

Summary Policy on Ownership, Confidentiality of Information & Investment for Employees

In carrying out business activities of PT Bank BTPN Syariah Tbk (hereinafter will be referred to as the BTPN Syariah), the entire employees are given the opportunity to obtain and access information in various forms of classification.

And to mitigate the risks, with the objectives of protecting the reputation and integrity of BTPN Syariah, the parent companies and other related parties, become very important matters to be noticed that in carrying out investment actions and activities, the Employees of BTPN Syariah and the covered person (as defined hereunder), may do that in an accountable manner in accordance with the Compliance Culture, and with the prevailing norms in the society by continue observing the Sharia Principles.

Legal Basis

Regulation on Public Banking

- 1.1.1. POJK No. 46/POJK.03/2017 dated 12 July 2017, regarding the Implementation of Compliance Function of Public Bank;

Regulations on Sharia Banking

- 1.1.2. Regulation of Bank Indonesia (PBI) No. 11/33/PBI/2009 dated 7 December 2009, regarding the Implementation of Good Corporate Governance for Sharia Public Bank and Sharia Business Unit;
- 1.1.3. Circular Letter of Bank Indonesia (SEBI) No. 12/13/DPbS dated 30 April 2010, regarding the Implementation of Good Corporate Governance for Sharia Public Bank and Sharia Business Unit;
- 1.1.4. PBI No. 15/13/PBI/2013 dated 24 December 2013, regarding the Amendment to PBI No. 11/3/PBI/2009 regarding Sharia Public Bank;
- 1.1.5. SEBI No. 15/50/DPbS dated December 30, 2013, regarding the Amendment to SE BI No. 11/9/DPbS dated April 7, 2009, regarding Sharia Public Bank;
- 1.1.6. POJK No. 1/POJK.07/2013 dated 26 July 2013, regarding the Consumers' Protection on Financial Services Sector;

Regulations related to Capital Market

- 1.1.7. Law No. 8 of the year 1995 regarding Capital Market;
- 1.1.8. Decree of the Chairman of the Capital Market and Financial Institutions Supervisory Agency (Bapepam and LK) No. 412/BL/2009 regarding Affiliated transactions and Conflict of Interest on Certain Transactions;

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- 1.1.9. SEOJK No. 11/SEOJK.04/2014 dated 24 July 2014, regarding the Obligation for the Submission of Report to the Financial Services Authority and the Announcement to the Public by Capital Market Player whose Maturity Date Falls on Holiday;
- 1.1.10. SEOJK No. 32/SEOJK.04/2015 dated 17 November 2015, regarding the Corporate Governance Guidance for Public Company;
- 1.1.11. POJK No. 8/POJK.04/2015 dated 25 June 2015, regarding the Website of the Issuer or Public Company;
- 1.1.12. POJK No. 21/POJK.04/2015 dated 16 November 2015, regarding the Implementation of Corporate Governance Guidance for Public Company;
- 1.1.13. POJK No. 31/POJK.04/2015 dated 16 December 2015, regarding Disclosure of Material Information or Facts by the Issuer or Public Company;
- 1.1.14. POJK No. 78/POJK.04/2017 dated 22 December 2017, regarding Securities Transactions Prohibited for Insiders;
- 1.1.15. Other related provisions and its amendments.

Internal Regulations

- 1.1.16. The Articles of Association of BTPN Syariah;
- 1.1.17. The Policy on Corporate Governance of BTPN Syariah;
- 1.1.18. The Policy on Information Safekeeping and Management of BTPN Syariah;
- 1.1.19. The Company Regulations of BTPN Syraiah;
- 1.1.20. The Decree of the Board of Directors No. 007/DIR/COMP/VIII/2018 related to the Hierarchy of Provisions of BTPN Syariah.

General Principles on Ownership of Information

- a. BTPN Syariah controls all forms of creation in the form of intellectual ownership;
- b. The entire information owned by BTPN Syariah has the status of proprietary right (the right of ownership of the company which cannot be owned by other party without permit);

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Bank Principles over Ownership of Customers Information

BTPN Syariah respects the confidentiality of ownership of Information owned by the Customers by taking into consideration the relationship with the third party as confidential.

In order to ensure the assurance of confidentiality of Customer's information, BTPN Syariah has adopted the following principles, which will be applicable to all Customers of BTPN Syariah, without prejudice to the citizenship, place of residence, location of account, nominal of account, position of customer data collected, used or maintained:

- a. BTPN Syariah shall only collect information on the Customers of BTPN Syariah if it were prescribed by the prevailing statutory regulations including the Code of Ethic.
- b. BTPN Syariah will maintain and protect the data and information of the Customers of BTPN Syariah from unauthorized access, utilization or disclosure, as well as unintentional loss or destruction.
- c. Based on the request and at appropriate time, BTPN Syariah will be enabled to request data from the Customers of BTPN Syariah, if the received information are considered inaccurate;
- d. BTPN Syariah will not convey information disclosure regarding the Customers of BTPN Syariah, unless the disclosure aforesaid is:
 - 1) Drawn up by the party acting on behalf of BTPN Syariah (for example: Public Accountant, Auditor, Legal Advisor or Consultant) and has approved to treat the information aforesaid as confidential;
 - 2) Drawn up by the Supervisory Agency (among others Bank Indonesia, the Financial Services Authority) in Indonesia or abroad in relation to its duties and carried out in accordance with the prevailing statutory regulations in the capital market sector and the banking sector;
 - 3) Drawn up as the response to the court, court order or other order stipulated by the regulations;
 - 4) Drawn up with the permission from the Customers of BTPN Syariah in writing to the relevant party who is responsible for the handling of the Customers of BTPN Syariah aforesaid; in accordance with the internal policy of BTPN Syariah;
 - 5) The organization within the scope of BTPN Syariah intending to distribute information aforesaid regarding the Customers of BTPN Syariah, with other organization units of BTPN Syariah, must consider any restrictions whatsoever which are imposed based on:
 - i. Confidentiality agreement with the Customers of BTPN Syariah
 - ii. Company Regulations
 - iii. This Policy
 - iv. Information Security Management Policy

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- v. Code of Ethic
- vi. Other prevailing statutory regulations.

These restrictions will be applicable to the joint utilization of information within the scope of BTPN Syariah.

- 6) The evidence of *Ownership* of "Documents" or "Confidential Information" is attached to the related Division carrying out the functions and responsible for the information with the "confidential" category. The related Division shall be in accordance with the latest organizational structure of the bank.

Ownership and Confidentiality of Information in relation to the Investment of the Employees

BTPN Syariah arrange related the trading of Financial Instruments issued by the Customers of BTPN Syariah (the "Customers' Financial Instruments")

BTPN Syariah arrange related the trading of financial instruments issued by BTPN Syariah (the "BTPN Syariah's Financial Instruments") will be applicable the following provisions, including the application of Black Out Period in relation to the trading activities of BTPN Syariah's financial instruments and the application of the sanction If there were any violations.

Criteria of Securities Transactions which are Not Prohibited for Insider

Referring to the Regulation of the Financial Services Authority No. 78/POJK.04/2017 which was issued over the amendment to the provisions of the statutory regulations in the capital market sector regarding securities transactions which are not prohibited for insider, it has the objective of provide clarity and certainty regarding the stipulation towards securities which are not prohibited for insider.

Insider shall be a) the Commissioner, the Director or the Employees of the Issuer or Public Company, b) the Main Shareholder or Public Company, c) an individual who due to his position and profession or due to his business relationship with the Issuer or Public Company enables such individual to obtain insider information, or the party within a period of the last 6 (six) months no longer becomes a party as referred to in letters a, b and c.

BTPN Syariah will be subject to the prevailing provisions regarding securities transactions which are not prohibited for Insiders, including the obligation for the submission of report in accordance with the prevailing provisions.

Management of Confidential Information

For the Management of Confidential Information will be applicable the provisions that the Employees will be obliged to execute Employment Agreement stipulating the obligation to safeguard the confidentiality of information owned by BTPN Syariah;

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The providing of Confidential Information to the External Party will be carried out in accordance with the prevailing agreement or regulations;

The Employees, the Outsourced Experts and the Partners in cooperation with the Bank will be obliged to safeguard the Confidential Information.

Management of Public Information

For the Management of Public Information will be applicable the provisions that the providing of Public Information to other party will be carried out in accordance with the needs and corresponding to the prevailing provisions;

The Public information management policy becomes the basis for the Internal Auditor and the External Auditor to carry out the compliance test as well as the effectiveness of its implementation;

The obligation for the delivery of and Type of Material Information or Facts

For the obligation for the delivery of and type of material information or facts will be applicable the provisions that as a public company listing its shares at the Stock Exchange, BTPN Syariah will be obliged to deliver report on Material information or Facts to the Financial Services Authority and make announcement of the Material Information or Facts to the Public at the latest at the end of the 2nd (second) working days after the obtainment of the Material Information or Facts.

For the announcement of the Material Information or Facts (for the Issuer whose shares are listed at the Stock Exchange) will be applicable the provisions that it must be through Website of BTPN Syariah and Website of the Stock Exchange or 1 (one) daily newspaper in the Indonesian language with national circulation;

For the Material Information or Facts have not yet been reported to the Financial Services Authority and announced to the public, however, they have been known by Other Party (other than the insider), BTPN Syariah will be obliged to immediately delivers report on the relevant Material Information or Facts to the Financial Services Authority

Concept of Conflict of Interest in the employee investment activities

Referring to the prevailing Code of Ethic of BTPN Syariah the conflict of interest shall occur when there is a difference between the economic interest of the Company and the personal economic interest of the employee, having impact either directly or indirectly. The Bank shall oblige the employee to avoid from action or the making of a decision in a situation and condition where there is a conflict of interest.

In the event that there is a conflict of interest, then, will be applicable the provisions that the employee of BTPN Syariah will be subject to, but not limited to, the Company Regulations, the Code of Ethic, the Corporate Governance Policy and other internal provisions.

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Control And Supervision

Control And Supervision will be carried out based on the Division Supervision, Independent Supervision and Document Supervision which will function to ensure that its implementation has conformed to the provisions and the objectives to be achieved.

The function of the control and supervision may be used to facilitate every action of remedy and as the consideration on the evaluation towards the implementation of the relevant Policy.

Sanctions

BTPN Syariah apply the sanction for every violations against this Policy, in accordance with the prevailing provisions.

For the employee or Covered Person who were aware of any violation or deviation whatsoever against this Policy, there is an obligation to report the violation aforesaid to the Principal of the related Unit and/or escalate it to the Compliance Director for direction.

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