

Principles of PT Bank Commonwealth's Whistleblower Policy

This policy is the commitment of PT Bank Commonwealth ("Bank") to Whistleblower. This policy regulates the principles for disclosing, receiving, investigating, and complete the Whistleblower report.

Disclosures

1. This policy applies where a Whistleblower makes a disclosure of Reportable Conduct to:
 - The **Whistleblower Hotline**: 08071919191 or Internal Line Ext. 8800 (Office Operating Hours, Monday until Friday);
 - **Email**: integrity@commbank.co.id ;
 - Bank Senior Leaders; atau
 - Internal Audit.
2. Reportable Conduct means dishonest; fraudulent; corrupt; illegal; unethical; in breach of internal policy (including the Code of Conduct); misconduct or an improper state of affairs; represents a danger, to the public or financial system; or is otherwise a breach of law.

Anonymity & Confidentiality

1. When making a disclosure, the Whistleblower has an option to do so anonymously or provide their identity.
2. All information received from the Whistleblower will be treated confidentially and sensitively.

Investigation

1. Each Whistleblower report will be reviewed to decide whether the Allegations raised should be investigated.
2. Investigations will follow an objective and fair process, be conducted in as timely a manner as the circumstances allow and be independent of the person(s) about whom an Allegation has been made.
3. The investigation results will be stated in the form of a report and each report will remain the property of the Bank and will not be shared with the Whistleblower or anyone else.

Whistleblower Protection

1. The Bank will take reasonable measures to protect the Whistleblower's identity and any information that would allow the disclosure of the Whistleblower's identity.
2. The Bank provides additional protections and remedies for certain disclosures in accordance with the Bank's policy.
3. The Bank strictly prohibits all forms of detrimental conduct against the Whistleblower including threats that could cause a detriment to the Whistleblower as a result of making a disclosure.
4. The Bank will take all reasonable steps to protect the Whistleblower from detrimental conduct, including termination of employment; harassment, bullying or intimidation; personal or financial disadvantage; unlawful discrimination; harm or injury, including psychological harm; damage to reputation; or any other conduct that constitutes retaliation.