

The implementation of SMAP is integrated into existing policies at Telkom, including procurement, recruitment, and finance policies.

- In the procurement process, to mitigate the risk of corruption and bribery in the supply chain, the procurement process incorporates due diligence and self-assessment of partners to verify ownership, blacklist search, and review the history of corruption cases from internal and external sources. Telkom also conducts a conflict-of-interest check by matching partners' owners and administrator data with employee and family data up to the second degree.
- In the recruitment process, Telkom ensures the process is clear of conflicts of interest by having examiners sign a Conflict-of-Interest Commitment and ascertains that the mapping of participants has no kinship ties with the examiners.

Regularly, the FKAP Committee evaluates potential risks related to corruption, bribery, and fraud in its operational areas and across several business units. In 2025, Telkom conducted a 100% bribery risk assessment for functions with bribery risk, based on the scope of ISO 37001:2016 SMAP, namely the Recruitment and Procurement Function.

Anti-Corruption and Bribery Policy

TelkomGroup implements a zero-tolerance policy against all forms of corruption, collusion, nepotism, bribery, fraud, and other unethical business practices, as stated in the Code of Ethics. To regulate the implementation of anti-corruption and bribery practices, Telkom has

implemented the Corruption Prevention Guidelines (PANCEK) issued by the Corruption Eradication Commission (KPK), whistleblowing mechanisms, and other supporting policies. The implementation of PANCEK reached a verification score of nearly 100% by 2025.

Prevention of Corruption, Bribery, and Fraud

[GRI 205-2]

Strict mitigation measures have been implemented by Telkom and its subsidiaries through key programs such as policy socialization, training, and competency development of personnel and suppliers. Anti-corruption and anti-fraud awareness sessions are conducted regularly for all TelkomGroup employees, who are also required to participate in e-learning programs covering topics such as SMAP and gratuities. In 2025, 100% of Telkom's Board of Directors members and 100% of Telkom employees have received socialization of anti-corruption policies and procedures, as well as participated in anti-corruption training. In the Subsidiaries, 100% of the members of the Board of Directors of TDE, Sigma, Metra-Net, and Telkom Infra have participated in anti-corruption socialization and training.

In addition, all members of the Board of Directors, Commissioners, employees at the Band I-II level (especially at Entities outside Telkom (EDLT) and the head office), as well as Commissioners and Directors in affiliated subsidiaries, are required to report their assets through the Wealth Report of State Administrators (LHKPN).

Table 49. Performance of Anti-Corruption Socialization and Training in TelkomGroup in the 2025 Financial Year*

Position level	Socialization	Training
Senior Management	92.2%	89.4%
Middle Management	98.0%	88.5%
Supervisor	99.7%	74.5%
Employees at other levels	85.4%	65.2%
	94.9%	76.0%

*Note: the entities covered in the calculation of socialization and training are Telkom, TDE, Mitratel, Sigma, GSD, and Telkom Infra.

TelkomGroup has disseminated its anti-corruption policy to business partners since the beginning of the procurement process through the technical clarification stage. In 2025, Telkom, Mitratel, Telin, and Sigma ensured that 100% of their business partners received this anti-corruption socialization.