

KEBIJAKAN ANTI PENYUAPAN DAN KORUPSI

PT. Super Bank Indonesia

ANTI BRIBERY & CORRUPTION POLICY

PT. Super Bank Indonesia

Catatan/Note: Kebijakan yang ditampilkan dalam situs web Superbank ini adalah versi saduran singkat. This Policy uploaded in the website is the summarized version.

PT. Super Bank Indonesia ("Bank") telah memiliki Kebijakan Anti Penyuapan dan Korupsi sebagai pernyataan komitmen Bank untuk menumbuhkan budaya integritas, mencegah dan mendeteksi praktik penyuapan serta korupsi, serta melindungi Bank dari risiko hukum, finansial, maupun reputasi

PT. Super Bank Indonesia ("Bank") has had Anti-Bribery and Corruption Policy as a statement of the Bank's commitment to fostering a culture of integrity, preventing and detecting bribery and corruption practices, and protecting the Bank from legal, financial, and reputational risks.

I. PENDAHULUAN

I.1 Latar Belakang

Praktik bisnis bebas suap dan korupsi melindungi Bank dan seluruh Pihak Bank dari risiko hukum, kerugian finansial, reputasi buruk, serta kehilangan nasabah.

Bank berkomitmen untuk menjalankan usahanya secara transparan dan bertanggung jawab. Dalam rangka menerapkan nilai Perusahaan, kegiatan usaha Bank tidak terlepas dari hubungan dan interaksi dengan nasabah maupun pihak ketiga lainnya. Reputasi Bank menjadi salah satu kunci kesuksesan, sebagai salah satu pelaku industri keuangan yang diatur oleh Otoritas Jasa Keuangan memiliki komitmen untuk menjunjung tinggi integritas dengan mengedepankan sikap anti penyuapan dan anti korupsi.

I. INTRODUCTION

I.1 Background

Clean business practices free from bribery and corruption protect the Bank and its Parties from legal risks, financial losses, reputational damage, and loss of customers.

The Bank is committed to conducting its business in a transparent and responsible manner. In line with the Company's values, the Bank's business activities inherently involve relationships and interactions with customers as well as other third parties. The Bank's reputation is one of the keys to its success. As a financial industry player regulated by the Financial Services Authority, the Bank is committed to upholding integrity by prioritizing an anti-bribery and anti-corruption stance.

Bank secara tegas tidak menawarkan atau memberikan Apapun Yang Bernilai (anything of value) kepada siapapun jika hal itu akan atau akan dianggap sebagai tindakan penyuapan, korupsi, tidak pantas, atau melanggar hukum. Bank mengharapkan Pihak Bank dan pihak ketiga lain yang bertindak atas namanya untuk menjalankan bisnis dan kegiatan bank sesuai dengan standar profesional dan etika

The Bank strictly prohibits offering or giving Anything of Value to anyone if it will, or may be perceived as, an act of bribery, corruption, impropriety, or a violation of law. The Bank expects all Bank Parties and third parties acting on its behalf to conduct business and Bank activities in accordance with professional and ethical standards.

Kebijakan Anti Penyuapan dan Korupsi dibuat berdasarkan peraturan perundang-undangan yang berlaku, Nilai Perusahaan, dan Kode Etik Bank.

The Anti-Bribery and Corruption (AB&C) Policy is established based on applicable laws, Company Values, and the Bank's Code of Ethics.

I.2 Tujuan

Tujuan dibentuknya Kebijakan Anti Penyuapan dan Korupsi ini adalah untuk menyatakan prinsip, komitmen, dan kode etik Bank dalam mendukung praktik anti penyuapan dan korupsi.

Kebijakan ini bertujuan menumbuhkan budaya anti penyuapan dan korupsi bagi seluruh Pihak Bank, serta mendorong upaya pencegahan dan penghindaran praktik tersebut.

Kebijakan ini membantu mencegah, mendeteksi, dan meniadakan tindakan penyuapan dan korupsi di lingkungan Bank.

Kebijakan ini meningkatkan kesadaran dan kepedulian Pihak Bank terhadap anti penyuapan dan korupsi dalam menjalankan tugas dan tanggung jawab sehari-hari.

I.2 Objective

The purpose of establishing this Anti-Bribery and Corruption Policy is to state the Bank's principles, commitments, and code of ethics in supporting anti-bribery and anti-corruption practices.

This Policy aims to foster an anti-bribery and anti-corruption culture for all Bank Parties, encouraging prevention and avoidance of such practices.

The Policy helps prevent, detect, and eliminate bribery and corruption within the Bank.

The Policy raises awareness among Bank Parties about prohibited and unlawful behaviors—such as gratification, bribery, and corruption—in carrying out their daily duties and responsibilities.

Kebijakan ini berlaku bagi setiap Pihak Bank yaitu seluruh anggota Dewan Komisaris, Direksi, Pihak Independen Anggota Komite Dewan Komisaris, karyawan Bank (baik karyawan tetap/PKWTT, kontrak/PKWT) dan Pihak Ketiga yang ditugaskan di Bank yang bertindak untuk dan atas nama Bank.

This Policy applies to all Bank Parties, namely all members of the Board of Commissioners, the Board of Directors, Independent Parties serving on the Board of Commissioners' Committees, Bank employees (both permanent and fixed-term), and Third Parties assigned to the Bank who act for and on behalf of the Bank

II. KOMITMEN BANK

Bank berkomitmen menjalankan usaha secara transparan, bertanggung jawab, beretika, dan patuh hukum, serta menolak segala bentuk suap dan korupsi untuk mendukung tata kelola perusahaan yang baik.

Bank tidak mentolerir penyuapan atau korupsi, baik memberi maupun menerima, dan berkomitmen bertindak profesional, adil, dan berintegritas dalam setiap hubungan bisnis.

Bank menerapkan langkah-langkah efektif untuk mencegah dan menindak praktik suap dan korupsi sesuai hukum yang berlaku.

Komitmen Bank adalah sebagai berikut:

1. Menjalankan usaha berdasarkan integritas, Kode Etik, dan Kebijakan Anti Penyuapan & Korupsi.
2. Meningkatkan dan memperbaiki proses bisnis agar sesuai prinsip integritas.
3. Melarang Pihak Bank berjanji, memberi, atau menerima sesuatu yang merugikan Bank.

II. BANK'S COMMITMENT

The Bank is committed to conducting business transparently, responsibly, ethically, and in compliance with the law, while rejecting all forms of bribery and corruption to support Good Corporate Governance.

The Bank does not tolerate bribery or corruption, whether giving or receiving, and is committed to acting professionally, fairly, and with integrity in all business dealings.

The Bank implements effective measures to prevent and address bribery and corruption in accordance with applicable laws.

The Bank's commitments are as follows:

1. *Conduct business based on integrity, the Code of Ethics, and the AB&C Policy.*
2. *Continuously improve business processes in line with integrity principles.*
3. *Prohibit Bank Parties from promising, giving, or receiving anything that may harm the Bank.*

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| <p>4. Melaporkan setiap potensi konflik kepentingan kepada Unit Sumber Daya Manusia dan Kepatuhan.</p> <p>5. Memberikan sosialisasi/pelatihan pencegahan suap dan korupsi secara berkala.</p> <p>6. Mengawasi pelaksanaan komitmen ini, dan memberi sanksi atas setiap pelanggaran.</p> | <p>4. <i>Report any potential conflicts of interest to the HR and Compliance Unit.</i></p> <p>5. <i>Provide regular training and socialization on anti-bribery and anti-corruption.</i></p> <p>6. <i>Monitor the implementation of this commitment and impose sanctions for violations.</i></p> |
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III. PELAKSANAAN

Untuk mendukung penerapan kebijakan ini, Bank menetapkan langkah-langkah pelaksanaan sebagai berikut:

1. **Sosialisasi & Kesadaran**
Bank memberikan pelatihan, seminar, dan sosialisasi mengenai anti penyuapan & korupsi.
2. **Uji Tuntas (Due Diligence)**
Bank melaksanakan proses uji tuntas yaitu *Know Your Customer* (KYC) (untuk nasabah dan Pihak ketiga) dan *Know Your Employee* (KYE) (untuk calon karyawan dan karyawan) untuk memastikan seluruh pihak setiap pihak yang berhubungan dengan Bank memiliki latar belakang dan reputasi yang sejalan dengan komitmen anti penyuapan dan korupsi.
3. **Gratifikasi**
Bank melarang pemberian atau penerimaan yang dapat mempengaruhi keputusan bisnis.
4. **Pembayaran Fasilitas & Kickback**
Bank melarang segala bentuk pembayaran fasilitas dan kickback; apabila Pihak Bank

III. IMPLEMENTATION

To ensure effective implementation of this Policy, the Bank establishes the following measures:

1. **Awareness & Training**
The bank conducts training and socialization on anti-bribery & corruption.
2. **Due Diligence**
The Bank carries out due diligence processes, namely Know Your Customer (KYC) (for customers and third parties) and Know Your Employee (KYE) (for prospective and existing employees), to ensure that all parties dealing with the Bank have a background and reputation aligned with the Bank's anti-bribery and anti-corruption commitment.
3. **Gratification**
The Bank prohibits giving or receiving anything that could improperly influence business decisions.
4. **Facilitation Payments & Kickbacks**
The Bank strictly prohibits any form of facilitation payment and kickback; if faced with such a

terpaksa menghadapi situasi tersebut, wajib melaporkannya kepada SDM dan Unit Kepatuhan.

5. Sponsor & Donasi

Hanya diperbolehkan untuk tujuan sah, transparan, dan sesuai peraturan Bank. Pihak Bank wajib mendapatkan data penerima sponsor/donasi untuk keperluan skrining nama sesuai Kebijakan Anti Pencucian Uang (APU), Pencegahan Pendanaan Terorisme (PPT), dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal (PPSPM).

6. Hadiah & Hiburan (*Gift & Entertainment*)

Diperbolehkan jika wajar, proporsional, dan tidak menimbulkan benturan kepentingan.

7. Kewajiban Pelaporan

Seluruh Pihak Bank wajib melaporkan:

a. Pemberian Hadiah dan Hiburan serta/atau pemberian dan penerimaan Sponsorship yang memerlukan persetujuan sebelumnya wajib diajukan melalui formulir Pre-Approval dan disetujui sesuai approval matrix yang telah ditetapkan, paling lambat tiga (3) hari kerja sebelum pemberian Hadiah dan Hiburan serta/atau pemberian dan penerimaan Sponsorship dilakukan.

b. Penerimaan Hadiah dan Hiburan yang melebihi batas maksimum yang ditentukan wajib dilaporkan melalui formulir Post-Approval sesegera mungkin setelah

situation, Bank personnel must report it to HR and Compliance.

5. Sponsorship & Donations

Allowed only for legitimate purposes, transparently, and in line with Bank rules. Bank Parties must collect sponsor recipient data for name screening in line with Anti-Money Laundering (AML), Countering the Financing of Terrorism (CFT), and Countering Proliferation Financing (CPF).

6. Gifts & Entertainment

Permitted if reasonable, proportionate, and without conflict of interest.

7. Reporting Obligations

All Bank Parties are required to report:

a. The giving of Gifts and Entertainment and/or the giving and receiving of Sponsorships that require prior approval must be submitted through the Pre-Approval form and approved in accordance with the established approval matrix, no later than three (3) business days prior to the giving of Gifts and Entertainment and/or the giving and receiving of Sponsorships.

b. The receipt of Gifts and Entertainment exceeding the prescribed maximum limit must be reported through the Post-Approval form as soon as it becomes known, but no later

diketahui, paling lambat tiga (3) hari kerja setelah penerimaan, sesuai approval matrix yang telah ditetapkan.

- c. Laporan Tahunan untuk seluruh pemberian dan penerimaan Hadiah dan Hiburan selama satu (1) tahun wajib disampaikan sesuai mekanisme yang diatur dalam kebijakan ini.

Selanjutnya, setiap dugaan pelanggaran wajib dilaporkan melalui saluran whistleblowing (external-whistleblower@superbank.id)

8. Pencatatan, Dokumentasi & Pengawasan
Semua pemberian/penerimaan wajib dicatat, didokumentasikan, dan diawasi untuk memastikan kepatuhan.

Pihak Bank wajib memastikan seluruh penerimaan dan pemberian dilakukan melalui proses yang berlaku dan telah mendapatkan persetujuan sebelumnya (apabila diperlukan) sesuai Kebijakan Anti Penyuapan dan Korupsi ini.

9. Pelanggaran & Sanksi
Pelanggaran kebijakan dapat dikenakan sanksi disiplin hingga pemutusan hubungan kerja, serta proses hukum.

IV. PENUTUP

Kebijakan Anti Penyuapan dan Korupsi ini dibuat sebagai bentuk komitmen dan kepatuhan Bank terhadap peraturan

than three (3) business days after the receipt, in accordance with the established approval matrix.

- c. *An Annual Report covering all Gifts and Entertainment given and received throughout the year must be submitted in accordance with the mechanism set forth in this Policy.*

Furthermore, any suspected violations must be reported through the supervisor, HR Unit, Compliance Unit, or whistleblowing channel (external-whistleblower@superbank.id)

8. *Recordkeeping, Documentation & Oversight
All giving/receiving must be recorded, documented, and monitored to ensure compliance.*

Bank Parties must ensure that all giving and receiving are carried out through the applicable process and have obtained prior approval (where required) in accordance with this Anti-Bribery and Corruption Policy.

9. *Violations & Sanctions
Breaches of this Policy may lead to disciplinary action, termination, or legal proceedings.*

IV. CLOSING

This Anti Bribery and Corruption Policy is established as a form of the Bank's commitment and compliance with the

perundang-undangan yang berlaku
serta prinsip Good Corporate
Governance.

*applicable laws and regulations as
well as the principles of Good
Corporate Governance.*