is submitted by the Permanent Insider without having to inform the reasons thereof.

The President Commissioner could cancel the plan to buy and/or sell of such Securities as set out above that is conducted by a member of the Board of Directors, Board of Commissioners (including the Sharia Supervisory Board) and/or an Independent Party by informing the CIMB Niaga Control Room.

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#### 8.6. Exceptions

#### a. Excepted Account

- 1) An Account that is managed in full, provided that:
  - a) the account is managed (either inhouse or externally) by an
    independent investment adviser.
  - b) there shall be no communication between the investment adviser and the Permanent Insider in relation to the permitted investment decision prior to the execution takes place.
  - c) an instruction that is not requested will not be accepted.
- 2) A retirement investment account where the Permanent Insider shall not have a

Policy Name : Conflict Management Policy

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Dealing

power to carry out the Securities trading individually.

3) Old age allowance, Term Deposit and money market Certificate, savings and current account with the requirement that based on its nature, it could not be executed to become Securities or commodity.

#### b. Exempted Transactions

- 1) Investment in the unit trust or investment product mutual funds.
- 2) Acceptance from a temporary allotment under the rights issue and application of the excess of Securities where the maximum right shall remain the same or where such matter is solely to gather odd lots.

Policy Name : Conflict Management Policy

Sub Policy Name : 8. Employee Personal Account

Dealing

3) The exercise of an option provided under the CIMB Group and CIMB Niaga Share Option Program.

Policy Name : Conflict Management Policy

Sub Policy Name : 9. Proprietary Trading

9. PROPRIETARY TRADING

A Proprietary trading applies provided that it

fulfills the requirements and prevailing laws and

regulations.

A conflict of interests occurs when the Covered

Division and/or Employee violates his/her authority

to act exclusively for the customers or account

beneficiary's interests.

An Employee, not limited to the Employee in the

Covered Division, who involves in a Proprietary

Trading for CIMB Niaga must comply with the Chinese

Wall policy. In particular, a separation must be made

in relation to the physical, computer access and

certain regulation separation in relation to the

Securities and derivative trading.

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Policy Name : Conflict Management Policy

Sub Policy Name : 9. Proprietary Trading

#### 10. RESTRICTED LIST

a) The Restricted List is managed by the CIMB Niaga Control Room. The Covered Division shall inform the CIMB Niaga Control Room when there is a company that is added into or is taken out from the Restricted List by using the Attachment 1 form.

- b) A company is included in the Restricted List based on the nature of the transaction or when a material corporate deal is announced. A transaction can be included in the Restricted List even prior to such transaction becomes a public information due to the sensitivity of its nature.
- c) All Employees/parties who have Insider
  Information are prohibited to carry out a
  transaction for their personal interests.
- d) A Company that is included in the Restricted List will remain in the Restricted List until:

Policy Name : Conflict Management Policy

Sub Policy Name : 9. Proprietary Trading

• if the transaction does not require for such matter; or

- based on information from the Covered Division; or
- the term of the transaction has ended as determined by the Covered Division



# LEMBAR RINGKASAN TRANSAKSI TIM DEAL TEAM SUMMARY SHEET

Tanggal   Date		Departemen	Department	
Tulis Tanggal   State of Date  Corporate Clients Solution		ents Solution		
Nama HOD   Name of HOD				er
Kong Sooi Lin	g Sooi Lin  Tulis nama pemohon State name of submitter			
A. PENEMPATAN KE DALAM RESTRICTED LIST EMPLACEMENT ON RESTRICTED LIST				
Apa nama atau kode (jika ada) entitas/sekuritas yang terlibat of What are the names and codes (if any) of the entities/securities.		?		
1. Tuliskan nama entitas/sekuritas   State Name of the entities/se 2. Tuliskan Nama Proyek atau "NA"   State Project Name or "N/A"				
<ol> <li>Apakah peran yang akan dilaksanakan oleh CIMB Niaga dalam What is the anticipated role of CIMB Niaga (e.g. lead advisor, u</li> </ol>		utama, penanggur	ng, dll)?	
Tuliskan peran   State role				
3. Berikan penjelasan singkat mengenai transaksi yang akan dilak Provide a brief but sufficient description on the transaction	ksanakan			
Deskripsikan transaksi secara singkat   <i>Briefly describe the deal</i>				
4. Apakah anda merekomendasikan entitas/sekuritas untuk dima restriksi  Do you recommend that such entities/securities be emplaced				1
Nama Entitas/Sekuritas  Name of Entity/Security	Tanggal Mulai Start Date	Tanggal S End Do		
Spesifikasikan entitas yang akan dimasukkan ke	Tuliskan tanggal mulai	Tuliskan tanggal s	selesai secara	
dalam daftar  Specify entity or entities to be placed restriction	State start date	spesifik atau tang 3 bulan dari tangg		
		State specific end maximum 3 mont date		
5. Apakah ketentuan yang terdapat dalam restriksi (contoh: restri What is the condition of the restriction (e.g. price restriction, p.			la tidak ada, tuliskan "N	il"
Tuliskan persyaratan tambahan, jika ada atau "Nil"   State additio	onal condition, if any or "Nil"			
Jika dimasukkan ke dalam RestrIcted List, larangan perdaganga     If placed on Trading Restricted list, the trading restriction appli	· ·			
Perdagangan Propietary (	Orang Dalam di poin 09 dan 10 siders named in item 09 and 10		Keduanya <i>Both</i>	
7. Apakah restriksi ini berlaku untuk perusahan anak regional CIN Do these restrictions apply to our regional subsidiaries?	MB Group? 8.	Apakah transaksi i Is this deal price se	ni sensitif terhadap harg ensitive?	;a?
Ya   Yes Tidak   No		Ya   Yes	Tidak / No	
B. MELINTASI CHINESE WALL   WALL CROSSING				
9. Sebutkan nama Karyawan dalam tim anda, yang sampai saat in State name of individuals within your team, who, to date, have		ın transaksi yang ak	kan dilakukan:	
1)Tuliskan nama anggota tim CCS yang terlibat   State name of CC	CS Team members involved			
10. Sebutkan nama Karyawan termasuk yang berada di tim lain d Name of individuals who have been brought over the wall inclu				
Lampirkan sebagai lampiran A apabila daftar nama panjang   <i>Atta</i> 1) Nama departemen   <i>Name of individuals Dept</i>	ach as Appendix A if name list Tanggal Pelintasan   <u>I</u>			



#### FORMULIR PERSETUJUAN TRANSAKSI KARYAWAN EMPLOYEE TRANSACTION APPROVAL FORM

UNTUK DIISI C	DLEH KARYAWAN	I   TO BE COMPLETED B	Y THE EMPLOYE	E			
Nama   <i>Name</i>	:		Nomor Kontak   (	Contact No:			
Departemen   De	partment :		Alamat Email   Email :				
Kode Klien   <i>Cliei</i>	nt Code :		No. CDS (Opsion CDS No. (Option	al)   al) :			
Jumlah Saham se Total Shares-Ow	ebelum transaksi ned before the share	s-trasaction					
Saya ingin bertra I wish to transact		: iTrade	Central D	ealing Team	Perbankan Privat Private Banking		
Niaga I wish to transact	t on the following and	ut dan menerangkan bahwa tra	does not in any way	conflict with the interes	at of the clients of CIMB Niaga.		
Beli/Jual	Kode Saham	Nama Surat Berharga	Jumlah	Tujuan Transaks	•		
Buy/Sell	Stock Code	Securities Name	Quantity	Transaction's purpo	oses Price (Optional)		
_	Tanda tangan Pegawai  Employee's Signature  Control Room CIMB Niaga  CIMB Niaga's Control Room  *Jika dibutuhkan ditanda tangani oleh Kepala Departemen  If required by Head Dept						
UNTUK DIISI (	DLEH CONTROL F	ROOM CIMB NIAGA   TO E	BE COMPLETED	BY CIMB NIAGA'S C	CONTROL ROOM		
Diperiksa olel Checked by	<sup>1</sup> :		Tanggal <i>Dat</i> e	:			
Di- <i>review</i> olel Reviewed by	n :		Tanggal Date	:			
Disetujui oleh Approved by			Tanggal <i>Date</i>	:			
Komentar Remarks	Tanda tangan I Designated Dir	Direktur atau yang berwenang ector / Authorized Signatory					



## **Covered Divisions**

1	Board of Commissioners (termasuk Dewan Pengawas Syariah)
2	Independent Party
3	Board of Directors
4	Bank Management Committee
5	Head of Risk Management
6	Head of Strategy & Finance
7	Head of Compliance, Corporate Secretary & Legal
8	Head of Credit Review
9	Corporate Client Solution
10	Head of Treasury & Capital Market
11	Head of Corporate Banking
12	Head of Commercial Banking





#### Surat Pernyataan Pribadi Personal Statement Letter

Yang bertanda tangan di bawah ini

The undersigned

Nama :

Name Jabatan

Title

PT Bank CIMB Niaga Tbk

("Bank" atau/or "CIMB Niaga")

Alamat Tempat Tinggal:

Domiciled Address

Kode Pos | Post Code

Telepon | Telephone

Telepon Seluler | Cellular Phone

Faksimili | Facsimile

E-mail | E-mail

Tempat dan Tanggal Lahir

Place and Date of Birth

Nomor Kartu Tanda

Penduduk

ID Card Number

Nomor Passport :

Passport Number



Dengan ini menyatakan hal-hal sebagai berikut: *Hereby states the followings*:

Α.	Informasi Keuangan Pribadi Personal Finance Information
	Saya tidak memiliki rekening CIMB Niaga  I do not have any account in CIMB Niaga
	Saya memiliki rekening di CIMB Niaga dengan perincian sebagai berikut I have account(s) in CIMB Niaga with the following details:

No.	Nama Produk Bank <sup>1</sup> Name of Bank's Product <sup>1</sup>	Nomor Rekening Account Number	Customer Information File (CIF)
1.	Pinjaman   Lending Tabungan   Saving Deposit Giro   Current Account Deposito   Time Deposit		
2.	Pinjaman   Lending Tabungan   Saving Deposit Giro   Current Account Deposito   Time Deposit		
3.	Pinjaman   <i>Lending</i> Tabungan   <i>Saving Deposit</i> Giro   <i>Current Account</i> Deposito   <i>Time Deposit</i>		
4.	Pinjaman   <i>Lending</i> Tabungan   <i>Saving Deposit</i> Giro   <i>Current Account</i> Deposito   <i>Time Deposit</i>		
5.	Pinjaman   Lending Tabungan   Saving Deposit Giro   Current Account Deposito   Time Deposit		

#### Note/Keterangan:

<sup>&</sup>lt;sup>1</sup> Coret Nama Produk yang tidak sesuai Cross the non-applicable Bank products



В.	ngan Keluarga dan Informasi Keuangan Keluarga / Relationship and its Financial Information
	Anggota Keluarga saya tidak memiliki rekening CIMB Niaga My Family Member does not have any account in CIMB Niaga
	Anggota Keluarga saya memiliki rekening CIMB Niaga My Family Member has account(s) in CIMB Niaga

Berikut ini adalah Daftar nama anggota keluarga saya dan informasi rekening di CIMB Niaga (apabila ada):

The followings are names of my family members, and information of each CIMB Niaga's account (if any):

Nama Anggota Keluarga <sup>1</sup> Name of Family Member <sup>1</sup>	Jenis Hubungan Keluarga <sup>1</sup> Type of Family's Relationship <sup>1</sup>	Nama Produk Bank <sup>2</sup> Name of Bank's Product <sup>2</sup>	Nomor Rekening CIF <sup>3</sup> Account Number CIF <sup>3</sup>	Tanggal Lahir <sup>4</sup> Date of Birth <sup>4</sup>
	Suami/isteri Husband/wife	Pinjaman   Lending Tabungan   Saving Deposit Giro   Current Account Deposito   Time Deposit		
	Ayah Tiri/Kandung/ Angkat Foster/Real/Adopted Father	Pinjaman   Lending Tabungan   Saving Deposit Giro   Current Account Deposito   Time Deposit		
	Ibu Tiri/Kandung/ Angkat Foster/Real/Adopted Mother	Pinjaman   Lending Tabungan   Saving Deposit Giro   Current Account Deposito   Time Deposit		
	Ayah Mertua Tiri/Kandung/Angkat Foster/Real/Adopted Father in Law	Pinjaman   Lending Tabungan   Saving Deposit Giro   Current Account Deposito   Time Deposit		
	Ibu Mertua Tiri/Kandung/Angkat Foster/Real/Adopted Mother in Law	Pinjaman   Lending Tabungan   Saving Deposit Giro   Current Account Deposito   Time Deposit		
	Kakek Tiri/Kandung/ Angkat Foster/Real/Adopted Grandfather	Pinjaman   Lending Tabungan   Saving Deposit Giro   Current Account Deposito   Time Deposit		
	Nenek Tiri/Kandung/ Angkat Foster/Real/Adopted Grandmother	Pinjaman   Lending Tabungan   Saving Deposit Giro   Current Account Deposito   Time Deposit		
	Kakek dari Suami/Istri Grandparents (Grandfather) from Spouse	Pinjaman   Lending Tabungan   Saving Deposit Giro   Current Account Deposito   Time Deposit		
	Nenek dari Suami/Istri Grandparents (Grandmother) from Spouse	Pinjaman   Lending Tabungan   Saving Deposit Giro   Current Account Deposito   Time Deposit		
	Anak Tiri/Kandung/Angkat Foster/Real/Adopted Children	Pinjaman   Lending Tabungan   Saving Deposit Giro   Current Account Deposito   Time Deposit		



Menantu dari anak Tiri/Kandung/Angkat Foster/Real/Adopted Children in law Cucu Tiri/Kandung/Angkat Foster/Real/Adopted Grandchildren	Pinjaman   Lending Tabungan   Saving Deposit Giro   Current Account Deposito   Time Deposit Pinjaman   Lending Tabungan   Saving Deposit Giro   Current Account Deposito   Time Deposit	
Suami/Istri dari Cucu Tiri/Kandung/Angkat Spouse from the Foster/Real/Adopted Brother/Sister	Pinjaman   Lending Tabungan   Saving Deposit Giro   Current Account Deposito   Time Deposit	
Kakak/Adik Tiri/Kandung/Angkat Foster/Real/Adopted Brother/Sister	Pinjaman   Lending Tabungan   Saving Deposit Giro   Current Account Deposito   Time Deposit	
Kakak/Adik Ipar Tiri/Kandung/Angkat Foster/Real/Adopted Brother/Sister in Law	Pinjaman   Lending Tabungan   Saving Deposit Giro   Current Account Deposito   Time Deposit	
Paman/Bibi Tiri/Kandung/Angkat Foster/Real/Adopted Uncle/Aunt	Pinjaman   Lending Tabungan   Saving Deposit Giro   Current Account Deposito   Time Deposit	
Suami/Isteri dari Paman/Bibi Tiri/Kandung/Angkat Foster/Real/Adopted Uncle/Aunt Spouses	Pinjaman   Lending Tabungan   Saving Deposit Giro   Current Account Deposito   Time Deposit	

#### Note / Keterangan:

- 1. Tuliskan Nama masing-masing anggota Keluarga anda sesuai dengan jenis hubungan masing-masing Indicate the name of your each family member in accordance with each relation type.
- 2. Tuliskan nama gadis Ibu Kandung Indicate your Mother's Maiden name
- 3. Berikan Tanda pada tipe Produk yang benar Indicate the correct product type
- 4. Tuliskan Nomor Rekening di CIMB Niaga dan CIF dari anggota Keluarga (jika ada). *Indicate your relative's account number in CIMB Niaga and its C/F (if any).*
- 5. Tuliskan tanggal lahir dari masing-masing anggota Keluarga Indicate the birth date of your each family's member

Harap ditulis semua nama anggota keluarga sesuai dengan data yang diminta meskipun mereka tidak memiliki rekening di CIMB Niaga. Data tambahan dari anggota keluarga dapat ditulis pada lembaran terpisah (jika diperlukan).

Please write down all members of your family/relatives names pursuant to the requested data even though they do not have CIMB Niaga account. Additional data of family members can be written on separate pages (if necessary)



dengan pernyataan tersebut di atas, saya menegaskan bahwa:  nt to the above statement, I hereby confirm that:
Saya tidak memiliki hubungan keluarga dengan anggota Dewan Komisaris Bank, Direksi Bank, atau dengan Pemegang Saham Pengendali Bank.  I do not have family relationship with any member of Board of Commissioners of the Bank, any member of Board of Directors or with the Controlling Shareholder of the Bank.
Saya memiliki hubungan keluarga dengan anggota Dewan Komisaris Bank, dan/atau dengan anggota Direksi Bank dan/atau dengan Pemegang Saham Pengendali Bank, dengan rincian sebagai berikut  I have family relationship with member of Board of Commissioners of the Bank, and/or member of Board of Directors and/or with the Controlling Shareholder of the Bank, with the following details:

Nama Anggota Keluarga	Jenis Hubungan Keluarga	Jabatan Anggota Keluarga Pada Bank Position of the Family Member in the Bank		
Name of Family Member	Type of Family Relationship	Komisaris Commissioner	Direktur <i>Director</i>	Pemegang Saham Pengendali Controlling Shareholer

#### Note / Keterangan:

- 1. Bagian ini tidak berlaku bagi Pejabat Eksekutif Bank
  This section is not applicable to the Executive of the Bank
- 2. Tuliskan Nama Anggota Keluarga yang juga menjabat sebagai komisaris, dan/atau direktur, dan/atau pemegang saham pengendali Bank.
  - Write down your relative's name who also acts as the commissioner, and/or director, and/or controlling shareholder of the Bank.
- 3. Tuliskan jenis hubungan keluarga yang sesuai (Harap merujuk pada Bagian B Surat Pernyataan ini)
  - Write down the type of family relationship (please refer to Part B of this Statement)
- 4. Berikan tanda centang (v) pada jabatan anggota keluarga yang sesuai di Bank. Please check (v) the right position of the family member in the Bank



# C. Kepemilikan Saham di PT Bank CIMB Niaga Tbk Ownership in PT Bank CIMB Niaga Tbk Saya dan/atau keluarga saya tidak memiliki saham yang dikeluarkan oleh Bank I and/or my immediate family do not own any shares issued by the Company. Saya dan/atau keluarga saya memiliki saham yang, dikeluarkan Bank baik langsung maupun tidak langsung sebagai berikut: I and/or my immediate family directly or indirectly own shares issued by the Company, as follows: Tipe/Seri Jumlah Saham Tercatat Atas Tanggal Tujuan Pembelian

Tipe/Seri Saham <sup>1</sup> Shares Type/Series <sup>1</sup>	Jumlah Saham dimiliki <sup>2</sup> <i>Total Owned</i> <i>Shares</i> <sup>2</sup>	Tercatat Atas Nama <sup>3</sup> Under the name of <sup>3</sup>	Tanggal Pembelian⁴ <i>Purchased date</i> ⁴	Tujuan Pembelian Saham <sup>5</sup> Purpose of Shares Purchasing <sup>5</sup>

#### Note:

#### Keterangan:

- 1. Tuliskan seri dan atau tipe/klasifikasi saham. *Indicate the serial and or type/classification of shares.*
- 2. Tuliskan total saham yang dimiliki. *Indicate the total shares owned.*
- 3. Tuliskan Nama yang tercantum dalam lembar saham. *Indicate the name that stated in the shares.*
- 4. Tuliskan tanggal Pembelian.
  Indicate the date when the shares were purchased.
- 5. Tuliskan tujuan Pembelian Saham. *Indicate the purpose of purchasing the shares.*

Harap ditulis kepemilikan saham CIMB Niaga yang dimiliki baik langsung maupun tidak langsung oleh anda dan/atau keluarga anda, dalam jumlah berapapun.

Please indicate if you/your family holds directly or indirectly CIMB Niaga Shares, including the number of shares.



Ownership in Other Bank and/or Other Company  Saya dan/atau keluarga saya tidak memiliki saham pada bank dan/atau perusahaan lain.  I and/or my family do not own any shares in other Bank and/or Company.  Saya dan/atau keluarga saya memiliki saham baik langsung maupun tidak langsung di perusahaan selain CIMB Niaga dan/atau perusahaan lain, sebagai berikut:  I and/or my family directly or indirectly own shares of Other Bank and/or Other Company as follows:						
Nama Bank / Perusahaan lain Name of Other Bank / Company	Domisili Bank / Perusahaan lain Domicile of Other Bank / Company	Jumlah Saham dimiliki (saham) Total Shares Owned (Shares)	Persentase Kepemilikan (%) Ownership Percantage (%)	Tercatat Atas Nama Under the name of	Tanggal Pembelian Purchased date	
			, ,			



#### E. Kepengurusan pada Perusahaan/Lembaga lain Directorship in Other Company/Institution

Saya tidak menjabat suatu kedudukan atau pangkat di perusahaan atau lembaga
lain.
I do not hold any position/title in other Company/Institution.
Dengan memperhatikan Peraturan Bank Indonesia Tentang Good Corporate Governance, Saya menjabat suatu kedudukan atau pangkat tertentu di perusahaan atau lembaga lain, dengan rincian sebagai berikut:  With respect to Bank Indonesia Regulation on Good Corporate Governance, hold certain positions in other Company/Institution and as follows:

Nama dan		Susunan Dewan Komisaris <sup>1</sup> The Composition of the Board of Commissioners <sup>1</sup>	Susunan Dewan Direksi <sup>2</sup> The Composition of the Board of Directors <sup>2</sup>	Jabatan <sup>3</sup> Tittle <sup>3</sup>	Checklist			
Alamat Perusahaan atau Lembaga Name and Address of	Nama Kelompok Usaha Name of Business Group				Menjalankan Tugas Fungsional Conducts Suvervising Task		Nirlaba Non Profit	
Company or Institution					Ya Yes	Tidak <i>N</i> o	Ya Yes	Tidak <i>No</i>
		_						

#### Note:

#### Keterangan:

- 1. Tuliskan semua nama Dewan Komisaris pada perusahaan atau lembaga lain Indicate all names of Commissioners of the other Company or institution
- 2. Tuliskan semua nama Direktur pada perusahaan atau lembaga lain *Indicate all names of Directors of the other Company or institution*
- 3. Tuliskan Jabatan anda pada perusahaan atau lembaga lain *Indicate your title/position in the other Company or institution*



#### F. Hubungan Keuangan

anggota Dewan K	ncial Relationship  Saya tidak memiliki hubungan keuangan dengan Pemegang Saham Pengendali dan anggota Dewan Komisaris/atau Direksi Bank, yang dapat mempengaruhi independensi saya dalam mengambif keputusan.					
members of the Co Saya memiliki hub Dewan Komisaris/a	I do not have any financial relationship with controlling shareholders and BoC/BoD members of the Company, which could affect my independency in taking decision.  Saya memiliki hubungan keuangan dengan Pemegang Saham Pengendali dan anggota Dewan Komisaris/atau Direksi Bank, yang dapat mempengaruhi independensi saya dalam mengambil keputusan, dengan rincian sebagai berikut					
I have financial relationship with controlling shareholders and BoC/BoD members of to Company, which could affect my independency in taking decision.						
Nama Stakeholder	Bentuk Hubungan Keuangan	Keterangan				
Stakeholder's Name	Type of Financial Relationship	Notes				

Harap ditulis dengan hubungan keuangan yang dapat mempengaruhi keputusan independent/independensi anda sebagaimana tertuang dalam Peraturan Bl mengenai *Good Corporate Governance*.

Please indicate the type of financial relation which may cause your independent decision/independency as stipulated in BI Regulation regarding Good Corporate Governance.



#### G. Pernyataan Lain\* Other Statements\* Saya telah lulus Penilaian Kemampuan dan Kepatutan sesuai dengan ketentuan Otoritas 1. Jasa Keuangan (OJK). I have passed the Fit and Proper Test in accordance with Financial Services Authority (OJK). 2. Sebagai Komisaris Independen, saya tidak memiliki hubungan keuangan, hubungan kepengurusan, kepemilikan saham dan/atau hubungan keluarga dengan anggota Dewan Komisaris lainnya, Direksi dan/atau Pemegang Saham Pengendali atau hubungan dengan Bank, yang dapat mempengaruhi kemampuan saya untuk bertindak independen sebagaimana diatur dalam ketentuan Pelaksanaan Good Corporate Governance bagi Bank Umum. As an Independent Commissioner, I have no financial relationship, management relationship, share ownership and/or family relationship with other member of Board of Commissioners, Board of Directors and/or Controlling Shareholder or relationship with the Bank, which can influence my ability to act independently as stipulated with Bank Indonesia Regulation on the Implementation of Good Corporate Governance Commercial Bank. 3. Apabila dikemudian hari, saya ditemukan memiliki hubungan-hubungan sebagaimana dimaksud diatas, maka saya bersedia melepaskan jabatan Komisaris Independen saya dan bersedia untuk diganti. If in the future, I am found to have relationships as aforesaid, then I am willing to relinquish my post as an Independent Commissioner and willing to be replaced. Sebagai Pihak Independen Saya telah menjalani masa tunggu selama 1 (satu) tahun. 4. As an Independent Party, I have been through the cooling off period for a year. 5. Saya mengetahui bahwa saya telah ditunjuk sebagai "Permanent Insider" dan saya telah membaca, memahami dan berjanji untuk mematuhi ketentuan Kebijakan Conflict Management ("KCM") sejauh yang berlaku kepada diri saya. I am aware that I have been designated as a "Permanent Insider" and I have read, understood and underlake to comply with the provisions of the Conflict Management Policy's to the extent that it applies to me.

#### Note:

#### Keterangan:

6.

Pemyataan F.1 tidak berlaku bagiPejabat Eksekutif Bank Statement F.1 is not applicable to the Executive of the Bank.

Berikan Tanda centang (v) pada Pernyataan F.2 dan F.3 apabila anda Komisaris Independen, dan pada Pemyataan F.4 apabila anda Pihak Independen.

persyaratan yang sama terkait dengan "Transaksi Pribadi"\*\*

respect of his/her •personal Transactionsn \*\*

Saya juga menyatakan bahwa Keluarga dekat saya jika ada) juga tunduk pada

I declare that My immediate family (if any) is a/so subject to the same requirements in

Please check (v) the statement F.2 and F.3 if you are an Independent Commissioner, and statement F.4 if you are an Independent Party.

\*\* Silahkan merujuk pada Kebijaksanaan Investasi Pribadi Please refer to the Personal Investment Policy

### **CIMB** NIAGA

Selanjutnya saya menyatakan bahwa saya mengerti mengenai tanggung jawab saya untuk memberikan informasi kepada *Corporate Secretary* apabila ada perubahan yang terjadi atas Surat Pernyataan ini dan diserahkan paling lambat 1 hari kerja setelah perubahan tersebut terjadi.

In witness whereof, I am aware of my responsibility to inform the Corporate Secretary if there are any changes to this Statement and must be submitted at the latest 1 business day after the changes occurred

Date / Tanggal : Place / Tempat :

[Signature – Tanda Tangan] [Full Name – Nama Lengkap]



#### PT Bank CIMB Niaga Tbk ("Bank" atau "CIMB Niaga") Realisasi Kepemilikan Saham CIMB Niaga dan Saham Lainnya Shares Ownership of CIMB Niaga and Other Shareholder

Nama*) Alamat*) Name*) Address*)	Nama Saham Name of Shares	Jumlah Saham yang dimiliki sebelum transaksi Total Shares- Owned before the shares- trasaction	Jumlah Saham yang akan dibeli/dijual Total Proposed Shares Bought/Sold	Harga per lembar Saham <i>Price/Share</i> s	Tanggal Transaksi Date of Transaction	Tujuan dari Transaksi Purpose of Transaction	Jumlah Saham yang dimiliki setelah transaksi Total-owned after the shares- transaction

Note: \*) Diisi apabila yang bertransaksi adalah Keluarga Dekat

To be completed if the transaction done by immediate family

Jakarta,	
Nama Karyawan & NIP/Name & Employee Number	:
Title & Unit Kerja/ <i>Titfe &amp; Dept</i>	:



# PT BANK CIMB NIAGA Tbk MANDATORY REVIEWER APPROVAL PROPOSAL DECEMBER 2016

#### Application for Approval on:

The Conflict Management Policy

The Applicant :

\_\_\_\_\_\_

Susiana Tanto Hayunaji/Yoyo

Herdiayanto

Corporate Board

Affairs Head Support/Corp.

Secretary Office

Reviewed by :

Liston Siahaan Surya Sulistiyo

Head of Head of Legal

Compliance



\_\_\_\_\_

#### Julius Wiantara

#### Tjhiou

Head of

Operations Risk

Management



#### PT BANK CIMB NIAGA Tbk

## PROPOSAL FOR APPROVAL OF THE RELEVANT MEMBERS OF THE

#### BOARD OF DIRECTORS

#### DECEMBER 2016

#### Confidential

#### Application for Approval on:

The Conflict Management Policy after containing the approval from the Mandatory Reviewer, and has been presented to the Board of Directors on the Board of Directors Meeting on 1 November 2016

The Applicant :

\_\_\_\_\_\_

Susiana Tanto Ha

Hayunaji/Yoyo

Herdiayanto

Corporate Affairs Board Support/Corp.

Head Secretary Office



Reviewed by :

Fransiska Oei Vera Handajani

Compliance, Risk Management

Corporate Director

Secretary & Legal

Director