



MANUAL
ANTI-BRIBERY MANAGEMENT SYSTEM
HEAD OFFICE
PT JASA MARGA (PERSERO) Tbk



CHAPTER 1 DEFINITION

1. **Jasa Marga Being** are members of the Board of Commissioners, Board of Directors and all the Employees with the status of full-time employees of Jasa Marga.
2. **Third Party related to the Company** are members of the Board of Commissioners, Board of Directors and all Employees representing the Company (for example contractor, sub-contractor, good/service provider. Consultant. And/or other third parties) providing and/or to provide services for and on behalf of the Company.
3. **Bribery** is an act of giving, promising, or receiving something or promise, while it is known or reasonably presumed, whereas such gift, promise or receiving something or promise is intended to do an action or not do anything in ones duty, contrary to the authority or liability conducted or not conducted in her/his position.
4. **Something Valuable** is something which has a value including but not limited to money, goods, discount, commission, loan without interest, travel ticket, boarding facility, holyday tour, free of charge medication, donation, sponsor, and other facilities (be it financial or otherwise).
5. **Audit** is a system, independent, and documented process to obtain audit evidence and evaluate it objectively to stipulate how far such audit criteria is met.
6. **Anti-Bribery Compliance Function** is someone or a group of people or unit with the role, responsibility and authority to compile, plan, associate, apply, implement, and monitor the implementation of the anti-bribery management system and report the performance of the anti-bribery management system to the Top Management and Directive Board
7. **General Election Candidate** is a General Election Candidate including all people stipulated by the General Election Commission or the Provincial General Election



Commission as candidate President and Vice President, Candidate Governor and Vice Governor, Candidate of Regional Head and Vice Regional Head, Candidate of Legislative Member (MPR, DPR, DPD Provincial DPRD, and DPRD Regency/City).

8. **Conflict of Interest** is a situation where there is a business, financial, family, politic or personal conflict of interest which can distract someone assessment in conducting its duties for the organization.
9. **Fit and Proper Test** is a process to further assess the nature and level of bribery risk and assist the organization to take decision related to a transaction, project, activity, business partner and certain personnel.
10. **Foreign Official** is an official employee or a foreign government employee or people working in an international organization or those acting in a formal capacity for and on behalf of a foreign government, foreign institution or foreign government institution, a person acting on behalf of an international organization. Foreign Official also include the definition of an official, state servant, state apparatus, or similar, valid in every country. Foreign Official also covers foreign political party.
11. **Directive Board** is a group or agency with the responsibility and highest authority for activities, management, and the organization policy and conduct report to Top Management and to whom the Top Management is responsible. The Directive Board in Jasa Marga is the Board of Commissioners.
12. **Government Institution** is every state institution assigned based on the constitution (Law Number 45) (President and Vice President, DPR, DPRD, DPD, MRP, Constitutional Court, Supreme Court, Judicial Commission, General Election Commissioner, Bank Indonesia, Army/Police (TNI/Polri.) Presidential Advice Board and Audit Agency), State Ministry, other State Institutions in the central government assigned based on law or other regulation and Regional Administration (Province, Regency, or City) and its instrument, or include all national provincial regency, city, local or foreign government, or other political subdivision of it, any entity conducting the executive,



- legislative, judicative, function, regulation, tax or administration or related to the government, and arbitrator or arbitration agency or competent jurisdiction panel.
13. **Gratification** is a gift in the widest sense, including but not limited to giving money, goods, discount, commission, loan without interest, travel tickets, boarding facilities, tour travel, free medication and other facilities, political donation or charity, sponsor, donation and community profit, training, club membership, personal profit and confidential and special information, present/gift and entertainment, be it received domestically or overseas and conducted by using electronic mean or without an electronic means.
 14. **Political Party Official** are persons who are registered as members of a Political Party management (presently active member or retiree), both in the central level, provincial level, district/city level, district level, district/village level.
 15. **Policy** of anti-bribery or other policies formally stated by the Top management or Directive Board related with anti-bribery including but not limited to CEO Message of PT Jasa Marga (Persero) Tbk and a copy of the Meeting Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk.
 16. **Political Parties** are as elucidated in Law Number 2 of 2008, as amended by Law No.2 of 2011 regarding Political Parties (together with other amendments to be later conducted), including newly organized or registered with the Ministry of Law and Human Rights Republic Indonesia to become a legal entity, including associations, organizations, or legal agencies affiliated to a certain political party.
 17. **BUMD** is the Regional State Owned Enterprise, a business entity of which all or the greatest part of its capital is owned by the Regional Administration.
 18. **BUMN** is a State owned Enterprise, is a business entity of which all or the greatest part of its capital is owned by the state through direct participation originating from separated state assets.



19. **Top Management** are people or a group of people directing and controlling the organization at the highest level. The Top management in Jasa Marga is the Board of Directors.

20. **State Civil Apparatus** is a profession for state civil servant and government workers with a work agreement based on working in a government institution.
State Civil Apparatus also include every civil State Employee, members of the Arm Forces Republic Indonesia (TNI), members of the Police of Republic Indonesia (Polri) members of the People's Representative (DPR)/People's Deliberative Assembly (MPR)/District Assembly(DPRD)/Regional Council (DPD), every member of the executive party (executive), every person continuously or temporary conducting a general position, any person who receive salary form the state finance or regional finance, any person receiving salary or wages from company, every person receiving financial assistant from the state finance or reginal finance or anyone receiving salary or wages from other company using capital or facility from the state or society.

21. **State Officials** are State Officials conducting their executive, legislative or judicative function and other official whose functions and main duties are related to running the state according to the provisions of prevailing laws and regulations.
State Officials also include every public official or government, Minister, Governor, Judges, and other Public Officials according to the stipulation of prevailing laws and other officials with strategic function related to national administration with the prevailing provision (for example, Director, Commissioner, and structural official of State Owned Enterprises/Regional Owned Enterprises (BUMN/BUMD), leader of Bank Indonesia, leader of State Universities, Echelon I and Echelon II or other officials deemed similar in civil society, TNI and POLRI, Prosecutors, Investigators, Court Clerks, Project Leaders and treasurers



CHAPTER II

LIST OF DOCUMENT RELATED WITH SMAP

No.	Document	Related Clausal
1.	List of Company's Internal and External Issues related to SMAP	4.1, 7.5
2.	List of Stakeholders Expectation related to SMAP	4.2, 7.5
3.	PT Jasa Marga (Persero) Tbk CEO Message Number 08/2020 regarding Implementation of the Anti-Bribery Management System: Create a Clean Culture and Anti-Bribery in the environment of the Jasa Marga Group	4.3, 7.5
4.	Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 87/KPTS/2020 dated 25 September 2020 regarding Anti-Bribery Policy of PT Jasa Marga (Persero) Tbk	4.3, 4.4, 4.5, 5.1, 5.2, 5.3, 7.1, 7.2, 7.3, 7.4, 7.5, 8.2, 8.4, 8.5, 8.6, 8.7, 8.8, 8.9, 8.10, 9.1, 9.2, 9.3, 9.4, 10.1, 10.2
5.	Joint Resolution of the Board of Directors and Board of Commissioners PT Jasa Marga (Persero) Tbk Number KEP 100/IX/2020 and Number 75/KPTS/2020 regarding the Whistleblowing System PT Jasa Marga (Persero) Tbk ("Whistleblowing System Guidelines")	5.1, 5.2, 5.3, 7.1, 7.2, 7.3, 7.4, 7.5, 8.2, 8.3, 8.4, 8.5, 8.6, 8.7, 8.8, 8.9, 8.10, 9.1, 9.2, 9.3, 10.1, 10.2
6.	Copy of the Meeting Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 39/2020 resolve on the Stipulation of the Internal Audit Group (IAU) as Anty-Bribery Compliance Function (FKAP) in Jasa Marga	5.3.2, 7.1.2, 7.2.1, 7.5
7.	Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 76/KPTS/2020 Attachment 5 regarding Details on the Titles of the Internal Audit Group	5.3.2, 7.1.2, 7.2.1, 7.5



8.	Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 89/KPTS/2019 regarding the Organizational Structure of PT Jasa Marga (Persero) Tbk	5.3.3, 7.5
9.	Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 77/KPTS/2020 regarding Employee Development	7.2.2, 7.5, 8.2, 8.4
10.	Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 78/KPTS/2020 regarding Guidelines on the Conflict of Interest in PT Jasa Marga (Persero) Tbk	7.2.2, 7.4, 7.5, 8.4, 8.7
11.	Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 78/KPTS/2020 regarding Archive Classification PT Jasa Marga (Persero) Tbk	7.5
12.	Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 143/KPTS/2014 regarding Implementation Guidelines on the Procurement of Goods and Services in the Environment of PT Jasa Marga (Persero) Tbk and its amendments	7.4, 7.5, 8.2, 8.4, 8.5, 8.6, 8.8
13.	Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 102/KPTS/2019 regarding Standard Operational Procedure of Cooperation PT Jasa Marga (Persero) Tbk	7.4, 7.5, 8.2, 8.4, 8.5, 8.6, 8.8
14.	Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 73/KPTS/2018 regarding Standard of Financial Transaction Procedure PT Jasa Marga (Persero) Tbk	7.5, 8.3
15.	Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 81/KPTS/2020 regarding Guidelines on Gratification Handling in the Environment of PT Jasa Marga (Persero) Tbk	7.4, 7.5, 8.4, 8.7



16.	Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 82/KPTS/2020 regarding Standard Procedure of Providing Sponsorship and Donation Fund in the Environment of PT Jasa Marga (Persero) Tbk	7.4, 7.5, 8.7
17.	Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 83/KPTS/2020 regarding Partnership Program With Small Enterprises and Environment Development Program	7.4, 7.5, 8.7
18.	Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 84/KPTS/2020 regarding Code of Conduct PT Jasa Marga (Persero) Tbk	7.4, 7.5
19.	Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 85/KPTS/2020 regarding Code of Corporate Governance) PT Jasa Marga (Persero) Tbk	7.4, 7.5
20.	Resolution of the Board of PT Jasa Marga (Persero) Tbk Number 88/KPTS/2020 regarding Formation of the Internal Audit Team for the Implementation of the Anti-Bribery Compliance Function (FKAP) in the Framework of Implementing SNI ISO 37001 Anti-Bribery Management System (SMAP)	7.5, 9.1, 9.2
21.	Result of Assessment on Bribery Risk of Goods / Service Provider and Candidate Goods / Service Provider	4.5, 7.5
21.	Resolution of the Board of PT Jasa Marga (Persero) Tbk Number 177.1/KPTS/2016 regarding Providing Honorarium for Meeting Participant from Agency Outside the Company	7.5, 8.7
22.	Circular Letter Number 28/SE-DIR/2020 regarding Standardization of Providing Honorarium Meeting And Facility and Duty Allowances for the Company's	7.5, 8.7



External Stakeholders	
23. Commitment on the Implementation of the Anti-Bribery Management System by the Company's Board of Directors and Board of Commissioners.	5.1, 7.2, 7.5
24. The Management of the Anti-Bribery Management System PT Jasa Marga (Persero) Tbk	5.1, 5.2, 5.3, 7.1, 7.2, 7.3, 7.4, 7.5
25. Board Manual PT Jasa Marga (Persero) Tbk	5.3.3, 7.5
26. Goal of SMAP and the Plan to Achieve it	6.2, 7.5
27. The Company Work Plan Budget	7.1.2, 7.5
28. The Company Internal and External Communication Plan related with SMAP	7.3, 7.4, 7.5, 8.2
29. Employee Integrity Pact	7.2.2, 7.4, 7.5, 8.2, 8.4, 8.6
30. Business Partner Integrity Pact	7.4, 7.5, 8.2, 8.4, 8.5, 8.6
31. Declaration Form of Employee Integrity	7.2.2, 7.4, 7.5, 8.2, 8.4, 8.6
32. Business Partner Integrity Declaration Form	
33. Conflict of Interest Form	7.2.2, 7.4, 7.5, 8.2, 8.4
34. Present and Entertainment Form	7.3, 7.4, 7.5, 8.4, 8.4
35. List of Bribery Risk in the Jasa Marga Head Office	4.5, 7.5
36. Criteria of the Impact and Probability related to Bribery Risk in Jasa Marga Head Office	4.5, 7.5
37. Bribery Risk Assessment Result, Existing Control, Mitigation Plan related to Bribery Risk in the Jasa Marga Head Office	4.5, 7.5
38. Result of the Assessment on Bribery Risk of the Employee and Employee Candidate	4.5, 7.5
39. Result of Assessment on Bribery Risk of Goods/Service Provider and Candidate Goods/Service Provider	4.5, 7.5
40. Result of the Assessment on Bribery Risk of Cooperation Partner Candidate Cooperation Partner	4.5, 7.5
41. Result of the Evaluation on the Implementation of Mitigation Plan by the Related Work Unit	4.5, 7.5



42. Evaluation Result on the Achievement on the SMAP Goal	6.2, 9.4
43. List of Employee SMAP Learning in the Head Office	7.3, 7.5
44. Employee SMAP Learning Syllabus in Head Office	7.3, 7.5
45. Employee SMAP Learning Material in Head Office	7.3, 7.5
46. Employee Evaluation Result of SMAP Material	7.3, 7.5
47. SMAP Learning Material of Business Partner	7.3, 7.5
48. Report on the Implementation of a Gift on Awareness and Learning Related to SMAP	7.3, 7.5, 8.2
49. Competency Standard on the SMAP Implementation in the Head Office of Jasa Marga	5.3.2, 7.2.1
50. Follow Up on Complaints Through WBS	7.5, 8.9
51. Internal Audit Manual of PT Jasa Marga (Persero) Tbk	8.10
52. Investigation Report related to Bribery	7.5, 8.10
53. Minutes of Meeting and List of Attendance on the SMAP Kick-off Meeting	9.2
54. Minutes of the Business Process understanding with the Work Unit in the Head Office	9.2
55. SMAP Internal Audit Work Paper	9.2
56. Report on the Result of the SMAP Internal Audit Team	4.3, 4.4, 4.5, 5.1, 5.2, 5.3.2, 7.1, 7.2, 7.3, 7.4, 7.5, 8.2, 8.4, 8.5, 8.6, 8.7, 8.8, 8.9, 8.10, 9.1, 9.2, 9.3, 9.4, 10.1, 10.2
57. Supporting Documentation of SMAP Internal Audit Finding	9.2
58. Minutes and Attendance List in the SMAP Audit Closing Meeting	9.2
59. Prove of Submission of the SMAP Internal Audit Result to the Directive Board, Top Management and FKAP	9.2
60. Consultation Report Form with FKAP	7.1, 7.2, 7.3, 7.4, 7.5, 8.2,



	8.4, 8.5, 8.6, 8.7, 8.8, 8.9, 8.10
61. Function Report of Anti-Bribery Compliance	4.3, 4.4, 4.5, 5.1, 5.2, 5.3.2, 7.1, 7.2, 7.3, 7.4, 7.5, 8.2, 8.4, 8.5, 8.6, 8.7, 8.8, 8.9, 8.10, 9.1, 9.2, 9.3, 9.4, 10.1, 10.2
62. Report on the Top Management Review	4.4, 7.5, 9.1, 9.3, 9.4, 10.1, 10.2
63. Report on the Board of Directive Review	4.4, 7.5, 9.1, 9.3, 9.4, 10.1, 10.2
64. Minutes of the Review Meeting of the Top Management and Directive Board	4.4, 7.5, 9.1, 9.3, 9.4, 10.1, 10.2
65. List of Attendance in the Review Meeting of the Top Management and Directive Board	4.4, 7.5, 9.1, 9.3, 9.4, 10.1, 10.2
66. Inconsistency Report and Corrective Action	10.1
67. Follow Up Report on the Corrective Action Implementation	10.1, 10.2



CHAPTER III
CONTROL LIST OF DOCUMENT CHANGES

DOCUMENT NO	DOCUMENT NAME	CHANGES	DATE	REASON OF CHANGE
No. 86/KPTS/2020	SMAP Manual	0	25/09/20	-



CHAPTER IV

THE COMMITMENT ON THE IMPLEMENTATION OF THE ANTI-BRIBERY MANAGEMENT SYSTEM

In the event of implementing the SNI ISO 37001:2016 regarding Anti-Bribery Management System (SMAP) in the environment of PT Jasa Marga (Persero) Tbk ("**Company**"), herewith we, all the members of the Company's Board of Commissioner and Board of Commissioner, are committed to:

1. Highly uphold the Company's value guided by the Board Manual, the Code of Corporate Governance and the 4 NO's Principles consisting of:
 - a. No Bribery (no bribery and coercion);
 - b. No Kickback (no commission, thank you, be it in the form of money and other items);
 - c. No Gift (no present or gratification which are contrary to existing regulations and stipulations)
 - d. No Luxurious Hospitality (no welcoming and luxurious meal).
2. Constantly effort to continuously enhance and improve SMAP in every business process to be in line with the principles of Good of Governance, Code of Conduct, business ethic and Company's values.
3. Conduct the principle of zero tolerance to actions and implementation of duties by all the Company's being and the Stakeholders violating the Law, the Company's Code of Ethic and the 4 No's principle.
4. Avoid and manage conflict of interest which is contrary to the Company's Code of Ethic, and the 4 No's Principles.
5. Socialize and provide training/learning routinely regarding the avoidance of corruption, collusion, nepotism, and also 4 No's Principles to all the Company's Being and stakeholders.



6. Conduct supervision on the implementation of the SMAP Commitment and any violation shall be given sanction according to the prevailing Company's Stipulation and Law.



CHAPTER V

MANUAL OF THE ANTI-BRIBERY MANAGEMENT SYSTEM

1. BACKGROUND AND SCOPE OF THE ANTI-BRIBERY MANAGEMENT SYSTEM

PT Jasa Marga (Persero) Tbk (“Company” or “Jasa Marga”) is a State Owned Enterprise (BUMN) committed to apply the zero-tolerance policy on bribery in conducting its business activities, especially when relating to the Company’s Stakeholders.

As a form of such commitment the Company has applied the Anti-Bribery Management System (SMAP) with the following objectives:

- a. Maximize profit and minimize financial lost by creating control, procedure and process to avoid bribery activity and mitigate the risk potential of bribery which may arise.
- b. Create anti-bribery culture in the company’s environment be it bribery activities which are active or passive.
- c. Improve the reputation and give greater trust to the shareholders and other stakeholders.
- d. Avoid the activity of:
 - Bribery in the public, private, and non-profit sector;
 - Bribery by the Company;
 - Bribery by personnel acting on behalf of the Company or for its own profit;
 - Bribery by the Company’s personnel related by the Company’s activities;
 - Bribery by the Company business partner acting on behalf of the Company or for its own profit;
 - Bribery by the Company business partner related to the Company’s activities and direct and indirect bribery conducted by the Company (for example offering or receiving bribe by a third party).

A more detail commitment for the application of the SMAP in the environment of the Jasa Marga Head Office is contain in the commitment on the implementation of Anti-



Bribery Management System handled by the Company's Board of Directors and Board of Commissioners.

The SMAP Application shall be further regulated in an Anti-Bribery Policy, stipulating the Anti-Bribery principle through the avoidance, detection, response on the anti-bribery incident and giving deterrent effect for those who conducting bribery or violation to the SMAP.

The scope of the SMAP implementation regulated in the manual book of the Anti-bribery Management System is the Head Office of Jasa Marga, but can also be applied for greater scope in Branch Offices and Regional Offices (based on the regulation of Jasa Marga Board of Director).

2. COMPANY'S PROFILE

PT Jasa Marga (Persero) Tbk is a limited liability company incorporated since 1978 through Government Laws and Regulation Number 4 of 1978 Regarding The Republic of Indonesia Capital Participation in the Establishment of the Limited Liability Company (Persero) in the field of Management, Maintenance and the Establishment of Toll Road Network and its Business Stipulation.

Jasa Marga obtained its status as Public Company listed in the Indonesian Stock Exchange in 2007. Jasa Marga main duty is to plan, develop, operate and maintain toll roads and its supportive means so that the toll roads may function as a freeway providing greater benefit than a non-toll general road.

At the beginning of its establishment, Jasa Marga was not only active as operator but also bear the responsibility as the toll road authority in Indonesia. Jasa Marga has operated the first toll road in Indonesia which is the Jagorawi Toll Road (Jakarta - Bogor – Ciawi) a historical land mark for the development of the toll road industry in Indonesia operated since 1978.



At the end of the decade in the 1980, the Indonesian Government started to include the private sector to participate in the development of toll roads to the Build, Operate and Transfer (BOT) mechanism. In the decade of the 1980, Jasa Marga had a greater role as an authority institution facilitating private investors, but along the way however, the greatest part of investor failed in realizing their project and therefore several toll road was taken over by Jasa Marga such as the Jakarta Toll Outer Ring Road (JORR) and the Cipularang Toll Road (Cikampeng – Purwakarta – Padalarang).

With the promulgation of Law Number 38 of 2004 regarding Toll Roads amended by Law Number 13 of 1980 and the Issuance of Government Law Number 15 which more specifically regulate toll roads, there was a change in the mechanism of the toll road business among others with the assignment of the Toll Road Regulating Agency (BPJT) as regulator of the toll road industry in Indonesia and the stipulation of the toll road tariff by the Minister of Public Work with an adjustment conducted every two years. Therefore, the authorization role was given back from Jasa Marga to the Government. As its consequences, Jasa Marga has conducted the full function as a company developing and operating toll road obtaining the toll road operating permit from the Government.

Since its establishment on 1978, Jasa Marga achievement in operating toll roads until the end of 2014 reached 576 km. In the last 5 (five) years, Jasa Marga actively develop and operated several new toll roads. Jasa Marga efforts to double its business since 2015, reflected from the extend toll road which can be operated by Jasa Marga until the end of 2019, of 1.162 km or an average of 117 km per annually. The connection of Trans Jawa from Merak untuk Grati of 933 km in 2018 is a factual contribution of Jasa Marga in supporting the strength of connectivity to boost economic central activities which is the driving motor of the national economic growth.

Jasa Marga efforts to provide infrastructure shall continue by completing the development of toll road segments currently owned. In line with the economic growth strengthened by the development of infrastructure, Jasa Marga has contributed in strengthening connectivity between territories and concurrently develop growth and doubled Jasa Marga business.



In 2016 Jasa Marga has operated a toll road expanding +/- 1.417 km with a total income of Rp1, 27 trillion, including operating in the toll road segment owned by the Jasa Marga Group and the operation of toll road of toll segment owned by other parties.

The Formation of Jasa Marga Board of Directors and Board of Commissioners are as follows:

No.	Position	Name
Board of Commissioners		
1.	President Commissioner	Yuswanda A. Temenggung
2.	Vice President Commissioner	Zulfan Lindan
3.	Independent Commissioner	Adriansyah Chaniago
4.	Commissioner	Anita Firmanti Eko Susetyowati
5.	Commissioner	Sugihardjo
6.	Commissioner	Agus Suharyono
Board of Directors		
1.	President Director	Subakti Syukur
2.	Finance Director	Donny Arsal
3.	Human Capital & Transformation Director	Enkky Sasono Anas Wijaya
4.	Business Director	Mohammad Sofyan
5.	Operational Director	Fitri Wiyanti
6.	Business Development Director	Arsal Ismail

3. DOCUMENT CONTROL AND DISTRIBUTION

3.1 The Structure of Anti-Bribery Management System Manual

The Manual on Anti-Bribery Management System ("SMAP Manual") is supported by documented information to build up a good SMAP. This SMAP manual is issued in loose



sheets and can be accessed by the Jasa Marga Being and Third Party related to the Company.

This SMAP manual must be implemented by all Work Unit existing in the Jasa Marga Head Office Environment.

3.2 Responsibility

The Board of Directors has approved the front page / cover of the SMAP Manual. The control and maintenance of the SMAP Manual is conducted by the Anti-Bribery Compliance Function (“FKAP”). If there is any amendment, the page to be amended must be reviewed, and its amendment notes must be approved by the Board of Directors.

3.3 Distribution

The SMAP Manual shall be controlled distributed to all the Work Units in the Jasa Marga Head Office environment. The SMAP Manual Copy shall be stamped “Restricted Copy” on the first page of the SMAP Manual and given the unique copy number for the objective of control.

A Soft copy of a Restricted Copy which can be modified, must be kept in the SMAP folder only accessible by the FKAP.

Page changes or revision of the SMAP Manual shall be issued with the “Changes Note” and given to the holder of the Controlled Copy. After receiving such Notes of Changes, the receiver shall replace the original page with a page which has been revised.

3.4 Numbering, Version and Document Control of the SMAP Manual

Numbering, Version and Document Control for each changes on the SMAP Manual can be seen in Chapter III – Control List of Document Changes.



The SMAP Manual is available in Indonesian Version and in a hard copy and soft copy document format.

4. ORGANIZATION CONTEXT

4.1 Organization and its Context

4.1.1 The Company has stipulated an internal and external issues which may influence its capacity in achieving the SMAP goal. Such internal external issue involved the following factors:

- a. Measurement, structure and delegating of authority to take decision in the Company;
- b. Location and sector where the Company operates;
- c. Nature, skill and complexity of the activity and operation of the Company;
- d. Business model of the Company;
- e. Entity control by the Company and entity applying the control of the Company;
- f. The Company business partner;
- g. The nature and reach of interaction with public official; and
- h. Laws and regulation, contract regulation and obligation and professional duties.

4.1.2 The list of the Company's internal and external issue related to the SMAP shall be periodically monitored and evaluated by FKAP, and novated (if there are changes) to ensure that the consequences of such issue shall not slow down the Company in achieving SMAP Goal. List of the Internal and External Issue of the Company related to the SMAP can be seen in the Attachment 2.

4.2 The Need and Expectation of the Stakeholders

4.2.1 In compiling and applying the SMAP, the Company has stipulated the relevant stakeholders to the SMAP, as follows:



- a. Shareholders
- b. Customers
- c. Employees
- d. Competitor
- e. Business Partner
- f. Creditor
- g. Government
- h. Mass Media
- i. Community

4.2.2 The need and expectation of each stakeholder can be seen in the List of Need and Expectation of the Stakeholder related to the SMAP, monitored, evaluated and renewed (if there are changes) by the FKAP. List of the Internal and External Issue of the Company related to the SMAP can be seen in the Attachment 3.

4.3 Scope of the SMAP

4.3.1 In stipulating the scope of SMAP, the Company has stipulated the boundaries and application of SMAP, by considering the following matters:

- a. Internal and external issues, as mentioned in part 4.1;
- b. A need and expectation of stakeholder as mentioned in part 4.2;
- c. Result of the bribery risk assessment, as mentioned in part 4.5;

4.3.2 The Company has stipulated the scope of the SMAP application, which is Head Office Jasa Marga, but the SMAP however can be applied in more extensive scope in Branch Offices and Regional Offices (based on a resolution of Jasa Marga Board of Directors).

4.3.3 The stipulation of the Jasa Marga Head Office and an entity to apply the SMAP can be seen in the CEO Message PT Jasa Marga (Persero) Tbk Number 08/2020 regarding the implementation of the anti-bribery management system;



create a clean culture and anti-bribery in the Jasa Marga Group environment, where such stipulation has considered the following matters:

- a. The Jasa Marga Head Office is the Asset Owner owning many Work Units in Jasa Marga; and
- b. The main priority in the budget allocation for the SMAP implementation shall be given to the Jasa Marga Head Office.

4.4 Anti-Bribery Management System

- 4.4.1 The Company has stipulated, documented, applied, maintained and continuously conduct review and improvement on the SMAP, including the process and interaction needed according to the requirement of the SNI ISO 37001:2016.
- 4.4.2 The Company SMAP contain action plans to identify and evaluate bribery risk and to prevent, detect and response on bribery.
- 4.4.3 The Company has made various stipulation regulating the implementation of SMAP contained in the PT Jasa Marga (Persero) Tbk Board of Directors Resolution Number: 87/KPTS/2020 dated 25 September 2020 regarding The Anti-Bribery Policy PT Jasa Marga (Persero) Tbk (“Anti-Bribery Policy”). The Anti-Bribery Policy function as an application of the Company’s policy in conducting SMAP to be a part of the Good Corporate Governance (“GCG”) effective in the Company.
- 4.4.4 The Company has conducted continuous evaluation and enhancement on the SMAP referring to the result of the review conducted by the FKAP, the SMAP Internal Audit Team, Top Management and Directive Board and result of the management quarterly review meeting with the Top Management and Directive Board.
- 4.4.5 Implementation of the review of the SMAP can be seen in:
 - a. The Report of the Anti-Bribery Discipline Function



- b. The Report of SMAP Internal Audit Team
- c. The Report of Top Management Review
- d. The Report of the Board Directive Review
- e. Minutes of Review Meeting of the Top Management and Directive Board

4.5 Bribery Risk Assessment

4.5.1 The Company has stipulated the internal and external issue as referred to in Part 4.1, and based on such issue, every Work Unit in the Jasa Marga Head Office as owner of the business process, shall formulate and evaluate the bribery risk assessment which is the responsibility of every related Work Unit.

4.5.2 The Bribery Risk Assessment (“BRA”) is a risk management process to identify, analyse, and assess the potential bribery risk faced by the Company and to evaluate the conformity and effective control existing in the Company to mitigate the bribery risk identified .

4.5.3 The goal of the BRA implementation are as follows:

- a. Identified all risk factors originating from several business area, processes or parties related to the Company, vulnerable on significant bribery risk.
- b. Prevent the risk of bribery by conducting mitigation on the identified bribery risk through improvement in internal control and/or through the formation of improvement step deemed necessary.
- c. Improve the awareness of all the Company’s employee regarding the bribery risk potential in the Company.
- d. Provide general review on the potential of bribery risk in the Company.

4.5.4 The BRA is conducted by the following means:

- a. Conduct identification on bribery risk and certain activities potential to give rise to bribery;
- b. Formulate the criteria of the impact and possibility;



- c. Analyse the existing control;
- d. Assess the bribery risk priority goal; and
- e. Formulate mitigation, the one responsible for the implementation of mitigation and the time target for the implementation of the mitigation to mitigate the bribery risk.

4.5.5 The Company conduct BRA for the following scope:

- a. Bribery Risk Assessment in the Head Office
- b. Bribery Risk Assessment on Employee
- c. Bribery Risk Assessment on Business Partner

4.5.6 The Bribery Risk Assessment in the Head Office is conducted by FKAP, while the Bribery Risk Assessment is conducted by the Work Unit of the Human Capital Services Group (“HCS Work Unit”). The Bribery Risk Assessment on Business Partner including Bribery Risk Assessment in Goods/Service Provider and Cooperation Partner, shall be as follow:

- a. The Bribery Risk Assessment on Goods / Service Provider is conducted by the Procurement Work Unit and Fixed Asset Group (“PFA Work Unit”); and
- b. The Bribery Risk Assessment on Cooperation Partner is conducted by the Toll Road Business Development Group Work Unit (“TBD Work Unit”).

4.5.7 In the Bribery Risk Assessment of the Head Office, FKAP shall conduct quantitative measurement based on a fixed risk matrix (very low, low, moderate, high, and extreme). In stipulating the level or value for each bribery risk factor identified.

4.5.8 For the Bribery Risk Assessment on Employee and Business Partner, the risk factor of bribery is translated in several transactional risk question and presented in a check list form to assist the HCS Work Unit, the PFA Work Unit and the TBD Work Unit in conducting the Bribery Risk Assessment in every Employee /



Candidate Employee and on the respective Business Partner / Candidate Business Partner of the Company.

4.5.9 The Result of the Bribery Risk Assessment is documented in the report, approved by the related Work Unit as an owner of the business process and periodically reviewed by FKAP to improve SMAP. Renewal on the BRA shall be conducted if there are significant changes on the business process or on the Company organization structure.

4.5.10 BRA shall be conducted periodically once a year. Novation on BRA shall be conducted if there are significant changes on the business process or on the Company organization structure.

4.5.11 The BRA implementation process can be seen in:

- a. The Anti-Bribery Policy
- b. List of the Bribery Risk in the Jasa Marga Head Office
- c. Impact and the Possibility related with the Bribery Risk in the Jasa Marga Head Office
- d. The Assessment Result of the Bribery Risk and Control Register of the Bribery Mitigation Control in the Jasa Marga Head Office
- e. The Assessment Result of the Employee / Candidate Employee Bribery Risk
- f. Result of the Bribery Risk Assessment on Goods / Service Provider / Good / Service Candidate Provider
- g. The Assessment Result in the Cooperation Partner / Candidate of Cooperation Partner
- h. Result of the Monitoring on Mitigation Step Implementation by the related Work Unit



5. LEADERSHIP

5.1 Leadership and Commitment

5.1.1 Directive Board

The Directive Board in Jasa Marga is the Company's Board of Commissioners, with the duty to show leadership and commitment on the SMAP. The Commitment, duty and role of the Directive Board related to SMAP which can be seen in:

- a. Commitment on the implementation of Anti-Bribery Management System
- b. Anti-Bribery Policy

5.1.2 Top Management

Top Management in Jasa Marga is the Company Board of Director, with the duty to demonstrate leadership and commitment to SMAP. The Commitment, duty and role of the Directive Board related to SMAP which can be seen in:

- a. Commitment on the implementation of Anti-Bribery Management System
- b. Anti-Bribery Policy

5.2 Anti-Bribery Policy

5.2.1 Top Management and Directive Board has stipulated, maintained and reviewed the Anti-Bribery Policy through the Resolution of the PT Jasa Marga (Persero) Tbk Number 87/KPTS/2020 dated 25 September 2020 regarding Anti-Bribery Policy of PT Jasa Marga (Persero) Tbk.

5.2.2 The Company's Anti-Bribery Policy has regulated the following matters:

- a. Prohibited bribery;
- b. Obligate compliance with the stipulation of anti-bribery valid in the Company;



- c. Ensure that the applied SMAP is in accordance with the Company's objective;
- d. Provide work structure to stipulate, review and achieve the SMAP Goal;
- e. Declared the commitment to meet the SMAP requirement
- f. Encourage increased concern in good faith, or on the basis of reasonable belief, without fear of reprisal;
- g. Declare a commitment to continuous improve the SMAP;
- h. Explain the authority and responsibility of FKAP; and
- i. Describe the sanctions imposed for violating the provisions contained in the Anti-Bribery Policy.
- j. Provide, socialize and communicate the Policy, Objectives and other ABMS tools.

5.2.3 FKAP must maintain the Anti-Bribery Policy as the documented information, also must be communicated to all the Jasa Marga Being, external party, and all the Company's stakeholders.

5.3 Role, Responsibility and Authority of the Organization

5.3.1 Role and Responsibility

The Top Management has the responsibility for the implementation on and compliance to SMAP as mentioned in Part 5.1.2

The Top Management stipulate and communicate the responsibility and authority for the relevant role related to SMAP in overall to each level in the Company.

The Company's manager shall be responsible to ensure that the SMAP requirement has been met and applied in every work unit in Jasa Marga Head Office.



The Directive Board, Top Management and all the Employee are responsible to understand, meet and apply the SMAP requirements, according to its role in the Company.

More detailed role and responsibility of the Directive Board and Top Management can be seen in the Anti-Bribery Policy.

5.3.2 Anti-Bribery Compliance Function

Jasa Marga (Persero) Tbk Anti-Bribery Management System Governance

The position of FKAP in the Company is as follows:

- a. FKAP as one of the SMAP Organ is conducted by the Internal Work Unit Audit Group (“IAU Work Unit”).
- b. FKAP report SMAP performance to the Top Management.
- c. FKAP has direct and rapid access to the Directive Board and the Top Management if there is an issue or awareness needed to know related to bribery or SMAP.
- d. In conducting its duties, FKAP shall conduct supervision and coordination with all work units in the Jasa Marga Head Office related to the application of the SMAP compliance in the Company.

The Company’s Organization Structure and the Anti-Bribery System Procedure PT Jasa Marga (Persero) Tbk can be seen in the Attachment 4.

The FKAP Resources

Top Management need to ensure that the IAU Work Unit intending to act as FKAP has adequate competence and responsibility in conducting supervision and the implementation of the SMAP Compliance Activity in the Company which can be seen from the standard of the Implementation Competence in the Jasa Marga Head Office.



The budget to conduct the SMAP implementation needed by the FKAP shall be part of the budget of the IAU Work Unit. The compiling and novation of the human resources budget and cost budget to conduct activity related to the implementation of the SMAP shall be compiled by FKAP. Related to the approval process of the SMAP budget, shall be processed according to the stipulation effective in the Company.

Duties, Responsibility and Authority of FKAP

The Top Management has assigned the IAU Work Unit as FKAP, with the duty, responsibility and authority as follows:

- a. Supervise the plan and application of the Company's SMAP;
- b. Prepare directive and guidance for the personnel on SMAP and the bribery issue;
- c. Ensure that the Company SMAP is according to the standard requirement of SNI ISO 37001:2016;
- d. Report the SMAP performance to the Board of Directive and Top Management.

A. Supervising the plan and implementation of the Company's SMAP

FKAP has the duty and responsibility to conduct the maintenance of the Company's Internal and External Issue List and the List of the Expectation of the Stakeholder, with the following elucidation:

- 1) The List of Internal Issue of the Company contains the general issue faced by the Company and the issue related to the application of the SMAP.
- 2) FKAP ensure that the Company and the Work Unit conducting SMAP application has conducted novation on the list of the Company's internal and external issue and the list of the stakeholder expectation minimal 1 (once) in a year and the latest information obtained from the Top Management and Directive Board.



- 3) FKAP ensure that the list of the Company's internal and external issue and the expectation list of the stakeholder is available any time, relevant and can be access by the Jasa Marga Being.

FKAP has the duty and responsibility to conduct monitoring on the result of the Bribery Risk Assessment with the following explanation:

- 1) Monitoring of the Result of the Bribery Risk Assessment is conducted through the following document:
 - The Result of the Bribery Risk Assessment and List of Bribery Mitigation Control in the Jasa Marga Head Office;
 - The Result of the Bribery Risk Assessment Employee / Candidate Employee;
 - The Result of the Bribery Risk Assessment for Goods / Service Provider / Candidate Goods / Service Provider;
 - The Result of the Bribery Risk Assessment of Cooperative Partner / Candidate Cooperative Partner; and
 - The Result of the Review of the Implementation of Mitigation by the related Work Unit.

- 2) In the action of the Bribery Risk Assessment, FKAP must ensure:
 - The identified bribery risk, must be assess according to parameter stipulated by the Company;
 - Existing control inherent in every Work Unit shall analyse to see its effectiveness of such control in preventing from bribery taking place;
 - The mitigation actions has been formulated and conducted; and
 - The Result of the Bribery Risk Assessment is available any time, relevant and can be accessed by Jasa Marga Being.



The FKAP has the duty and responsibility to conduct the compiling and evaluation on the SMAP Goal with the following elucidation:

- 1) The stipulation and formatting of the SMAP Goal must consider the following matters:
 - The list of the Company's internal and external issue;
 - List of the expectation of the stakeholders; and
 - Result of the Bribery Risk Assessment

The Goal of SMAP can be seen in the Attachment 5.

- 2) The evaluation of the SMAP Goal implementation is conducted 1 (once) every year. In the evaluation of the SMAP Goal implementation, the FKAP must ensure that:
 - The stipulated SMAP Goal must be still relevant;
 - The Company's achievement for the stipulated SMAP Goal. If there are goals which are not achieved, FKAP together with the Work Unit conduct the evaluation to stipulate its cause and reason of not achieving such SMAP Goal;
 - The evaluation process has been documented;
 - Result of the evaluation and the proposal for renewal on the SMAP Goal shall be reported to the Top Management;
 - Obtain agreement from the Top Management from the proposal on the renewal of the SMAP Goal; and
 - Novation on the SMAP Goal conducted according to the need of the Company.

B. Provide guidance and guideline for the personnel on the SMAP and issue related to the bribery

In providing consultation, FKAP consider the potential of bribery in the business process, compliance to the policy / regulation related to anti-bribery, and the potential to the conflict of interest to take place.



The consultation provided by the FKAP must be documented in a Consultation Report Form which can be seen in the Attachment 6.

C. Ensure the Company's SMAP is accordance with the term of SNI ISO 37001:2016 standard

FKAP conduct review on the activities of giving / receiving gratification in the form of amusement, donation, club membership and other benefit through report provided by Jasa Marga Being to the Gratification Control Work Unit ("UPG").

Report submitted by the UPG shall contain the following matters:

- 1) Reporter Identity;
- 2) The log of providing and receiving;
- 3) Types of giving and receiving; and
- 4) Issues related to other bribery (if any).

Beside the implementation of review on the activity of giving / receiving gratification, FKAP also must conduct review on the implementation of other SMAP activities, conducted by the Work Unit in the Jasa Marga Head Office. If from the result of such monitoring implementation and certain things found as inconsistency or violation on SMAP, the FKAP must report the non-compliance or prohibition to the Top Management.

Source of information and inconsistency or violation on SMAP can be resources from:

- 1) The conducting of the review by the FKAP (back up by sufficient evidence);
- 2) Report of the SMAP Internal Audit Team Result; or
- 3) Report on the Result of the Special Audit issued by the IAU Work Unit or External Auditor related to the result of the investigation related to an actual bribery act which has taken place.



On such identified inconsistency, FKAP and the related Work Unit must stipulate their action which can remove the cause in such inconsistency identified.

The FKAP shall compile an inconsistency report and corrective actions containing information related to:

- 1) The inconsistency identified;
- 2) Corrective action for each inconsistency; and
- 3) Status and result of the review from the corrective action implementation by the Company's management.

The Inconsistency Report and Corrective Action compile by the FKAP can be seen in the Attachment 7.

The Inconsistency Report and Corrective Action shall be reported by FKAP to the Top Management and shall become a topic of discussion to be discussed in the review meeting of the Top Management and Directive Board for the SMAP evaluation.

The Inconsistency Report and Corrective Action must be maintained according to the renewal of the status to the follow up conducted, and shall be used as a material to conduct the renewal on the List of the Bribery Risk in the Jasa Marga Head Office.

The role, duty and responsibility of the IAU Work Unit to conduct its duties as FKAP can be seen in the Resolution of the Jasa Marga (Persero) Tbk Board of Directors Number 76/KPTS/2020 Attachment 5 regarding Description of the Internal Audit Position ("IAU Position Detail").

D. Reporting the SMAP performance to the Directive Board and Top Management



Information related to the SMAP performance is compiled by FKAP in the FKAP Report which contain the following matters:

- 1) The status of the actions from the previous result of the Review by the Top Management Directive Board;
- 2) Changes in the internal and external issues related to the SMAP;

5.3.3 Delegated Resolution Taking

When the top management delegate its authority to a personnel assign to make decision related to bribery above the low boundary, the top management must require a control to ensure that the process of taking the decision itself is free from conflicting interest and this process need to be periodically reviewed as part of the role and responsibility of the top management in applying and complying to SMAP.

Delegation of authority is stipulated through a decision letter formulated according to need. The process of delegating authority team in detail can be seen in:

- a. The Board of Directors Resolution Number 89/KPTS/2019 regarding the organization structure of PT Jasa Marga (Persero) Tbk
- b. The Board of Directors PT Jasa Marga (Persero) Tbk Resolution Number 92/KPTS/2019 regarding the organization and detail of the position in PT Jasa Marga (Persero) Tbk Head Office as several times amended and lastly with the resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 76/KPTS/2020
- c. Anti-Bribery Policy

6. PLANNING

6.1. The Company Action on the Risk of Bribing and Opportunity



6.1.1. As part of GCG principle valid in the Company, the Company has applied SMAP in the environment of Jasa Marga Head office.

Therefore, external stakeholders directly involved in business activities with the Company such as customers, business partners (which include Goods / Services provider and cooperation partner) and creditor, have the expectation that there will be no request for money payment or whatsoever gift (anything of value) which is not official in conducting relation with the Company. The Jasa Marga Being also has the expectation that there will be a conducive, ethical, fair and transparent work environment. With the application of the SMAP, the Company is expected to meet the expectation of the stakeholders.

6.1.2. Planning of the SMAP is conducted in synergy by the Directive Board, Top Management, FKAP and Work Units in Jasa Marga Head Office to provide certainty that the SMAP may achieve its goal and has been effectively conducted.

6.1.3. The Company also need to formulate action plan to overcome the risk of bribery and opportunity to improve SMAP through the implementation of BRA. In the BRA Process, the Company identify bribing risk, access the bribing risk, identify the existing control and formulate mitigation control related to bribing risk identified as opportunity action in improving SMAP.

6.2. SMAP Goal and Achievement Plan

6.2.1. The Company has stipulated the goal of applying SMAP to create a clean and integrated business and working environment as an effort to avoid bribery.

The Company's SMAP is in line with the Anti-Bribery Policy, has considered internal and external issues, expectation of every stakeholder and the risk of bribing identified from the implementation of BRA.



6.2.2. Achievement of the SMAP goal by its work unit shall be evaluated and monitored by the FKAP and such evaluation reported to the top management. The SMAP goal shall be novated based on the need of the Company and communicated to each working unit in the Jasa Marga Head Office which can be seen in more detail in Part 7.4 regarding communication. The goal of SMAP and its achievement plan can be seen in Attachment 5.

7. SUPPORT

7.1. Resources

7.1.1. The Company has stipulated and provided needed resources for the stipulation, application, maintenance and continuous improvement of the SMAP.

7.1.2. The Company has assigned and stipulated the duties and responsibility of the Directive Board, the Top Management and FKAP as human resources in the implementation of SMAP. The Company has also especially prepared budget and facility needed for SMAP. The formation of human resources and budget for the implementation of SMAP can be seen in:

- a. Anti-Bribery Policy.
- b. The Work Plan (RKAP) which show the information related to budget to formulate application and implementing of SMAP or the budget assigned from other activities and directed for the compiling of the SMAP.
- c. A copy of the Minutes of Meeting of the Board of Directors PT Jasa Marga (Persero) Tbk Meeting Number 39/2020 which resolved the stipulation of the internal audit group (IAU) as Anti-Bribery Compliance Function in Jasa Marga.
- d. Detail regarding IAU Position.

7.2. Competence

7.2.1. General



The Company has stipulated adequate competence for the personnel intending to implement the duty as FKAP based on education and experience from the related personnel.

The Company has required that the learning of Anti-Bribery must be conducted periodically to obtain and maintain the personnel competence and evaluate the effectiveness of the learning conducted, which shall be further elucidated in Part 7.3. The Company has stored precise documented information as proof of the competence which can be seen in:

- a. A copy of the Minutes of Meeting of Jasa Marga (Persero) Tbk. Board of Director Meeting Number 39/2020 has stipulated the Internal Audit Group (IAU) as Anti-Bribery Compliance Function in Jasa Marga.
- b. Detail of IAU Position
- c. The competence standard of implementing SMAP in Jasa Marga Head Office.

7.2.2. Process of Conducting

The Company requires all Jasa Marga being to comply with the stipulation contained in the Anti-Bribery Policy and the SMAP manual, and shall give sanction for personal who do not comply to such stipulation as can be seen in:

- a. The Anti-Bribery Policy
- b. PT Jasa Marga Board of Directors Resolution Number 79/KPTS/2020 regarding the Employees Development (Employee Development Guideline) and its amendment.

Employee who has join the Company within 90 days, the Company shall provide access for the employee to be able to open the copy of the Anti-Bribery Policy and the Anti-Bribery learning material (soft copy format) which among others can be accessed through JM-click. The Company requires that all employees open the copy of the Anti-Bribery Policy every 3 months, to be able to maintain the related employee competence related to the stipulation of Anti-Bribery valid in the



Company. The implementation of such matter above can be monitored by the HCS working unit, and is able to influence the performance assessment indicator of every personnel concern to every related personnel.

Anti-Bribery Policy has regulated the giving of sanction for employees or a business partner conducting violation on the stipulation of the Anti-Bribery Policy. Especially the giving of a disciplinary act for employees has been regulated in the Employee Development Guideline.

The Company requires that employees or personnel shall not receive Retaliation or Discrimination or Disciplinary Action in the form of a threat, isolation, demotion, prevention of enhancement, transfer, dismissal, intimidation, offered or other form of harassment for the employees who:

- a. Refuse to participate in or refuse activities reasonably deemed as bribery.
- b. Submit a report meet with good intention or based on reasonable belief of a bribery intention or delegation of bribery or violation on the Anti-Bribery Policy (except for an individual participating in the violation).

The Company has a procedure regulating the process of complain related to bribery as can be seen in the Join Resolution of the PT Jasa Marga (Persero) Tbk Board of Directors and Board of Commissioners Number KEP 100/IX/2020 and Number 75/KPTS/2020 regarding the *Whistleblowing System* PT Jasa Marga (Persero) Tbk (Manual of the *Whistleblowing System*).

The Company has a procedure regulating the selection process for candidate employees pre hire to being hired in the Company. This is to ensure that every employee to be employed are proper ones for such position and free of *Conflict of Interest* which can be seen:

- a. Anti-Bribery Policy
- b. Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 78/KPTS/2020 regarding *Conflict of Interest* in PT Jasa Marga (Persero) Tbk (Guidelines on *Conflict of Interest*).



c. The Employee Integrated Declaration Form.

The Company has a procedure to ensure that employees to be assigned or promoted are proper employees for such position and free of conflicting interest which can be seen in:

- a. Anti-Bribery Policy
- b. Guideline on *Conflict of Interest*
- c. Form of Employee Integrity Declaration

A Fit And Proper Test must be conducted to:

- a. Candidate employee who has a high risk of bribery above the low upper limit;
- b. Function of Anti-Bribery Compliance; and
- c. The Internal SMAP Audit Team.

The Company need to periodically review the giving of performance bonus, the performance target and other element incentive to employees to prevent the employees to conduct bribing action. Review on providing performance boarders, performance target and other incentive element can be seen in the Anti-Bribery Policy.

The Company requires that the top management and Directive Board declared the commitment to meet and conduct SMAP which can be seen in:

- a. Anti-Bribery Policy
- b. Commitment on the Implementation of Anti-Bribery Management System
- c. Employee Declaration Integrity Form

7.3. Awareness and Learning

The Company requires that the implementation of *awareness* and *learning* of Anti-Corruption is conducted periodically for every employee and business partner acting on



behalf for its profit which means give rise to a bribery risk above the low limit for the company which can be seen in Anti-Bribery Policy.

By considering the result of the bribing risk assessment, the giving of material on *awareness* and *learning*, Anti-Bribery must contain the following matters:

- a. Anti-Bribery Policy and procedure related to SMAP and the obligation for employees and business partners to meet it.
- b. Bribing risk and damage risk may arise for the Company and employee from such bribery result.
- c. A situation where a bribery act can happen in relation which the duty of an employee and how to recognize this condition.
- d. How to recognize and react on a request on bribery request or offer.
- e. How an employee may assist to prevent and avoid bribing, and recognize the key indicator on bribing risk;
- f. Employee contribution on the effectivity of SMAP including benefit from the improvement of Anti-Bribery performance and reporting on delegation of bribery or bribery which actually happen;
- g. Potential implication and consequences to be received if not meeting the SMAP terms.
- h. How and to whom employees and business partner can report any *awareness*; and
- i. Information regarding applicable *learning* and resources.

The Anti-Bribery *awareness* and *learning* program must be innovated if needed to reflect new information with Anti-Bribery.

The Company need to start documented information on the Anti-Bribery *awareness* and *learning* including the *learning* material delivery procedure and *learning* evaluation, time planning, participant target, list of attendance, etc which can be seen in:

- a. Anti-Bribery Policy
- b. The Company Internal and External Communication Plan related to SMAP.
- c. A report on the implementation of *awareness* and *learning* related to SMAP.



- d. Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 80/KPTS/2020 regarding amendment on the Resolution of the Board of Directors Number 85/KPTS/2019 regarding Archive in PT Jasa Marga (Persero) Tbk (General Guideline on Archive).

7.4. Communication

FKAP shall formulate an internal and external communication plan related to the activity of applying SMAP in the environment of the Jasa Marga Head Office. Such communication plan includes, but not limited to awareness on Anti-Bribery and / or learning the application of SMAP, Anti-Bribery Policy and other SMAP activities in the Company. In conducting the communication plan, FKAP shall conduct further coordination with parties and related work units.

In stipulating the communication plan to internal and external parties related to SMAP, the Company must at least consider the following matters:

- a. What to communicate
- b. When to communicate
- c. With whom to communicate
- d. How to communicate
- e. Who shall be communicated
- f. The language used for the communication

The documentation format of the Company internal and external communication plan related to SMAP can be seen in Attachment 9.

The Company has provided access on the Anti-Bribery Policy for all the employees and business partner, and directly communicate it through *awareness* and or *learning* to all employees and business partner (for business partner acting on behalf or for the benefit which can give rise to bribery risk above the low limit for the Company). Such communication form must be published through the Company internal and external communication channel.



The Company internal and external communication channel consist of:

- a. JM-click which can be access by all the Company's employees, where JM-click store the Anti-Bribery Policy document, code of conduct, the Company's regulation, the Board of Directors Resolution etc.
- b. Website of the Company.

The Company's website is also used to publish the Company's annual report and the Company's Anti-Bribery Policy which can be accessd by the external stakeholders or public.

The implementation of the Company's internal and external communication related to SMAP is further regulated in:

- a. Anti-Bribery Policy
- b. Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 84/KPTS/2020 regarding *Code of Conduct* PT Jasa Marga (Persero) Tbk
- c. Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 85/KPTS/2020 regarding Guideline on *Code of Corporate Governance* PT Jasa Marga (Persero) Tbk
- d. Guideline on *Conflict of Interest*
- e. Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 81/KPTS/2020 regarding Gratification Handling in the environment of PT Jasa Marga (Persero) Tbk (Gratification Handling Guideline)
- f. Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 143/KPTS/2014 regarding Guideline on Implementation of Goods and Services Procumbent in the environment of PT Jasa Marga (Persero) Tbk and its amendment.
- g. Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 102/KPTS/2019 regarding Standard Operational Procedure of Cooperation PT Jasa Marga (Persero) Tbk
- h. Employees Integrity Pact
- i. Employee Integrity Declaration Form
- j. Business Partner Integrity Pact



- k. Form of Business Partner Integrity Declaration

7.5. Documented Information

General

The Company must maintain all information and data in the form of documentation as required in the SMAP including to document the Anti-Bribery Policy and documentation on the novation of the Anti-Bribery Policy, SMAP manual and other documents. FKAP shall ensure the completeness and relevance on all supportive documents of the SMAP manual which can be seen in the list of documents related to SMAP in this SMAP manual. Documented information storage related to SMAP follow the policy existing in the Company and further regulated in:

- a. The Anti-Bribery Policy
- b. Archive Clarification Guideline

7.5.1. Making and Renewing

In compiling and novating documented information, the Company need to ensure compliance on:

- a. Document identification and description, which include the document number, title of document, date of issuance and parties compiling such document.
- b. The document format which includes the language use and existing in the form of a hard copy and all soft copy; and
- c. review and approval for the issuance of such document.

The history list of the formatting and novation of documented information on the Anti-Bribery Policy and SMAP manual can be found in the document changes control section contained in the Anti-Bribery Policy and in this SMAP manual.



The List of the documents related to SMAP is periodically maintained by FKAP, according to the novation conducted.

7.5.2. Control of Documented Information

The activity of documented information control related to SMAP which involve distribution, access, taking, using, storage and preservation, changes control, storage and removal, conducted based on the principle and implementation regulation by the Company contained in:

- a. Anti-Bribery Policy
- b. Archive Clarification Guideline

8. OPERATION

8.1. Planning and Operational Control

The Company has planned , applied, review, and control the process needed to meet the SMAP requirements to mitigate the bribery risk and to conduct continual improvement on the SMAP (according to clause 6.1) by stipulating criteria for the process, applied control on the process and store documented information. This matter shall be further elucidated in Part 8.2 until 8.10.

Related to such matter above, the Company shall control the changes planned and review the consequences of unplanned changes, and take needed action to prevent the happening of unwanted matters.

8.2. Feasibility Studies

Based on the bribery risk assessment conducted according to Part 4.5 the Company need to apply the fit and proper test process for each transaction, project, plan relation or which is on-going with the employees and business partners with a high bribery risk above the low boundary. The fit and proper test which need to be conducted by the Company consist of:



a. Fit and Proper Test – Transaction Project or Activity

The fit and proper test process related to specific category of transaction, project or activity is conducted together with the fit and proper test conducted to business partner. The fit and proper test process conducted on the business party refer to point 2 here under.

b. Fit and Proper Test – Business Partner

The fit and proper test process to Business Partner is conducted periodically by the Company as regulated in:

- a. Anti-Bribery Policy
- b. Guideline on the Implementation of Goods and Service
- c. Cooperation Guideline

c. Fit and Proper Test – Employee

The fit and proper test process on Employee can be seen in Part 7.2.2 regarding Utilization Process.

8.3. Financial Control

The Company has applied financial control to manage bribery risks by conducting the following activities:

- a. Apply separation between personnel conducting payment initiation with personnel approving such payment where the invoice from the third party Goods / Services Provider shall be address to the work unit (as payment initiator) and further forwarded to the Accounting Work Unit and Tax Group (ATA Work Unit) to approve and conduct payment, which is regulated in the Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 73/KPTS/2018 regarding Standard Financial Transaction Procedure PT Jasa Marga (Persero) Tbk (Financial Transaction Guideline).
- b. Apply level of stages according to the authority for the approval of payment which is regulated in the Financial Transaction Guideline.



- c. Conduct verification on the payment of the transaction value, the party receiving the payment and other document according to what is required in the contract document with the business partner. Beside it, the respective work unit acting as user also conduct verification on the invoice collected by the Goods / Services provider prior to being submitted to the Accounting and Tax Work Unit to conduct its payment which is already regulated in the Financial Transaction Guideline.
- d. Need minimal 2 signatures of parties giving the approval on the such payment contained in the financial document in the form of a billyet, check and other letters, as regulated in the Financial Transaction Guideline.
- e. Conduct verification on the completeness of the supportive payment document required in the contract document to be attached in the payment approval regulated in the Financial Transaction Guideline.
- f. Limit the use of cash payment and apply control matter of effective cash payment which is all payment of the Company to third party Goods / Services provider conducted by means of transfer which has been regulated in the Financial Transaction Guideline.
- g. Need a payment category and accurate and transparent account description which has been regulated in the Financial Transaction Guideline.
- h. Apply the management review periodically for significant financial transaction regulated in the Financial Transaction Guideline.
- i. Apply financial audit conducted independently by a public accountant and periodically as part of the Company's annual management report regulated in the Financial Transaction Guideline.



8.4. Control of Non-Finance

The Company has applied non-financial control in procurement activities, operational, sales, commercial, human resources, law and regulation. The existing non-financial control activities in the scope of application conducted by the Company among others:

- a. Utilize contractors, sub-contractors, supplier and consultant who have been approved, and has been through the prequalification process to avoid the possibility of such parties participating in bribery regulated in the Goods and Services Provider Implementation Guideline. Beside it, the Company also conduct the fit and proper test process in employees and cooperation partner according to what has been describe in Part 8.2 above.
- b. Conduct assessment on:
 - 1) The need and legitimation on Goods / Services provided by the Goods / Services provider for the Company.
 - 2) Whether the Goods / Services provider has conducted good storage on Goods / Services and
 - 3) Whether the payment for Goods / Services provider is according to the Goods / Services provided to the Company.

The assessment on those 3 matters above is further regulated in the Goods / Services Procurement Implementation Guideline.

- c. To win contract if possible and fair only after a fair auction process and if auction process is competitive and transparent auction process among others at least 3 competitors regulated in the Guideline on the Implementation of Goods / Services Procurement.
- d. Need at least 2 persons to evaluate the auction and approve the contract winner regulated in the Guideline on the Implementation of Goods and Services Provision.



- e. Apply separation of duties so that the personnel approving the placement of the contract is different with the one requesting the placement of the contract and originating from different department of function and the one managing the contract or approving the work existing in the contract, which is regulated in the Goods and Services Provider Implementation Guideline.
- f. Need the signature of at least 2 persons in the contract and in the document causing changes to the contract terms and condition or work which has been approved or the changes in the procurement of the contract regulated in the Guideline on the Implementation of Goods and Services Procurement.
- g. Place a higher level management to supervise the bribery transaction which is potentially high regulated in:
 - 1) Anti-Bribery Policy
 - 2) Guideline on the Implementation of Goods and Services Procurement.
 - 3) Report of the FKAP.
 - 4) Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 88/KPTS/2020 regarding The Assignment of Internal Audit Team on the Implementation of Anti-Bribery Compliance Function in the framework of applying the SNI ISO 37001 Management System Anti-Bribery SMAP (“Formation of the SMAP Internal Audit Team”)
- h. Protect the auction integrity and sensitive information regarding prices, by limiting the access to certain people regulated in the Guideline on the Procurement of Goods and Services.
- i. Provide appropriate tools and template to assist personnel (for example: practical guideline, matters with may and may not, approval stages, list of examination form, IT work flow) further regulated in:
 - 1) Anti-Bribery Policy
 - 2) Conflict of Interest Guideline
 - 3) Gratification Handling Guideline



- 4) Goods and Services Procurement Implementation Guideline
 - 5) Mutual Cooperation Guideline
- j. The legal work unit and compliance conduct novation to the contract document to ensure that the Anti-Bribery clause is contain in the contract between the Company and its business partners, already regulated in:
- 1) Anti-Bribery Policy
 - 2) Goods and Services Procurement Implementation Guideline
 - 3) Mutual Cooperation Guideline

8.5. Anti-Bribery Control Application Controlled by the Company and Business Partner

To the subsidiaries, joint venture and entity controlled by the Company, shall be given authority for such entity to regulate the SMAP application in line with the Company Anti-Bribery Policy.

Business partners who are not controlled by the Company in the bribery risk assessment or result of the visibility test has identified that the bribery risk is above the low limit, the Company needs to stipulate whether the concerned business partners already have Anti-Bribery Control to manage the relevant bribery risk.

If the business partner has no Anti-Bribery Control or the Company cannot stipulate whether the business partner has an Anti-Bribery Control, such matter shall be a factor which must be considered by the Company:

- a. In the evaluation of the bribery risk related to such a business partner; and
- b. Stipulate a mitigation plan to manage bribery risk related to such business partners.

The procedure regulating the application of Anti-Bribery Control controlled by the Company and business partner can be seen in the:

- a. Anti-Bribery Policy
- b. The guideline on the Implementation of Goods and Services Procurement
- c. Cooperation Guideline



8.6. Anti-Bribery Commitment

To business partners which may give rise to bribery risk above the low limit, the Company must conduct the following procedure:

- a. Require the business partner to be committed in preventing bribery by or on behalf of or for the profit of such business partner related to transaction, project, activity or relevant relation.
- b. The Company is entitled to end the relation with business partner conducting bribery by or behalf or for the profit of such business partner related to transaction, project, activity or relevant relation.

If the business partner cannot give commitment to prevent bribery by or behalf or for the benefit of such business partner related to a transaction, project, activity or relevant relation. Such matter must become a factor considered by the Company in:

- a. Evaluating the bribery risk related to such business partner; and
- b. Stipulate the mitigation plan to manage the bribery risk related to such business partner (referring to Part 8.3 and 8.4).

The Company needs to document the commitment of the business partner in a form of integrity pact signed by the business partner.

The procedure regulating the Implementation of the Anti-Bribery Commitment and terminating the relation with the business partner where there is bribery by or behalf or for the benefit of such business partner can be seen in:

- a. Anti-Bribery Policy
- b. The Guideline to Implement the Procurement of Goods and Services
- c. Cooperation Guideline
- d. Business Partner Integrity Pact
- e. Business Partner Integrity Declaration Form

8.7. Present, Generosity, Donation and Similar Benefit

The Company has applied a procedure planned to avoid offer, preparation or receiving of present, generosity, donation and similar benefit where such offer provision or receiving



are or reasonably deemed as a bribery. The policy regarding present, generosity, donation and benefit is contained in:

- a. Anti-Bribery Policy
- b. Gratification Handling Guideline
- c. The Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 82/KPTS/2020 regarding the procedure of providing sponsorship fund and donation in the environment of PT Jasa Marga (Persero) Tbk
- d. The Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 83/KPTS/2020 regarding partnership programme with small enterprises and environment development programme.
- e. The Resolution of the Board of Directors PT Jasa Marga (Persero) Tbk Number 177.1/KPTS/2016 regarding Providing Honorarium to Meeting Participants from outside the Company.

The Company has obligated Jasa Marga Beings to fill in the Present and Entertainment Report available in the Present and Entertainment Form prior to offer Gift or receive Gratification, Present, Gift and/or whatsoever Entertainment, and submit the Present and Entertainment Form to the Gratification Control Unit through Electronical Official Note and through reference link upg@jasamarga.co.id , as regulated in:

- a. Gratification Handling Guideline
- b. Anti-Bribery Policy.

8.8. Managing the Inadequacy of the Anti-Bribery Control

At the time of conducting the fit and proper test process on a transaction, project, certain activity or relation with a Business Partner / Candidate Business Partner, if it is known that there is a Bribery risk which is not managed by the existing anti-bribery control or it is known that the Business Partner has conducted bribery practice in the contract valid between the Company and Business Partner, the Company is entitled to reject or terminate the Agreement or business relation with the Business Partner / Candidate Business Partner, which is already further regulated in:

- a. Anti-Bribery Policy
- b. The Guideline on the Implementation of Goods and Service Procurement.



c. Cooperation Guideline

8.9. Improving Awareness

The Company already has procedures which encourage and made personnel to report with good intention or on the basic certainty of trust to:

- a. Effort;
- b. Suspicion;
- c. Actual bribery; or
- d. Violation on the SMAP stipulation conducted by a certain personnel.

The Company guarantee the confidentiality of the *whistleblower* and provide guarantee for the *whistleblower* that they are protected from retaliation of the perpetrator on the claim report made, even if the perpetrator is the superior of the *whistleblower*.

The Company has a policy regulating the claim reporting procedure related to bribery or violation of the SMAP regulated in the:

- a. Anti-Bribery Policy
- b. Whistleblowing System Guideline

The Company has also stipulated a procedure which enable personnel to conduct consultation or receive advice from the right party regarding what must be done if faced with the effort or situation that may involve bribery. If it is related to receiving, rejecting and requesting gratification, the Employee must report it to the FKAP as regulated in the Gratification Handling Guideline.

To ensure that all employee is aware of the procedure related to claim reporting and know their right and protection, the Company needs to conduct socialization related to the *Whistleblowing System* to all employee, as contained in the Company's Internal and External Communication Plan related to SMAP, which can be seen in Attachment 9.

The Company must document the evidences of the internal and external socialization related to the *Whistleblowing System* to all employees.



8.10. Investigation and Handling of Bribery

The Company has applied a reactive strategy to face incident of bribery taking place in the Company. A reactive strategy is conducted by following up the result of the report and conduct an investigation process on the allegation of a bribery practice. The report status and the related bribery result is conducted by the IAU Work Unit and shall be informed to FKAP according to the stipulation regulated in:

- a. The Anti-Bribery Policy
- b. PT Jasa Marga (Persero) Tbk Internal Audit Manual.

9. PERFORMANCE EVALUATION

9.1. Monitoring, Measuring, Analysis and Evaluation

The Company conduct anti-bribery performance evaluation and the effectivity and efficiency of the SMAP contained in:

- a. The Anti-Bribery Policy
- b. The Assignment of the SMAP Internal Audit Team
- c. The Report on the Function of Anti-Bribery Compliance Function
- d. The Report on the Result of the SMAP Internal Audit Team
- e. the Report of the Review of the Top Management
- f. the Report of the Review of the Directive Board
- g. The Minutes of Meeting regarding the Top Management and Directive Board Meeting

The adequacy and effectivity of SMAP is continuously and regularly assessed through a review conducted by the FKAP, the SMAP Internal Audit Team, Top Management and Directive Board.

In each review conducted on the SMAP, the Company must ensure whereas:

- a. The evaluated object exist;
- b. Know the Work Unit responsible in meeting the SMAP requirements;
- c. Has stipulated the method and period of monitoring; and



- d. Conduct evaluation and reporting on the adequacy and effectivity of the SMAP.

9.2. Internal Audit on the SMAP

Implementation of the internal audit on SMAP is conducted by the SMAP Internal Audit Team directed to provide reasonable certainty to the Directive Board and Top Management whereas SMAP is effectively implemented and operated, in assisting, preventing and detecting bribery. The implementation of the internal audit on SMAP is already further regulated in:

- a. The Anti-Bribery Policy
- b. The Assignment of the SMAP Internal Audit Team

Planning and work method of the internal audit on SMAP

The internal audit on SMAP is conducted periodically at least 1 (once) in 3 (three) months, and can be conducted according to the request of the Top Management and Directive Board.

The criteria and scope of the internal audit implementation on the SMAP is conducted in the area where the bribery risk is above the low limit or in area based on request of the Top Management or Directive Board. The audit area may be in the form of a project, contract, procedure, control and system existing in the Company.

Planning and the internal audit work method on SMAP has been regulated in the assignment of the SMAP internal audit team.

Audit is conducted by reasonable principles, proportional and risk based. The audit conducted must consist of internal audit process and other procedure which review the procedure and control on:

- a. Bribery and allegation of bribery taking place;
- b. Violation on the anti-bribery policy or SMAP requirements;
- c. The failure of business partner to meet the prevailing terms on anti-bribery in the Company; and
- d. The weakness in, or opportunity to improve on SMAP.



In conducting examination on the current year, the Company must consider the previous audit result and status of the corrective action conducted by the related work unit based on the findings of the previous audit result.

Internal Audit Report on SMAP

An internal audit result report on SMAP is formulated based on the assignment of the SMAP Internal Audit Team valid in the Company. The report of the internal audit result on the SMAP is reported to the Top Management, and later on forwarded to the Directive Board as an evaluation material conducted by the Top Management and Directive Board, as to be further elucidated in Part 9.3 here under. Result of the report on the SMAP internal audit is also forwarded to FKAP.

The SMAP Internal Audit Team has direct access to the Directive Board and Top Management if there are urgent matters related with the Compliance to SMAP.

Documentation of Internal Audit on SMAP

The Company need to start documentation as evidence of the audit program application and result of the implementation of the internal audit on SMAP, as already regulated in the Company Internal SMAP Audit Team Assignment.

9.3. Review of the Top Management and Directive Board

The Top Management conduct review at least 1 (once) every 3 (three) months on the SMAP application, conducted through a review on the FKAP Report previously compiled by FKAP.

The FKAP Report which is the review material of the Top Management contain the following matters:

- a. Status of the action of the previous review result by the Top Management and Directive Board;
- b. Changes in the internal and external issues related to SMAP;



- c. Information on the SMAP performance, including the discrepancy found and the corrective action conducted, monitoring result and measurement, audit result, report on allegation or actual bribery, investigation result, nature and level of bribery risk faced by the Company.
- d. Effectivity and action taken to mitigate the bribery risk;
- e. Opportunity of improving the continuity of the SMAP.

The result of the Top Management review including the decision related to the opportunity of continuous improvement and every need for the changes in the SMAP. Summary of the review result by the Top Management is reported to the Directive Board. The Directive Board conduct a periodical review on the application of the SMAP based on information provided by the Top Management, FKAP and the SMAP Internal Audit Team.

Besides the review conducted by the Top Management and Directive Board, the Company must conduct a review meeting of the Top Management and Directive Board conducted quarterly, coordinated by FKAP.

The Company needs to document the result of the Top Management review, the result of the Directive Board review and evidences of the Review Meeting Implementation of the Top Management and Directive Board in the form of Minutes of Meeting and Attendance List drawn up by FKAP.

The implementation of the Top Management and Directive Board review is further regulated in the Anti-Bribery Policy.

9.4. FKAP Review

The FKAP must conduct a review to assess whether the SMAP is adequate in managing bribery risk faced by the Company and already effectively applied. The FKAP conduct review at least 1 (one time) in 3 (three) months. Further regulation regarding the review by FKAP is already mentioned in Part 5.3.2 in this SMAP Manual.



The Company needs to store documentation related to review conducted by FKAP as already regulated in:

- a. The Anti-Bribery Review
- b. Guideline on Archive Classification

10. IMPROVEMENT

10.1. Discrepancy and Corrective Action

When discrepancy occurs, the Company must immediately react on the discrepancy found by means of reviewing such inadequacy, stipulate the cause of such discrepancy and decide whether a similar discrepancy has happened or may potential to happen.

On such Discrepancy, the Company need to formulate and apply Corrective Actions to remove the cause of such Discrepancy, review the effectivity of every Corrective Action taken and made changes on the anti-bribery policy if needed.

Further regulation regarding the Discrepancy and Corrective Action conducted by the FKAP, is already mentioned in Part 5.3.2 in this SMAP Manual. While the procedure related to Discrepancy and Corrective Action conducted by the SMAP Internal Audit Team is further regulated in:

- a. The Anti-Bribery Policy
- b. The Formation of an SMAP Internal Audit Team

The Company needs to store a documentation on the Discrepancy Report and Corrective Action Report further regulated in the Archive Classification Guideline.

10.2 Continuous Improvement

The Company must conduct continuous improvement, upgrade compliance, adequacy and effectivity of the SMAP. The Company need to consider the assessment result and output to stipulate changes in the Anti Bribery Policy (if needed) . The Company also need to ensure the SMAP integrity on the changes in the respective SMAP elements by



Attachment 1
Resolution of Board of Director PT Jasa Marga (Persero) Tbk
Number : 86/KPTS/2020
Date : 25 September 2020

considering the dependency and change impact on the SMAP in overall. The procedure on continuous improvement on SMAP is contained in the Anti Bribery Policy.

Board of Directors PT Jasa Marga (Persero) Tbk.

signed,

SUBAKTI SYUKUR
PRESIDENT DIRECTOR

DNY/YAN/ESA/AIS/FWS/AGS/ALP/SRH/BNB/ATH/KPS/DAZ/SAG



List of the Company's Internal and External Issue Related to SMAP

Internal Issue

No.	Issue/Factor	Description	Relation to SMAP
1.	Company's Dimension	The Company is the greatest Toll Road Company in Indonesia controlling the operation of the toll road market niche in Indonesia by operating a 1.162 km toll road. The Company is also one of the biggest BUMN in Indonesia based on several factors (consolidated) such as assets, business revenue and number of Employees.	The more extended dimension of the Company's enlarge its potential of bribery.
2.	The Company's' Business Location	The Company operate all over Indonesia with different regional and cultural character.	The difference in character in one region to another and a certain boundary due to cultural reason may have the potential of bribery.
3.	Business Sector and Company Complexity	To improve the non-toll revenue the Company, conduct expansion through business outside the toll road	The more extensive and complex business sectors may increase the potential for bribery.
4.	The Company's Business Model	The Jasa Marga Group role is divided into Asset Owner, Asset Manager, and Service Provider. In this matter, the Jasa Marga Head Office has the role as Asset Owner	As an Asset Owner, the Jasa Marga Head Office continue to conduct the process of procurement. If compared to the



No.	Issue/Factor	Description	Relation to SMAP
			<p>process of procurement in the subsidiary however, in the Head Office it's much more smaller therefore the potential of bribery in the Head Office is much more less compared to the Subsidiary.</p>

External Issue

No.	Issue/Factor	Description	Relation to SMAP
1.	The Structure of the Jasa Marga Group	The Company is the majority shareholder in most of the subsidiaries.	The minority shareholder can influence the resolution of the majority shareholder through bribery practice.
2.	The Company's Business Partner	The Company has a list of Cooperation Partners related to the development of the toll road business and list of goods/service providers related to the procurement of goods and services.	The great urge of the candidate Partner/Goods/Service Provider to enter into the list of Goods/Service Partner/Provider in the Company has the potential to give rise to



No.	Issue/Factor	Description	Relation to SMAP
			bribery, for certain parties to be profited and able to be accepted as Partner /Goods/Service Provider of the Company.
3.	Interaction with Public Officials	The Company often conduct coordination with various Public Officials among others the PUPR Ministry, BUMN Ministry, BPJT, Commission V DPR RI, Commission VI DPR RI, Police, Ministry of Transportation, Court, Attorney, and the Financial Inspection Agency Republic of Indonesia	Interaction with public officials may give rise to the potential of bribery in the framework of maintaining good relation, smooth/speed up the process of certain work and/or in obtaining the wanted result.
4.	Law and regulation of contract and obligation and professional duty	The Company must meet prevailing requirements related to operational implementation of the toll road business and other obligation stipulated according to prevailing regulations.	Many regulations which are not yet met by the Company has the potential to give rise to bribery to the regulator party to meet the stipulation in certain regulations.



List of Expectation of the Stakeholder related to SMAP

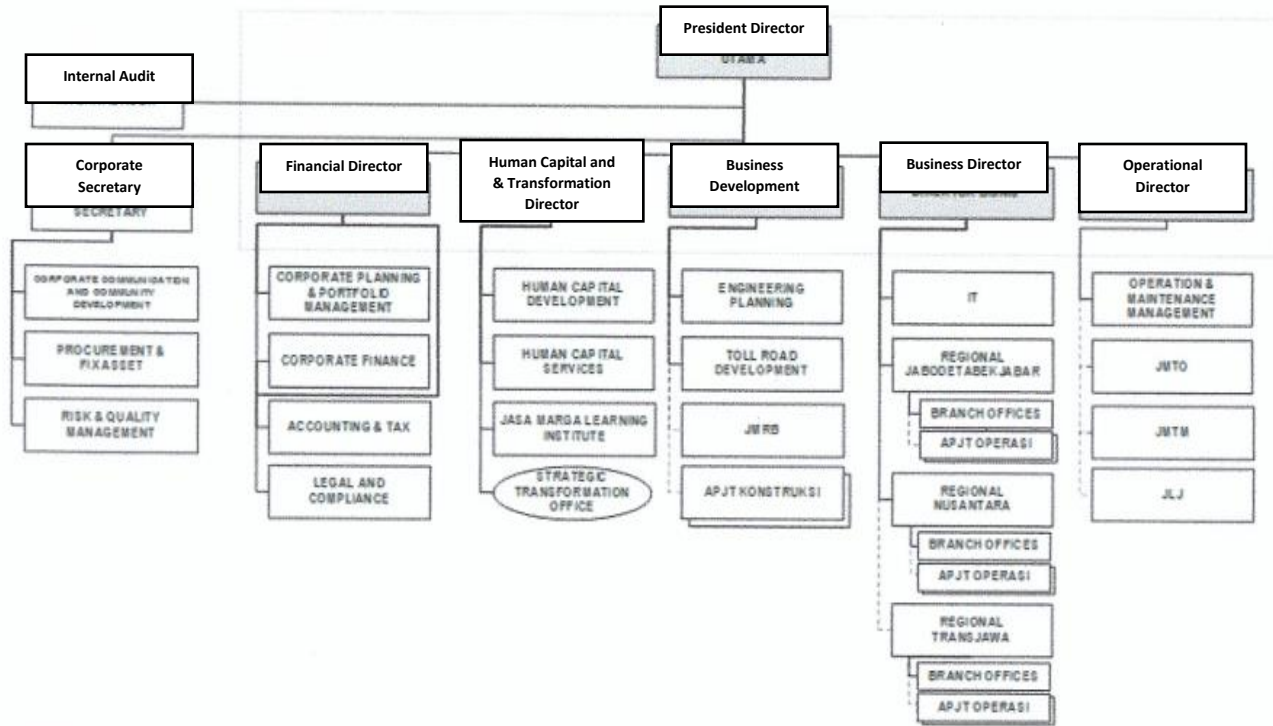
No.	Stakeholders	Description	Expectation on SMAP implementation
1.	Shareholders	Ministry of BUMN, Investor	The implementation of all activities and all corporate action with actual cost, to become efficient, profit increase, dividend distribution realize, and the positive image of the Company maintained, the Company becomes more trusted by investors and candidate investors.
2.	Customer	Toll Road User	The availability of traffic services and transaction services through various facilities according to minimum standards for the toll road user, and without any unofficial/illegal cost burden on the toll road user.
3.	Employee	Jasa Marga Being, Personnel working for the Company	Upgrading of facilities and incentive for the employees, possible by cost efficiency and profit improvement resulting into decrease in the turnover.
4.	Competitor	Toll Road Business Agency (BUJT)	The emergence of business sound competition through participation in fair, transparent and open tender.
5.	Business Partner	Contractor, Supplier, Goods/Service Provider	The realization of sound business competition by applying fair principles, transparent, open, non-discriminative in the process of goods and service provision, therefore the trust of the business partner improves.
6.	Creditor	Bank, Loan Provider	Enchantment in the creditor trust with the financial condition and good image of the



No.	Stakeholders	Description	Expectation on SMAP implementation
			Company, by the accountable utilization of obtained funds.
7.	Government	Regulator	Improvement in service and additional length of the toll road operated by the Company.
8.	Mass Media	Print, Electronic, Online	The Creation of goof corporation be it through positive news regarding the Company's performance.
9.	Community	Society Community, Foundation, Industrial Association	With the increase in social responsibility activity and environment of the Company for the society and its environment.

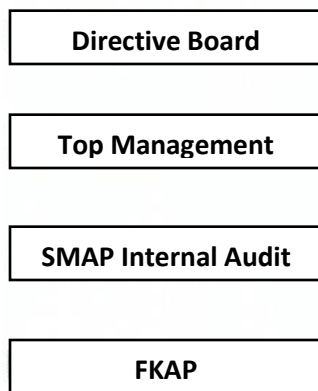


**The Company's Organization Structure and Anti Bribery Management System
 Management PT Jasa Marga (Persero) Tbk
 The Jasa Marga Head Office Organizational Structure**

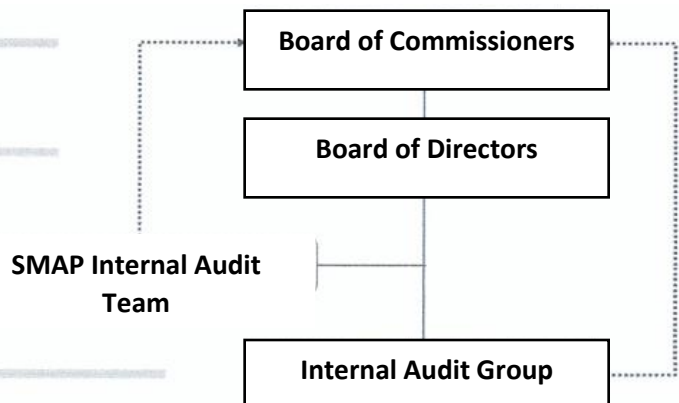


Anti-Bribery Management System Governance

Clause SNI ISO 37001



Implementation in Jasa Marga





SMAP Goal and its Achievement Plan

Function/ Working Unit	SMAP Goal	Indicator	Proof of Documentation	Achievement Target	Achievement Period	Follow up
FKAP	Submit the FKAP Report to the Top Management and Directive Board	The Number of FKAP Report compile 1 (one) time in 3 (three) months	FKAP Report	33%	October 2020	
				66%	March 2021	
				100%	June 2021	
	SMAP related documentation is ready, valid, and complete	Completing the Document related to SMAP	List of Document related to SMAP	100%	October 2020 (Main Directorate Head Office) June 2021 (Overall Hear Office)	
	Conduct coordination on the implementation of the internal and external communication plan of the Company related to SMAP	Result of the internal and external communication plan related to SMAP	1. Internal and external communication plan of the company related to SMAP 2. Result of the internal and external communication plan of the Company related to SMAP	50%	October 2020	
				100%	June 2021	
	Conduct assessment on the bribery risk in the Jasa Marga Head Office area	Result of the bribery risk assessment implementation in the Head Office of Jasa Marga area	Result assessment to the Bribery Risk in the Head office of Jasa Marga	100%	October 2020	



Function/ Working Unit	SMAP Goal	Indicator	Proof of Documentation	Achievement Target	Achievement Period	Follow up
		conducted once in a year				
	Supervision on the implementation of the existing control and mitigation plan based on the result of the Assessment on the Bribery Risk in Jasa Marga Head Office	Number of inconsistencies disclose related to existing control implementation and mitigation plan base on the result of the Assessment on the Bribery Risk in Jasa Marga	1. Result of Implementation Evaluation of the Existing Control 2. Result of the Evaluation on the Implementation of Mitigation Plan	100%	October 2020	
	Provide guideline consultation to Employees personnel related to SMAP and issue related to the Bribery	Number of consultation implementation including "satisfactory" feedback from Employee personnel requesting such consultation consisting of 10 reports	1. Consultation Report by FKAP 2. Result of Feedback on consultation proved by FKAP	25%	October 2020	
50%				March 2021		
100%				June 2021		
	Conduct Certification SNI ISO 37001	Implementation of the SNI ISO 37001 Certification in the scope of the Main Directorate Jasa Marga Head Office	SNI ISO 37001 Certificate for the scope of the Main Directorate Jasa Marga Head Office	100%	November 2020	
		Implementation of the SNI ISO 37001 Certification in the scope of the Overall Head Office and Regional Office of Jasa Marga	SNI ISO 37001 Certificate for the scope of the Overall Head Office and Regional Office of Jasa Marga	100%	November 2021	



Function/ Working Unit	SMAP Goal	Indicator	Proof of Documentation	Achievement Target	Achievement Period	Follow up
		Implementation of the SNI ISO 37001 Certification for the scope of the all the Company's Subsidiaries	SNI ISO 37001 Certificate for the scope of the all the Company's Subsidiaries	100%	November 2024	
PFA Work Unit	Conduct fit and proper test to Business Partner and Business Partner Candidate consisting of: <ul style="list-style-type: none"> - Goods/Service Provider - Goods/Service Provider Candidate 	Number of Supplier/Service passing through the fit and proper test process	1. List of Goods/Service Provider	10%	March 2021	
			2. List of Goods/Service Provider Candidate	50%	June 2021	
			3. Result of the Evaluation on the Implementation of the Fit and Proper Test to Goods/Service Provider	100%	December 2021	
PFA Work Unit	Conduct bribery risk assessment on Goods/Service Provider and Goods/Service Provider Candidate	<ul style="list-style-type: none"> • Result of the bribery risk assessment implementation to Goods/Service Provider conducted once in a 1 (one) year 	1. List of Goods/Service Provider	10%	March 2021	
			2. List of Goods/Service Provider Candidate	25%	March 2021	



Function/ Working Unit	SMAP Goal	Indicator	Proof of Documentation	Achievement Target	Achievement Period	Follow up
		<ul style="list-style-type: none"> Result of the risk assessment implementation to Goods/Service Provider Candidate 	3. Result of Bribery Risk Assessment on the Goods/Service Provider 4. Result of Bribery Risk Assessment on the Goods/Service Provider Candidate	50% 100%	June 2021 December 2021	
	Conduct Transaction with Goods/Service Provider having sign Integrity Pact	Number of Goods/Service Provider that have sign the Integrity Pact	1. List of Goods/Service Provider Transaction 2. Sheet of Integrity Pact sign by related the Goods/Service Provider	10% 100%	October 2020 June 2020	
	Ensure that he contract with the Goods/Service Providers contain Anti-Bribery clause	The number of contracts with Goods/Service Provider who have made an Anti-Bribery clause	1. Transaction list of goods/service providing or its implementation 2. Document Contract of Goods/Service Provider signed by the related Goods/Service Provider	100%	October 2020	
	Ensure that the contract with the business partner contain Anti-Bribery clause	Number of Contract with the Business Partner who have made an Anti-Bribery clause	1. Transaction list of goods/service providing or its implementation 2. Document	100%	October 2020	



Function/ Working Unit	SMAP Goal	Indicator	Proof of Documentation	Achievement Target	Achievement Period	Follow up
PFA Work Unit			Contract of Business Partner signed by the related Business Partner			
	Reporting by the Employee on the receiving of a gratification received from Goods/Service Provider including present,	The amount of present/entertainment given by the Business Partner Reported by the Employees through the	1. List of gratification received by Employee to the Gratification Control Unit	100%	October 2020	
PFA Work Unit	holiday or similar benefits.	Gratification Control Unit	2. List of Gratification Control Unit report that have been reported to KPK	100%	October 2020	
	Socialization related to the Anti-Bribery System and Anti-Bribery Policy prevailing in Jasa Marga	Number of socializations conducted once in 1 (one) year	1. Number of Goods/Service Provider following the socialization	10%	October 2020	
			2. Report on the Implementation of Socialization	100%	March 2021	



Function/ Working Unit	SMAP Goal	Indicator	Proof of Documentation	Achievement Target	Achievement Period	Follow up
TBD Work Unit	Conduct fit and proper test to Business Partner and Candidate Business Partner consisting of: <ul style="list-style-type: none"> – Cooperation Partner, and – Cooperation Partner Candidate 	Number of Business Partner going through the process of fit and proper test	<ol style="list-style-type: none"> 1. List of Cooperation Partner 2. List of Partner Candidate 3. Result of the Implementation to the Evaluation of the fit and Proper test on the cooperation Partner 	50%	June 2021	
				100%	December 2021	
	Conduct transaction with Cooperation	Number of Cooperation Partner who have signed t	1. List of translation of the cooperation	50%	March 2021	
	Partner having signed the Integrity Pact	he Integrity Pact	<ol style="list-style-type: none"> 1. Implementation 2. Sheet of Integrity Pact signed by the Cooperation Partner 	100%	June 2021	
	Ensure that the Contract with the Cooperation Partner contain an Anti-Bribery clause	Number of Contract with Cooperation Partner counting the Anti-Bribery clause	<ol style="list-style-type: none"> 1. List of implementation transaction 2. Document of Cooperation Partner sign by the Cooperation Partner 	100%	March 2021	
	Reporting by the Employee on the receiving of a gratification	The amount of present/entertainment given by the Cooperative Partner	1. List of gratification received by Employee to the Gratification			



Function/ Working Unit	SMAP Goal	Indicator	Proof of Documentation	Achievement Target	Achievement Period	Follow up
	received from Cooperation Partner including present, entertainment or similar benefits	Reported by the Employees through the Gratification Control Unit	Control Unit 2. List of Report by the Gratification Control Unit reported	100%	March 2021	
	Socialization related to the Anti-Bribery System and Anti-Bribery Policy prevailing in Jasa Marga	Number of socializations conducted once in 1 (one) year	1. Number of Cooperative Partner following the socialization	100%	March 2021	
			2. Report on the Implementation of Socialization			
ATA Work Unit	Payment can only be conducted if meeting complete document supporting and required in the document contract with the Business Partner	Number of payment transaction with supportive document required in the contract with Business Partner	1. Collection Document for Business Partner 2. Official Report of the Work Handover 3. Purchase Contract 4. Document to Money Expenses approved by the Authorize Officials 5. Proof of Money Expenses from the Bank	100%	October 2020	
	Payment is conducted with the approval according to the authorization matrix	Number of transaction payment conducted with the approval according to the authorization matrix	1. Collecting Document from Business Partner 2. Official Report of the Work Handover 3. Purchase Contract	100%	October 2020	



Function/ Working Unit	SMAP Goal	Indicator	Proof of Documentation	Achievement Target	Achievement Period	Follow up
			4. Document to Money Expenses approved by the Authorize Officials 5. Proof of Money Expenses from the Bank			
	Payment conducted through account transfer	Number of transaction payment conducted through account transfer	1. Collection Document for Business Partner 2. Official Report of the Work Handover 3. Purchase Contract 4. Document to Money Expenses approved by the Authorize Officials 5. Proof of Money Expenses from the Bank	100%	October 2020	
	Implementation of the financial audit conducted periodically and independent by a Public Accountant	Audited annual Financial Statement	Document of Annual Financial Statement completed with an audited Opinion	100%	March 2021	



Function/ Working Unit	SMAP Goal	Indicator	Proof of Documentation	Achievement Target	Achievement Period	Follow up
HCS Work Unit	1. Ensure that the Employee has signed the Integrity Pact and Annual Integrity Declaration Form	The number of Employee signing the Integrity Pact and Annual Integrity Declaration form	1. Integrity Pack 2. Annual Integrity Declaration form	100%	March 2021	
	2. Ensure that the Compensation Management System and the Employees Welfare is in accordance to prevailing stipulation	The Employees Rights agreed must be met timely and fully	1. Payroll Report 2. Welfare Payment Application Document	100%	March 2021	
	3. Ensured that the Employee who must do a LHKPN Report has reported the E-LHKPN in the KPK web application	Number of Employees who must do LHKPN Report has fill and reported the annual E-LHKPN through the KPK E-LHKPN Online Application	1. Report E-LHKPN 2. Report Recap which has been recorded in the E-LHKPN Application	100%	March 2021	
HCD Work Unit	Ensure that the Employees Work Contract contain an Anti-Bribery clause	The number of new Employee Contract containing Anti-Bribery clause	1. List of new Employees Accepted 2. Work Contract	100%	March 2021	



Function/ Working Unit	SMAP Goal	Indicator	Proof of Documentation	Achievement Target	Achievement Period	Follow up
			Document signed by the New Employees			
	Conduct fit and proper test to Employees and Candidate Employees	The number of Employees and Candidates Employees having gone through the fit and proper test process	1. List of Employees 2. List of Candidate Employees 3. Result of the Evaluation on the Implementation of the Fit and Proper Test on Employees 4. Result of the Evaluation on the Implementation of the Fit and Proper Test on Employees	25%	March 2021	
100%				March 2021		
100%				June 2021		
	Conduct bribery risk assessment on Employees and Candidate Employees	<ul style="list-style-type: none"> Result on the implementation of bribery risk assessment on Employees conducted once annually Result on the implementation of bribery risk 	1. List of Employees 2. List of Candidate Employees 3. Result on the Employees Bribery Risk	25%	March 2021	
50%				June 2021		
50%				June 2021		



Function/ Working Unit	SMAP Goal	Indicator	Proof of Documentation	Achievement Target	Achievement Period	Follow up
		assessment on Candidate Employees for each new acceptance of the Candidate Employees	4. Assessment Result on the Candidate Employees Bribery Risk Assessment	100%	December 2021	
JLI Work Unit	Conduct review on the Employees competent standard relevant to SMAP	Review on the standard of the FKAP Competence and Internal SMAP	Review documentation on standard competence of Employees relevant to SMAP	100%	October 2020	
	Socialization related to eh Anti-Bribery Management System and Anti-Bribery Policy valid in Jasa Marga	Number of socializations conducted annually	<ol style="list-style-type: none"> 1. Socialization Implementation Material 2. Number of Employees following the socialization 3. Socialization Attendance List 4. Number of Employees graduating on the implementation of the evaluation on understanding SMAP 	100%	October 2020	



Function/ Working Unit	SMAP Goal	Indicator	Proof of Documentation	Achievement Target	Achievement Period	Fol- low up
			5. Report on the result of the Socialization Implementation			
LCO Work Unit	Conduct review on draft contract to be signed by the Business Partner to ensure that the Document Contract contains an Anti-bribery clause	Number of draft contract compared to existing draft contract	List of Legal Official Notes to the related Work Unit containing the Anti-Bribery clause	100%	March 2021	
CCO Work Unit	Conducted evaluation on the Receiver and the Candidate Partnership Assistant Receiver	Result of the evaluation on the Receiver and Candidate Receiver Assistance conducted once in a year	1. List of Assistant Receiver/Candidate Assistant Receiver 2. Result of the Evaluation Implementation on Receiver and Candidate Receiver of Partnership Assistant	100%	October 2020	
RQM Work Unit	Conduct SNI ISO 37001 Certification	The implementation of the SNI ISO 37001 Certification for the scope of the Main Directorate Head Office of Jasa Marga	SNI ISO 37001 Certificate for the scope of Main Directorate Head Office Jasa Marga	100%	November 2020	
	Assist FKAP in conducting bribery risk assessment in the Head Office Jasa Marga	Bribery Risk Implementation and Assessment for 4 (four) Work Unit in the Jasa Marga Head Office	Result on the Bribery Risk Assessment	100%	October 2020 (4 Work Unit of the Main Directorate) January 2021 (all the Head	



Function/ Working Unit	SMAP Goal	Indicator	Proof of Documentation	Achievement Target	Achievement Period	Follow up
					Office Marga Unit)	Jasa Work Unit)

**Consultation Reporting Form on the Anti-Bribery Compliance Function**

Report Consultation Number	
Date	DD/MM/YYYY
Name of Reporter	
Work Unit	
Department	
Regarding Anti-Bribery	(Giving a present generously, donation, and similar benefit)
Parties Involved	(Party involved in related situation)
Parties who Know	(Party who know in the related situation)
Description of the issue or problem discussed	
Documentation provided by FKAP	
Regulation related to the Company's Anti-Bribery which can be made into guideline	
Consultation Summary	
Follow up action conducted by the involved parties	
Further steps conducted by the FKAP	
Date of Compiling the Report	DD/MM/YYYY
Name of Report Compiler	
Position	
Dated of the Report Examination	DD/MM/YYYY
Name of the Report Examination	



Attachment 6

Resolution of Board of Director PT Jasa Marga
(Persero) Tbk

Number : 86/KPTS/2020

Date : 25 September 2020

Position	
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**Discrepancy Report and Corrective Action****DISCREPANCY REPORT**

Status	Finish/Not Yet Finish
Latest Update	
Discrepancy Number	
Work Unit	
Department	
Related Business Process	
Date that Discrepancy Identified	
Reference of SNI ISO 37001 Clause	
Criteria/Regulation Violated	
Category	
Cause Identification	
Existing Supportive Document	
Recommendation	
Date of Implementing Recommendation	DD/MM/YYYY
Date of Compiling Report	DD/MM/YYYY
Name of the Report Compiler	
Title	
Date of Examining the Report	DD/MM/YYYY
Name of Report Examiner	
Title	

**REPORT OF CORRECTIVE ACTION**

Status	Finish/Not Yet Finish
Latest Update	DD/MM/YYYY
Corrective Action Number	
Reference Number of Discrepancy Report	
Work Unit	
Department	
Related Business Process	
Reference of SNI ISO 37001 Clause	
Criteria/Regulation Violated	
Description of Discrepancy of Observe	
Cause Identification	

Corrective Act 01

Corrective Act to be Conducted	
Date of Starting the Implementation	DD/MM/YYYY
Date of Completing the Target	DD/MM/YYYY
Related PIC and Work Unit	Name – Title -Work Unit

Corrective Act 02*

Corrective Act to be Conducted	
Date of Starting the Implementation	DD/MM/YYYY
Date of Completing the Target	DD/MM/YYYY



Attachment 8

Resolution of Board of Director PT Jasa Marga
(Persero) Tbk

Number : 86/KPTS/2020

Date : 25 September 2020

Related PIC and Work Unit	Name – Title -Work Unit
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Date of Compiling Report	DD/MM/YYYY
Name of the Report Compiler	
Title	
Date of Examining the Report	DD/MM/YYYY
Name of Report Examiner	
Title	

*) : Column can be increase according to need



Report of the Anti-Bribery Compliance Function

Report Period: MM/YYYY until MM/YYYY

I. Status of Previous Act by Top Management and Directive Board

No.	Report Period	Clause/Area	Follow Up	Status
	MM/YYYY			Finish/Not yet Finish
	MM/YYYY			Finish/Not yet Finish

II. Changes to the Company's Internal and External Issue Related to SMAP

No.	Internal/External	Related Area	Issue

III. SMAP Performance

a. Discrepancy and Corrective Act

Report Number	Identification Source	Identification Date	Discrepancy	Area	Corrective Area	Status
	FKAP Evaluation on the implementation of the SMAP					
	The LHA Audit Team Internal SMAP					
	..					



b. Performance of Bribery Risk Assessment

No.	Risk Assessment Area	Number of Identified Risk	Nature and Level of Risk to be Discuss

IV. FKAP Recommendation as Continuous Improvement on SMAP

No.	Clause	Area	Recommendation	Justification

Report on the Anti-Bribery Compliance Function formulated as a review material by the Top Management and Directive Board

Jakarta, DD/MM/YYYY

FKAP

Name

Title



The Company Internal and External Communication Plan Related to SMAP

No.	Policy/Procedure of Related Activity	Implementation Target	Internal / External	Target of Information Receiver	Media	Language Used	Reference to Supportive Document
1.	Anti-Bribery Policy	15 October 2020	Internal	<ul style="list-style-type: none"> - Member of Board of Commissioners - Member of Board of Directors - Corporate Secretary 	Letter	Indonesia	<ul style="list-style-type: none"> - Training Material - List of Document Letter Provided
2.	Anti-Bribery Policy	9 October and 23 October 2020	Internal	<ul style="list-style-type: none"> - Corporate Communication & Community Development - Legal and Compliance Group - Risk and Quality management Group - Corporate Planning and Portfolio Management Group - Corporate Finance Group - Accounting and Tax Group - Procurement and 	Zoom Meeting	Indonesian	<ul style="list-style-type: none"> - Training Material - List of Attendance - Sheet of Training Evaluation



No.	Policy/Procedure of Related Activity	Implementation Target	Internal / External	Target of Information Receiver	Media	Language Used	Reference to Supportive Document
				<ul style="list-style-type: none"> Fix Assets Group – Human Capital Development Group – Human Capital Services Group – Jasa Marga Learning Institute Group – Strategic Transformation Office – Engineering Planning Group – Toll Road Business Development Group – Information Technology Group – Operation and Maintenance Management Group – All the employee with the status f specified time 			



Attachment 10

Resolution of Board of Director PT Jasa Marga (Persero) Tbk

Number : 86/KPTS/2020

Date : 25 September 2020

No.	Policy/Procedure of Related Activity	Implementation Target	Internal / External	Target of Information Receiver	Media	Language Used	Reference to Supportive Document
				employee or not specified time employee in Jasa Marga			



**IMPLEMENTAION COMPETENCE STANDARD ON TE ANTI-BRIBERY
MANAGEMENT SYSTEM (“SMAP”)
JASA MARGA (PERSERO) TBK HEAD OFFICE
 (“JASA MARGA”)**

Minimum Competence Requirements for Implementing SMAP

A. Anti-Bribery Compliance Function

Educational History	Education minimum: S1
Work Experience	<ul style="list-style-type: none">– Minimum 3 (three) years' experience employed in PT Jasa Marga (Persero) Tbk– Has knowledge regarding the standard or regulation related to Anti-Corruption and Anti-Bribery such as Law Number.31 of 1999, Law Number 20 of 2001, ISO37001, FCPA, UKBA.
Training	Has followed the SNI ISO 37001 training

B. SMAP Internal Audit Team

Educational History	Education minimum: S1
Work Experience	<ul style="list-style-type: none">– Minimum 5 (five) years' experience employed in PT Jasa Marga (Persero) Tbk or a professional appointed by the Board of Director or Board of Commissioners– Has knowledge regarding the standard or regulation related to Anti-Corruption and Anti-Bribery such as Law Number 31 of 1999, Law Number 20 of 2001,



Attachment 10

Resolution of Board of Director PT Jasa Marga (Persero) Tbk

Number : 86/KPTS/2020

Date : 25 September 2020

	ISO37001, FCPA, UKBA.
Training	Has followed the SMAP Internal Audit training

C. SMAP Champion and in the Work Unit Jasa Marga Head Office

Work Experience	Has knowledge regarding the standard or regulation related to Anti-Corruption and Anti-Bribery such as Law Number.31 of 1999, Law Number 20 of 2001, ISO37001, FCPA, UKBA.
Training	Has followed the SNI ISO 37001 training

I, HARSO SUTANDYO, SWORN TRANSLATOR,
in Jakarta, registered with the Ministry of Law and Human Rights Republic of Indonesia, do hereby declare this to be a true and correct translation of the original in Indonesian.

Jakarta, 18 June 2021