

Code of Ethics

**PT Bank Tabungan Pensiunan Nasional Syariah
(BTPN Syariah)**

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Message from the President Director

Dear BTPN Syariah Colleagues,

Commitment for integrity is the absolute principle in the ethical conduct of our business, as stated in the Good Corporate Governance (GCG). The implementation of GCG must be in line with the attitude and behavior as the manifestation of core values outlined in this guideline of Code of Ethics for our employees. Consistent applications of Code of Ethics by all employees will shape the culture of PT Bank Tabungan Pensiunan Nasional (BTPN) Syariah that will distinguish our Bank from the other Banks.

The efforts to apply the GCG Principles require strong commitment from all the people in BTPN Syariah; so that the implementation of GCG principles and code of ethics by all employees will create a good management control system that impacts to the company performance in order to realize the vision of BTPN Syariah "To be the Best Sharia Bank in financial inclusion, making a difference in the lives of millions."

Best regards,

President Director of PT Bank Tabungan Pensiunan Nasional (BTPN) Syariah

Speak Your Mind

The whole organization of BTPN Syariah is obliged to apply this Code of Ethics in the undertaking of duties and responsibilities in the work and in decision making so as to ensure its alignment with the Code of Ethics.

BTPN Syariah provides the media "Speak Your Mind" as a vehicle and media channel to report and inform the employee aspiration in a secured manner that guarantees the confidentiality in disclosing and reporting any problems related to misconduct and/or incidents of fraud, aspiration and/or ideas for improvement.

The Management of BTPN Syariah is committed to keep the confidentiality of the employees and the information and provides protection to the Employees for using Speak Your Mind media. The Employees are obliged to report any suspicious behaviour that may indicate a violation of the policy or internal BTPN Syariah regulations, Bank Indonesia Regulations / Financial Services Authority Regulations, and/or other prevailing laws and regulations.

Such the report and information can be communicated by the Employee to the immediate supervisor or Speak Your Mind media and/or other related party for further follow up.

Chapter 1 Introduction

Every employee is an individual who will be held responsible to Allah SWT for all the deeds that he has done, as stated in the QS. Al-Muddatsir (74):38:

“Every soul is held in pledge for what it has earned.”

Representing BTPN Syariah, every employee bears the responsibility to protect the reputation and personal integrity and BTPN Syariah. Every employee must demonstrate the commitment to the ethical standards and professional conduct in the relationship with the company, customers, business partners, shareholders, society and colleagues. To align the actions in the overall BTPN Syariah organization; all components in the organizations including the Employees, the Board of Directors, and the Board of Commissioners consistently act according to the prevailing regulations and uphold the principles of Islamic virtuous character and corporate values to realize the vision and mission of BTPN Syariah.

1.1. Company Vision

To be the best Sharia Bank in financial inclusion, making a difference in the lives of millions of people of Indonesia.

1.2. Company Mission

Together, we create opportunities for growth and a more meaningful life.

1.3. Company Values

Professionalism, Integrity, Mutual Respect and Teamwork (the Indonesian abbreviation is PRISMA):

1. Professionalism – Professional attitude is attached to each individual internally. Every employee of BTPN Syariah is required to continuously enhance the expertise according to the mandated duties and the profession as a banker. The qualities and attitudes that build the values of Professionalism are:
 - a. Honesty (Shiddiq). Honesty is the most important foundation to build the values of professionalism. All employees of BTPN Syariah must be honest to him/herself, supervisor, colleagues, management and other stakeholders.
 - b. Responsibility (Amanah). Being responsible is a quality and character that are necessary to build the values of professionalism. The realization of the vision and mission of BTPN Syariah will only be possible with the dedication of the employees who hold themselves accountable for their call of duties to deliver the objectives of the company.
 - c. Communicative (tabligh). Being responsible is a quality and character that are necessary to build the values of professionalism. The realization of the vision and mission of BTPN Syariah will only be possible with the dedication of the employees who hold themselves accountable for their call of duties to deliver the objectives of the company.
 - d. Intelligent (fathonah). Being intelligent, Employee will be able to seize the opportunities accurately, understand the challenges of the Company and solve them effectively and understand the aspiration of the organization and the environment in order to help them realize the aspiration.

2. Integrity. The values of Integrity is the quality that always upholds the truth and justice and the commitment to consistently apply the Code of Ethics in the daily conducts in BTPN Syariah.
3. Mutual Respect. The values of mutual respect always appreciate the opinion and the contribution of every Employee according to the duties, responsibilities and professional competence. This attitude is essentially the seeds of the spirit of teamwork.
4. Teamwork. The values of teamwork reinforces the spirit that BTPN Syariah always seeks to develop an environment that nurtures synergy to deliver the best results.

1.4. The Objectives of the Code of Ethics

1. To serve as the foundational guidelines in the attitude and behavior of Employees in the undertaking of duties and decision making.
2. To reinforce understanding of the Employees about the necessity of responsibility of each Employees to Allah for all the deeds and actions in the life in this world, about appropriateness of the Employees in the relationship with the colleagues, relationship with the Company, relationship with the customers, relationship with competitors, relationship with the authorities and/or relationship with other stakeholders.

1.5. The Scope of the Code of Ethics

This Code of Ethics applies for all Employees, Board of Directors and Board of Commissioners, including the individuals in the undertaking of duties and other works in the BTPN Syariah working environment.

Chapter 2 Compliance and Risk Management

The Employees of BTPN Syariah is obliged to comply with the Sharia principles and values, internal regulations of BTPN Syariah, Bank Indonesia / Financial Services Authority regulations and other prevailing laws and regulations in executing the business activities. The Employees must also have risk awareness and manage the risks within the respective scope of responsibility.

Implementation

- a. Ensure that all the decision made and the action taken are in compliance with and not a violation of the Sharia principles and values (such as immoral conduct).
- b. Ensure that all the decision made and the action taken in the undertaking of business activities apply the prudent principles and in adherence to the policies, procedures, code of ethics and prevailing regulations in BTPN Syariah.
- c. Should there be any discrepancies between Sharia principles and values, Internal Regulation, Syariah, Bank Indonesia / Financial Services Authority regulations and other prevailing laws and regulations; the Company shall discuss such discrepancies with the

Supervisor and request the clarification of Compliance Division whenever deemed necessary.

- d. Ensure that all the risks inherent in the work activities are identified, mitigated and measured and understood by the executor of the work activities. The awareness to create and nurture the risk management culture at all layers of the organization is maintained through good communication regarding risk management, communication regarding acceptable risk tolerance, delegation of authority according to duties and responsibilities referring to the prudent principles and Code of Ethics BTPN Syariah; and monitor the effectiveness of Risk Management in every activity.
- e. The awareness to create and nurture the risk management culture and compliance culture is a shared responsibility of all Employees of BTPN Syariah.

Chapter 3 Conflict of Interest

Conflict of interest involves the incompatibility of concerns between economical aim of the Company and the personal economical aim of the Employee which may create direct or indirect impact. The Company obliges the Employees to avoid making decision or taking action in situation involving conflict of interest.

Implementation

- a. The Employees are not allowed to receive and/or request any gift in any form whatsoever including the entertainment from the Employee or Candidate Employee, customer / prospect customer, partner / prospect partner that is considered as a reward for the performance for which he/she is obliged to deliver.
- b. The Employees is obliged to report to the Human Capital (HC) if there is any family relationship with the other employees or candidate employees. HC shall then put a note in the personal file of the respective employee as one consideration in the promotion or transfer process.
- c. The Employees are not allowed to be engaged in a working agreement with another party during office hours, earn other income from sources other than BTPN Syariah that is related to the work or position in BTPN Syariah, nor engaged as public official, appointed in government institution of other institution that may influence the work or position in BTPN Syariah.

- d. The Employees are not allowed to have personal business outside the occupation as the Employee of BTPN Syariah that may disrupt or influence the professionalism or integrity of the respective Employee.
- e. The Employees are not allowed to offer products/services/businesses other than those of BTPN Syariah to the customers of the BTPN Syariah.
- f. The Employees are not allowed to process the financing application or vendor selection from the family or the relatives. The Employees are obliged to inform the supervisor regarding such the situation and the processing of financing application or vendor selection shall be transferred to the other Employees.

Chapter 4 Creating Conducive Working Environment

4.1.Fair Treatment to all Employees

BTPN Syariah is committed to provide equal opportunity to all Employees in the career and individual development and implement fair performance appraisal system.

Implementation:

- a. BTPN Syariah has implemented performance management by administering Key Performance Indicators that are clear and measurable and mutually agreed by the staff and immediate supervisor;
- b. Employee Performance Appraisal is based on competency and not influenced by any subjectivity.

4.2.Anti-Discrimination and Harrassment

BTPN Syariah applies zero tolerance to all discrimination and harrassment action attributed to differences in ethnic group, religion, race, gender, age, position or capability in any form whatsoever. Any kind of threat and violence or discrimination, intimidation in the work place will be processed according to the prevailing regulation.

BTPN Syariah prohibits all kinds of conduct, behavior or saying that imply harrassment that may create discomfort in the work place and is considered a violation to the norms or habits both religious norms and moral norms.

Implementation:

Committing immoral action or violating shared company values and/or persuading others to commit such action, attacking, persecuting, threatening supervisor or colleague and/or the family are considered violation and subject to termination sanction.

4.3. Security in the Work Place

BTPN Syariah prioritize security and safety in the work place supported by all Employees by maintaining health, safety and security to avoid any risks in the work place.

Implementation:

- a. BTPN Syariah cares to maintain the work safety and health of the Employee as stipulated in the Company Regulation by implementing the Work Safety and Health Procedures.
- b. The work protection efforts are intended to avoid the Employees from work risk and diseases so as to create safe and conducive work environment.

4.4. The Use of Company Facility

BTPN Syariah provides adequate work equipment and facility and can only be used by the Employees to support the work in BTPN Syariah.

Implementation:

The work equipment and facility of BTPN Syariah is to be used by the Employees only during the undertaking of duties for the interest of BTPN Syariah, and shall follow the prevailing procedures.

4.5. Activities outside the Company

The Employees in their capacity as an individual may participate as the member of an organization or association outside the Company and as a citizen, the Employees also have the freedom to do political activity but are not allowed to become the active official of any political party.

The Employees are not allowed to become a member of association/club/organization that is not recognized by the government and/or follows the values that are not aligned with the Company values.

Implementation:

- a. As Indonesian Citizen, the Employees have the freedom to do political activity and may participate as a member of political party (not as active official), but are not allowed to leave the duties and obligation as the Employees including not allowed to use the Company facilities, attributes, symbols or other matters related to the Company for the political activities both directly and indirectly;
- b. Not using the position or authority to influence or compel other Employees to do such activity related to activity of the organization/association/political party followed.

4.6. The Use of Social Media

The social media network enables us to share knowledge, insight, information and everything to the public. This is positive, however, the imprudent use of social media may

create risks to the information of ownership right, confidentiality and Company reputation. To minimize the risk to the Company and Employees, an internal guidelines has been prepared to provide parameters and clarity about the conducts in social media that is acceptable and not acceptable.

Implementation:

- a. In using the social media:
 1. The Employees are obliged to always follow the policy, procedures, and standards of the Company;
 2. The Employees are not allowed to use the Company logo or symbol or identity in social media personal account;
 3. The Employees are not allowed to endorse or protest on behalf of the Company unless the Employees are authorized by the Company to do so.
- b. The Employees are obliged to protect the asset and confidential information of the Company.

Chapter 5 Information Management and Security

The Employees are obliged to keep the confidentiality of all classified business information including inside information (non-public information) and Proprietary Information. Inside information is the non-public information, both written and oral, from the customers, prospect customers or other third party with the intention that such the information is kept secret and only used for the business purpose of the Company.

Proprietary Information is the information belongs to the Company such as business strategy, business research, new product plans, business plans, financial information or other matters related business that are not published, such as some actions and other things whose disclosure may harm the business.

Implementation:

- a. Every Employee is responsible to keep information confidentiality according to the prevailing regulation. The Employees are not entitled and are not allowed to disseminate Company and customer information to the third party in any condition whatsoever, unless with the proper approval and agreement from the authorized officer, and/or allowed by the prevailing laws and regulations.
- b. Every Employee who has access to the sensitive information of the Company is prohibited from disseminating such the information to the other party.
- c. The Employees are obliged to keep the confidential information in the safe place so as to not enable any unrelated party and/or unauthorized party to get involved, to know, to record, and/or make copy of such the information.

- d. The production, the recording and/or reporting of information shall consider the aspect of completeness, accuracy, information confidentiality and accountability; and avoid any thing that can mislead the users of information or cause any mistakes in making a decision.
- e. For every work of the Employees that are acknowledged as the product of the Company, both in form of hard copy or soft copy – all actions of quoting, refining, adding, reducing or reproducing such the work without the permission of the BTPN Syariah are considered as an action that harm the Company or violation to the prevailing regulation.

Chapter 6 Relationship with Customers and Stakeholders

Integrity is the key factor in building reputation and earning the trust from customers and stakeholders of BTPN Syariah.

6.1. Relationship with Customers

BTPN Syariah is committed to deliver service excellence to the customers independent of the volume of customer deposits or financing, ethnic group, religion, race, gender and age.

In delivering services to the customers, the Employees of BTPN Syariah shall always display the conduct of honesty, kind and discipline. BTPN Syariah provides the latest information to the customers about products and services. The banking products and services delivery shall comply with the principles of customers protection, including:

1. Transparency
2. Fair Treatment
3. Reliability
4. Confidentiality and security of customers data/information
5. Complaint handling and resolution of customers conflict in a simple, fast, and affordable cost.

Implementation:

- a. The Employees are obliged to serve the customers in a professional manner and offer products and services according to the customers needs and capability;

- b. The Employees are obliged to inform the customers every changes of benefit, cost, risk, terms and conditions stated in the document and/or agreement of products and/or services;
- c. The Employees are prohibited from using the products/services marketing strategy that harms the customers by using the customers condition who do not have any other option in making decision;
- d. The Employees are obliged to provide and/or present information about products and/or services that is accurate, clear and not misleading, that must be:
 - a. Communicated in the explanation to the customers about the right and obligation;
 - b. Communicated in the preparation of agreement with the customers;
 - c. Presented through a number of media such as advertising in printed media or electronic media.

6.1.Relationship with Vendor

The relationship between BTPN Syariah and vendors are based on fair dealing (arm's length), efficiency and fair practices. The Vendor is obliged to comply with the prevailing conditions, including but not limited to, code of ethics, manpower regulation, regulation related to work safety, health and environment.

Implementation:

- a. The Employees are not allowed to establish cooperation with company of not good reputation despite the more competitive price compared to the other companies;
- b. The Employees are obliged to apply the prudent principles and administer a fair appraisal according to the prevailing regulation in doing the selection and maintaining the relationship with Vendor;
- c. The Employees are obliged to ensure that cooperation with the Vendor is administered in written agreement with reasonable transaction value.

6.3.Relationship with Regulator

BTPN Syariah always implements the good corporate governance in doing the business. Compliance to prevailing regulation is part of the commitment, including the mandatory reporting performed in a transparent, accurate, complete and timely manner.

Implementation:

- The relationship with regulator is conducted with transparency, appropriateness, mutual respect, professionalism and in accordance to the prevailing regulation.

6.4.Bribing and Corruption

BTPN Syariah applies zero tolerance to all kinds of bribing (including to or from the customers, Vendors, government officials, Employees) and corruption. Any violation of such

a kind will be administered under the civil or criminal law according to the prevailing laws and regulations.

Implementation:

- The Employees are not allowed to offer and/or receive any gift in any form whatsoever from and to customers, Vendors, government officials for the personal interest of both parties.

6.5. Giving or Receiving Gifts

The Employees are prohibited from giving and/or receiving any gifts including entertainment to or from the customers, vendors, or government officials that has any potential to influence the business decisions.

Implementation:

- a. The Employees are not allowed to give and/or receive gift in any form whatsoever to or from other parties as the personal gratitude for any matters related to the work or position.
- b. In the event that such receiving or giving of gifts from or to other parties is not possible to avoid, the Employee must create a written declaration to the Supervisor.
- c. Giving present or entertainment is allowed as long as the intention is to maintain good will with a reasonable value. The value that is considered reasonable is a present / gratitude with a value not exceeding Rp 1.000.000 (one million Rupiah).
- d. The present or gratitude in the form of cash is not allowed regardless of the amount.

6.6.Anti Money Laundering

BTPN Syariah is committed to implement the regulation of Anti Money Laundering and Counter Terrorism Financing (AML/CTF) including the implementation of know your customer principle.

BTPN Syariah and all the Employees must act cautiously in order to prevent the use of the products and services for money laundering and terrorism financing purposes and detect suspicious transaction according to the prevailing regulation.

Implementation:

- In administering the transaction with customers, the Employees are obliged to prioritize the prudent principle and comply with the regulations related to AML/CTF.

Chapter 7 Enforcement of Code of Ethics

7.1. Roles and Responsibilities

The Employees are obliged to:

1. Learn, understand, obey and implement the Code of Ethics.
2. Report to the Supervisor or through the "Speak Your Mind" media for any suspicion of the violation or any attempt to violate Code of Ethics.

The Supervisors are obliged to:

1. Provide explanation and ask the team members to read and understand the Code of Ethics.
2. Ensure that every Employee in the Unit implements the Code of Ethics.
3. Conduct socialization of the Code of Ethics to all Employees in the respective Unit.
4. Play an active role in coaching the Employees and resolve the violation of the Code of Ethics.
5. Report and escalate the suspicion, indication, and/or occurrence of violation to the authorized party.
6. Follow up every report of Code of Ethics violation according to the procedures.

7.2.Violation of the Code of Ethics

Deviation, abuse, negligence, and/or violation of the Code of Ethics are subject to sanction either employment sanction, civil law or criminal law according to the prevailing procedures and regulations, and at certain level may result in termination of employment without warning.

The Employees who happen to know the occurrence of deviation, abuse, negligence, and/or violation of the Code of Ethics but do not do any action to report, are considered violating the Code of Ethics.

Attachment – Statement Letter Code of Ethics Implementation

I, the undersigned below, certify that I have read, learnt, and understood the Code of Ethics. I am willing to obey and implement to Code of the Ethics to best of my ability.

If, in the future, I am proven to commit violation of the Code of Ethics, I am willing to accept sanctions in accordance to the prevailing regulation in BTPN Syariah.

Certifying the statement:

Name :

NIK :

Position :

Unit :

Signature

(_____)

Reporting Violation of Code of Ethics or Fraud

Report any violation of Code of Ethics / Fraud through the information channel below.

The confidentiality of the informer is fully protected and guaranteed.

Email: speakyourmind@btpnsyariah.com