Throughout 2019, the violation reporting system, known as the Whistleblowing System (WBS), ran well in Telkom. This mechanism allows all individuals within Telkom and third parties to report violations, fraud or other forms of ethical violations that occur at Telkom. All individuals at all levels of Telkom's staffing, including the Board of Directors, the Board of Commissioners and committee members under the Board of Commissioners, are entitled to take advantage of WBS.

Since it was formed in 2006, WBS has been managed by the Audit Committee through a decision of the Board of Commissioners and ratified by Resolution of the Board of Directors. Every year, Telkom socializes WBS to employees so that the mechanism can be used properly and effectively.

DELIVERING A VIOLATION REPORT

Reports can be submitted by website, email, fax or letter to:

Audit Committee

Corporate Governance

PT Telkom Indonesia (Persero) Tbk

The Telkom Hub, Telkom Landmark Tower 40th Floor

Jl. Jend. Gatot Subroto Kav. 52, Jakarta, 12710

Email: whistleblower@telkom.co.id; ka301@telkom.co.id

Fax: +6221 5271800 Website: www.telkom.co.id

Complaints must meet the following conditions:

- 1. It is submitted through the website, email, fax or letter.
- 2. Complaints submitted related to the issue on internal control, accounting, auditing, breach of regulation, allegation on the fraud and/or allegation of corruption, and the breach of code of ethics.
- 3. The information that is reported must be supported with sufficient evidence and those are reliable to be used as the initial data to conduct further investigation.

PROTECTION TO THE COMPLAINANT

Telkom guarantees protection of the identity of the reporter who utilizes the WBS mechanism. This is based on the following internal policies:

- 1. Resolution of the Board of Commissioners No. 08/KEP/DK/2016 dated June 8, 2016, regarding the Policy Procedures for Complaints Handling (Whistleblower) of PT Telkom Indonesia (Persero) Tbk and Consolidated Subsidiaries.
- 2. Directors Regulation No. P.6.618.00/r.00/HK200/COP-C0000000/2016 dated December 21, 2016.
- 3. Resolution of the Board of Commissioners No. 01/KEP/DK/2018 regarding the Standard Operating Procedure of the Whistleblowing System at the State-owned Company PT Persero Indonesia Tbk. and Consolidated Subsidiaries.

In following up on any complaints or reports, the WBS Telkom mechanism promotes the confidentiality and presumption of innocence. The aim is to encourage safe reporting of violations without fear or concern for their safety.

THE COMPLAINT HANDLING

Referring to the Regulation of OJK No.55/POJK.04/2015 and Sarbanes-Oxley Act 2002 Section 301 regarding Public Company Audit Committee, the mechanism of Whistleblowing System is the responsibility of the Audit Committee. Internal and third-party complaint reports handled by the Audit Committee cover the following topics:

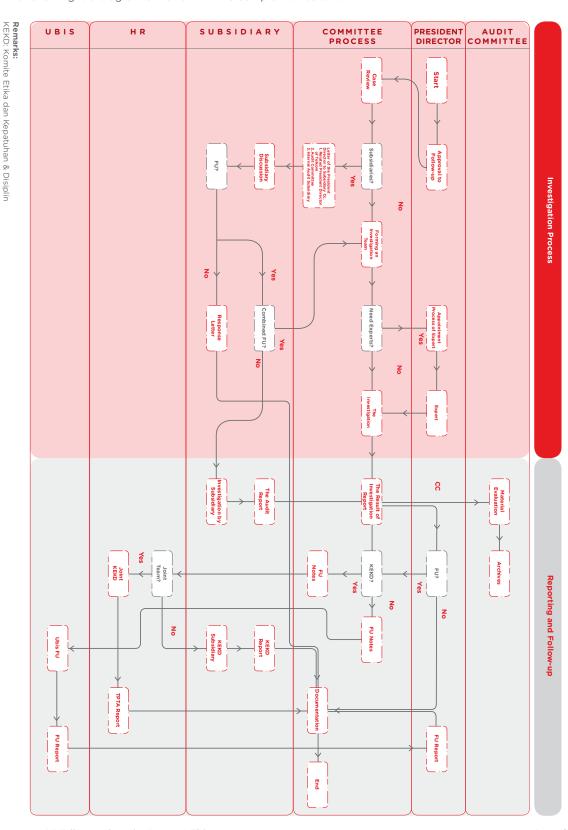
- 1. Accounting and auditing.
- 2. Violation of regulation.
- 3. Fraud and/or the allegation of corruption.
- 4. Code of conduct.

In handling complaints, Telkom determines certain complaint requirements that ensure the complainant submits the complaint responsibly and not slander against someone. So that reports can be followed up immediately, it is necessary to ensure the correctness and accuracy of the information supported by sufficient data. Some WBS complaints cannot be followed up because of inaccurate and unreliable data and information.

About Telkom

THE COMPLAINT HANDLING MECHANISM

The following is a diagram of Telkom's WBS complaint mechanism.



238 PT Telkom Indonesia (Persero) Tbk Annual Report 2019