

## OPERATIONAL TECHNICAL GUIDELINES GRATIFICATION CONTROL

### Statement

In order to uphold a culture of integrity and to establish a clean corporate governance system that is free from potential ethical misconduct, conflicts of interest, and corrupt practices, PT Bank Syariah Indonesia Tbk (hereinafter referred to as “BSI”) has established an internal regulation in the form of Operational Technical Guidelines (OTG) for Gratification Control. These provisions serve as a reference for all levels within the Bank in controlling and reporting gratifications in a transparent manner, aligned with business ethics and the principles of Good Corporate Governance. This OTG applies to all members of BSI, including employees, officials, business partners, and other third parties who may potentially be involved in the receipt or provision of gratifications related to the execution of duties and/or positions.

This procedure covers various activities that may potentially give rise to gratifications, including interactions with customers, debtors, vendors, contractors, and business partners related to procurement of goods/services, official travel, as well as the giving or receiving of gifts and similar items. Through this OTG, every member of the Bank is expected to carry out their duties and responsibilities professionally, transparently, and accountably, thereby fostering an organization of high integrity and trustworthiness.

The primary objectives of this policy are to cultivate a clean and transparent work culture, to provide guidance for employees, and to ensure that every gratification report is appropriately followed up in accordance with applicable internal regulations and prevailing laws. The handling of such reports shall be carried out by a designated unit in compliance with internal policies and statutory provisions.

### Introduction

As an Islamic financial institution, BSI is committed to instilling a culture of cleanliness, honesty, and integrity across all levels of the organization. This commitment includes the rejection of all forms of gratification, whether direct or indirect, as part of the Bank’s efforts to maintain stakeholder trust and to carry out its mandate in a professional manner.

As stated in the Holy Qur’an, Surah Al-Baqarah [2]:188:

*“And do not consume one another’s wealth unjustly or send it [in bribery] to the rulers in order that [they might aid] you to consume a portion of the wealth of the people in sin, while you know [it is unlawful].”*

This verse serves as a foundation that any unlawful gains, including gratification, must be strictly avoided in order to uphold the principle of justice and to ensure blessings in every business activity.

## **Legal and Regulatory**

This policy has been prepared with reference to various regulations that form the foundation of gratification control in the financial services sector, including:

1. Law No. 11 of 1980 concerning Criminal Acts of Bribery.
2. Law No. 28 of 1999 concerning State Administration that is Clean and Free from Corruption, Collusion, and Nepotism.
3. Law No. 31 of 1999 concerning the Eradication of Criminal Acts of Corruption as amended by Law No. 20 of 2001 (valid until January 1, 2026, and will be repealed and replaced by Law No. 1 of 2023 concerning the Criminal Code).
4. Law No. 30 of 2002 concerning the Corruption Eradication Commission as last amended by Law No. 19 of 2019 concerning the Second Amendment to Law No. 30 of 2002.
5. Financial Services Authority (OJK) Regulation No. 21/POJK.04/2015 concerning the Implementation of Corporate Governance Guidelines for Public Companies.
6. Corruption Eradication Commission (KPK) Regulation No. 2 of 2019 concerning Gratification Reporting.
7. Compliance Control Standard Procedure (SPP).

## **Reference**

Operational Technical Guidelines (OTG) for Gratification Control of PT Bank Syariah Indonesia Tbk.

## **Organization, Duties, and Responsibilities Related To The Compliance Function**

Gratification control at BSI is under the coordination of the Compliance Unit, which acts as the main coordinator in implementing gratification control throughout the Bank. The technical implementation is carried out by the Anti-Bribery Unit, which specifically handles the application of gratification control policies and procedures. The organizational structure involved in gratification control includes:

- Head of Compliance & AML-CFT Unit
- Department Head of GCG and Compliance
- Anti-Bribery Manager
- Anti-Bribery Officer

Through this structure, BSI ensures that the compliance function related to gratification control is effective, well-coordinated, and aligned with anti-bribery principles as well as applicable laws and regulations.

## **General Provisions**

The Bank consistently applies the principles of gratification control across all operational activities, guided by the following principles:

1. **Integrity and Professionalism**
  - a. All BSI personnel are prohibited from receiving or giving gratifications that may be perceived as bribes related to their positions.
  - b. All BSI personnel are required to politely refuse such gratifications at the first opportunity and report them to the Anti-Bribery Unit.
2. **Prevention and Education**
  - a. Heads of Units are required to foster and provide education to employees under their supervision regarding the gratification control program.
  - b. Heads of Units are also required to educate givers or parties with potential conflicts of interest, in a respectful manner, about the prohibition of receiving gratifications considered as bribes and/or other prohibited gratifications.
3. **Whistleblower Protection**

Gratification reporters are entitled to protection from threats related to bribery offenses as well as confidentiality of identity and report contents.
4. **Transparency and Accountability**
  - a. All BSI personnel must report any rejection or acceptance of gratifications related to their positions and contrary to their duties to the Gratification Control Unit or directly to KPK.
  - b. The process of reporting, handling, and deciding on gratifications must be accountable administratively, legally, and ethically.
5. **Independence**

All BSI personnel must maintain independence in carrying out their duties, free from the influence or pressure of gratification givers.
6. **Fairness and Equity**

All customers, debtors, vendors, contractors, and business partners or other third parties must be treated equally, without special treatment as a result of gratification.
7. **Compliance with Laws**
  - a. The determination of the ownership status of gratifications deemed as bribes falls fully under the authority of the Corruption Eradication Commission (KPK).
  - b. All BSI personnel must comply with applicable laws, internal regulations, and Sharia principles in both the acceptance and rejection of gratifications.

The general provisions regulated in the OTG on Gratification Control include:

1. Criteria for Gratification; and
2. Provisions on Giving by the Management of Bank Syariah Indonesia.

### **Gratification Reporting Mechanism**

#### **A. Reporting of Gratification Rejection**

1. Bank personnel must reject gratifications considered as bribes and official-related gratifications exceeding a reasonable value at the first opportunity and report them to KPK via and/or the Anti-Bribery Unit via email [antibribery@bankbsi.co.id](mailto:antibribery@bankbsi.co.id), WhatsApp 08118451451, or to the Gratification Control Unit at The Tower Building, 27th Floor, Jalan Gatot Subroto Kav. 27, South Jakarta.
2. If the gratification cannot be rejected at the first opportunity, the recipient must return the gratification within a maximum of 24 hours from the time of receipt.
3. Bank personnel must report gratifications to the Anti-Bribery Unit no later than 10 (ten) working days from the date of rejection or submit them directly to KPK in writing, via email, or through the online application at no later than 30 (thirty) days from the date of rejection, with a copy submitted to the Anti-Bribery Unit.

#### **B. Reporting of Gratification Acceptance**

1. All received gratifications, including those that cannot be returned, must be reported no later than 10 (ten) working days from the date of receipt through the Anti-Bribery Unit via email [antibribery@bankbsi.co.id](mailto:antibribery@bankbsi.co.id), WhatsApp 08118451451, or to the Gratification Control Unit at The Tower Building, 27th Floor, Jalan Gatot Subroto Kav. 27, South Jakarta.
2. Gratifications deemed as bribes, related to celebrations, or exceeding the permitted threshold value of IDR 1,000,000 (one million rupiah) from the same giver must be reported directly to KPK in writing, via email, or through the online application at no later than 30 (thirty) days from the date of rejection, with a copy submitted to the Anti-Bribery Unit.

### **Closing Statement**

The implementation of gratification control at BSI is an essential part of efforts to safeguard integrity, public trust, and compliance with Sharia principles. Since obtaining ISO 37001:2016 Anti-Bribery Management System (ABMS) certification in 2021 and re-certification in 2024, BSI has consistently strengthened the prevention and handling of bribery practices through transparent policies, procedures, and reporting mechanisms. This certification affirms BSI's commitment to creating a clean, accountable, and competitive work environment, while minimizing legal risks and enhancing the Bank's reputation.