




WHISTLEBLOWING SYSTEM TECHNICAL GUIDE

PT Sarana Multi Infrastruktur (Persero)

2022

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1. Background

PT Sarana Multi Infrastruktur (Persero) (“PT SMI”), hereinafter referred to as the “Company”, consistently strives to implement the Good Corporate Governance (GCG) principle and Corporate Values in every activity, as well as to improve the effectiveness of internal controls aimed at reducing or avoiding violations in the Company.

To accomplish this, the Company requires a mechanism to detect violations, one of which is through the Whistleblowing System (WBS) implementation-hereinafter referred to as “WBS”. In addition, in accordance with the Company's policy regarding Anti-Fraud Strategy Implementation, the WBS Policy and Mechanism is one of the detection pillars contains steps to identify and find acts of Fraud in the Company's business activities.


The WBS implementation is expected to be one of the methods for early detection of the occurrence of the said Violation. This is also expected to encourage efforts to create a more transparent and accountable organizational culture, encourage organizational performance, and protect the stakeholders. Thus, the implementation of the organization’s main duties and functions can be achieved properly, effectively and efficiently, both in the short and long terms, to accelerate the Company's reputation inside and outside the Country.

2. Purpose, Objectives and Benefits

This WBS Technical Guide is aimed at to be a technical guide for the Company people in their behavior towards matters related to Violations and/or deviations from the code of ethics, law, standard operating procedures and management policies as well as other matters deemed necessary to be detrimental and/or endanger the organization.

For the internal organization, WBS Technical Guide is aimed to:

- a. Improve the effectiveness of Fraud control system implementation by putting priority on the disclosure of complaints, where WBS constitutes one of the Fraud detection tools as stipulated in the applicable Company's Policy regarding Anti-Fraud Strategy Implementation.
- b. Require every Company people and other stakeholders to submit/report to the authorized internal parties of the Company regarding Violations and/or deviations from the code of ethics, law, standard operating procedures, management policies as well as other matters that are deemed to be detrimental and/or endanger the Company, both on the environment, office buildings, working conditions, organizational reputation, and others. Based on the Report, the Company may as soon as possible take appropriate action to resolve the problems that cause the Violations and/or deviations.
- c. Minimize the potential risks that can be detrimental to the Company if the internal mechanism as determined cannot be implemented or enforced to prevent Violations/deviations and/or mistreat by Company's people.
- d. Provide understanding or education to the Company's people and other stakeholders that the Company pays serious attention to adherence to the code of ethics.

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- e. Increase confidence in every Company people and other stakeholders regarding protection from punishment, retaliation or unfair and improper treatment to the Whistleblower if the person concerned discloses a Violation based on good faith and sufficient evidence.
- f. Support the establishment of a culture of openness, accountability and integrity.
- g. Improve the effectiveness of good corporate governance, internal control, as well as employee and organizational performance.

In general, a good and effective WBS implementation can provide various benefits, which are among others:

- a. Providing a forum for each party to convey early important and critical information regarding any Violations in the Company; thus, the handling can be carried out immediately and effectively..
- b. Suppressing the desire to commit any Violation in line with increasing awareness and willingness to report any Violations based on the belief in effective WBS implementation.
- c. Encouraging the creation of an early warning system for potential problems resulting from a violation.
- d. Providing an opportunity to deal with internal violations as the first step, before they escalate into public violations.
- e. Mitigating the risks faced by the organization due to violations in terms of finance, operations, law, work safety, and reputation.
- f. Minimizing financial losses for the Company caused by violations.
- g. Improving the Company's reputation from the perspective of stakeholders, regulators, and general public.
- h. Providing input to the Company to take a more comprehensive and through view of critical and crucial areas, as well as work processes having weaknesses in internal control, to be taken into consideration in designing any necessary corrective actions.

3. Scope

The scope of this WBS Technical Guide covers the Whistleblowing principles, Reporting provisions, follow-up processes for complaints, outreach and evaluation, awards and sanctions, and vindication.

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4. Legal Basis


- a. Law Number 31 Year 1999 and has been amended by Law Number 20 of Year 2001 concerning the Eradication of Corruption;
- b. Law Number 13 Year 2006 concerning Protection of Witnesses and Whistleblowers;
- c. Law Number 11 Year 2008 concerning Information and Electronic Transactions;
- d. Decree of the Chairman of Capital Market and Financial Institution Supervisory Agency Number Kep-431/BL/2012 concerning Submission of Issuer's or Public Company's Annual Reports;
- e. Financial Services Authority Regulation Number 46/POJK.05/2020 concerning Infrastructure Financing Companies;
- f. Company's Articles of Association;
- g. Code Corporate Governance;
- h. Code of Conduct;
- i. Company Policy related to the Risk Management;
- j. Company Policy related to the Internal Control System;
- k. Company Policy related to the Operational Risk Management;
- l. Company Policy related to the Anti-Fraud Strategy Implementation;
- m. Company Policy related to the Company Policy Establishment;
- n. Audit Committee Charter; and
- o. Internal Audit Charter

5. Special Conditions

In the event there are any certain circumstances that make the activity implementation beyond the provisions in this Technical Guide occurs and/or there are matters that have not been regulated in this Technical Guide, the approval for such special conditions shall be submitted on a case-by-case and very selective basis. Approvals of such special conditions shall be carried out by the Board of Directors. If necessary, the Board of Directors may request a review in advance from other related Divisions.


The special conditions referred are intended for operational matters (it is not related to the submission of changes to this Technical Guide) and must be based on the analysis results, taking into account any potential risks that may occur and careful management considerations regarding the Company's interests.

Provisions regarding submission of changes and/or revisions to this Technical Guide shall refer to the applicable Company Policy Establishment Guideline.

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6. Definition

- a. Fraud : Deliberate acts of deviation or omission carried out to trick, deceive or manipulate the Company, Debtor, or other parties that occur in the Company's environment and/or make use the Company's facilities. These kind of acts are decided by the Company Authorized Official as acts of Fraud which cause the Company, Debtor or other parties to suffer losses and/or the Fraud Perpetrator to take direct or indirect advantages.
- b. Administrative Immunity : Protection provided by the Company to the Whistleblower against any administrative status such as employment status, administrative sanctions and others as a result of being involved in the Whistleblowing.
- c. Company people : Members of the Board of Commissioners and Supporting Organs of the Board Commissioners, Sharia Supervisory Board, members of the Board of Directors, Committee members, Permanent, Non-Permanent and Outsourcing Employees.
- d. Investigation : Activities to find evidence related to violations committed by the Company or organization people that have been reported through the WBS.
- e. Violation : Actions that violate laws and regulations, standard operating procedures, policies, codes of ethics and others. Below are the activities that fall into a violation category:
- a. Violating laws and regulations, for example committing general crimes, corruption, embezzlement, mark-ups, drug use, destruction of Goods, and so on;
 - b. Violating the code of ethics Guideline, for example conflicts of interest, harassment, engaging in prohibited community activities;
 - c. Violating the principles of applicable Financial Accounting Standards;
 - d. Violating operational policies and procedures, or other policies, procedures and regulations relevant to the Company;
 - e. Abusing authority or position for personal, family and/or class/group interests;

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- f. Performing irregularities, such as falsification of documents, misappropriation of resources (assets, funds, office equipment and others), as well as unauthorized use or misuse of fixed assets, office machinery and equipment or office administration records/bookkeeping;
 - g. Other acts of Fraud that can cause financial or non-financial losses;
 - h. Actions that endanger work safety;
 - i. Gratification, as regulated in laws and regulations; and
- There is a conflict of interest that is suspected to have adverse impacts on the Company.

- f. Whistleblower : A person who reports an act of violation, either from the organization itself (internal party), but it is possible that the Whistleblower comes from external parties (contractors, suppliers, or the public). The Whistleblower may not have seen and heard of the violation implementation, but the Whistleblower should have and provide clear evidence, information, indications of the reported violation occurrence; thus, it can be traced or followed up. The absence of any sufficient evidence, information or indications can make the report difficult to be further followed up.
- g. Whistleblowing : Disclosure of violation acts or disclosure of unlawful acts, unethical/immoral acts or other actions that can harm the Company and Stakeholders that must be carried out by the Company's people to the management of the Company or other institutions that can take action on the Violation. This disclosure is generally made confidentially.
- h. WBS Administrator : Parties designated and authorized by the Company to carry out WBS administration starting from report receipt, initial verification, status updating, to reporting, including communication with related parties in the Company.
- i. Witness : A person who saw and heard or experienced the act of violation committed by the Reported Party and is willing to give his/her statement in front of the Investigation Team. A Whistleblower may be a witness, but not all Whistleblowers can become witnesses.
- j. Reported Party : Company people and Company Stakeholders suspected of committing Violations.

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In general, WBS management principles are confidential, impartial, independent, and non-repudiative (reciprocal protection).

1. Confidential

Each Whistleblower's identity must be kept confidential by WBS Administrator. For the protection of such identity, the WBS Administrator is required to disguise the Whistleblower identity to avoid any subjectivity, suspicion, and partiality. The obligation to keep the Whistleblower identity does not apply if the legal process states that an identity is required for the Whistleblowing.

2. Impartial

Every Whistleblowing and/or deviations to the WBS Administrator must fulfill impartial characteristics, whether it is ethnic, racial, and religious or group and not belonged to any slanderous and/or false reports.


3. Independent

The WBS Administrator and Authorized Official (PBM) must act independently of the reports received. In the event the report received is related to one or several WBS Administrators and/or PBM, the WBS Administrator and/or PBM concerned is prohibited from processing, handling, investigating, and/or deciding on the complaints received to avoid any conflicts of interest.

4. Non-repudiation

All Company people, including WBS Administrator, are required to apply the non-repudiation principle, namely providing protection, including Administrative Immunity, to Whistleblower from the potential retaliation, also physical, psychological, administrative pressure or threats or legal prosecution. The Whistleblower will receive a non-repudiation protection against any adverse treatment, among others, such as:

- a. demotion orf position or rank;
- b. postponement of promotion;
- c. postponement of periodic salary increases and/or benefits;
- d. unfair transfer;
- e. unfair dismissal;
- f. imposition of direct or indirect sanctions;
- g. harassment or discrimination in all its forms;
- h. intimidation, coercion or victimization; And
- i. adverse records in archive/file of the Whistleblower personal or employee data.

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1. WBS Implementation Commitment

WBS implementation shall require a commitment from the Board of Commissioners and its organs, the Board of Directors, and all Company people to implement WBS and actively participate in reporting violations, abuse of authority and malpractices that are known and/or discovered. A written statement of commitment can be prepared separately or combined into one part of a statement of compliance with the Company's code of ethics and good corporate governance implementation. The original of statement of commitment is kept or archived by the authorized work unit while a copy of the said statement of commitment is kept by WBS Administrator.

WBS is communicated in a transparent manner to all organizational levels and is implemented consistently to generate confidence of all Company people in the reliability and confidentiality of the Grievance Redress Mechanism.

2. Protection for Whistleblower

The Company is committed to providing full support and protection for each Whistleblower, guaranteeing the confidentiality of the Whistleblower's identity and carrying out investigations and disclosure of reports submitted. In this case, the reporting is possible to be done anonymously or by giving prizes to the Whistleblowers whose reports are proven to be true and supported by adequate evidence. Under certain considerations, the Company may also provide protection facilities for the Whistleblowers.

Protection for the Whistleblowers shall be carried out if the Whistleblowers submit any disclosures which meet the following criteria:


- a. Having good faith based on moral and ethical encouragement and not expecting any material rewards and/or popularity; And
- b. Alleged Violations submitted have occurred and can be trusted, supported by adequate evidence, information or indications;

The basic criteria of protection for the Whistleblowers must be met in order to encourage the Whistleblowers not to hesitate to convey any Violations to their knowledge. To avoid any false, slanderous, fabricated reports, the Whistleblowers may have their non-repudiation rights revoked and are subject to sanctions by the Authorized Official after going through the verification and investigation process.

In the event the Whistleblowers deem it necessary to need protection other than protection from the Company, the Whistleblowers may request assistance from the Witness and Victim Protection Agency (LPSK) as referred to in Article 13 of Law Number 13 Year 2006 concerning Witness and Victim Protection.

Protection also applies to WBS Administrator who is under pressure from certain parties to disclose the identity of the Whistleblowers which are kept confidential.

If necessary, disclosure of the Whistleblowers' identities to other or external parties can be carried out, but must meet the following criteria:

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- a. WBS Administrator is prohibited from disclosing the identity of the Whistleblower without the verbal or written approval from the Whistleblower except in the following cases:
 - i. It is required based on laws and regulations or for judiciary benefit;
 - ii. The report submitted contains matters of malpractice, abuse of authority or violations; and
 - iii. Reported issues expected to have negative impacts on the public interest or society.
- b. If the Whistleblower identity needs to be disclosed or not hidden as required in the Investigation process or in the context of the need for appropriate actions to be taken, WBS Administrator or Investigator is required to seek a prior approval from the Whistleblower.
- c. In the event the Whistleblower identity information must be disclosed, the disclosure of such identity can only be conveyed to the party requesting the Whistleblower identity. The WBS Administrator must obtain a prior approval from the Board of Directors or Authorized Official before conveying the Whistleblower identity.

The WBS Administrator may cooperate with other related Divisions to provide protection to the Whistleblower.

3. WBS Administrator

WBS Administrator is appointed from the Compliance Division (DK) to receive, record, and carry out the verification and initial assessment, as well as monitor all incoming complaints from various types of complaint channels, whether received directly or from other sources. One of DK staff shall be appointed as a WBS Administrator who will be given the authority to carry out the roles of a WBS Administrator.


A WBS Administrator must have integrity, be independent and objective or impartial, be trustworthy, be able to communicate and carry out interviews, and have adequate competence, including adequate trainings. In addition, the WBS Administrator must be supported by the provision of adequate facilities and infrastructure.

Under certain conditions, the Company may appoint external parties or other internal parties to carry out the roles of WBS Administrator while still under strict supervision of the Head of DK .

4. Grievance Redress Mechanism

WBS implementation which is aimed to increase the Company transparency and accountability shall require the support, involvement, obligation fulfillment and proactive contributions from every member of the Company to provide more added values to the Company. In general, the Whistleblowing may be carried out through the following mechanism:

- a. Reporting

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The Grievance Redress Mechanism is basically carried out through a formal channel, namely through Direct Superiors or Ethics Officials. If the Whistleblower considers the complaint facility to be ineffective or there are doubts, the Whistleblower may submit a complaint through WBS reporting media as stipulated in Chapter III. 5.-Reporting Media.


The mechanism for channeling complaints/disclosure of Violations by the Whistleblower through the WBS reporting media is as follows:

- i. The Whistleblower is advised to provide information regarding his/her identity, which at least contains name, address, telephone/mobile number, email and photocopy of personal identity, which will be kept confidential by WBS Administrator.
- ii. Violation reports must be accompanied by supporting documents as evidence of the occurrence of reported event, such as documents or documentation related to the transactions carried out and/or Whistleblowing submitted.
- iii. If the Whistleblowing is filed by an external party as a Stakeholder, in addition to the documents in point b above, other documents that explain the relationship between the Whistleblower and the institution or legal entity he/she represents should also be submitted.
- iv. Written Whistleblowing without identity (anonymous) may be made, but must be accompanied by photocopies/copies of documents related to the transactions carried out and/or Whistleblowing submitted.
- v. The Whistleblowing submitted without identity (anonymous) shall remain to be processed; however firstly, the seriousness of report contents, credibility, and evidence submitted should be considered, as well as the possibility of confirming the Report should be carried out.

b. Reporting Supporting Data

The Whistleblower is required to provide complete, relevant and valid evidence, information and initial indications to be accounted for as sufficient initial evidence for the next stage, which cover:

- i. The reported violation which consists of the amount of loss (if it can be determined) or other adverse impacts, 1 (one) complaint only covers 1 (one) Violation or the Reported Party to give more focus on the handling;
- ii. The involved parties (the Reported Parties) who should be responsible for the violation, including the witnesses and parties who were benefited or harmed by the violation;
- iii. Location of Violation, which are the name, place, work unit or function of the Violation occurrence;
- iv. Time of Violation, namely the period of Violation either in the form of specific day, week, month, year or date at the time the Violation occurred;
- v. How the Violation occurred and whether there is any supporting evidence of the Violation occurrence;

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- vi. Information regarding whether the Violation has ever been reported to other parties; and
- vii. Information regarding whether the Violation has occurred before.

c. Submission of Complaints by Whistleblower

The Whistleblowing must be carried out in good faith and not because of personal interest or revenge. In addition, the intended Whistleblowing must also make benefits for the common interests of all Company people and stakeholders a high priority.

The Whistleblower makes a complaint/disclosure and sends it through the following means/media as stipulated in Chapter III. 5.-Reporting Media below.

d. Reporting Handling

Incoming report handling by WBS Administrator covers:


- receiving and recording all incoming complaints from various types of complaint channels, as well as administering the incoming Reports;
- Registering and analyzing the reports, analyzing the adequacy of supporting evidence as well as protecting the Whistleblower;
- based on the analysis results, making a Minutes of Verification Process (BAHV) and reporting it the PBM as stipulated in Chapter V-The Authorized Officials ;
- monitoring the report handling follow-up;
- updating the complaint status in on the database system;
- evaluating the effectiveness of the Company WBS implementation; and
- Reporting WBS management results periodically at least 1 (once) a month, which cover the number of complaints, complaint categories, channels used by the Whistleblower, and status of the complaint settlement. The report should be submitted to the President Director and President Commissioner and the report copy should be also shared with the Director in charge of WBS Management.

5. Reporting Media

To accomplish an effective WBS implementation, it is necessary to have reporting facilities or media which is easily accessible by the Whistleblower. Such media is used by the Whistleblower to communicate the Violation to WBS Administrator. The reporting media used by the Whistleblower can be in the form of:

- Face-to-face communication with WBS Administrator Officials.

The results of the communication are then made into reporting minutes by WBS Administrator Official. For security reasons, the WBC Administrator Official may maintain the confidentiality of the Whistleblower identity stated in the minutes

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- Written by letter.


Complaint letters can be addressed to the WBS Administrator/Head of Compliance Division, President Director, or President Commissioner (in the event the reported person is a member of the Board of Directors);

- Telephone or facsimile;
- Electronic mail or e-mail;
- Internet site/application provided for WBS;
- Mail box; and/or
- Other forms.

Detailed information regarding the reporting media such as the telephone number/address as reporting media destination shall be determined by DK and disseminated by DK to all Company people.

WBS Administrator is required to administer reports received from the Whistleblower including keeping the Whistleblower identity confidential. All reports received from various types of complaint media must be entirely recorded and given status in WBS application database, and the status should be updated according to the stages of report completion.


WBS Administrator is required to classify reports into reporting categories in the form of violations, acts of Fraud, abuse of authority and/or others to facilitate the reporting handling process.

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	COMPLAINT FOLLOW-UP PROVISIONS	CHAPTER-IV

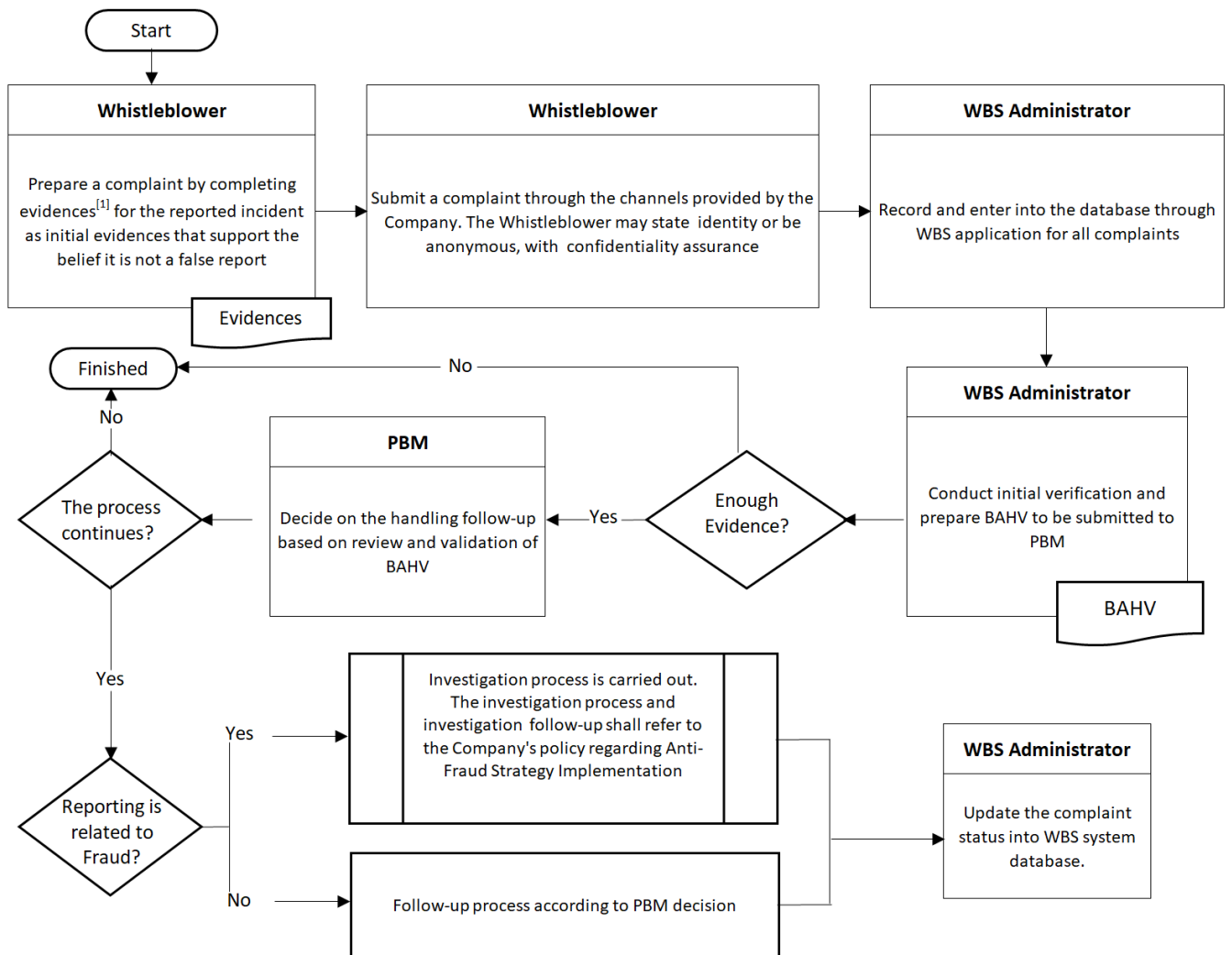
1. Complaint Follow-Up Process

This complaint follow-up shall be carried out starting from the receipt of complaint with the following process:

- a. The Whistleblower should prepare every complaint through the complaint channel provided by the Company by completing evidence for the incident reported as initial evidence that supports the belief that the incident reported is true.
- b. In the event the complaint is received directly by letter by the President Director, the complaint handling process shall be carried out by disposition to WBS Administrator; or in the event the complaint received directly by letter by the President Commissioner, the complaint handling process shall be carried out through assignment to the Audit Committee.
- c. WBS Administrator receives and registers complaints into the database through WBS application.
- d. WBS Administrator shall conduct initial verification and prepare BAHV to be submitted to PBM as stipulated in Chapter V-The Authorized Officials.
- e. PBM receives BAHV and shall conduct a review or validation for 14 (fourteen) working days.
- f. Based on these results, PBM shall decide the following follow-up:
 - i. Terminating it, if it does not meet the requirements;
 - ii. In terms of reporting related to actions with Fraud indications and fulfills the requirements, an investigation process shall be carried out. The investigation process and provisions as well as investigation result follow-up shall refer to the applicable Anti-Fraud Strategy Implementation Procedure; or
 - iii. In terms of reporting related to actions with non-Fraud indications, PBM shall make decisions on necessary follow-up actions, including but not limited to decisions on the investigative process, investigators, decisions on the need to form an Ethics Committee as stipulated in the Company's policy regarding Code of Conduct, or other follow-up decisions based on PBM considerations.
- g. The President Director shall report the handling of complaints which are followed up or which cannot be followed up to the Board of Commissioners at least once every 3 (three) months and a summary of the report can be published on the Company WBS website.


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2. Flowchart




Notes:

[1] Evidences can be in the form of transaction documents, photos, videos and others

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Provisions for the Authorized Officials (“PBM”) shall refer to the applicable Company's Policy regarding Anti-Fraud Strategy Implementation.

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	OUTREACH & EVALUATION, REWARDS & SANCTIONS, VINDICATION	CHAPTER-VI

1. Outreach and Evaluation

This WBS Technical Guide is disseminated to all Company people and evaluated on an ongoing basis. The WBS system will also be updated and improved on regular basis in accordance with applicable regulations and Company's business development.

Continued outreach is intended to gain perceptions and understanding as well as increase the spirit of openness for Company people to report any irregularities and be able to use the WBS properly.

WBS outreach implementation can be carried out simultaneously with GCG implementation outreach, new Company policies, laws related to criminal acts of corruption, publications through the Company's intranet and various other communication media.

2. Rewards and Sanctions


Rewards can be given to the Whistleblower if the reported case contains the truth and the Company gets positive impacts from the report. The type and amount of the rewards given shall be regulated by the policy of the Board of Directors.

In accordance with the provisions and regulations that apply in the Company, sanctions can be given to both the Reported Party and Whistleblower. The imposition of sanctions on the Reported Party can be given if the person concerned has been proven to have committed a Violation. Meanwhile, the Board of Directors may impose sanctions on the Whistleblower, if the person concerned has been proven to have submitted a slanderous or false Violation report.


3. Vindication

The Company is obliged to restore or rehabilitate the good name the Reported Party who is not proven to have committed a Violation.

This WBS Technical Guide must be communicated, disseminated, implemented, carried out and obeyed by all Company people, WBS Administrator, and other related work units in reference to the complaint reports/Reporting received by the Company.


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This Technical Guide is effective as of the date of its approval. At the time this Technical Guide applies, the Whistleblowing System Guideline Revision II and the provisions that are contrary to the provisions in this Technical Guide shall be declared no longer valid.

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Appendix I: Reporting Form

<p>WHISTLEBLOWERS FORM</p> <p>Please make a report by providing the most complete information (mark * is mandatory)</p> <p>GENERAL DATA</p> <p>1. Report Type * : <input type="checkbox"/> Violation of <input type="checkbox"/> Complaints on Service[] Related Financial</p> <p>2. Ethics Report Title:*</p> <p>3. Where did the incident take place?*</p> <p>4. How long has the incident been happening? From date: To date:</p> <p>5. How did this incident occur? (Describe the process/steps) *</p> <p>6. Did this incident result in any financial loss for PT SMI? If yes, how much is the estimated financial loss? If not, what impacts will PT SMI have?</p> <p>7. Are you willing to share your identity in this report? <input type="checkbox"/> Yes, Name _____ Telephone _____ E-mail: _____ <input type="checkbox"/> No (want to remain anonymous) We guarantee your confidentiality, regardless of whether you wish to reveal your identity or remain anonymous.</p> <p>8. Are you willing to be a witness in this complaint if necessary? <input type="checkbox"/> Yes, <input type="checkbox"/> No, please state the reasons: _____</p>

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WITNESS AND EVIDENCE

9. Is any eyewitnesses? (if any, please write Name/Position

10. Do you have supporting documentation or evidence?

Yes ('upload file' column) No

11. Have you reported the incident to other parties?*

12. Have you spoken to the person/them? If so, what advices did he/she/they give?

Name of Violator

13. Name:*

Work Unit or Division

We appreciate your participation in upholding ethics and corporate governance at PT SMI; thus, all reports submitted should be based on good faith and honesty accompanied by complete, relevant and valid evidence for further follow-up.

