

English

## The Implementation of Good Corporate Governance Policy and Regulation

PT FWD Insurance Indonesia

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### Anti-Bribery and Corruption (ABC) Policy

PT FWD Insurance Indonesia (“Company”) is committed to conducting business in accordance with the highest ethical standards and has zero tolerance towards bribery and corruption. The Company prohibits all forms of bribery and corruption. The Company will not seek to influence others, either directly or indirectly, by offering, paying or receiving bribe or kickback, or by any other means that is considered unethical, illegal or harmful to our reputation for honesty and integrity.

All employees and representatives of The Company have the responsibilities to:

- Comply and uphold the Company’s commitment on anti-bribery and corruption in their undertaking of performance of their services for, and on behalf of the The Company.
- Report any concerns on bribery and corruption through relevant channels.

The Company has in place a compliance program to manage bribery and corruption risks.

The program comprises:

- a) **Written policies and standards:** The Company Policy on Anti-Bribery and Corruption sets out the The Company’s commitment, key principles and standards on anti-bribery and corruption. It is supplemented by other various policies and standards which address specific areas of bribery and corruption risk.
- b) **Risk identification and assessment:** The Company leverages on its self-assessment process where Business Units would identify and assess key risks including bribery and corruption risks. In addition, The Company will have to conduct a Company-wide risk assessment based on FWD Group’s methodology.
- c) **Training and Communication:** The Company requires all employees to undergo periodic ABC training to enhance the awareness and understanding of the The Company’s commitment on ABC. In addition, The Company communicates its stance on bribery and corruption to third party service providers via provision of ABC clauses in outsourcing agreements.
- d) **Reporting:** The Company leverages on its whistle-blowing program that provides a channel for employees and external parties to raise concerns relating to bribery, corruption, suspected fraud, misconduct or any other irregularities without fear of reprisal.