

STATEMENT OF ETHICS AND BUSINESS PRINCIPLES FOR COUNTERING BRIBERY

Bank Mandiri (Europe) Limited (BMEL) is a UK bank and wholly owned subsidiary of PT Bank Mandiri (Persero) Tbk, Indonesia.

BMEL's Anti-Bribery and Corruption Policies and Procedures have been compiled to comply with the requirements of the **UK-Bribery Act 2010**, and as such, prides itself on its reputation for acting fairly and ethically wherever it does business. The bank's reputation is built on its values as a company, the values of its employees and the collective commitment to acting with integrity throughout the organisation.

BMEL condemns corruption in all its forms and will not tolerate it in the business it undertakes or in those it does business with. Bribery and extortion are not 'victimless crimes' and it is essential to realise the scale of the damage they cause. **BMEL's** zero tolerance policy towards bribery recognises that corruption also undermines democracy, distorts markets, erodes the quality of life and allows organised crime, terrorism and other threats to human security to flourish. Corruption is found in all countries – big and small, rich and poor – corruption hurts the poor disproportionately by diverting funds intended for development, undermining the ability to provide basic services, feeding inequality and injustice and discouraging foreign aid and investment.

BMEL prohibits bribery in any form whether direct or indirect and has implemented policies and procedures to counter and prevent bribery.

The Bank's Policies and Procedures have been prepared for the benefit of its customers, clients, counterparties, agents, contractors and business partners as much as for **BMEL** itself. If convicted of a bribery offence a corporate would be likely to get a significant fine and suffer lasting reputational harm. If an individual is convicted of a bribery offence, they could face up to **ten years** in prison. The harm done by bribery, both to **BMEL** and its business partners, is long term and hugely outweighs any potential short term gain. Bribery is simply not worth the risk.

Business Principles

In pursuit of our ethical approach **BMEL** adopts the following business principles:

- to carry out business fairly, openly and honestly;
- will not make bribes, nor condone the offering of bribes on the bank's behalf, so as to gain business advantage;
- will not accept bribes, nor agree to them being accepted on the bank's behalf in order to influence business;
- will avoid doing business with others who do not accept these values and who may harm the bank's reputation;
- will set out processes for avoiding and preventing direct or indirect bribery, and keeping to and supporting the bank's ethical values;
- will maintain clear and updated records;

- will assess risks and monitor the banks compliance with the requirements of the law, its regulators and of its processes;
- will ensure that customers, clients, counterparties, agents, contractors and business partners are informed of the banks Principles;
- will regularly review and update our processes, as needed; and
- will maintain these Principles at all times.

Any doubts or concerns in regard to the banks ethics and business principles may be discussed in complete confidence with the Head of Internal Control, Compliance & MLRO. **BMEL** is committed to eradicating corruption and the bank will stand by our business partners acting ethically.

Iman N Soeko
Chief Executive

Kelvin R Barnard
Head of Internal Control,
Compliance & MLRO