



**CODE OF CONDUCT**  
**EXTRAORDINARY GENERAL MEETING OF SHAREHOLDERS ("MEETING")**  
**PT BANK VICTORIA INTERNATIONAL, Tbk. ("Company")**  
**November 30, 2021**

1. The meeting will be held in Indonesian.
2. In accordance with the Financial Services Authority ("OJK") Regulations, the Company has provided an alternative for shareholders to grant power of attorney electronically through the eASY.KSEI system which is managed by PT Kustodian Sentral Efek Indonesia (KSEI) ("E-Proxy").
3. The Company hereby appeals to Shareholders not to attend physically but by granting power of attorney to an Independent Party, namely the Company's Securities Administration Bureau, PT Adimitra Jasa Korpora, through E-Proxy to represent shareholders to attend and vote at the Meeting.
4. Shareholders or their proxies who will remain physically present at the Meeting must follow and pass the safety and health protocols that will be enforced by the Company, including the following:
  - Have a Certificate of Rapid Antigen Test or COVID19 PCR Swab Test with negative results obtained from hospital doctors, health centers or clinics with a sampling date of 1 (one) day before the GMS
  - Use a mask while in the area and place of the GMS.
  - Based on the detection and monitoring of body temperature does not have a body temperature above 37.3 ° C.
  - Use the hand sanitizer provided before entering the GMS room.
  - At the time of registration, Shareholders or their proxies are required to submit a Health Covid-19 Risk Self Assessment Instrument which can be downloaded on the Company's website.
  - Shareholders or their proxies must follow the directions of the GMS committee in implementing physical distancing policies while in the building where the GMS is being held.
5. In the event that the Shareholders or their proxies do not pass the safety and health protocols as mentioned above, the Shareholders are requested to give power of attorney to an independent party appointed by the Company (BAE Representative) or another party appointed by the Shareholders, by filling out and signing Power of Attorney form provided by the Company at the location of the GMS.
6. Based on article 13 paragraph 1 (1) of the Company's Articles of Association, the Meeting will be chaired by a member of the Board of Commissioners appointed by the Board of Commissioners.



7. Meeting Quorum
  - a. For the First Meeting Agenda

Meetings can be held if the GMS is attended by more than 1/2 (one half) of the total shares with valid voting rights owned by independent shareholders and shareholders who are not affiliated with the Public Company, members of the Board of Directors, members of the Board of Directors Commissioner, major shareholder, or controller.
  - b. For the Second Meeting Agenda

Meetings can be held and can take legal and binding decisions if attended by more than 1/2 (one half) of the total shares with valid voting rights.
8. Questions or opinions regarding the agenda of the Meeting may be submitted by the shareholders or their proxies after the Chairperson of the Meeting has finished discussing all the agenda items of the Meeting by filling out the question sheet which is distributed and submitted to the Chairperson of the Meeting.

Notes:  
added for those present through the e-GMS, what is the mechanism if you want to ask questions.
9. Those who are entitled to ask questions at the Meeting are only the Shareholders of the Company or their legal proxies whose names are recorded in the Register of Shareholders of the Company on November 5, 2021.
10. Meeting Resolutions
  - a. Meeting decisions are made by way of deliberation to reach consensus, if deliberation to reach consensus is not reached, then a vote will be held.
  - b. For the agenda of the 1st Meeting

Decisions are valid if approved by more than 1/2 (one half) of the total shares with valid voting rights owned by independent shareholders and shareholders who are not affiliated with a public company, members of the board of directors, members of the board of commissioners, Major Shareholder, Or Controlling
  - c. For the agenda of the 2nd Meeting

Decisions are valid if approved by more than 1/2 (one half) of the total shares with voting rights present at the meeting.

Jakarta, November 30, 2021  
**PT BANK VICTORIA INTERNATIONAL, Tbk.**  
**Directors**