

Whistleblowing System

Telkom has established a violation reporting system or Whistleblowing System (WBS) since 2006. This WBS is part of Telkom's efforts to prevent fraud and provides a medium for all individuals within Telkom and third parties to report violation, fraud, or other form of ethical violation related to TelkomGroup.

As part of continuous improvement, on January 31, 2022, Telkom launched Telkom Integrity Line, the latest version of the WBS, with the involvement of Deloitte as an Independent Consultant. The policies and procedures of this system are regulated through Regulation of the Board of Commissioners Number 01/KEP/DK/2022 dated January 25, 2022, and ratified through the Regulation of the Board of Directors Number PD.622/r.00/HK200/COP-C0000000/2022 on February 22, 2022. The Company is updating the policies and procedures for handling WBS to be relevant to the latest regulatory development.

One of the regulatory considerations that Telkom pays attention to in revising WBS policies and procedures is POJK Number 12 of 2024 regarding Implementation of Anti-Fraud Strategies for Financial Services Institutions. Although the company is not a financial institution, the important things regulated in the POJK are relevant to be applied in Telkom.

Submission of Violation Reports

Public can submit complaints through the following channels for the Telkom Integrity Line reporting system.



Website	: https://id.deloitte-halo.com/telkomwbs/
Hotline	: (021) 5088 4601
Facsimile	: (021) 5088 4602
E-mail	: telkomwbs@tipoffs.info
PO Box	: Telkom Integrity Line PO Box 2800 JKP 10028
SMS	: 0813 9000 3217
WhatsApp	: 0813 9000 3217

Types of complaint that can be followed through the WBS mechanism include:

1. Fraud is a statement or action in the form of deception, conflict of interest, or the unauthorized use of something in any form to obtain material or immaterial benefit that should not be obtained or to avoid obligation that should be fulfilled, resulting in losses for TelkomGroup. Types of action that are classified as fraud include:
 - a. Corruption, includes:
 - i. Conflict of interest that is detrimental to the company and/or consumers;
 - ii. Bribery;
 - iii. Invalid admission; and/or
 - iv. Extortion.
 - b. Misuse of asset, includes:

- i. Misuse of cash;
 - ii. Misuse of supplies; and/or
 - iii. Misuse of other asset.
 - c. Financial Statement fraud, includes:
 - i. Overstating net worth and/or net income; or
 - ii. Resulting in a reduction of net worth and/or net income.
 - d. Deception.
 - e. Leakage of confidential information; and/or
 - f. Other actions that can be equated with fraud in accordance with the provision of law and regulation.
2. Accounting issue and internal control over financial reporting that have the potential to result in material misstatements in the company's Financial Statements other than those described in point 1.c.
 3. Audit issue, especially those related to the independence of Public Accounting Firms.
 4. Violation of Capital Market law and regulation related to the company's operations.
 5. Violation of internal regulation that have the potential to result in losses to the company.
 6. Behavior of the Board of Commissioners, Board of Commissioners' organ, Directors, management and company employees that is not commendable, such as but not limited to abuse of office and/or providing misleading information to the public which directly or indirectly has the potential to tarnish the reputation and/or result in losses for the company.

7. Offensive action or behavior such as degrading, insulting, harassing or humiliating someone, and are identified as inappropriate within social and moral norms.

Protection for the Whistleblower

Telkom consistently prioritizes confidentiality and the presumption of innocence in following up on every report submitted through the WBS. This is done to encourage all parties to have the courage and feel safe without fear or worry in reporting violation and is one aspect of the TPK (*Terintegrasi Telkom dan KPK*) collaboration. Telkom has included a protection policy for the whistleblower in the draft policy for handling complaints of alleged violations (Whistleblowing System).

Complaint Handling

Telkom's WBS mechanism is under the responsibility of the Audit Committee and refers to Financial Service Authority Regulation Number 55/POJK.04/2015 and Sarbanes-Oxley Act 2002 Section 301 regarding Public Company Audit Committee. To fulfill a complaint report that is responsible and not defamatory, Telkom determines the requirement for complaint with report supported by sufficient evidence. Report can be followed immediately if the type of complaint is in accordance with the scope of the Whistleblowing System mechanism, supporting evidence can be relied on as preliminary data for further examination. Some WBS complaints cannot be followed up due to incomplete, inaccurate and unreliable data and information.