

WHISTLEBLOWING SYSTEM

PT JASA MARGA (PERSERO) Tbk.

CHAPTER I INTRODUCTION

A. BACKGROUND

PT Jasa Marga (Persero) Tbk herein after to be called “**Company**” or “**Perseroan**” consistently and continuously implement the principles of GCG in the operational management of the Company. In conducting its business, the Company is continuously driven to conduct it full of trust transparent and accountable, and continuously meet the prevailing laws and regulation in the Company in operating its business.

Violations on the principles of *Good Corporate Governance*, ethical values, and prevailing laws and regulation in the Company is a matter that must be eluded by all the Jasa Marga people. Therefore, as a form of the Company’s commitment to provide a system to uphold its principles of *Good Corporate Governance*, it created clean and responsible work situation, the Company has formulated and applied the *Whistleblowing System* in the framework to provide opportunity to all Jasa Marga people and other external parties to forward a report regarding allegation of violation on the principles of Good Corporate Governance, and ethical values applicable in the Company, based on evidences which are accountable and good intention for the interest of the Company.

The Company *Whistleblowing System* is professionally managed by the *Whistleblowing System* Management Team, assisted by the Independent Consultant as the Manager of the Whistleblowing System Administration. With the existence of the *Whistleblowing System* it is expected able to prevent and detect the potential of violation in the Company.

The regulation and application on this *Whistleblowing System* should be continuously socialized and evaluated to all Jasa Marga people, and periodically should be conducted completion of this *Whistleblowing System* in the framework of continual improvement according to the business development of the Company.

B. BASIC OF FORMULATION

1. The Company's objective to constantly uphold the principles of *Good Corporate Governance* in all the Company's environment, especially related to integrity and transparency.
2. As the Company's commitment to provide media to uphold the principles of *Good Corporate Governance*, able to create a clean and responsible working condition.
3. As a considerable mean in preventing and detecting the potential of violation act in the Company.

C. OBJECTIVE GOAL AND BENEFIT

1. The availability means to forward important and critical information for the Company to parties who have to immediately handle it.
2. The availability of an *early warning system*.
3. The availability of an opportunity to handle the violations internally, before extend to become a public issue.
4. Causing reluctance to conduct a violation (supervision by all parties).

D. SCOPE

The Whistleblowing System is effective for all Jasa Marga being and all the Company stakeholders.

E. DEFINITION

1. **Conflict of Interest**, is a situation or condition where the Jasa Marga Being with power and authority owned / alleged to have personal / group interests on the use of its power and authority and therefore able to influence the actual quality and performance.
2. **Jasa Marga Being** are the Board of Commissioners as the Staff of the Board of Commissioners, Committees, Secretary of the Board of Commissioners, Board of Directors and all the Company's employees including employees on duty in the subsidiaries and other institution, and other personnel directly working for and on behalf of the Company.

3. **External Investigator** is a party outside the Company assigned by the Company to conduct special investigation on a claim / revelation of violations in the Company.
4. **Gratification**, is giving in a widest sense, involving the giving of money, goods, discounts, commissions, loan with low interest, travel tickets, hotel facilities, tour travel, free medication, and other facilities, received domestically or overseas and conducted by using electronical means or without electronical means.
5. **Gifts / souvenirs**, which covers money, goods, discounts, commissions, loan with low interest, travel ticket, free board, tour travel, free medication, and other facilities.
6. **Entertainment** is all in a form of words, place, goods, behavior which can become entertainment enjoy for somebody including but not limited to invitation to a meal, music, film, opera, drama, fees, or game, sport, etc.
7. **Preliminary Indication** is an information existing in the complaint / revelation, containing among other matters as follows: scope of the report, reported party, form and basic of loss, time of occurrence, the location and other information as regulated in this Guideline.
8. **Investigation** is an activity to find related evidences to the violation conducted by the Accused, reported through the *Whistleblowing System*.
9. **Reporters** are Jasa Marga Being and other *Stakeholders*.
10. **Sueing/ Disclosure** is an act of reporting the violation or revelation of the act against the law, unethical act, immoral or other acts which is detrimental to the Company.

11. **Administration Management** is the independent consultant or external party assigned by the Company to conduct administration management on the *Whistleblowing System* in the Company, according to its field of expertise.
12. **Company or Perseroan**, with a capital P, is PT Jasa Marga (Persero) Tbk. While the Company or Perseroan with a small p shows the Company in general.
13. **The reported Person** is a Jasa Marga Being and the Company's *Stakeholders*.
14. **Investigation Team** is a team conducting the task to collect data / evidences related to violation. The investigation team considered are the Internal Audit Unit and / or External Investigator.
15. **Whistleblowing System Management Team** is a team specially assigned to conduct management on the *Whistleblowing System* in the Company, including to conduct preliminary investigation on the claim / revelation of violation. This team directly reports to the Board of Directors.
16. **Anti-Bribery Compliance Function** is one of the Company's Anti-Bribery Management System organ with the duty to supervise the planning and application of the Anti-Bribery Management System, provide directions and guidance for the employees on the Anti-Bribery Management System and issues related to bribery, ensure that the Anti-Bribery Management System is in line with the requirements of the ISO 37001, and report the implementation of the Anti-Bribery Management System to the Directive Board and Board of Directors.
17. **Whistleblowing System** is a system managing claim / disclosure regarding acts with are contrary to law, unethical action / confidential matters, independent and able to be conducted anonymously to optimize the role of Jasa Marga People and other parties in referring violation taking place in the Company's environment.

CHAPTER II

WHISTLEBLOWING SYSTEM

A. MEANING AND SCOPE

The Whistleblowing System is a system which managed Claim / Disclosure regarding an action contrary to the law, unethical action, secret act, *independent* and can be conducted anonymously to optimize the role of Jasa Marga Being and other parties in disclosing violation happening in the Company's environment. The *Whistleblowing System* is applied if Claim / Revelation is deemed not effective to be channeled through formal channels (through direct supervisors or related functions).

Reporting a Claim / disclosure forwarded through a Whistleblowing System must not be a slander with the objective to defame somebody without responsible evidences.

Scope of Claim / Revelation to be followed up by the *Whistleblowing System* is an act which can be detrimental to the Company including the following matters:

1. Deviation from prevailing laws and regulation;
2. Abusing one's position for other interests outside the Company;
3. Extortion;
4. Misdemeanor;
5. Conflicting Interest;
6. Gratification;
7. Bribing;
8. Act with violate the ethics, morals and decency norms.

B. BASIC PRINCIPLES

Submitting a Claim / Disclosure by a Reporter must observe the following matters:

1. The reporter must provide accountable preliminary indication, covering:
 - a. The violation forwarded, covering the amount of lost (if able to be stipulated). 1 (one) Claim / Revelation should be only for 1 (one) violation to give focus to its handling.
 - b. The party involved, the one who must actually be responsible on such violation, including witnesses and parties profiting or impaired on such violation.

- c) Location of the violation, including the name, place or location of the work unit where such violation took place.
 - d) Time of violation, the period of violation in the form of day, week, month, year or a certain date the violation took place.
 - e) The chronological of such violation.
 - f) Supporting evidences of the violation.
 - g) Whether such violation has been reported to other parties or previously reported.
 - h) Whether such violation has happened before.
2. To speed up and smooth the process of following up the Claim / Disclosure, the reported is to provide information regarding his / her identity with must at least contain address / phone number / cellular number / facsimile / email.
 3. If the Reporter choose to stay anonym in submitting the Claim / Disclosure, the Administration Manager must keep secret the data of the reporter, except if the Claim / Disclosure process is already handled by the External Investigator and / or legally needed the identity of the Reporter in handling such Claim / Disclosure.
 4. The Jasa Marga Being must contact and request advice to the Anti-Bribery Compliance Function related to such action which must be conducted if faced with effort or situation which may involve bribery.

C. PROTECTION TO THE REPORTER

1. The identity of the reporter is guaranteed to be kept secret.
2. The Company guarantee the protection to the reporter against all form of threat, intimidation, or actions which are not comfortable from whatsoever party as long as the reporter keep confidential the violation forwarded from whichever party.
3. Protection on the reporter is also valid for parties conducting the investigation or other parties providing information related to such Claim / Disclosure.

4. The protection against the reporter prohibiting retaliation, and protecting them who submitted the report from retaliation with the good intention or on the basis of reasonable awareness to reveal or report an effort of bribery allegation or violation against the anti-bribery policy or anti-bribery management system.
5. The company guarantee the protection of the reporter from retaliation action, discrimination or disciplinary act (for example against threats, isolation, demotion, preventing upgrading, transfer, lay off, intimidation, offered or the form of harassment for the employee personnel giving the report (made with good intention on reasonable awareness) from intention, bribery or allegation of bribery or the violation on the anti-bribery policy or the anti-bribery management system due to the awareness of the related personnel (except for individual participating in the violation).

D. AUTHORIZATION OF HANDLING THE REPORT

1. Complaints / Disclosure of violation related and / or conducted by the employee followed up by the *Whistleblowing System* Management Team.
2. Complaints / Disclosure of violation related and / or conducted by the *Whistleblowing System* Management Team shall be followed up by the Board of Directors.
3. Complaints / Disclosure of violation related and / or conducted by the Board of Directors shall be followed up by the Board of Commissioners.
4. Complaints / Disclosure of violation related and / or conducted by a member of the Board of Commissioners shall be followed up by the other Board of Commissioners member free of such report.
5. Complaints / Disclosure of violation related and / or conducted by an organ of the Board of Commissioners (Committee Secretary of the Board of Commissioners and others) shall be followed up by the Board of Commissioners.

E. REPORT OF THE WHISTLEBLOWING SYSTEM MANAGEMENT TEAM

The *Whistleblowing System* Management Team must compiled a periodical report every 3 (three) months submitted to the Board of Directors and Board of Commissioners at the latest on the second week of the next month, covering the number of Complaint /

Disclosure, the category of Complaint / Disclosure, the media used by the reporter, and other recommendation (if needed).

F. DOCUMENT STORAGE

The Anti-Bribery Compliance Function must maintain the following register:

- a. Register of the report containing the data of the report received through the *Whistleblowing System* and evidence provided by the reporter; and
- b. Other needed documentation to be kept as supporting document in analyzing the related report of bribing allegation and / or violation on the anti-bribery management system.

CHAPTER III

WHISTLEBLOWING SYSTEM MANAGEMENT

A. MEANS / MEDIA OF REPORTING

The reporter submits a Complaint / Disclosure on a violation through the *Whistleblowing System* Administration Manager by special maze / media especially created for the *Whistleblowing System* as follows:

1. Website <https://whistleblowing.tips/wbs@jasamarga>
2. Email jasamarga.wbs@rsm.id
3. WhatsApp 08118754700

B. MANAGEMENT PROCEDURE

1. The *Whistleblowing System* Administration Manager receives and filter the Complaint / Disclosure report of the violation received whether the information and data submitted has met the preliminary indication and according to the *Whistleblowing System* report criteria and can be followed up. If YES, the Complaint / Disclosure report shall be forwarded, if NOT, this *Whistleblowing System* process shall be returned to the reporter to complete its report or the Complaint / Disclosure shall be deemed to be settled.
2. The reporting mechanism if the Reported is a member of the Board of Commissioners / Committee of the Board of Commissioners / Secretary of the Board of Commissioners is as regulated in Attachment II of this Board of Directors Resolution.
3. The mechanism of reporting if the Reported is a member of the Board of Directors is as regulated in the Attachment III of this Board of Directors Resolution.
4. The mechanism of reporting if the Reported person is a member of the *Whistleblowing System* Management Team is as regulated in Attachment IV of this Board of Directors Resolution.
5. The mechanism of reporting if the Reported person is the employee of the Company who is not a member of the *Whistleblowing System* Management Team is as regulated in Attachment V of this Board of Directors Resolution.
6. All the investigation process on the Claim / Disclosure must be made into an Official Report as the format example in Attachment VI and VII.

7. All the *Whistleblowing System* process must be well documented and reliable. (is accountable).
8. The *Whistleblowing System* Managing Team **must** conduct periodical socialization and improvement on the *Whistleblowing System* management, and submit the result of the *Whistleblowing System* management at the end of each year to be inserted in the Company's Annual Report.

G. SANCTION

The form of sanction on the Reported person proven to have conducted violation shall be stipulated according to prevailing stipulation and regulation in the Company, and prevailing laws and regulations.

Board of Directors PT JASA MARGA (PERSERO)Tbk	Board of Commissioners PT JASA MARGA (PERSERO)Tbk
signed	signed
<u>SUBAKTI SYUKUR</u> President Director	<u>YUSWANDA A. TEMENGGUN</u> President Commissioner

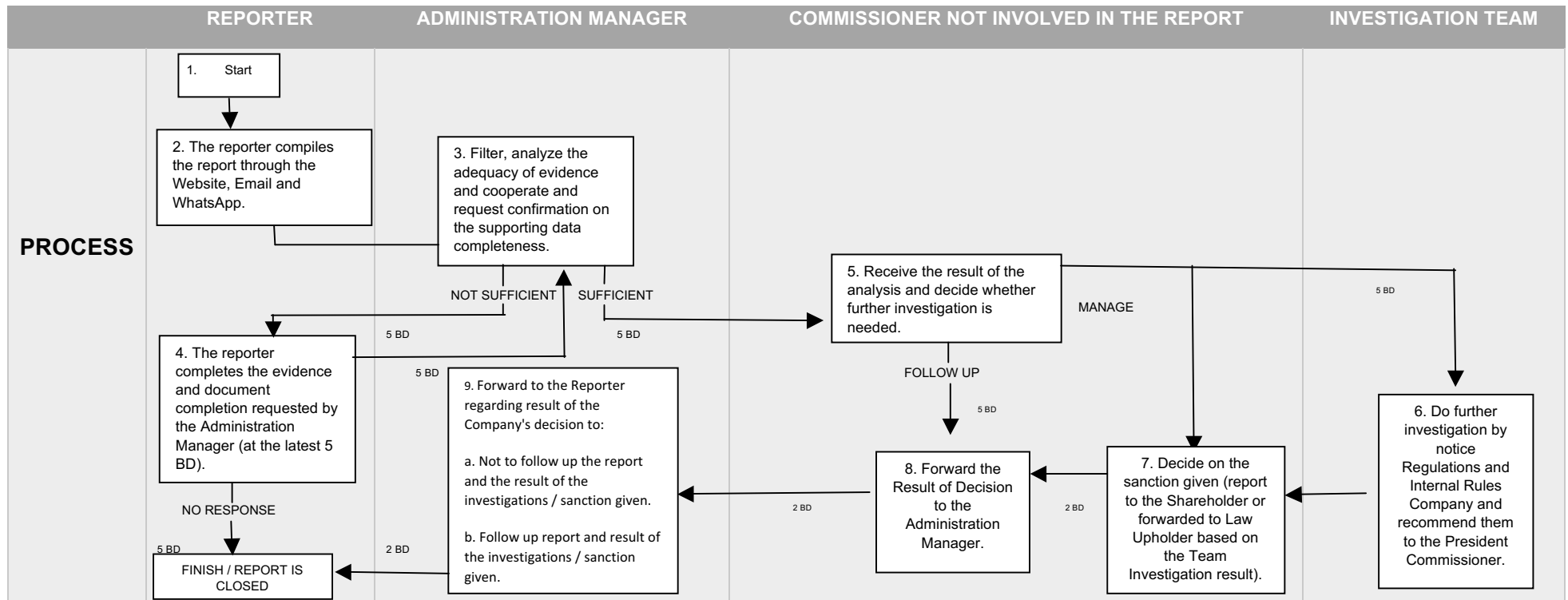
I, HARSO SUTANDYO, SWORN TRANSLATOR,
in Jakarta, registered with the Ministry of Law and Human
Rights Republic of Indonesia, do hereby declare this to be
a true and correct translation of the original in Indonesian.

Jakarta, 18 June 2021

FLOW CHART OF THE WHISTLEBLOWING SYSTEM PROCESS
PT JASA MARGA (PERSERO) Tbk

APPENDIX II

IF THE REPORTED PARTY: IS THE BOARD OF COMMISSIONERS



Remark:

1. Investigation Team is: an Independent Team assigned by the President Commissioner and / or Commissioner who is not involved in the report or the External Party having the authority for examination / investigation.
2. Evidence and Document is stated **Not Sufficient** if the Reporter does not submit supporting evidences and document compliant to the standard stipulated by the Administration Manager.
3. Evidence and Document is stated **Sufficient**: if the Reporter submit supporting evidences and document according to the standard stipulated by the Administration Manager able to be analyzed by the Administration Management.
4. The report is stated **Not Followed Up** if the Commissioner who is not involved decide not to follow up the investigation on the report with its consideration.
5. If the Report is stated **To Be Continued**, the Commissioners who are not involved can order in writing/using a special form to the Investigation Team to investigate the report according to a prevailing regulation and stipulation (if the Reported Commissioners are more than half of the number of Commissioners) and can examine independently.
6. If the Reporter has **No Response** / does not provide supportive evidence / document to the Administration Manager at the latest 5 (five) business days after the Administration Manager contact the reporter to complete the evidence / document, the Report shall be deemed to be finished / closed. If later on the Reporter submit proof / document after the Report is deemed finished / closed, a new one shall be formulated and deemed as a new report.
7. The Investigation Team in conducting its duties and responsibility may request the Whistleblowing Management Team to coordinate with the Administration Manager if additional evidence / document is needed from the reporter.

Join Resolution of the Board of Directors and the Board of Commissioners
PT Jasa Marga (Persero) Tbk
Number: KEP/100/IX/2020
Number: 75/KPTS/2020
Date : 24 September 2020

Board of Directors

PT JASA MARGA (PERSERO) Tbk

signed

SUBAKTI SYUKUR

President Director

Board of Commissioners

PT JASA MARGA (PERSERO) Tbk

signed

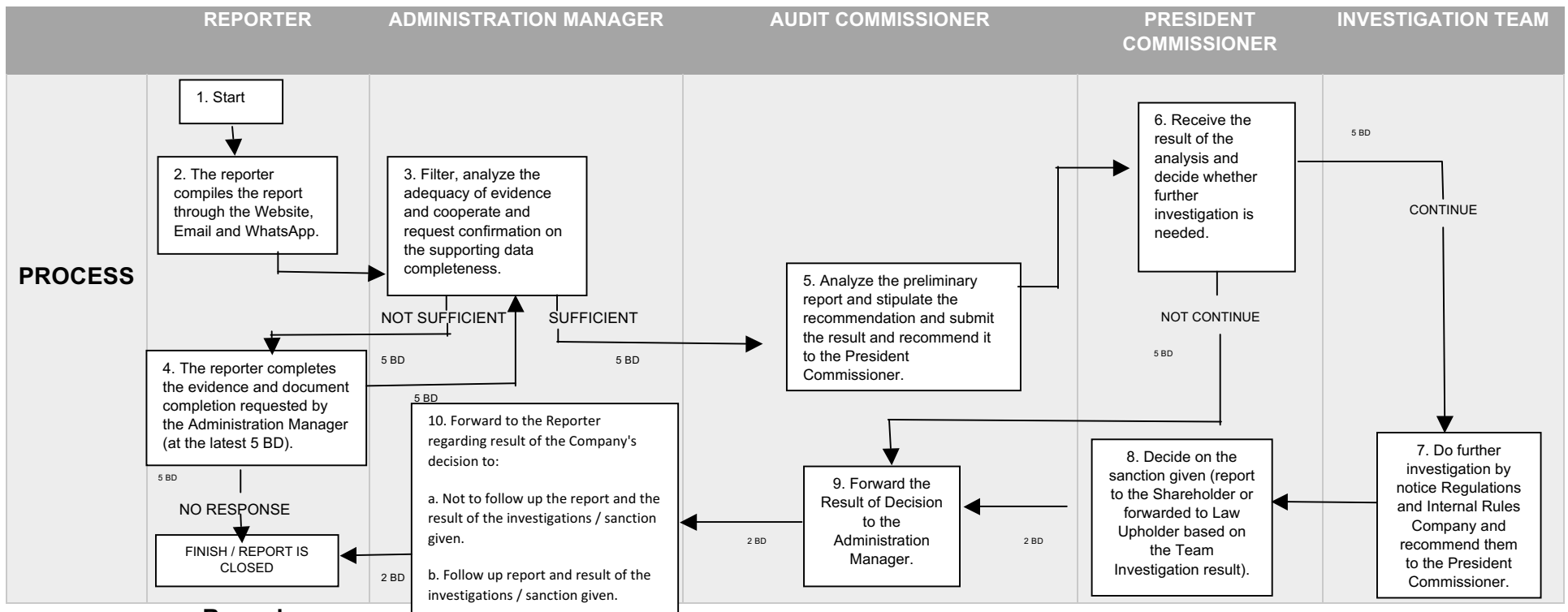
YUSWANDA A. TEMENGGUN

President Commissioner

FLOW CHART OF THE WHISTLEBLOWING SYSTEM PROCESS PT JASA MARGA (PERSERO) Tbk

APPENDIX III

IF THE REPORTED PARTY IS: THE BOARD OF DIRECTORS, SECRETARY OF THE BOARD OF COMMISSIONERS, COMMITTEES, AND STAFF OF THE BOARD OF COMMISSIONERS



- Investigation Team is: an Independent Team assigned by the President Commissioner and/or Commissioner who is not involved in the report or the External Party having the authority for examination / investigation.

2. Evidence and Document is stated **Not Sufficient** if the Reporter does not submit supporting evidences and document compliant to the standard stipulated by the Administration Manager.
3. Evidence and Document is stated **Sufficient**: if the Reporter submit supporting evidences and document are according to the standard stipulated by the Administration Manager able to be analyzed by the Administration Management.
4. Audit Commissioner is the Commissioner who chairs the Audit Committee and in charge of Audit matters.
5. The report is stated **Not Followed Up** if the President Commissioner decide not to follow up the investigation on the report with its consideration.
6. If the Report is stated **To Be Continued**, the President Commissioners order in writing / using a special form to the Investigation Team to investigate the report according to a prevailing regulation and stipulation.
7. If the Reporter has **No Response** / does not provide supportive evidence / document to the Administration Manager at the latest 5 (five) business days after the Administration Manager contact the reporter to complete the evidence / document, the Report shall be deemed to be finished / closed. If later on the Reporter submit proof / document after the Report is deemed finished / closed, a new one shall be formulated and deem as a new report.
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Join Resolution of the Board of Directors and the Board of Commissioners
PT Jasa Marga (Persero) Tbk
Number: KEP/100/IX/2020
Number: 75/KPTS/2020
Date : 24 September 2020

Board of Directors

signed

SUBAKTI SYUKUR

President Director

Board of Commissioners

PT JASA MARGA (PERSERO) Tbk
PT JASA MARGA
(PERSERO) Tbk

signed

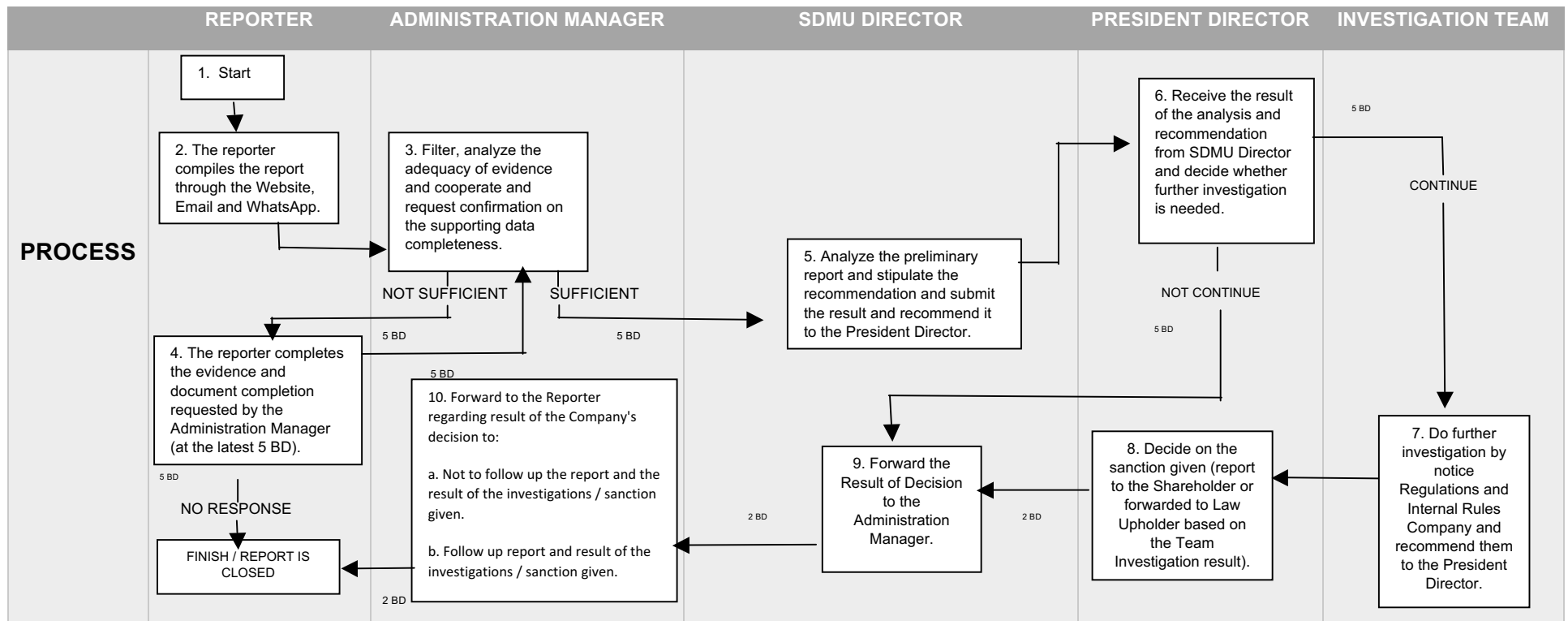
YUSWANDA A. TEMENGGUN

President Commissioner

FLOW CHART OF THE WHISTLEBLOWING SYSTEM PROCESS
PT JASA MARGA (PERSERO) Tbk

APPENDIX IV

IF THE REPORTED PARTY IS: THE MEMBER OF WHISTLEBLOWING SYSTEM MANAGEMENT



Remark:

1. Investigation Team is: an Independent Team assigned by the President Director or other External Party having the authority for examination / investigation.
2. Evidence and Document is stated **Not Sufficient** if the Reporter does not submit supporting evidences and document compliance to the standard stipulated by the Administration Manager.
3. Evidence and Document is stated **Sufficient**: if the Reporter submit supporting evidences and document according to the standard stipulated by the Administration Manager able to be analyzed by the Administration Management.
4. The report is stated **Not Followed Up** if the President Director decide not to follow up the investigation on the report with its consideration.
5. If the Report is stated **To Be Continued**, the President Director who is not involved can order in writing / using a special form to the Investigation Team to investigate the report according to a prevailing regulation and stipulation (if the Reported Commissioner is more than half of the number of Commissioners) and can examine independently.
6. If the Reporter has **No Response** / does not provide supportive evidence / document to the Administration Manager at the latest 5 (five) business days after the Administration Manager contact the reporter to complete the evidence / document, the Report shall be deemed to be finished / closed. If later on the Reporter submit proof / document after the Report is deemed finished / closed, a new one shall be formulated and deemed as a new report.
7. The Investigation Team in conducting its duties and responsibility may request the Whistleblowing Management Team to coordinate with the Administration Manager if additional evidence / document is needed from the reporter.

Join Resolution of the Board of Directors and the Board of Commissioners
PT Jasa Marga (Persero) Tbk
Number: KEP/100/IX/2020
Number: 75/KPTS/2020
Date : 24 September 2020

Board of Directors

PT JASA MARGA (PERSERO) Tbk

signed

SUBAKTI SYUKUR

President Director

Board of Commissioners

PT JASA MARGA (PERSERO) Tbk

signed

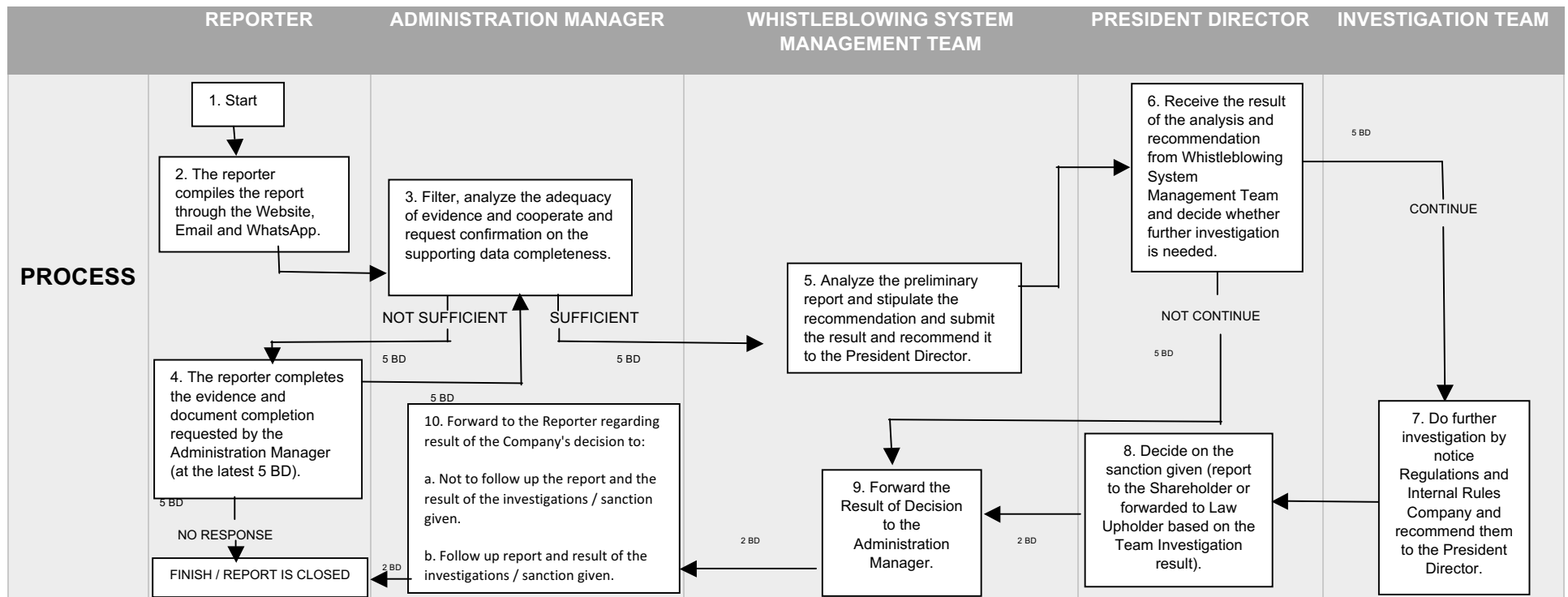
YUSWANDA A. TEMENGGUN

President Commissioner

FLOW CHART OF THE WHISTLEBLOWING SYSTEM PROCESS
PT JASA MARGA (PERSERO) Tbk

APPENDIX V

IF THE REPORTED PARTY IS: AN EMPLOYEE



Remark:

1. Investigation Team is: an Independent Team assigned by the President Director or other External Party having the authority for examination / investigation.
2. Evidence and Document is stated **Not Sufficient** if the Reporter does not submit supporting evidences and document compliance to the standard stipulated by the Administration Manager.
3. Evidence and Document is stated **Sufficient**: if the Reporter submit supporting evidences and document are according to the standard stipulated by the Administration Manager able to be analyzed by the Administration Management.
4. The report is stated **Not Followed Up** if the President Director decide not to follow up the investigation on the report with its consideration.
5. If the Report is stated **To Be Continued**, the President Director who are not involved can order in writing / using a special form to the Investigation Team to investigate the report according to a prevailing regulation and stipulation (if the Reported Commissioner is more than half of the number of Commissioners) and can examine independently.
6. If the Reporter has **No Response** / does not provide supportive evidence / document to the Administration Manager at the latest 5 (five) business days after the Administration Manager contact the reporter to complete the evidence / document, the Report shall be deemed to be finished / closed. If later on the Reporter submit proof / document after the Report is deemed finished / closed, a new one shall be formulated and deemed as a new report.
7. The Investigation Team in conducting its duties and responsibility may request the Whistleblowing Management Team to coordinate with the Administration Manager if additional evidence / document is needed from the reporter.

OFFICIAL REPORT

Number

**REGARDING
RESULT OF PRELIMINARY INVESTIGATION
WHISTLEBLOWING SYSTEM
PT JASA MARGA (PERSERO) Tbk**

On this day, dated ... month ... year was reported the result of the Preliminary Investigation of the *Whistleblowing System* on the claim:

.....
.....
.....

Based on the forwarding of the report of Preliminary Investigation Result, the Disclosure Report on such claim **is / not *** according to the criteria to be followed up by further investigation.

Investigation shall be conducted by the Investigation Team (**Audit Internal / External Investigator**)*.

Signature

Full Name

Whistleblowing System Management Team:

1.
2.
3.
4.
5.

**cross out if not needed*

OFFICIAL REPORT

Number

**REGARDING
FOLLOW UP INVESTIGATION RESULT
WHISTLEBLOWING SYSTEM
PT JASA MARGA (PERSERO) Tbk**

On this day, dated ... month ... year was reported the Result of the Further Investigation by the Investigation Team (**Internal / External Audit Investigator**) * of the Whistleblowing System on the complaint:

.....
.....
.....

Based on the forwarding of the Further Investigation Result Report, the Report / Disclosure Number
..... is **proved / not proved**.*

Signature

Full Name

Investigation Team:

- 1.
- 2.
- 3.
- 4.

**cross out if not needed*

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.
akarta, 18 June 2021