

## CODE OF ETHICS AND CODE OF CONDUCT

### PT BANK ALADIN SYARIAH TBK

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#### FOREWORD

At PT Bank Aladin Syariah Tbk (“Bank Aladin Syariah” or “The Bank”), securing the trust of our stakeholders is paramount. Trust serves as the foundation of every relationship that the Bank has with our clients, employees, partners, suppliers/vendors, regulators, investors, and the community which we belong to. It is embedded into each of our core values: *Help* (sincerely helping fellow *Aladiners*, i.e. all members of the Board of Commissioners, Sharia Supervisory Board, Directors, chief, and all Bank staff; and the community); *Build* (every product and process are well built and sustainable); and *Grow* (Bank Aladin Syariah is a place for all to learn and grow together). Hence, we each share a responsibility to earn and maintain such trust by acting with integrity and doing the right thing at all times, to allow us to grow as an organization and achieve the Bank’s vision.

This Code of Ethics and Code of Conduct (“The Code”) is our guiding principles to securing and maintaining the trust of our stakeholders. Continued adherence to the Code and to the Bank’s objectives of fostering a diverse, inclusive and safe workplace is essential to our success.

Therefore, I ask you to read the Code and ensure you understand how it applies to your daily work. If you have any questions or concerns, please consult your manager or other appropriate contact as described in the Code.

Thank you for all *Aladiners*’ continued efforts in securing trust and protecting our reputation, which allow Bank Aladin Syariah to keep serving our clients and community with high integrity.



**Dyota Mahottama Marsudi**

President Director

## OBJECTIVES AND SCOPE

The Code is based on Bank Aladin Syariah's core values and sustainability principles, and is developed to assist all *Aladiners* to make the right decisions and take appropriate actions that are consistent with applicable laws, regulations, standard of ethics as well as Bank's policies and procedures. The Code covers all expected behavior and conduct, and is divided into the following sections:

- A. Responsibility of *Aladiners*;
- B. Responsibility of manager;
- C. Conducive working environment;
- D. Doing business fairly and honestly;
- E. Data privacy and security;
- F. Financial crime prevention;
- G. Conflict of interest;
- H. Sustainability and respecting human rights;
- I. Safeguarding the Bank's interest;
- J. Anti fraud;
- K. Speaking and raising concerns (including *whistleblowing*);
- L. Making a decision; dan
- M. Sexual violence.

The overall objectives of the Code are as follows:

1. Provide a clear guideline of expected behavior for all *Aladiners* with regard to their relations and interactions with the Bank's stakeholders: colleagues, clients, partners, suppliers/vendors, investors, regulators, public entities, and the community in general.
2. Provide reference for all *Aladiners* in day-to-day decision making.
3. Mitigate reputational and financial risks associated with government fines for ethical misconduct and/or violating the law and regulations.
4. In alignment with the Bank's commitment to sustainability principles and high standards of ethical conduct.

The Code has been adopted by the Board of Directors of Bank Aladin Syariah, and applies to all *Aladiners*: every Commissioner, Director, Chief, manager, and staff of the Bank. *Aladiners* are required to read and comply with this Code. Other parties performing services for Bank Aladin Syariah may also be subject to this Code by contract or other agreement.

Failure to comply with this Code, the policies and applicable laws and regulations will be viewed as a serious violation of your terms of employment, and may result in disciplinary

action, up to and including termination of employment as per the Company Regulation and the Bank's internal policy.

#### **A. RESPONSIBILITY OF ALADINERS**

1. Act in accordance with the highest standards of personal and professional integrity, honesty and ethical conduct, while working at the Bank's premises, at offsite locations, at Bank's sponsored business and social events, and/or at any other place where *Aladiners* represent the Bank.
2. Act in a manner that is fair, transparent, prudent, and dependable. This includes a commitment to honesty in our interactions with clients, colleagues, suppliers, and other stakeholders.
3. Immediately report unacceptable conduct, and promptly escalate violations or potential violations of law, regulation, rule, or breaches of policy, standard, procedure, or this Code.
4. Fully cooperate with any investigation into alleged violations of laws, regulations, rules, or breaches of policy, standard, procedure, or this Code and be truthful and forthcoming during such investigation.

#### **B. RESPONSIBILITY OF MANAGER**

1. A manager is someone who manages, directs, and coordinates his/her subordinates to achieve the set objective of the Bank/respective department.
2. Encourage his/her subordinates to work collaboratively.
3. Remind his/her subordinates of the importance of treating each other with respect.
4. Encourage his/her subordinates to speak up and raise concerns, especially about potential legal or ethical issues, and foster a work environment where they feel comfortable doing so.
5. Listen to his/her subordinates who raise concerns and take their concerns seriously.
6. Ensure all concerns are properly resolved or promptly escalated through appropriate channels.
7. A manager must always act exclusively in the interests of the Bank and not be guided by personal interests when exercising influence, power or authority over his/her subordinate. As such, a manager is not allowed to abuse his/her authority or put his/her subordinate in a condition that can cause a conflict of interest. Abuse of authority is defined as the improper use of a position of influence, power, or authority against another person.

### **C. CONDUCTIVE WORKING ENVIRONMENT**

1. Treat colleagues with respect and dignity.
2. Work together without discrimination based on race, gender, ethnicity, religion, age, disability, marital status, citizenship, or any other characteristics protected by the law of the Republic of Indonesia.
3. Comply with all applicable laws and regulations pertaining to providing equal opportunity and career opportunities for all *Aladiners*.
4. Always strive to resolve employment-related disputes as quickly and as confidentially as possible, in a manner that is respectful to *Aladiners*.
5. Do not tolerate any retaliation against anyone for making an employment-related complaint or cooperating with an investigation related to discrimination or harassment.

### **D. DOING BUSINESS FAIRLY AND HONESTLY**

#### **Fair Treatment**

1. Not engage in unfair, deceptive, or abusive acts and practices, such as manipulation, concealment, abuse of confidential information, or misrepresentation of material facts.
2. Provide fair and equitable access to products, services, facilities and privileges provided by the Bank, and make decisions regarding their provision based on objective criteria.
3. Inform customers and potential customers about options that may be appropriate for them, and explain terms and features in a fair and balanced way.
4. Listen carefully to any feedback from those doing business with the Bank and promptly escalate that feedback as appropriate.
5. Approve or award contracts, work orders, or commitments based on objective business standards, in accordance with the applicable law and regulations, as well as the Bank's policies and procedures.
6. Not allowed to offer or conduct any forms of bribery to any third party in order to obtain business for the Bank. Every commission or any other payment, favorable terms, or other terms that are provided by each *Aladiners* in conducting business for the Bank must be aligned with the Bank's policy or procedure that is informed from time to time and well documented in writing.

#### **Fair Competition**

1. Protect the Bank and the interests of clients by abiding by all competition and antitrust law and regulations.

2. Avoid situations that create any potential for unlawful anti-competitive or collusive conduct.
3. Immediately stop any conversation in which a competitor, client, or third party with whom Bank Aladin Syariah does business, tries to engage in anti-competitive or collusive conduct.

#### **Supplier/Vendor Relationships**

1. Only engage with suppliers or vendors who are in compliance with laws and regulations related to labor and environment, as well as uphold ethical business practices and human rights.
2. Ensure that all third-party activity is conducted in compliance with applicable laws, rules, regulations, policies, sharia principles, and the Bank's expectations of conduct.
3. Ensure equal and fair treatment during the supplier selection process.
4. Provide competitive bidding opportunities to diverse suppliers, where available.
5. Purchase all goods and services based on price, quality, availability, terms, and service.
6. Not lead suppliers or vendors to believe that they can inappropriately influence any procurement decisions at the Bank.
7. Avoid real or perceived conflicts of interest in the procurement process. When there are potential conflicts, promptly disclose them.
8. Act in accordance with data privacy requirements and with appropriate judgment when responding to supplier information requests.

#### **E. DATA SECURITY AND PRIVACY**

1. Ensure that all records of the Bank's operational activities are complete and accurate, and kept for a certain period of time based on the prevailing regulatory requirements.
2. *Aladiners* who are granted with or have the access to certain information and data in any forms, including opinion, be it in writing, oral, graphic, magnetic, electronic, and/or in other forms, either directly or indirectly submitted by, shared with, obtained or acknowledged by *Aladiners*, anything that is classified as confidential, either marked as 'confidential' or not, either still considered as opinion or decision that is related/unrelated to the Bank and the Bank's affiliation, including but not limited to information pertaining to subsidiary, holding company, and the Bank's group company, as well as other entities that are considered as the Bank's affiliates as per the law and regulations ("**Affiliates**"), including but not limited to information about the Affiliate, its agent, its customers, its employees, its suppliers/vendors, its advisor, its consultant, its partner, and the customers of the Bank and its affiliates, its operations and business activities, personal data, financial data, trade secret, technology, product, service, process, data, plan and business approach, promotion

and marketing activities, financial and other business aspects, customer data, data, system, document either in the forms of paper, electronic, and/or in any other forms, business details, strategy, business plan, information either in the forms of consumer technology and/or research information, design model, algorithm model, computer program, software, sistem, process, formulation and other instruments, agendas of a series of discussions or other activities that are performed by *Aladiners* and the Bank including the Bank's Affiliates, all communications between *Aladiners* and the Bank including the Bank's Affiliates, either orally or in writing that is known or supposed to be known by *Aladiners* to be confidential or belonging to the Bank and/or the Bank's Affiliates, and is produced in a series of discussion or in other activities performed by *Aladiners* and the Bank including the Bank's Affiliates, in addition to any other information that in the future can be classified as confidential by the Bank and/or the Bank's Affiliates ("**Classified Information**"). Type of information that is not considered as Classified Information is defined as follows: (a) information that is already publicly known by the time it is disclosed, and not caused by the fault of *Aladiners*; (b) information that is already become public, and not caused by *Aladiners* who violate the secrecy clause in the Code; (c) information that is disclosed to *Aladiners* by a third party who, as far as the *Aladiners'* concern, does not violate any obligation to maintain secrecy of the information, and such information can be disclosed without any limitation; (d) the information is already known or independently developed by *Aladiners* without being categorized as Classified Information, by which *Aladiners* could provide evidence on such case; (e) the information is disclosed pursuant to the order of a court, administrative agency, or other governmental body or applicable law, provided that *Aladiners*, as requested by the Bank, initiates reasonable efforts to limit such disclosure as per the necessary requirements to comply with the order or the applicable law; and /or the information is disclosed upon receiving a written approval by the Bank. Based on the above, *Aladiners* is required to:

- (a) protect all Classified Information with the highest integrity, and limit the access and use of such information in a reasonable manner and for the benefit of *Aladiners'* work at the Bank, in addition to treating all information as Classified Information, even though such information is still not yet confirmed, until after the Bank states otherwise;
- (b) maintain the confidentiality, and protect, treat, and safeguard all Classified Information as if they are part of your own secret;
- (c) use Classified Information as per the role and responsibility of *Aladiners* in alignment with the Bank's business need and in accordance to the applicable law and regulation;
- (d) not to leak, communicate, disclose, share, abuse, and/or perform other similar activities, including but not limited to installing software and clicking a link, either directly or indirectly to anyone or any party, each Classified

Information that may be informed to *Aladiners* or will be provided to or obtained by *Aladiners*, without prior approval of the Bank and/or its Affiliates in accordance with point (c) above;

- (e) share Classified Information only to those who have the right and authority as per the applicable Bank's policy and/or regulation;
  - (f) keep Classified Information only in working device that is used in the Bank as per the Bank's applicable internal procedure and/or policy; keep Classified Information in the Bank's device and/or its Affiliates' device and/or other device based on prior agreement between the Bank and/or Bank's Affiliates safely as per the applicable procedure of the Bank and/or the Bank's Affiliates;
  - (g) not keep all copies of Classified Information in any forms, including but not limited to documents, email, screenshot, notes unless the Bank and/or the Bank's Affiliates ask to keep them;
  - (h) return access and all Classified Information to the relevant superior within the working unit or division upon a change in work function or termination of employment;
  - (i) be responsible in each disclosure and/or performing other similar activities with regard to Classified Information and is required to initiate all necessary actions to protect Classified Information, and avoid disclosing or abusing or performing any other similar act of Classified Information. *Aladiners* can use Classified Information for work-related purposes only based on the instruction from the Bank and/or the Bank's Affiliates;
  - (j) unless required by the law and approved by the Bank, *Aladiners* is not allowed to share and/or perform other similar acts including but not limited to selling and disclosing Classified Information to any third party. *Aladiners* is also not allowed to reduce, expand, revise, exploit, copy, announce, manipulate, decompile, change or reproduce Classified Information, including but not limited to examples, models, computer program, pictures, documents or other instruments and containing Classified Information, in all forms for the benefit of *Aladiners* or other parties or for any other purpose except for the interest of the Bank;
  - (k) immediately inform the Bank in writing in case there is a leak of Classified Information within one day.
3. When in doubt, assume all information received is confidential.
  4. Comply with the Bank's policies and procedures relating to the security and confidentiality of information, inside or outside of the workplace.
  5. Respect the confidentiality of information from any former employer. *Aladiners* is not allowed to share nonpublic information or intellectual property from any former employer(s) – or ask others to do so – without the prior consent of the former

- employer. If *Aladiners* leaves Bank Aladin Syariah, do not share the Bank's nonpublic information or intellectual property with others.
6. If *Aladiners* identifies any potential violation or potential violation to data security and privacy based on the applicable policy, procedure and standard in the Bank and/or the Bank's Affiliates, please inform the Information Security & GRC Department, as appropriate.

#### **F. FINANCIAL CRIME PREVENTION**

1. Complete all customer due diligence (KYC) requirements when entering into client relationships and, where applicable, individual transactions to avoid from the risks of money laundering, terrorism financing, and other financial crimes.
2. Escalate unusual or suspicious financial activity to the relevant department according to the Bank's procedures.

#### **G. CONFLICT OF INTEREST**

1. Each *Aladiners* is not allowed to:
  - a. receive gifts in the forms of cash, securities, loan, ticket and accommodation, or any other facilities from any other party;
  - b. receive gifts/gratuities/entertainment and/or any other facilities from a vendor who has not worked with the Bank under circumstances that would compromise, or even appear to compromise, the business judgment of *Aladiners*;
  - c. receive gifts/gratuities/entertainment and/or any other facilities from any other party who could compromise the capability of *Aladiners* in making business decision, influencing/with the intention of having *Aladiners* to perform something or not perform something that is related to his/her job, in violation to his/her authority or obligation and/or in relation to the public interest; and/or
  - d. making any promises to perform something or not to perform something in his/her job, in violation to his/her authority or obligation, and/or in relation to the public interest.
2. Each *Aladiners* who receives gifts/gratuities/entertainment/facilities not mentioned in the above or is unsure whether the gifts/gratuities/entertainment/facilities that he/she received is classified under the point 1 or not is obligated to declare it to the Bank by submitting the Gift Acceptance Declaration Form. The Bank will then make a final decision on the gift based on the Company Regulation and/or Bank's internal policy.
3. *Aladiners* is obligated to ensure that any of his/her family member does not receive any gifts, gratuities, entertainment, and/or any other facilities and/or making any promises that could compromise or even appear to compromise, the business



- judgment of *Aladiners*, influencing/with the intention of having *Aladiners* to perform something or not perform something that is related to his/her job, in violation to his/her authority or obligation and/or in relation to the public interest. A family member is defined as a person having the relation with the Employees by blood, marriage, adoption or legal relationship including:
- a. *Aladiners'* wife/husband;
  - b. *Aladiners'* sibling/in-law;
  - c. Descendants who are in a straight line from *Aladiners*;
  - d. Descendants who are in a straight line from *Aladiners'* wife/husband;
  - e. Spouses from the families mentioned in (b), (c), or (d);
  - f. Straight line descendants from the families mentioned in points (b), (c) or (d);
  - g. Parents, Uncle, Aunt or Cousin of *Aladiners* or of *Aladiners'* Spouse; and the Spouses, or the straight line descendants mentioned in point (g).
4. *Aladiners* who is in violation of point 1, 2 and 3 above will be penalized based on the Bank's decision.
  5. Do not give any gratuities or facilities to Government officials and their immediate family members as per the Law Number 31 of 1999 regarding Eradication of Criminal Act of Corruption ("Law on Anti-Corruption") and Law Number 20 of 2001 regarding Amendment to Law Number 31 of 1999 regarding Eradication of Criminal Acts of Corruption ("Law on Gratification").
  6. Not engage in outside business activities that are similar to, or might be in competition with, any products or services offered by Bank Aladin Syariah, or that might put the personal interests of *Aladiners* ahead of the best interests of the Bank and/or our clients.
  7. *Aladiners* can become the director of non-profit organizations, such as religious organizations; educational institutions; cultural, social, welfare, charities or donation activities; as per the approval of the Board of Directors. For the Board of Directors, the approval must be obtained from the shareholders.
  8. Not allow your outside business activities, or the time you spend on them, to interfere with your job responsibilities at Bank Aladin Syariah.
  9. Inform the company, entity, or other third party with which you engage in outside business activities that you are an employee of Bank Aladin Syariah.
  10. Do not perform as the executor, administrator, or trustee of assets owned by customers.

## **H. SUSTAINABILITY AND RESPECTING HUMAN RIGHTS**

1. Commit to balancing economic returns with environmental and social responsibility.
2. Identify and address the environmental and social impacts of our business activities.
3. Support businesses that enable sustainable growth.

4. Commit to respecting human rights including the prevention of child labour, modern slavery and human trafficking, in making our business decisions and in engaging with third parties, such as vendors, suppliers and partners.
5. Strive to do business only with clients and suppliers who share our values with respect to human rights and use our business relationships to share best practices.

## **I. SAFEGUARDING THE BANK'S INTERESTS**

### **Protecting the Bank's Assets**

1. The Bank's assets are defined as all tangible and intangible assets owned by the Bank that are beneficially valuable to the Bank. The Bank's assets include:
  - a. Financial assets, including current accounts and placements with Bank Indonesia, current accounts with other banks, securities investment, financing, and other financial assets;
  - b. Fixed assets are defined as recorded assets that fulfill all criteria such as tangible, have a useful life of more than one year, value per item is equal to or greater than the determined material value, owned and used by the Bank for operational activities. Examples of fixed assets are leased buildings that are already renovated, vehicles, computers, office furnishings, supplies and equipment;
  - c. Intangible assets, such as application or software.
2. Never use the Bank's name, logo, attributes, trademarks, facilities or relationships for commercial purposes unrelated to *Aladiners'* jobs at the Bank. The Bank's assets should be used only in relation to conducting the Bank's business, except authorized by the Board of Directors and/or in-line with the Bank's policies.
3. The bank is a politically neutral organization and does not engage in any political party or political figure campaign, or contribute to any activities that have political agenda, including donation to political parties/figures.

### **Use of Social Media and Representing the Bank**

1. Use social media in a responsible manner:
  - a. Only post content on behalf of Bank Aladin Syariah in social media if you are authorized to do so and in accordance with the Bank's policies.
  - b. Not disclose any information related to the Bank.
  - c. Refrain from harassing, discriminatory, or retaliatory actions of any kind.
  - d. Ensure your personal use of social media does not interfere with your work and is consistent with the Bank's values and Code.

2. Obtain approval from the Excom <excom@aladinbank.id> before arranging or participating in meetings with representatives of the media, and before consenting to or engaging in any public relations activity on behalf of the Bank.
4. Activities that are in need of prior approval from Excom are as follows.
  - a. Sharing, publishing, posting, or linking to any material in written or electronic format that mentions any classified information of the Bank.
  - b. Making speeches, giving interviews, or making public appearances on behalf of the Bank.

#### **J. ANTI-FRAUD**

1. *Fraud* is an act of distortion or omission that is deliberately perpetrated to deceive, cheat, or manipulate Bank, client, or any other party, and happens within the Bank's environment and/or by using the Bank's facility that is resulted in a loss for the Bank, client, or other party and/or a direct/indirect financial benefit for the perpetrator.
2. Commit not to conduct fraudulent acts or deliberate negligence, including misrepresentation or embezzlement, or intention to mislead or embezzle, with the objective of gaining personal advantage or avoiding personal liability.
3. Commit to abide by all applicable law and regulations within the Bank.
4. Commit not to perform any fraudulent acts and to understand that the consequence of such acts would create a negative impact to both the Bank and oneself.
5. Commit to avoid any activities that can facilitate and/or create an opportunity for other parties to commit fraud, either within or outside of the Bank.
6. Commit to implement and support the overall anti fraud strategy implementation procedure in a consistent manner.
7. Commit to report any fraudulent acts that happen within the Bank, either knowingly or unintentionally, to the appropriate channel.

#### **K. SPEAKING AND RAISING CONCERNS (INCLUDING WHISTLEBLOWING)**

1. All *Aladiners* are encouraged to raise all concerns related to possible violations of laws, rules, regulations, bank policies, conflicts of interest, harassment and retaliation at the workplace to whistleblowing@aladinbank.id
2. All *Aladiners* are required to raise concerns related to possible criminal activity by the Bank, other *Aladiners*, clients or third parties that are related to the Bank. Criminal activity, for example, includes bribery, corruption, fraud, market abuse, financing terrorist, money laundering, and other violations to the applicable law and regulations to whistleblowing@aladinbank.id
3. To provide protection to a whistleblower in relation to any deviation/violation or for making a complaint, the Bank's senior management will ensure that any information given is treated with a high degree of confidentiality.

4. Disciplinary action, up to and including termination of employment will be imposed on *Aladiners* and/or the head of the respective unit based on the degree of the deviation/violation as per the Bank's internal policy, Company Regulation and the applicable law and regulations.
  - a. Bank Aladin Syariah does not tolerate any retaliation, discrimination, or harassment against the whistleblower. Disciplinary action will be imposed on *Aladiners* who are involved in such acts.
  - b. Ungrounded allegations with no support of proof are not tolerated.
  - c. Disciplinary action will be imposed on *Aladiners* who make ungrounded and/or inaccurate allegations, or for the purpose of personal interest.
  - d. Protection will not be provided to a whistleblower who makes ungrounded and/or inaccurate allegations, and previously has been involved in or performed any inappropriate actions.

#### **L. MAKING A DECISION**

1. When faced with a challenging situation or decision that does not feel right, you should use the following questions to help guide your action/decision.
  - a. Is it in the Bank's best interest?
  - b. Is it in the Client's best interest?
  - c. Does it comply with the laws, regulations, the Bank's policies and the Code?
  - d. Will it cause harm to the Bank's reputation, or to your reputation?
  - e. Will it create a conflict of interest?
  - f. Would you feel comfortable if it was made public?
2. If *Aladiners* is not sure or answer "NO" to the above questions, *Aladiners* must seek advice from the supervisor, Compliance & Legal, Human Capital, Anti Fraud Management or Infosec & GRC, as appropriate.

#### **M. SEXUAL VIOLENCE**

1. Sexual violence encompasses all acts that are condescending, insulting, harrasing and/or violating one's physical body and/or one's reproductive function, due to gap in authority and/or gender relationship, which led or could lead into psychological and/or physical harm, including those that affect the health of someone's reproductive system and the loss of a safe and optimal working opportunity.
2. Sexual harassment encompasses all unwanted sexual acts, inappropriate promises of rewards in exchange for sexual favors, verbal or physical or implicit sexual overtones,

- or other types of sexual offense that make someone feels offended, humiliated and/or intimidated and disrupts the condition of the workplace.
3. Every *Aladiners* is entitled to work in a safe and conducive environment. Therefore, the Bank views sexual violence (including sexual harassment) at the workplace as a serious offence. In this context, the workplace is defined not only as the Bank's physical location but also includes:
    - a. Work related social activities, such a reception organized by the enterprise for staff or clients, etc.;
    - b. Conferences, seminars, workshops and training sessions organized by the Bank, either ;
    - c. Official business travel;
    - d. Business meals;
    - e. Work related telephone conversations; and
    - f. Work related communications through electronic or social media.
  4. Examples of sexual violence that happen quite often at the workplace:
    - a. Non Physical sexual harassment: all acts of non physical sexual harassment that are directed towards one's physical body, sexual desire, and/or reproductive organs, such as:
      - i. verbal harassment that is considered sexual in nature, offensive jokes, insulting one's private life or physic or appearance;
      - ii. harassment that is done through visual or gesture;
      - iii. psychological or emotional harassment.
    - b. Physical sexual harassment that is directed towards body, sexual desire, and/or reproductive organs.
    - c. Sexual harassment that is done through electronic channels:
      - i. Sexual in nature recording of someone without the person's acknowledgement or consent;
      - ii. Transmission of information and/or documents that are considered sexual in nature via electronic channels to unwanted receiver; and/or
      - iii. Stalking and/or tracing of someone by using an electronic system.
  5. *Aladiners* is not allowed to perform and/or facilitate all forms of sexual violence as outlined in point 4 above.
  6. All incidents of sexual violence must be reported to:
    - a. whistleblowing channel: [whistleblowing@aladinbank.id](mailto:whistleblowing@aladinbank.id);
    - b. local government unit in the municipality/regency that manages manpower-related matters;
    - c. Ministry of Manpower; and/or
    - d. local police authority.
  7. To protect victims of sexual violence, the Bank's senior management will ensure that any information given is treated with a high degree of confidentiality.

8. Bank will provide counseling to victims of sexual violence based on the applicable law and regulations.
9. Disciplinary action, up to and including termination of employment will be imposed on *Aladiners* who is involved and/or facilitate in all forms of sexual violence, based on the law, Company Regulation and other applicable regulations.