

Whistleblowing System (WBS) is a mechanism for submitting complaints regarding suspected violations that have occurred or are likely to occur within the Bank. Complaints must be based on good faith and should not stem from personal grievances or be motivated by malice or slander.

### **Purpose of the Whistleblowing System**

The Whistleblowing System aims to assist in detecting violations, including those against the law that harm the company, fraud, and other breaches, including but not limited to, the code of ethics, internal policies/regulations, and/or conflicts of interest. When implemented properly, WBS can also function as a control and monitoring tool to help enhance ethical behavior within the organization and encourage a positive shift in the organizational culture. This, in turn, will increase public trust in the Bank.

### **Basic Principles**

The basic principles of the Whistleblowing System are as follows

1. Confidentiality

Employees who are directly or indirectly involved in handling complaints are required to maintain the confidentiality of the reporter's identity, complaint information, and reports related to handling complaints.

2. Convenience

The WBS management mechanism must be designed to provide convenience for employees and stakeholders in submitting complaints, as well as facilitate WBS managers in handling complaints and providing good service to whistleblowers.

3. Focus on Substance

Handling is focused on the truth of the substance of the violation and is not directed at the interests of finding the whistleblower's identity.

4. Protection

Whistleblowers have the right to protection and a sense of security, both personal and family security, and freedom from threats and retaliation related to reports that will be, are being or have been given.

5. Independence

In handling complaints, employees involved in handling complaints act professionally and free from the influence of any party.

### Reporting Methods

#### 1. Source of Complaints

Below are the sources of complaints received by the whistleblowing system management.

Source	Description
<i>E-mail</i>	bcas.bersih@bcasyariah.co.id
Others	The PIC of the unit managing the complaint facility (e.g., complaints received from Branches/Halo BCA) will forward complaints from whistleblowers related to violations to the whistleblowing system management.

#### 2. Criteria to be Met by Whistleblowers

To facilitate and expedite the follow-up process, here are the criteria that whistleblowers must meet when submitting their complaints:

- a. Whistleblowers must provide their identity information to facilitate communication, at a minimum:
  - Name of the whistleblower (anonymous allowed)
  - Contactable phone number/email address
- b. Complaints/reports submitted should at least include information covering the following 4W + 1H:
  - (Indication of) the violation that occurred (what).
  - The parties indicated as the perpetrators and/or involved parties (who).
  - Date and time of the reported incident (when).
  - Location/place of the reported incident (where).
  - Method used/modus operandi (how).
  - Additional information if known by the whistleblower (optional):
    - Loss impact suffered by the Bank.
    - Any changes in behavior/lifestyle or consumption / expenditure /investment patterns suspected or reasonably suspected to show irregularity according to the employee's capabilities.

### Protection for Whistleblowers

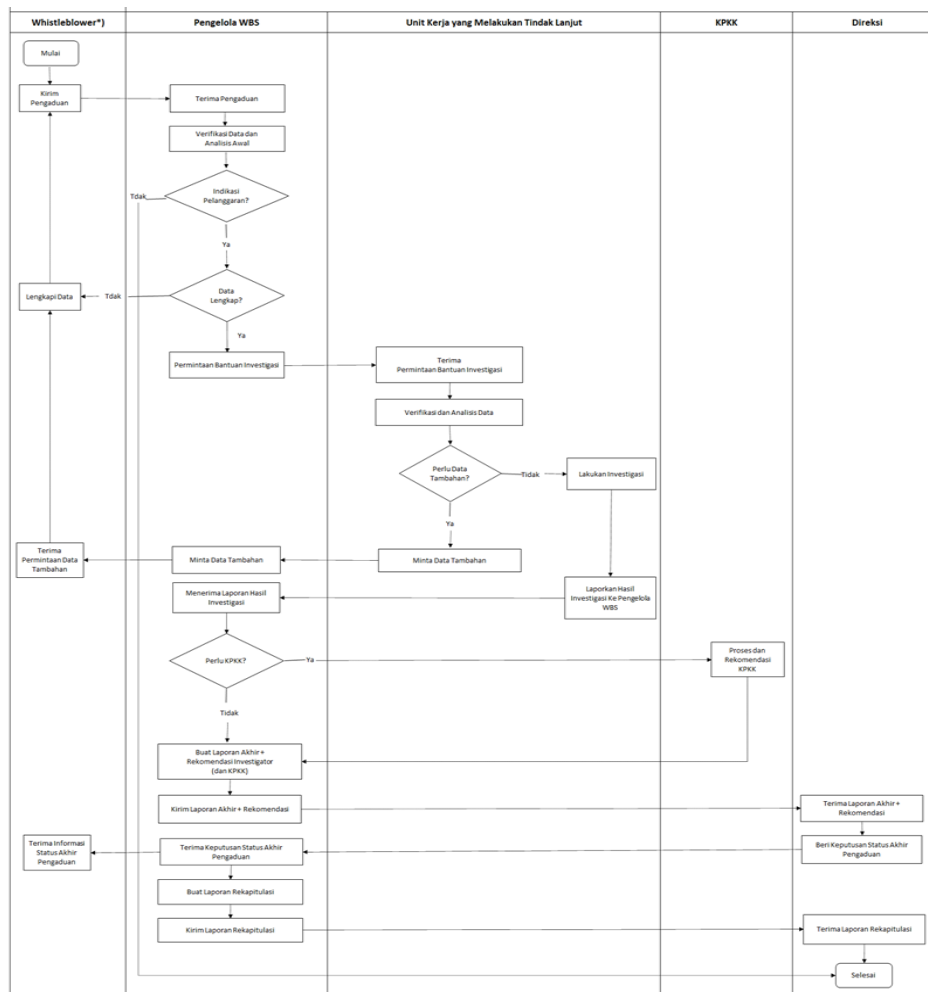
Based on the complaint submitted, BCA Syariah will provide protection to the whistleblower.

Protection for whistleblowers in relation to complaints they make:

1. Guarantee of confidentiality of the whistleblower's identity and the content of the complaint submitted;
2. Guarantee of protection against adverse treatment towards the whistleblower, and/or
3. Guarantee of protection against possible threats, intimidation, punishment, or unpleasant actions from the reported party.

## Complaint Handling Procedure

The complaint handling procedure at BCA Syariah is as follows:



\*) Including forwarding complaints from the PIC of the Work Unit managing other complaint facilities.

Stage	Actor	Action
1	Whistleblower/ PIC Complaint Management Unit	Submitting a complaint through the provided channels.

2	Whistleblowing System Administrator	<ul style="list-style-type: none"> <li>• Receives complaints from the whistleblower/PIC the Complaint Management Unit.</li> <li>• Conducts data verification and initial analysis. If the data is incomplete, requests the whistleblower to provide additional information. If the whistleblower does not provide the requested data within 3 (three) working days and the initial analysis shows no indication of a violation, the complaint may be considered invalid.</li> <li>• However, if the initial analysis indicates a potential violation, even if the data is incomplete, the whistleblowing system administrator will proceed with the complaint.</li> <li>• Requests investigative assistance from the relevant unit.</li> </ul>
3	Follow-up Unit	<ul style="list-style-type: none"> <li>• Receives a request for assistance from the whistleblowing system administrator and conducts an investigation of the complaint.</li> <li>• Requests the whistleblowing system administrator to contact the whistleblower for additional data if the received complaint requires it.</li> <li>• Reports the investigation results to the whistleblowing system administrator.</li> </ul>
4	Whistleblowing System Administrator	<ul style="list-style-type: none"> <li>• Receives the investigation results and determines whether the complaint needs to be forwarded to the Corporate Governance Committee (KPKK) according to the applicable regulations.</li> <li>• Prepares a final report accompanied by recommendations from the investigator (and KPKK).</li> <li>• Sends the final report to the Board of Directors for a final decision on the complaint.</li> </ul>
5	Board of Directors	<ul style="list-style-type: none"> <li>• Receives the final report and recommendations from the whistleblowing system administrator.</li> </ul>

		<ul style="list-style-type: none"><li>Decides on the final status of the complaint and communicates it back to the whistleblowing system administrator.</li></ul>
6	Whistleblowing System Administrator	<ul style="list-style-type: none"><li>Receives the final status decision on the complaint.</li><li>Forwards the decision to the relevant unit (if any).</li><li>Informs the whistleblower of the complaint's final status.</li><li>Periodically reports the summary of complaint developments received through the whistleblowing system to the Board of Directors.</li></ul>
7	Whistleblower	Receives information on the final status of the complaint.

### Responsible Party for the Whistleblowing System

The responsible party for the management of the whistleblowing system is not disclosed publicly (confidential), and their appointment is approved by the Board of Directors.

### Sanctions Imposition

If the investigation results confirm that the reported party has committed a violation, sanctions will be imposed in accordance with the provisions stipulated in the Collective Labor Agreement and/or applicable regulations at BCA Syariah.