

**STRENGTHENING GOOD CORPORATE GOVERNANCE AT  
PERTAMINA: A CASE STUDY ON IMPLEMENTING ISO  
37001 AND ISO 37002**



**THESIS**

**By:**

**Faiq Nur Zaman  
(21241001)**

**Academic Supervisor:**

**Prof. Ir. H. M. Roy Sembel, MBA, Ph.D, CSA, CIB, CIIM**

**Dr. Melinda Malau, SE., MM., CBV., CFRM., CFA., CPA**

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## **CERTIFICATE OF APPROVAL**

Name & Student ID : Faiq Nur Zaman - 21241001  
Topic : Strengthening Good Corporate Governance at  
Pertamina: A Case Study on Implementing ISO 37001 and ISO 37002

Jakarta, October xx, 2024

Examined by,

Supervisor I  
Prof. Ir. Roy H.M. Sembel,  
MBA, Ph.D, CSA, CIB, CIIM

Supervisor II  
Dr. Melinda Malau, SE., MM.,  
CBV. ,CFRM., CFA., CPA

Chair of Examiners

Examiner

Acknowledged by,

Director of Academic and Student Affairs  
Prof. Dr. Ir. M Syamsul Maarif, M.Eng

## **NON-PLAGIARISM DECLARATION FORM**

This thesis is a presentation of my original research work. Whatever contributions others are involved, every effort is made to indicate this clearly, with due reference to the literature, and acknowledgement of collaborative research and discussions.

Also, this work is being submitted in partial fulfillment of the requirement for the Master of Business Administration degree and has not previously been accepted in substance for any degree and is not being concurrently submitted in candidature for any degree.

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**Faiq Nur Zaman**

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## ABSTRACT

This project investigates the implementation of ISO 37001 and ISO 37002 at PT Pertamina (Persero) within the oil and gas industry, with a focus on anti-bribery management and whistleblowing systems. It addresses challenges such as difficulties in applying the standards, assessing their effectiveness compared to international benchmarks, defining compliance metrics, and validating outcomes, while also focusing on the synergy between Pertamina's holding company, subsidiaries, and affiliates. The objectives are to overcome implementation challenges of ISO 37001 and ISO 37002 at Pertamina, assess the effectiveness of these standards, and enhance collaboration among Pertamina's various entities to ensure effective implementation. The methodologies used include SWOT analysis, the TOWS matrix, and gap analysis based on ISO 37001 and ISO 37002 standard. The project timeline spans from month 1 to month 5, from the kickoff meeting to the finalization of the audit. The deliverables include a summary of relevant research, a methodology report, a case study analysis of ISO 37001 and ISO 37002 implementation at Pertamina, findings and discussions, and actionable recommendations for improving governance and achieving certification for Pertamina and its affiliated entities. The results indicate that Pertamina must overcome resistance and integration challenges by implementing targeted strategies, rigorous assessments, and improved collaboration, including fostering transparency, aligning processes, conducting audits, and enhancing communication to effectively implement ISO 37001 and ISO 37002. To effectively implement ISO 37001 and ISO 37002, organizations need a clear strategy, integrity training, and regular evaluations, ensuring consistency across subsidiaries. The industry should standardize practices, share knowledge, align with regulations, and use technology. Customers should demand transparency and support ethical companies. Project limitations include restricted data access, short timelines, and limited generalizability, so future projects should enhance data collection, use varied methods, and extend timelines.

**Keywords:** *Synergy, Anti-bribery Management, Whistleblowing Systems, Good Corporate Governance*

# CHAPTER I

## INTRODUCTION

### 1.1 Industry Background

The oil and gas industry is a pivotal sector globally, providing essential energy resources that drive industrial operations and everyday life. This industry is characterized by its significant economic impact, extensive supply chains, and complex regulatory requirements. Due to these factors, the oil and gas sector is highly susceptible to risks related to corruption and unethical practices. Pertamina, as Indonesia's largest state-owned oil and gas company, operates within this high-stakes environment, making it imperative for the company to address these risks effectively. (Nonci et al, 2020)

Within this broad industry context, Pertamina faces specific challenges related to anti-bribery and transparency. To manage these challenges, the company has focused on implementing rigorous anti-bribery management systems and whistleblowing mechanisms. Anti-bribery management is crucial in this sector to prevent and mitigate the risks of bribery and corruption that can arise due to the significant financial transactions and complex relationships involved. Pertamina, recognizing the importance of ethical governance, has adopted ISO 37001, an international standard designed to help organizations establish and maintain effective anti-bribery management systems. This standard provides a framework for developing anti-bribery policies, conducting risk assessments, and implementing controls to combat bribery.

In addition to anti-bribery measures, Pertamina has also emphasized the importance of effective whistleblowing systems. Whistleblowing systems are essential for ensuring that unethical behavior can be reported confidentially and safely. ISO 37002, which provides guidelines for establishing and maintaining whistleblowing management systems, supports this effort by helping organizations create secure channels for reporting misconduct. This system is particularly valuable in the oil and gas industry, where the potential for corruption is high, and

reporting mechanisms can play a crucial role in maintaining transparency and accountability.

By integrating ISO 37001 and ISO 37002 into its operations, Pertamina not only addresses industry-specific risks but also sets a benchmark for good corporate governance in the oil and gas sector. These standards enable the company to manage bribery risks effectively and foster a culture of integrity. The implementation of these systems demonstrates Pertamina's commitment to ethical practices and enhances its reputation among stakeholders. Thus, while Pertamina operates within the broad oil and gas industry, its specific focus on anti-bribery management and whistleblowing systems highlights its proactive approach to addressing corruption and promoting transparency.

## **1.2 Company Background**

Pertamina remains steadfast in its commitment to providing energy and developing new and renewable energy sources to support national energy independence. Appointed as the holding company in the energy sector by the Ministry of State-Owned Enterprises of the Republic of Indonesia on June 12, 2020, Pertamina now plays a highly strategic role, overseeing six Subholdings engaged in various energy activities. These include the Upstream Subholding, operated by PT Pertamina Hulu Energi; the Gas Subholding, managed by PT Pertamina Gas Negara; the Refinery & Petrochemical Subholding, conducted by PT Kilang Pertamina Internasional; the Power & NRE Subholding, run by PT Pertamina Power Indonesia; the Commercial & Trading Subholding, operated by PT Pertamina Patra Niaga; and the Integrated Marine Logistics Subholding, managed by PT Pertamina International Shipping.

This significant role marks a new milestone in Pertamina's business journey, following more than six decades of substantial contributions to energy provision that have driven various aspects of Indonesian life and beyond.

Pertamina's strong capabilities are built upon a solid foundation and the company's long history in supporting national energy independence. The company's origins trace back to the 1950s when the Government of the Republic of Indonesia appointed the Army to establish PT Eksploitasi Tambang Minyak

Sumatera Utara to manage oil fields in Sumatra. This company later became PT Perusahaan Minyak Nasional, abbreviated as PERMINA, on December 10, 1957, which is now commemorated as Pertamina's founding day.

In 1960, PT Permina was restructured as a State-Owned Enterprise (PN Permina). Subsequently, PN Permina merged with PN Pertamina to form PN Pertambangan Minyak dan Gas Bumi Negara (Pertamina) on August 20, 1968.

Pertamina's role became increasingly strategic after the Government, through Law No. 8 of 1971, designated the company to produce and process oil and gas from oil fields and supply fuel and gas needs in Indonesia. This was further refined through Law No. 22 of 2001, which restructured Pertamina's role to focus on Public Service Obligation (PSO) activities.

Based on Government Regulation No. 31 of 2003, dated June 18, 2003, the company was renamed PT Pertamina (Persero), undertaking oil and gas activities across both upstream and downstream sectors. PT Pertamina (Persero) was established on September 17, 2003, according to Notarial Deed No. 20 of 2003. On December 10, 2005, Pertamina updated its logo from a seahorse to an arrow with green, blue, and red colors, reflecting its dynamic elements and environmental concern.

On July 20, 2006, PT Pertamina (Persero) underwent a fundamental transformation, updating its vision to "becoming a world-class national oil company."

On December 10, 2007, Pertamina achieved a significant milestone through its subsidiary PT Pertamina International EP by acquiring a 72.65% stake in the French oil company Maurel et Prom (M&P).

In 2011, Pertamina refined its vision to "becoming a world-class national energy company." During the Extraordinary General Meeting of Shareholders on July 19, 2012, Pertamina increased its issued and paid-up capital and expanded its business activities.

On December 14, 2015, the Minister of State-Owned Enterprises approved changes to Pertamina's Articles of Association to optimize resource utilization, increase state capital, and require written approval from the Board of

Commissioners for certain Director actions. This change was formalized in Notarial Deed No. 10 dated January 11, 2016, by Notary Lenny Janis Ishak, SH.

In 2017, Pertamina moved closer to its vision of becoming a world-class national energy company by completing its acquisition of shares in the French oil company Maurel et Prom (M&P). As of February 1, 2017, through its subsidiary PT Pertamina International EP, Pertamina became the majority shareholder of M&P with a 72.65% stake. This majority ownership provided Pertamina with operational access in 12 countries across four continents. Moving forward, Pertamina targets a production of 650,000 BOEPD (Barrels of Oil Equivalents Per Day) by 2025 from international operations, as part of its goal to reach a total production of 1.9 million BOEPD by 2025, contributing to Indonesia's energy independence and security.

Despite undergoing significant business evolution over six decades, Pertamina remains committed to sustaining its transformation efforts to become a world-class energy company. Supported by a more agile, aggressive, adaptable organization, Pertamina aims to navigate future business dynamics, foster new growth opportunities through investment and business optimization, and continue to grow in line with shareholder and stakeholder expectations.



**Figure 1.1 PT Pertamina Aspiration, Vision, Mission, and Values**

Source: <https://www.pertamina.com/id/visi-misi-tujuan-dan-tata-nilai>

### Aspiration

To become a leading global energy company with a market value of USD 100 billion.

### Vision

To become a world-class national energy company

### Mission

To operate in oil, gas, and new and renewable energy in an integrated manner, based on strong commercial principles

### Values

#### AKHLAK

- **Amanah / Trustworthy**: Upholding the trust entrusted to us.
- **Kolaboratif / Collaborative**: Building synergistic partnerships.
- **Loyal**: Dedicated and prioritizing the interests of the nation and country.
- **Harmonis / Harmonious**: Caring and respecting differences.
- **Adaptif / Adaptive**: Continuously innovating and enthusiastically navigating or facing change.

- **Kompeten / Competent:** Committed to learning and developing capabilities.

### **1.3 Problem Background**

PT Pertamina has identified three main problems:

1. Implementation challenges highlight the difficulties Pertamina faces in applying ISO 37001 and ISO 37002
2. Evaluating how effectively ISO 37001 and ISO 37002 enhance the Anti Bribery and WBS system at Pertamina compared to international standards.
3. Effectiveness of collaboration between Pertamina's holding company, subsidiaries, and affiliates in implementing ISO 37001 and ISO 37002.

These issues impact the overall performance and integrity of Pertamina's operations, particularly in relation to its Anti-Bribery Management System and Whistleblowing Systems (WBS). Therefore the raised questions are:

1. How can Pertamina overcome the main difficulties in applying ISO 37001 and ISO 37002?
2. How can Pertamina assess the conformity and effectiveness of the Anti-Bribery and WBS Management System compared to ISO 37001 and ISO 37002 requirements?
3. How can Pertamina's Holding Company, subsidiaries, and affiliates enhance their collaboration in implementing ISO 37001 and ISO 37002?

### **1.4 Objectives**

1. Insights and recommendations for overcoming difficulties in applying ISO 37001 and ISO 37002 at Pertamina.

Pertamina may encounter specific obstacles such as inadequate resources, resistance to change, or a lack of understanding of the ISO standards during implementation. Identifying these challenges is crucial for developing effective solutions. To overcome these difficulties, tailored training programs should be provided to enhance understanding and



engagement with the standards. Allocating dedicated resources and support can help address practical challenges effectively. Furthermore, the implementation of the Gap Analysis methodology through a structured checklist in accordance with ISO 37001 and ISO 37002 will allow Pertamina to identify the areas in which the current management framework does not meet the requirements set forth by ISO 37001 and ISO 37002, thus promoting a more precise understanding of the requisite improvements.

2. Evaluation of the conformity and effectiveness of the Anti-Bribery and WBS Management System compared to ISO 37001 and ISO 37002 requirements.

Evaluating the impact of ISO 37001 and ISO 37002 involves assessing how these standards contribute to improvements in Pertamina's Anti-Bribery Management System (ABMS) and Whistleblowing System (WBS). This includes measuring enhancements in transparency, accountability, and compliance within the organization. A comparison with international standards will help gauge the effectiveness of Pertamina's practices by benchmarking against global best practices. Analyzing performance metrics and feedback will provide insights into how well Pertamina's systems align with international norms and highlight areas where adjustments or improvements may be needed. The precise evaluation will be provided by the certification body who has the authority to recognize the organization as effective in its implementation of ISO 37001 and ISO 37002.

3. Insights and recommendations for improving collaboration among Pertamina's Holding Company, subsidiaries, and affiliates in implementing ISO 37001 and ISO 37002.

The effectiveness of collaboration between Pertamina's holding company and its subsidiaries is crucial for the successful implementation of ISO 37001 and ISO 37002. Current challenges may include communication breakdowns and misaligned objectives across different entities. To address

these issues, it is essential to develop a unified implementation strategy with clearly defined roles and responsibilities for each entity. Regular inter-entity meetings and a robust reporting system should be established to ensure consistent alignment and timely resolution of any issues. Additionally, fostering a collaborative culture through joint training sessions, certification between subholdings and affiliates, and shared resources, can help enhance coordination and support the implementation process among Pertamina's Group.

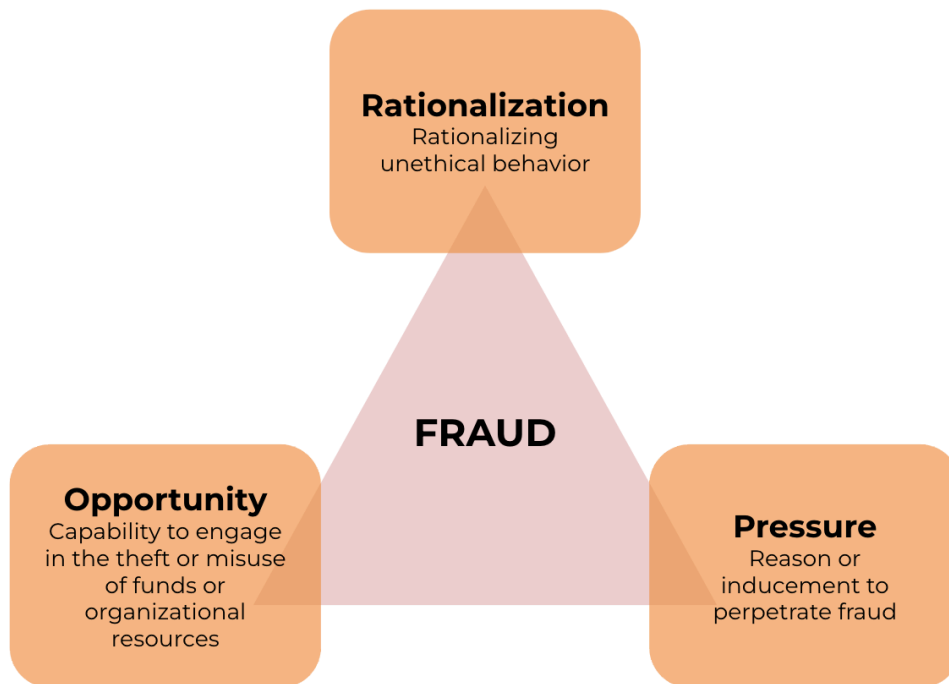
## CHAPTER II

### EVIDENCE REVIEW

#### 2.1 Grand Theory

##### 2.1.1 Fraud Triangle Theory

According to Cressey (1953), The Fraud Triangle Theory is predicated upon interviews conducted with prisoners who perpetrated financial fraud, wherein Cressey aimed to elucidate the underlying motivations for their criminal behaviors. (Suryandari et al, 2023)



**Figure 2.1 Fraud Triangle Theory**

*Source: Cressey, 1950 Re-Processed in Google Slides*

The Fraud Triangle Theory in Figure 2.1 delineates three critical components that must coexist for fraudulent activities to transpire: pressure, rationalization, and opportunity.

Pressure represents the external or internal forces that drive individuals toward fraudulent behavior. These pressures can take various forms, such as financial difficulties, unrealistic performance targets, or personal obligations. Individuals under significant stress or facing seemingly insurmountable challenges may resort to dishonest means as a quick fix, driven by the urgency to resolve their issues.

Rationalization is the cognitive process through which individuals justify their fraudulent actions to themselves. This process allows them to reconcile their behavior with their self-image. Fraudsters might convince themselves that they deserve more, that they are simply "borrowing" funds, or that their actions will not have a detrimental impact on the organization. This self-justification helps them to maintain a sense of integrity while engaging in unethical behavior.

Opportunity refers to the conditions that enable fraudulent activities to occur. Such opportunities arise when there are weaknesses in internal controls or a lack of oversight within an organization. For instance, insufficient internal controls, inadequate supervision, or unrestricted access to organizational assets and sensitive information can create an environment where fraud can be perpetrated without immediate detection.

Understanding these elements of the Fraud Triangle is crucial for developing effective anti-bribery and anti-fraud management systems. Organizations can address these factors to mitigate the risk of fraudulent activities. By alleviating pressure, organizations can provide adequate financial and psychological support to employees. Reducing opportunity involves reinforcing internal controls, conducting regular audits, and implementing strict oversight measures. To counter rationalization, it is essential to cultivate a strong ethical culture, offer ongoing training on integrity and compliance, and enforce a zero-tolerance policy towards fraudulent behavior.

ISO 37001, a standard designed to combat bribery, focuses on reducing the opportunity for fraud by strengthening internal controls and closely examining high-risk transactions. Additionally, it addresses pressure and rationalization by setting clear policies and providing training on ethics and compliance. Complementing this, ISO 37002 enhances these efforts by offering secure and

transparent reporting channels, which enable employees to report suspicious activities before they escalate into more significant issues. Together, these standards form a comprehensive approach to preventing and addressing fraud and corruption within organizations.

## **2.2 Specific Theories**

### **2.2.1 Agency Theory**

Agency Theory constitutes a pivotal framework within the disciplines of economics and finance. This theoretical construct highlights the dynamics of the interaction between the principal and the agent within a corporate entity. (Jensen and Meckling, 1976)

Agency Theory argues that in the principal-agent relationship, there is potential for conflict of interest, as the agent may prioritize personal aspirations that diverge from the interests of the principal. This discordance is referred to as the "agency problem." While principals typically depend on agents for the operational management of the company, agents may undertake decisions that disproportionately serve their own interests rather than those of the principals.

In the framework of anti-corruption and anti-bribery programs, Agency Theory maintains notable relevance as it sheds light on the factors that may drive management (agents) to partake in corrupt actions or bribery.—such as to secure personal advantages or to expedite the achievement of business objectives that are beneficial to them personally. To address this risk, organizations are compelled to establish robust oversight mechanisms, which may include internal audits, rigorous anti-corruption protocols, and incentive structures that are congruent with the long-term objectives of the principal.

ISO 37001 (Anti-Bribery Management System) operates to reduce the agency problem through the establishment of policies, procedures, and controls intended to prevent, detect, and address instances of bribery. This standard further ensures that agents operate in alignment with the anti-bribery policies sanctioned by the principal. ISO 37002 (Whistleblowing Management System) enhances this framework by offering anonymous reporting channels for employees to disclose

misconduct perpetrated by agents without apprehension of retribution, thereby fortifying oversight and accountability.

### **2.2.2 Institutional Theory**

The conceptual framework of Institutional Theory emerges from the disciplines of sociology and organizational studies. This theoretical perspective investigates the manner in which entrenched norms, values, and social conventions influence both organizational and individual conduct. (DiMaggio and Powell, 1983)

Institutional Theory posits that organizations function not solely in pursuit of rational objectives but are concurrently shaped by prevailing social norms and expectations endemic to their surroundings. Organizations frequently adopt established practices prevalent within their respective industries or communities to attain legitimacy, irrespective of the practices' inefficiency or lack of rationality. This phenomenon is commonly termed "institutional isomorphism," signifying that organizations operating within the same sector tend to exhibit increasing similarities as a result of external pressures, including governmental regulations, customer expectations, or industry standards.

Within the framework of anti-corruption, Institutional Theory elucidates the mechanisms by which corrupt or bribery practices can become "institutionalized" within the cultural fabric of an organization—illustrated by instances where such behaviors are perceived as integral to the operational ethos of the organization. Nevertheless, this theoretical model also offers valuable insights into the processes of institutional change facilitated by the introduction of new standards, such as ISO 37001, and examines how organizations may be motivated to embrace more ethical practices through regulatory, normative, and cognitive pressures emanating from their external environment.

ISO 37001 and ISO 37002 can be conceptualized as instrumental frameworks aimed at fostering institutional change within organizations through the establishment of internationally recognized standards. The enactment of ISO 37001 contributes to the cultivation of an anti-bribery organizational culture by instituting policies and procedures that evolve into the new normative framework

within the organization. In conjunction, ISO 37002 enhances this initiative by instituting reporting mechanisms that facilitate behavioral and value transformation within the organization, thereby ensuring that ethical practices are acknowledged and embraced as standard protocols.

## 2.4 Good Corporate Governance

Based on The Regulation of The Minister of State-Owned Enterprises of The Republic of Indonesia Number PER-2/MBU/03/2023 on Guidelines for Good Corporate Governance and Significant Corporate Activities of State-Owned Enterprises, Article 1 Paragraph 23, Good Corporate Governance is a method of managing a company that applies the principles of transparency, accountability, responsibility, independence, and fairness.

Furthermore, on Article 3 Paragraph 2:

1. **Transparency**, refers to openness in the decision-making process and the disclosure of material and relevant information regarding the company;
2. **Accountability**, refers to the clarity of functions, implementation, and responsibility of the company's organs so that the management of the company is conducted effectively;
3. **Responsibility**, refers to the alignment of the company's management with applicable laws and regulations and sound corporate principles;
4. **Independency**, refers to the condition where the company is managed professionally without conflicts of interest and without influence/pressure from any party that is not in accordance with the laws and regulations and sound corporate principles; and
5. **Fairness**, refers to justice and equality in fulfilling the rights of stakeholders arising from agreements and applicable laws and regulations.

Central to GCG is the principle of transparency, which requires that a company's operations, financial performance, and decision-making processes are openly communicated to stakeholders. This transparency helps to build trust and confidence among investors, customers, and the public, as it reduces the potential for corruption and mismanagement. Transparency also enables stakeholders to

make informed decisions based on accurate and comprehensive information. By regularly disclosing relevant data and information, companies demonstrate their commitment to openness and accountability. (Karsono, 2023)

Accountability is another cornerstone of GCG. It involves holding the board of directors and senior management responsible for their actions and decisions. This accountability is achieved through mechanisms such as regular performance reviews, audits, and compliance checks. Ensuring that management is accountable helps to prevent misuse of power and resources, thereby protecting the interests of shareholders and other stakeholders. Additionally, a strong framework for accountability establishes clear lines of responsibility and authority, which are essential for effective governance. (Rumengan et al, 2023)

Responsibility in Good Corporate Governance emphasizes the adherence to ethical standards and legal requirements by both the company and its employees, ensuring that business practices are conducted with integrity and in compliance with laws. This principle involves acting in a socially responsible manner, which means considering the broader impact of the company's actions on society and the environment, such as through sustainable practices and fair labor conditions. It also entails aligning with the company's values and obligations to stakeholders by integrating ethical considerations into decision-making processes, implementing policies like codes of conduct, and providing training to promote ethical behavior. Ultimately, responsibility ensures that a company not only meets its legal duties but also upholds its values and contributes positively to society.

Independence involves ensuring that the board of directors and key committees, such as the audit committee, operate without bias to provide impartial oversight and prevent conflicts of interest. By maintaining independence, these governing bodies can make decisions objectively and prioritize the company's best interests over any internal or external pressures. This separation helps ensure that oversight and decision-making processes remain transparent and focused on the long-term health and success of the organization, rather than being swayed by personal or external influences.

Fairness involves treating all shareholders and stakeholders equitably, ensuring that minority shareholders have the same rights and opportunities as



majority shareholders. It also means considering the interests of all stakeholders in decision-making processes. By upholding fairness in governance, a company builds trust and ensures that diverse interests are balanced and respected, contributing to a more inclusive and transparent decision-making environment.

## **2.5 Anti-Bribery Management System**

An Anti-Bribery Management System (ABMS) is a structured framework designed to prevent, detect, and address bribery and corruption within an organization, aligning with ISO 37001:2016 standards. The primary objective of an ABMS is to ensure that the organization's operations adhere to the highest ethical standards, promoting integrity and transparency in all business dealings. This system is crucial for maintaining public trust, complying with legal and regulatory requirements, and safeguarding the organization's reputation. According to ISO 37001, an effective ABMS should include a comprehensive set of policies, procedures, and controls. These elements guide the behavior of employees, management, and other stakeholders, ensuring that bribery risks are effectively managed and mitigated. Key aspects include implementing anti-bribery policies, conducting risk assessments, providing training, and establishing monitoring and reporting mechanisms to foster a culture of compliance and ethical behavior. (ISO 37001; Putri et al., 2022; Ali et al, 2024).

A key element of an effective ABMS, as specified by ISO 37001 (ISO 37001:2016), is its commitment to a zero-tolerance policy towards bribery. This entails the development of clear anti-bribery policies that articulate the organization's stance against bribery and outline the consequences for engaging in such practices. ISO 37001 emphasizes the need for rigorous procedures for reporting and investigating potential bribery incidents. Additionally, training and awareness programs are integral components of the system, ensuring that all employees understand the legal implications of bribery and are equipped to recognize and address potential risks.

The implementation of an ABMS in accordance with ISO 37001 involves several critical steps. First, the organization must conduct a thorough risk assessment to identify areas where bribery could potentially occur. This

assessment helps in developing targeted anti-bribery controls and procedures. Subsequently, the organization needs to establish a robust framework for reporting and handling suspected bribery incidents. This often includes setting up confidential reporting channels and ensuring there are clear protocols for investigating and addressing any allegations.

Leadership plays a vital role in the effective implementation of an ABMS. According to ISO 37001, leaders must set the tone for the organization by demonstrating a strong commitment to anti-bribery principles and ensuring that resources are appropriately allocated to support the system. Regular monitoring and auditing are also essential to evaluate the effectiveness of the system and to identify areas that may require improvement.

## **2.6 Whistleblowing Management System**

A Whistleblowing System is a critical mechanism for ensuring transparency and accountability within an organization by providing employees and other stakeholders with a secure way to report unethical or illegal activities without fear of retaliation. This system is designed to uncover wrongdoing such as fraud, corruption, or safety violations that might otherwise go unreported. By offering a confidential reporting channel, the whistleblowing system helps organizations address issues promptly and effectively, thus protecting the organization's integrity and fostering a culture of ethical behavior (Kartika, 2024).

ISO 37002 (present standard according to ISO 37002:2021) aligns closely with these objectives by providing a structured framework for managing whistleblowing within an organization. The standard emphasizes the importance of designing an effective whistleblowing system that includes clear and accessible reporting processes, assurances of confidentiality, and strong protection against retaliation. ISO 37002 mandates that all employees are informed about how to report concerns and understand the significance of doing so, often through comprehensive training programs. It also requires that reports can be made anonymously if desired, and that robust measures are in place to protect whistleblowers from any form of retribution or discrimination. (Andriansyah et al, 2024)

According to ISO 37002, an effective whistleblowing system must incorporate several critical components. Firstly, it should establish a clear reporting mechanism, such as a dedicated hotline, email address, or online platform, that allows concerns to be submitted confidentially. The system should also define the procedures for investigating and addressing reports, including the process for conducting investigations and communicating outcomes. Transparent reporting procedures and the implementation of a whistleblower protection policy are crucial to ensure that individuals feel safe and supported when coming forward. Additionally, ISO 37002 highlights the necessity of regular monitoring and evaluation of the system to maintain its effectiveness and to make improvements based on feedback and evolving circumstances.

## **2.7 Synergy and Coordination**

Synergy and coordination are pivotal concepts in organizational management, essential for enhancing efficiency and achieving collective goals. Synergy refers to the interaction of various elements within an organization that results in a combined effect greater than the sum of their individual effects. This phenomenon occurs when departments, teams, or individuals collaborate in a way that leverages their unique strengths and resources, leading to improved overall performance and innovation. Synergy promotes a cohesive working environment where collaborative efforts lead to enhanced problem-solving capabilities, creative solutions, and optimized use of resources. (Castañer and Oliveira, 2020)

Coordination, on the other hand, involves the systematic alignment of activities and efforts within an organization to ensure that they are harmonized and work towards a common objective. It is the process of organizing various functions and operations to avoid duplication of efforts, streamline processes, and ensure that all parts of the organization are working towards shared goals. Effective coordination requires clear communication, well-defined roles and responsibilities, and the establishment of processes that facilitate seamless interaction between different departments and teams. (Rosanti, 2022)

In the context of an organization, synergy and coordination are deeply interconnected. Effective coordination enables different departments and teams to

work together smoothly, while synergy amplifies the benefits of this coordination by fostering an environment where collaborative efforts lead to enhanced outcomes. For instance, when marketing and sales teams coordinate their efforts through regular meetings and shared goals, the resulting synergy can drive higher sales performance and more effective market strategies.

When applied to a company with a complex structure, such as a conglomerate with multiple subsidiaries or holding companies, synergy and coordination become even more crucial. In such a structure, holding companies and their subsidiaries must work together in a coordinated manner to achieve overarching corporate objectives. The holding company often sets strategic directions and policies that guide the operations of its subsidiaries. Effective coordination ensures that these policies are implemented consistently across all subsidiaries, while synergy enables these units to leverage each other's strengths. For example, a technology holding company might have subsidiaries specializing in different tech sectors. By coordinating their R&D efforts and sharing innovations, these subsidiaries can create synergies that drive technological advancements and competitive advantages for the entire group.

## **CHAPTER III**

### **METHODOLOGY**

#### **3.1 Strategic Business Method**

##### **3.1.1 SWOT Analysis**

SWOT analysis is a strategic planning tool used to identify and evaluate the Strengths, Weaknesses, Opportunities, and Threats associated with an organization or project. This analysis provides a comprehensive overview of internal and external factors that can influence success and helps in formulating strategies to leverage strengths, address weaknesses, capitalize on opportunities, and mitigate threats. (Kumar, 2023)

Strengths are internal attributes and resources that support an organization's ability to achieve its goals. These might include a strong brand reputation, unique technology, skilled workforce, or efficient processes. Recognizing these strengths allows organizations to build on what they do well and differentiate themselves from competitors. For example, a company with advanced research and development capabilities can use this strength to innovate and lead in its market.

Weaknesses are internal factors that hinder an organization's performance or put it at a disadvantage. These could be issues such as poor financial management, lack of expertise, or inadequate infrastructure. Identifying weaknesses is crucial as it highlights areas where improvements are needed. Addressing these weaknesses can help in mitigating risks and enhancing overall performance.

Opportunities refer to external factors that an organization could exploit to its advantage. These might include emerging markets, changes in regulatory environments, or technological advancements. By recognizing and seizing these opportunities, organizations can enhance their growth potential and gain a competitive edge. For instance, a business might leverage new technologies to develop innovative products or enter new markets.

Threats are external challenges that could negatively impact an organization. These might include economic downturns, increasing competition, or changes in consumer preferences. Identifying threats helps organizations prepare and implement strategies to mitigate their potential impact. For example, a company facing increased competition might focus on differentiating its products or improving customer service to maintain its market position.

### **3.1.2 TOWS Matrix**

The TOWS Matrix is a strategic planning tool that enhances the SWOT analysis by integrating internal and external factors to create actionable strategies. It helps organizations align their strengths and weaknesses with opportunities and threats in the external environment. By systematically evaluating how internal capabilities and limitations interact with external opportunities and risks, the TOWS Matrix facilitates the development of strategies that leverage organizational strengths, address weaknesses, capitalize on market opportunities, and mitigate potential threats. (Dandage et al, 2019)

The Strengths-Opportunities (SO) strategies within the TOWS Matrix are designed to capitalize on an organization's internal strengths to seize external opportunities. This approach involves leveraging existing capabilities to take advantage of favorable market conditions or emerging trends. For instance, a company with a robust research and development team might focus on innovating new products to meet growing market demands. By aligning its strengths with external opportunities, the organization can drive growth and enhance its competitive position.

Conversely, Weaknesses-Opportunities (WO) strategies aim to improve internal weaknesses to better exploit external opportunities. This strategy involves addressing internal deficiencies that may hinder the organization's ability to capitalize on market opportunities. For example, if a company's outdated technology limits its ability to compete in the digital marketplace, investing in new technology and training can help overcome this weakness. By rectifying internal shortcomings, the organization can better position itself to take advantage of external opportunities.

Strengths-Threats (ST) strategies focus on using an organization's internal strengths to mitigate external threats. This involves leveraging what the organization does well to counteract potential risks or challenges from the external environment. For instance, a company with a strong brand reputation might use its established market presence to fend off competitive pressures or protect itself from negative market shifts. By utilizing internal strengths, the organization can effectively navigate and reduce the impact of external threats.

Finally, Weaknesses-Threats (WT) strategies are designed to address both internal weaknesses and external threats simultaneously. This approach involves implementing measures to overcome internal deficiencies while also managing potential risks from the external environment. For example, a company facing financial difficulties might implement cost-cutting measures to stabilize its operations and reduce vulnerability to economic downturns. This dual focus helps the organization manage risks and improve its overall resilience.

### **3.1.3 Gap Analysis**

Gap analysis is a crucial strategic tool used by organizations to identify and bridge the gaps between their current performance and their desired goals or standards. This process involves a systematic evaluation of existing practices, processes, or outcomes against predefined benchmarks or objectives. By pinpointing discrepancies between the current state and the desired state, organizations can highlight areas that need improvement. This methodical approach aids in understanding performance deficiencies, optimizing operational processes, and aligning organizational activities with strategic goals. Ultimately, gap analysis helps organizations develop targeted action plans to address identified gaps, thereby enhancing overall efficiency and effectiveness in achieving their strategic objectives. (Kim and Ji, 2018; Surianugraha et al, 2020)

In the context of ISO 37001 and ISO 37002, gap analysis is specifically focused on assessing how well an organization's anti-bribery and whistleblowing practices align with the requirements set forth by these international standards. ISO 37001 provides a framework for establishing, implementing, and maintaining an effective Anti-Bribery Management System (ABMS), while ISO 37002 offers

guidelines for creating and managing a robust Whistleblowing Management System (WMS). Conducting a gap analysis in this context involves a detailed comparison between the organization's current anti-bribery and whistleblowing practices and the criteria outlined in these standards.

This comparison includes evaluating existing policies, controls, and procedures to determine their effectiveness in preventing bribery and supporting whistleblowing activities. For instance, the analysis might reveal gaps in anti-bribery controls or deficiencies in the whistleblowing mechanisms currently in place. By identifying these gaps, organizations can understand the underlying reasons, such as outdated procedures, insufficient resources, or lack of training. This insight allows for the development of targeted strategies to address these deficiencies, such as updating policies, enhancing training programs, or improving whistleblowing channels.

The goal of this gap analysis is to ensure that the organization's anti-bribery measures and whistleblowing systems are aligned with international best practices and effectively manage potential risks. By strengthening these systems and addressing any shortcomings, organizations can enhance their commitment to ethical conduct and ensure compliance with ISO 37001 and ISO 37002. This structured approach not only helps in bridging the identified gaps but also supports the organization in maintaining high standards of integrity and regulatory compliance.



## 3.2 Source of Data

### 3.2.1 Primary Data

**Table 3.1 Primary Data Sources for PT Pertamina**

<b>Aspect</b>	<b>Description</b>
Interview	<ul style="list-style-type: none"><li>- Conduct in-depth interviews with Pertamina employees, management, and stakeholders</li><li>- Gather insights on experiences and challenges related to ISO 37001 and ISO 37002</li></ul>
FGD	<ul style="list-style-type: none"><li>- Facilitate guided discussions with a small group (6 to 12 participants)</li><li>- Encourage interaction and diverse viewpoints on challenges and effectiveness of ISO standards</li><li>- Uncover collective insights and common themes</li></ul>
Case Studies	<ul style="list-style-type: none"><li>- Conduct in-depth examinations of specific ISO 37001 and ISO 37002 implementations</li><li>- Analyze relevant documents, processes, and outcomes</li><li>- Explore challenges faced and impacts on Good Corporate Governance</li><li>- Contribute to broader generalizations about best practices</li></ul>

Table 3.1 shows the research on the implementation of ISO 37001 and ISO 37002 at PT Pertamina that employs three primary sources of data: interviews, focus group discussions (FGD), and case studies. Each of these methods contributes uniquely to understanding the organization's approach to enhancing Good Corporate Governance.

Interviews are conducted to gather in-depth insights from Pertamina employees, management, and stakeholders who are directly involved in the implementation of the ISO standards. This method allows for personalized dialogue, enabling participants to share their experiences, challenges, and perspectives in detail. The flexibility of interviews—whether structured,

semi-structured, or unstructured—facilitates a deeper exploration of specific issues related to the anti-bribery and whistleblowing systems.

Focus Group Discussions (FGD) involve guided conversations with a small group of participants, typically ranging from six to twelve individuals. This interactive method encourages the sharing of diverse viewpoints on particular topics, such as the challenges and effectiveness of ISO 37001 and ISO 37002. By fostering dialogue among participants, FGDs help uncover collective insights and identify common themes or concerns. This group dynamic is particularly valuable for understanding the perceptions and attitudes of various stakeholders toward the implementation processes.

Case studies provide an in-depth examination of specific instances of ISO 37001 and ISO 37002 implementation within Pertamina and its subsidiaries. This method entails analyzing relevant documents, processes, and outcomes to gain a comprehensive understanding of how these standards are applied in practice. By exploring real-world scenarios, case studies reveal the challenges faced during implementation and the overall impact on Good Corporate Governance. This approach not only contributes to a detailed understanding of the current practices but also allows for broader generalizations about best practices that can be applied across the organization.

### 3.2.2 Secondary Data

**Table 3.2 Secondary Data Sources for PT Pertamina**

Aspect	Description
Journal	<ul style="list-style-type: none"> <li>- Peer-reviewed articles on GCG, ISO 37001, and ISO 37002</li> <li>- Insights into current research and case studies</li> <li>- Empirical evidence on anti-bribery and whistleblowing practices</li> </ul>
Book	<ul style="list-style-type: none"> <li>- Comprehensive overviews of corporate governance and management systems</li> <li>- Theoretical frameworks and practical guidance</li> <li>- Contextualization of ISO standards in organizational theory</li> </ul>
Legal Regulations	<ul style="list-style-type: none"> <li>- National and international laws related to anti-bribery and governance</li> <li>- Guidelines and policies relevant to compliance</li> <li>- Context for Pertamina’s operational framework</li> </ul>

Table 3.2 presents the secondary data sources for PT Pertamina, highlighting the various aspects that contribute to the understanding of Good Corporate Governance (GCG) and the implementation of ISO 37001 and ISO 37002.

The first aspect, journals, includes peer-reviewed articles that focus on GCG, ISO standards, and empirical evidence on anti-bribery and whistleblowing practices. These articles provide insights into current research and case studies, enriching the understanding of effective governance strategies.

The second aspect, books, offers comprehensive overviews of corporate governance and management systems. They provide theoretical frameworks and practical guidance, helping to contextualize the ISO standards within organizational theory and illustrating their relevance to Pertamina's governance efforts.

Lastly, legal regulations encompass national and international laws related to anti-bribery and governance. These regulations include guidelines and policies that are crucial for compliance and offer essential context for Pertamina's operational framework. Understanding this legal landscape is vital for assessing how Pertamina aligns its practices with regulatory expectations.

### 3.3 Relevant Departments

**Table 3.3 Relevant Departments of Pertamina**

Company	Department	Job Description
Pertamina Pusat	Quality Assurance (QA)	<ul style="list-style-type: none"> <li>- Develops and implements regulations and standards.</li> <li>- Ensures operational processes meet quality standards.</li> <li>- Facilitates compliance with ISO 37001 and ISO 37002.</li> </ul>
	Whistleblowing System (WBS)	<ul style="list-style-type: none"> <li>- Oversees the implementation of the whistleblowing system.</li> <li>- Manages reporting and investigation of misconduct.</li> <li>- Fosters a culture of transparency and accountability.</li> </ul>

<b>Company</b>	<b>Department</b>	<b>Job Description</b>
Pertamina Power	Internal Audit	<ul style="list-style-type: none"> <li>- Evaluates governance, risk management, and control processes.</li> <li>- Conducts audits for compliance with policies and regulations.</li> <li>- Provides recommendations for improvement.</li> </ul>
PT Asuransi Tugu Pratama Indonesia Tbk	Compliance	<ul style="list-style-type: none"> <li>- Ensures adherence to legal and regulatory requirements.</li> <li>- Develops compliance programs and conducts training.</li> <li>- Monitors regulatory changes.</li> </ul>
PT Tugu Reasuransi Indonesia		<ul style="list-style-type: none"> <li>- Maintains compliance with laws and regulations.</li> <li>- Oversees compliance programs and risk management strategies.</li> <li>- Upholds integrity and ethical standards.</li> </ul>
PT Samsung Tugu Indonesia		<ul style="list-style-type: none"> <li>- Responsible for regulatory compliance in operations.</li> <li>- Implements policies and procedures for legal standards.</li> <li>- Promotes a culture of ethical conduct.</li> </ul>
PT Pertamina Geothermal Energy	Internal Audit	<ul style="list-style-type: none"> <li>- Conducts audits to assess internal controls and compliance.</li> <li>- Identifies areas for improvement.</li> <li>- Provides assurance that operations align with goals and regulations.</li> </ul>

Table 3.3 outlines the relevant departments within Pertamina and their respective job descriptions, highlighting their critical roles in maintaining Good Corporate Governance and compliance with ISO standards.

At Pertamina Pusat, the Quality Assurance (QA) department is responsible for developing and implementing regulations and standards. This department plays a vital role in ensuring that operational processes meet established quality benchmarks and facilitates compliance with ISO 37001 and ISO 37002. Additionally, the Whistleblowing System (WBS) at Pertamina Pusat oversees the implementation of mechanisms that allow employees to report misconduct

confidentially. It manages the reporting and investigation processes while fostering a culture of transparency and accountability throughout the organization.

Within Pertamina Power, the Internal Audit department evaluates governance, risk management, and control processes. This team conducts audits to ensure compliance with internal policies and external regulations, providing essential recommendations for improvement. Their work is crucial in maintaining operational integrity and identifying areas that require attention.

At PT Asuransi Tugu Pratama Indonesia Tbk, the Compliance department ensures adherence to legal and regulatory requirements. This department develops compliance programs and conducts training sessions to educate employees about relevant laws and policies. They also monitor regulatory changes to keep the organization aligned with evolving legal standards.

PT Tugu Reasuransi Indonesia similarly focuses on compliance, maintaining adherence to laws and regulations. This department oversees compliance programs and risk management strategies, upholding integrity and ethical standards within the organization.

At PT Samsung Tugu Indonesia, the Compliance department is responsible for ensuring regulatory compliance in all operational activities. It implements necessary policies and procedures to meet legal standards while promoting a culture of ethical conduct among employees.

Lastly, PT Pertamina Geothermal Energy has its own Internal Audit department that conducts audits to assess internal controls and compliance. This team identifies areas for improvement and provides assurance that operations align with organizational goals and regulatory requirements.

### 3.4 Project Timeline

**Table 3.4 Project Timeline**

Month	Phase	Task	Participants	Mode	Deliverables
1	Preparation	Kick-Off Meeting	Consultant, Implementer, Top Management, Steering Committee	Remote/On-Site	Final Schedule and Agreements
		ISO 37001 Awareness Training	Consultant, Implementer, Top Management, Steering Committee	On-Site	Training Certification
		Gap Analysis	Consultant, Implementation Team	Remote/On-Site	Gap Analysis Report
2	Document Development	Drafting Manuals, Policies, SOPs, Work Instructions, and Other ISO 37001 Documents	Consultant, Implementation Team	Desk Study (Outside Visits)	Draft Manuals, Policies, SOPs, Work Instructions
		Approval of Manuals, Policies, SOPs, Work Instructions, and Other Documents	Consultant, Implementation Team, Top Management	On-Site/Remote	Approved Manuals, Policies, SOPs, Work Instructions
		Document Awareness Training	Consultant, Implementation Team, Top Management	Remote	Proof of Document Training
3	Implementation	Implementation of Manuals, Policies, SOPs, and Work Instructions across Departments	All Employees	Remote/On-Site	Evidence of ISO 37001 and 20400 Implementation
		Monitoring Implementation, Improvements, and	Consultant, Department Representatives, ISO Team	Remote/On-Site	Implementation Refinements, Effectiveness Report

Month	Phase	Task	Participants	Mode	Deliverables
		Enhancements			
4	Evaluation	Internal Audit Training	Consultant, Internal ISO 37001 Auditors	On-Site	Training Certificates, Audit Methodology Understanding
		Conducting Internal Audit	Consultant, Internal ISO 37001 Auditors, Department Representatives	On-Site	Internal Audit Report
		Management Review	Consultant, Implementer, Top Management, Supervisory Board	On-Site	Management Review Report
		Preparation for Stage 1 External Audit	Consultant, ISO Team	On-Site	Stage 1 Audit Preparation
5	External Audit	Stage 1 External Audit	All Employees	On-Site	Stage 1 Audit Report
		Addressing Stage 1 Audit Findings	All Employees	On-Site	Report on Stage 1 Audit Findings
		Stage 2 External Audit	All Employees	On-Site	Stage 2 Audit Report
		Addressing Stage 2 Audit Findings	All Employees	On-Site	Report on Stage 2 Audit Findings

The project timeline shown in Table 3.4 spans five months and is organized into distinct phases: Preparation, Document Development, Implementation, Evaluation, and External Audit. Each phase is crucial for the successful integration of ISO 37001 standards into the organization's processes.

The project begins with the Preparation phase, which involves key foundational activities. The first task is the Kick-Off Meeting, where the consultant, implementer, top management, and steering committee convene to finalize the project schedule and agreements. This meeting is critical for setting expectations and aligning objectives. Following this, an ISO 37001 Awareness Training session is conducted to ensure that all relevant personnel are familiar with the standards and requirements. This training is essential for building a

foundational understanding of the anti-bribery management system. The phase concludes with a Gap Analysis to identify discrepancies between current practices and ISO 37001 requirements, which is performed remotely and on-site.

In the second month, the focus shifts to Document Development. This phase involves drafting key documents such as manuals, policies, standard operating procedures (SOPs), and work instructions that comply with ISO 37001 standards. The consultant and implementation team will work on these documents, which are developed primarily through desk studies and occasional site visits. Once drafts are completed, they are reviewed and approved by top management to ensure they meet organizational needs. Document awareness training is also provided to familiarize employees with the new policies and procedures, thus ensuring effective implementation.

The third month is dedicated to Implementation. During this phase, the new manuals, policies, SOPs, and work instructions are put into practice across all departments. This involves both remote and on-site activities to support employees in adapting to the new system. Concurrently, monitoring and evaluation of the implementation process occur to address any issues and make necessary improvements. This ongoing oversight ensures that the system is functioning as intended and that any problems are promptly addressed.

The fourth month focuses on Evaluation. This phase begins with training internal auditors on ISO 37001 standards to prepare them for conducting internal audits. Following the training, internal audits are carried out to assess compliance with the new system. Management reviews are also conducted to evaluate the overall effectiveness of the system and identify areas for improvement. Preparation for the Stage 1 External Audit is also part of this phase, involving detailed preparations and reviews to ensure readiness for external scrutiny.

The final month is devoted to External Audits. The first external audit (Stage 1) assesses the initial implementation and readiness for certification. After addressing any findings from Stage 1, the Stage 2 External Audit is conducted to evaluate full compliance with ISO 37001 standards. Addressing any issues identified in Stage 2 is crucial for achieving final certification. This phase concludes with reports on the findings and corrective actions taken.



### **3.5 Deliverables**

The project deliverables will begin with a comprehensive summary of relevant research on Good Corporate Governance (GCG), ISO 37001, and ISO 37002. This section will distill insights from scholarly articles, industry reports, and case studies to provide a well-rounded understanding of the principles underlying GCG and the specifics of the ISO standards. It will highlight the importance of these standards in promoting transparency, integrity, and ethical conduct within organizations, setting the stage for the detailed analysis that follows. By summarizing existing research, this deliverable will offer a solid foundation for understanding the significance of implementing ISO 37001 and ISO 37002 in enhancing corporate governance practices.

Following this, the methodology report will outline the research methods and data collection techniques used in the study. This detailed account will describe how qualitative and quantitative data were gathered, including the use of surveys, interviews, and document analysis. It will provide insights into the sampling strategies, development of research instruments, and procedures for ensuring data reliability and validity. Additionally, the report will address any limitations encountered and the steps taken to address these challenges, ensuring the research findings are robust and reliable. This methodological transparency is crucial for validating the research process and the subsequent findings.

The case study analysis will then examine the implementation of ISO 37001 and ISO 37002 at Pertamina. This in-depth analysis will explore how these standards were applied within the organization, detailing the challenges faced, the strategies employed to overcome them, and the outcomes achieved. By focusing on Pertamina's specific context, this case study will provide valuable insights into the practical aspects of implementing anti-bribery measures and enhancing corporate governance. It will serve as a key component in understanding the real-world application of the standards and the lessons learned from Pertamina's experience.

In the findings and discussion section, the research results will be presented and interpreted. This section will summarize key patterns and insights from the data, discussing their implications for Pertamina's implementation of

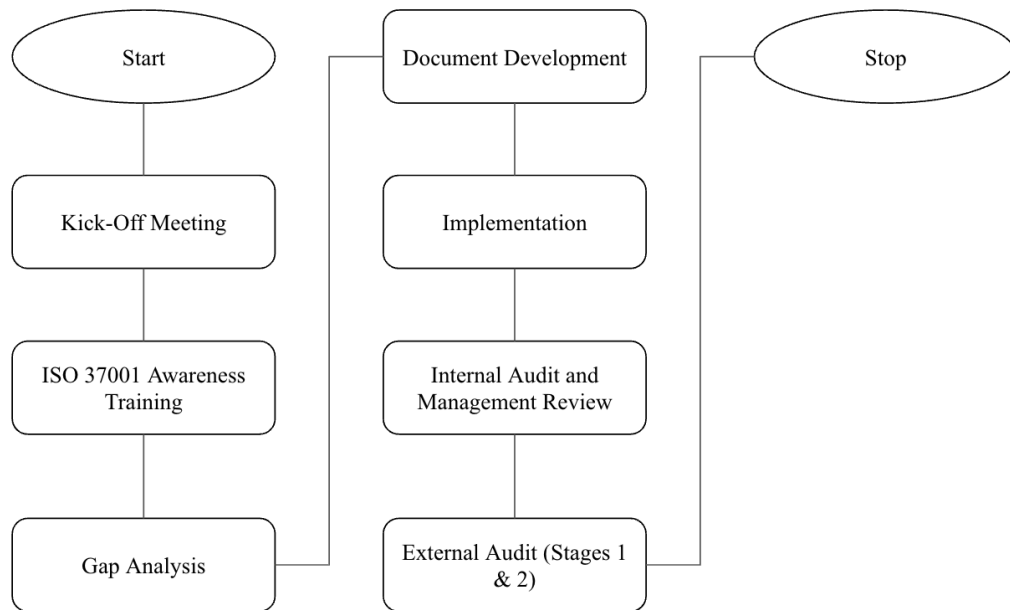
ISO 37001 and ISO 37002. The analysis will contextualize these findings within the broader framework of GCG and anti-bribery standards, providing a comprehensive understanding of their impact on organizational practices. This discussion will illuminate how effectively the standards have been integrated into Pertamina's governance framework and highlight areas for further improvement.

The recommendations section will offer actionable suggestions for enhancing Good Corporate Governance (GCG) at Pertamina, based on the research findings. These recommendations will address specific challenges identified during the study and propose practical strategies for strengthening the organization's anti-bribery management system. By providing tailored advice, this section aims to support Pertamina in improving its governance practices and fostering a culture of ethical conduct and transparency.

The project will culminate in the issuance of certifications for PT Pertamina Persero as the holding company and for selected subsidiaries and affiliates that have successfully implemented ISO 37001 and ISO 37002. Specifically, certifications will be awarded to PT Asuransi Tugu Pratama Tbk (Asuransi Tugu) and PT Pertamina Power Indonesia (Pertamina PNRE - Power and New Renewable Energy), along with their respective subsidiaries: PT Tugu Reasuransi Indonesia (Tugure) and PT Samsung Tugu Indonesia (Samsung Tugu) under Asuransi Tugu, and PT Pertamina Geothermal Energy Tbk under Pertamina PNRE. This certification will formally acknowledge their adherence to robust anti-bribery and governance standards, reinforcing their commitment to ethical conduct and transparency.

The complete thesis document will compile all sections into a cohesive final report. This comprehensive document will integrate the summary of relevant research, methodology report, case study analysis, findings and discussion, recommendations, and certification details. By presenting all components together, the final thesis will provide a thorough and unified analysis of the research, offering valuable insights and supporting ongoing efforts to enhance corporate governance and anti-bribery practices at Pertamina.

### 3.6 Project Flow



**Figure 3.1 Project Flow**

The project flow shown in Figure 3.1 initiates with a Kick-Off Meeting, where key stakeholders, including consultants, implementers, top management, and steering committees, gather to outline the project’s scope, schedule, and agreements. This meeting sets the foundation for the subsequent phases. Next, ISO 37001 Awareness Training is conducted to familiarize all participants with the ISO 37001 standard, ensuring that everyone understands its requirements and implications.

Following the training, a comprehensive Gap Analysis is performed to assess current practices against ISO 37001 standards. This analysis identifies areas where improvements are needed to achieve compliance. With the gaps identified, the Document Development phase begins. During this phase, essential documents such as manuals, policies, and procedures are drafted. These documents are then reviewed and approved by management to ensure they meet ISO 37001 requirements.

The project then transitions into the Implementation phase. Here, the newly developed procedures and policies are rolled out across all departments. This phase involves practical application and integration of the new processes into

daily operations. To ensure the effectiveness of these implementations, Internal Audits are conducted to evaluate how well the procedures are being followed and to identify any areas needing improvement.

Following the internal audits, a Management Review is held to assess the overall performance of the implemented system and to make strategic decisions based on audit findings. The final phase involves External Audits. External auditors conduct Stage 1 and Stage 2 audits to validate compliance with ISO 37001. Any findings from these audits are addressed through corrective actions. The project concludes with final adjustments based on audit feedback and the documentation of results to formally close the project.

## **CHAPTER IV**

### **FINDINGS, ANALYSIS, AND DISCUSSION**

#### **4.1 FINDINGS**

The implementation of ISO 37001 and ISO 37002 at PT Pertamina (Persero) revealed several significant challenges. Key difficulties included resistance to change among employees and managers, which hindered the smooth adoption of anti-bribery and whistleblowing practices. Additionally, there were gaps in the existing processes that complicated the integration of these standards. The challenge of defining and measuring specific metrics for the Anti-Bribery Management System (ABMS) and the Whistleblowing System (WBS) was particularly notable. The lack of clear, actionable indicators made it difficult to gauge the effectiveness of the implemented measures accurately.

In terms of effectiveness, the standards have had a positive impact on Pertamina's governance framework. The integration of ISO 37001 and ISO 37002 contributed to improvements in anti-bribery practices and whistleblowing procedures, though the extent varied across different segments of the organization. The standards were generally effective in enhancing corporate governance, but certain areas still lagged behind international benchmarks, reflecting the need for further refinement and adaptation.

The assessment of conformity revealed that while Pertamina's practices aligned with many aspects of ISO 37001 and ISO 37002, there were notable gaps. These discrepancies often stemmed from variations in local practices and the difficulty in translating international standards into the specific context of Pertamina's operations. This misalignment highlighted the need for more precise adaptation of the standards to fit local operational realities.

Comparative analysis showed that evaluating Pertamina's performance against international standards was challenging due to differing practices and metrics. The comparison was further complicated by variations in how anti-bribery and whistleblowing systems are implemented globally. This disparity

underscored the need for more standardized metrics and practices that facilitate better benchmarking and performance evaluation.

Synergy issues between Pertamina’s holding company, subsidiaries, and affiliates were also evident. While there were efforts to ensure consistent application of ISO 37001 and ISO 37002 across the organization, the effectiveness of these efforts varied. Coordination among different entities was sometimes inconsistent, affecting the overall impact of the standards. Enhanced collaboration and more unified approaches are needed to improve the integration of these standards across all levels of the organization.

Finally, the validation of outcomes indicated that the improvements in Pertamina’s Anti-Bribery and Whistleblowing Management Systems could be attributed to the implementation of ISO 37001 and ISO 37002. However, the extent of this impact varied, and the full benefits of the standards have yet to be realized in some areas. This suggests a need for ongoing assessment and adjustment to ensure that the standards fully meet their intended goals.

## 4.2 ANALYSIS

### 4.2.1 SWOT ANALYSIS

**Table 4.1 SWOT Analysis Pertamina**

Strengths	<ul style="list-style-type: none"> <li>● <b>Leadership and Management Support:</b> Strong commitment from top management to implement anti-bribery and whistleblowing standards.</li> <li>● <b>Internal Resources:</b> Skilled and experienced personnel in risk management and compliance.</li> <li>● <b>Integrated Organizational Structure:</b> A structure that allows for coordination between the holding company, subsidiaries, and affiliates.</li> <li>● <b>Previous Experience:</b> Experience in implementing various international standards can support the adoption of ISO standards.</li> </ul>
Weakness	<ul style="list-style-type: none"> <li>● <b>Coordination Among Entities:</b> Challenges in achieving effective synergy between the holding company and its related entities.</li> <li>● <b>Resistance to Change:</b> Potential resistance from staff towards</li> </ul>

	<p>new procedures and policies.</p> <ul style="list-style-type: none"> <li>● <b>Lack of Specific Knowledge:</b> Limited in-depth knowledge of ISO 37001 and ISO 37002 within some parts of the organization.</li> <li>● <b>Technology Limitations:</b> Limitations in technology and information systems required to support implementation and monitoring.</li> </ul>
Opportunities	<ul style="list-style-type: none"> <li>● <b>Enhanced Reputation:</b> Implementing these standards can improve Pertamina's reputation as a company committed to integrity and transparency.</li> <li>● <b>Access to International Markets:</b> Compliance with international standards can open up opportunities for international collaborations and access to global markets.</li> <li>● <b>Improved Internal Processes:</b> Opportunity to enhance internal processes and policies related to anti-bribery and whistleblowing systems.</li> <li>● <b>Capability Development:</b> Opportunity to develop internal capabilities and expertise in risk management and compliance.</li> </ul>
Threats	<ul style="list-style-type: none"> <li>● <b>Implementation Challenges:</b> Difficulties in consistently implementing the standards across different entities.</li> <li>● <b>Regulatory Changes:</b> Risk of changes in regulations or policies that may impact compliance with ISO standards.</li> <li>● <b>Potential Evasion:</b> Risk of individuals or groups attempting to circumvent the anti-bribery or reporting systems.</li> <li>● <b>Implementation Costs:</b> Financial burden associated with training, technology, and audits, which could impact the company's budget.</li> </ul>

Table 4.1 presents a detailed SWOT analysis for PT Pertamina (Persero) in relation to implementing ISO 37001 and ISO 37002 standards. This analysis provides insight into the internal and external factors that can influence the successful adoption of these anti-bribery and whistleblowing standards.

Strengths identified include strong support from leadership and management, which is crucial for driving the implementation process. The company benefits from having skilled and experienced personnel in risk management and compliance, which can facilitate the effective adoption of these standards. Additionally, Pertamina's integrated organizational structure, encompassing the holding company, subsidiaries, and affiliates, allows for better coordination and alignment. The company's previous experience with various

international standards also provides a valuable foundation for implementing ISO 37001 and ISO 37002.

On the other hand, weaknesses highlight several challenges. Coordination among the different entities within the organization can be problematic, potentially hindering effective implementation. There may be resistance from staff toward new procedures and policies, which could impede progress. Moreover, some parts of the organization might have limited in-depth knowledge of ISO 37001 and ISO 37002, which could affect the overall implementation. Additionally, the company faces technology limitations that might affect the implementation and monitoring of these standards.

Opportunities for Pertamina include the potential to enhance its reputation as a company committed to integrity and transparency. Successfully implementing these standards can improve its public image and strengthen trust among stakeholders. Compliance with international standards also opens doors to new international collaborations and market opportunities. Furthermore, the implementation process offers a chance to refine and improve internal processes related to anti-bribery and whistleblowing. It also presents an opportunity to develop and enhance the organization's internal capabilities in risk management and compliance.

However, threats pose significant risks to the implementation process. Achieving consistent application of the standards across various entities within the company can be challenging. There is also the risk of regulatory changes that could impact compliance efforts. The possibility of individuals attempting to evade the anti-bribery or reporting systems presents another threat. Additionally, the financial burden associated with training, technology upgrades, and audits could strain the company's budget, potentially impacting the overall implementation effort.



## 4.2.2 TOWS Matrix

Table 4.2 TOWS Matrix Pertamina

TOWS Matrix	Strengths	Weakness
Opportunities	<p>SO</p> <ul style="list-style-type: none"> <li>• <b>Leverage Leadership and Management Support:</b> Use strong management backing to drive widespread adoption of ISO standards, promoting Pertamina’s reputation for integrity and transparency in international markets.</li> <li>• <b>Capitalize on Previous Experience:</b> Apply past experience with international standards to effectively implement ISO 37001 and ISO 37002, enhancing internal processes and seizing opportunities for global market access.</li> </ul>	<p>WO</p> <ul style="list-style-type: none"> <li>• <b>Utilize Internal Resources to Address Implementation Challenges:</b> Deploy skilled personnel to overcome difficulties in consistent implementation and address potential regulatory changes.</li> <li>• <b>Overcome Resistance by Developing Internal Capabilities:</b> Address resistance to change by focusing on capability development.</li> </ul>
Threats	<p>ST</p> <ul style="list-style-type: none"> <li>• <b>Overcome Lack of Specific Knowledge Through Training:</b> Address gaps in knowledge by implementing comprehensive training programs to build expertise in ISO 37001 and ISO 37002, thereby improving internal processes and policies.</li> <li>• <b>Mitigate Coordination Issues with Structured Programs:</b> Develop structured coordination programs to enhance collaboration among entities, leveraging opportunities to improve processes and internal capabilities.</li> </ul>	<p>WT</p> <ul style="list-style-type: none"> <li>• <b>Manage Resistance to Change with Communication:</b> Address potential resistance from staff by establishing clear communication and change management strategies to ensure smooth adoption of new procedures.</li> <li>• <b>Prepare for Regulatory Changes with Flexible Planning:</b> Develop flexible implementation plans and contingency strategies to adapt to potential regulatory changes, minimizing the impact of external threats on compliance efforts.</li> </ul>

The TOWS Matrix outlined in Table 4.2 offers a strategic framework for Pertamina to address its internal and external challenges while leveraging its strengths and opportunities. This analysis is crucial for the effective implementation of ISO standards, specifically ISO 37001 and ISO 37002, which focus on anti-bribery management systems and whistleblowing management systems, respectively.

To harness Pertamina's strengths, the matrix suggests two key strategies. Firstly, leveraging strong leadership and management support is vital. The endorsement from top management can drive widespread adoption of ISO standards within the organization. This move not only aligns with Pertamina's goal to enhance its reputation for integrity and transparency but also positions the company favorably in international markets. Secondly, capitalizing on previous experience with international standards is recommended. Pertamina's past familiarity with such standards can be a significant asset in implementing ISO 37001 and ISO 37002 effectively. By applying lessons learned and best practices from previous experiences, Pertamina can improve its internal processes and better access global markets.

In addressing weaknesses, the matrix outlines strategies under two key areas. Utilizing internal resources to address implementation challenges involves deploying skilled personnel to manage the complexities associated with the ISO standards. This approach is crucial for overcoming difficulties in consistent implementation and adapting to potential regulatory changes. Additionally, overcoming resistance to change is a critical factor. By focusing on developing internal capabilities and fostering a culture of adaptability, Pertamina can address resistance and ensure smoother transitions during the implementation of new standards.

To counteract threats, the matrix recommends several strategies. Overcoming a lack of specific knowledge through training is essential. Implementing comprehensive training programs will help build expertise in ISO 37001 and ISO 37002, thereby enhancing Pertamina's internal processes and policies. Additionally, mitigating coordination issues can be achieved through the development of structured programs. These programs will improve collaboration

among various entities within the organization, leveraging opportunities to enhance processes and internal capabilities.

Lastly, the matrix advises on managing resistance to change with effective communication and flexible planning. Establishing clear communication and change management strategies will help address potential resistance from staff, facilitating smoother adoption of new procedures. Furthermore, preparing for regulatory changes with flexible planning ensures that Pertamina can adapt to external threats while maintaining compliance. Developing contingency strategies will help mitigate the impact of regulatory changes on the company's operations.

### 4.2.3 Gap Analysis

**Table 4.3 Gap Analysis of Pertamina on ISO 37001 and ISO 37002**

Aspect	Previous State	Current State	Recommendations
ISO 37001 and ISO 37002 Implementation	- Partial implementation of anti-bribery measures and inadequate whistleblowing mechanisms.	- Full implementation of both ISO 37001 and ISO 37002 across all relevant entities.	- Continue monitoring and evaluating the effectiveness of both systems.
	- Limited awareness among employees regarding the standards.	- Comprehensive training and awareness programs in place.	- Regular refresher training to maintain awareness.
	- Inconsistent application of policies across subsidiaries.	- Standardized policies and procedures implemented organization-wide.	- Conduct regular audits to ensure adherence to standards.
	- Lack of confidentiality and protection for whistleblowers.	- Established protocols for confidentiality and protection in the whistleblowing system.	- Promote the use of the whistleblowing system to encourage reporting.
	- Limited feedback on reporting processes.	- Clear feedback mechanisms in place for reporting incidents.	- Ensure transparency in the investigation and resolution process.

Table 4.3 shows the gap analysis of the implementation of ISO 37001 and ISO 37002 at Pertamina that reveals significant improvements from a previous state of partial compliance to a current, fully operational framework. Initially, the company faced challenges in implementing effective anti-bribery measures and

lacked adequate whistleblowing mechanisms. This deficiency not only hindered the enforcement of anti-corruption strategies but also created an environment where employees were hesitant to report misconduct due to concerns about confidentiality and protection.

Currently, Pertamina has successfully implemented both ISO standards across all relevant entities. This full implementation signifies a commitment to enhancing corporate governance and ethical practices. Comprehensive training and awareness programs have been established, addressing the prior lack of employee knowledge regarding these standards. Such initiatives have fostered a culture of compliance and ethical conduct within the organization.

In the previous state, the inconsistency in the application of policies across subsidiaries posed another significant challenge. However, the current implementation has led to the standardization of policies and procedures throughout the organization. This uniformity not only facilitates better governance but also ensures that all employees are held to the same ethical standards, reducing the risk of misconduct.

Additionally, the previous lack of effective whistleblowing mechanisms has been addressed through the establishment of protocols that ensure confidentiality and protection for whistleblowers. This improvement has created a safe environment for employees to report unethical behavior without fear of retaliation. Furthermore, clear feedback mechanisms for reporting incidents have been introduced, allowing for transparency in the investigation and resolution processes.

While these advancements mark significant progress, ongoing recommendations include the continuous monitoring and evaluation of both ISO systems to ensure their effectiveness. Regular refresher training should be conducted to maintain employee awareness of the standards, and audits must be performed to verify adherence to policies. Promoting the use of the whistleblowing system will further encourage reporting and strengthen organizational integrity.

### 4.3 DISCUSSION

The implementation of ISO 37001 and ISO 37002 at PT Pertamina (Persero) highlighted several significant challenges. Key among these was resistance to change from employees and managers, which impeded the smooth adoption of anti-bribery and whistleblowing practices. Additionally, gaps in existing processes made integrating these standards difficult, particularly in defining and measuring metrics for the Anti-Bribery Management System (ABMS) and the Whistleblowing System (WBS). The lack of clear, actionable indicators further complicated the accurate assessment of the effectiveness of these measures.

Despite these challenges, the standards positively impacted Pertamina's governance framework. The integration of ISO 37001 and ISO 37002 led to improvements in anti-bribery practices and whistleblowing procedures, although these improvements varied across different segments of the organization. While the standards generally enhanced corporate governance, certain areas still lagged behind international benchmarks, indicating a need for ongoing refinement and adaptation.

The assessment of conformity revealed that Pertamina's practices aligned with many aspects of the standards but also exposed notable gaps. These discrepancies were often due to variations in local practices and difficulties in applying international standards to Pertamina's specific context. This misalignment emphasized the need for a more precise adaptation of the standards to fit local operational realities. Comparative analysis also showed challenges in evaluating Pertamina's performance against international standards due to differing practices and metrics, underscoring the need for standardized metrics and practices to facilitate better benchmarking.

The SWOT analysis identified Pertamina's strengths, including strong leadership support, skilled personnel, and previous experience with international standards. However, weaknesses such as coordination issues among different entities, staff resistance, and technology limitations were also noted. Opportunities for enhancing reputation, accessing international markets, and improving internal

processes were recognized, while threats from inconsistent implementation, regulatory changes, and potential evasion of anti-bribery measures posed risks.

The TOWS matrix suggested strategies to leverage Pertamina's strengths and opportunities, such as using strong leadership to drive adoption and applying past experience to implement the standards effectively. Addressing weaknesses by utilizing internal resources and investing in technology was recommended to tackle implementation challenges. To counter threats, the matrix proposed training to overcome knowledge gaps and structured coordination programs to improve synergy among entities.

The gap analysis revealed that while Pertamina demonstrated strong leadership commitment and established effective anti-bribery policies, significant gaps remained in whistleblowing mechanisms. The whistleblowing policy was not fully developed, and training programs lacked comprehensive coverage of whistleblowing processes. Risk assessments primarily focused on bribery risks and did not adequately address whistleblowing threats. Additionally, while anti-bribery audits were conducted, they did not consistently cover whistleblowing systems. This analysis highlights the need for a more comprehensive approach to developing whistleblowing policies, enhancing training, and integrating whistleblowing risks into risk assessments and audits to fully meet ISO 37001 and ISO 37002 standards.

## **CHAPTER V**

### **CONCLUSION AND RECOMMENDATION**

#### **5.1 CONCLUSIONS**

There are several conclusions to be drawn regarding Pertamina's implementation of ISO 37001 and ISO 37002. Addressing these standards involves not only overcoming initial resistance and integration challenges but also ensuring ongoing compliance and effective system management. By focusing on targeted strategies, rigorous assessments, and enhanced collaboration, Pertamina can achieve a successful implementation and meaningful impact of its anti-bribery and whistleblowing systems.

To overcome the main difficulties in applying ISO 37001 and ISO 37002, Pertamina needs to address resistance to change and process integration challenges. Key strategies include fostering a culture of transparency and accountability through targeted communication and training programs to reduce resistance from employees and managers. Additionally, Pertamina should focus on aligning existing processes with the new standards by identifying and bridging gaps through process optimization and integration efforts. Clear, actionable metrics should be developed to better measure the effectiveness of anti-bribery and whistleblowing systems, ensuring that implementation challenges are managed systematically.

Assessing the conformity and effectiveness of the Anti-Bribery and Whistleblowing System (WBS) against ISO 37001 and ISO 37002 requirements involves a multi-faceted approach. Pertamina should conduct regular internal audits and external reviews to evaluate how well current practices align with the standards. This includes analyzing compliance with the anti-bribery policies and the effectiveness of whistleblowing mechanisms. Performance metrics and indicators should be clearly defined and monitored to gauge the impact of the standards. Comparative benchmarking against international best practices can provide insights into areas needing improvement and help in adjusting strategies to better meet ISO requirements.

Enhancing collaboration among Pertamina's Holding Company, subsidiaries, and affiliates in implementing ISO 37001 and ISO 37002 requires a unified approach and improved coordination. Establishing structured programs for regular communication and alignment across different entities can ensure that standards are applied consistently throughout the organization. The development of centralized guidelines and shared resources will facilitate uniformity in implementation and adherence to the standards. Additionally, leveraging cross-entity workshops and training sessions can build a cohesive understanding and commitment to the standards, promoting synergy and consistent application across the entire corporate structure.

Ultimately, achieving successful implementation of ISO 37001 and ISO 37002 at Pertamina demands a strategic and coordinated effort. By addressing resistance, conducting thorough assessments, and enhancing collaboration, Pertamina can not only meet but potentially exceed the standards' requirements. This comprehensive approach will support the company in fostering a robust anti-bribery and whistleblowing culture, ensuring long-term effectiveness and adherence to global best practices.

## **5.2 RECOMMENDATIONS**

### **5.2.1 For Organizations**

To effectively implement ISO 37001 and ISO 37002 standards, organizations should first develop a clear and comprehensive strategy. This strategy should outline specific timelines, allocate resources, and define responsibilities for integrating the standards into everyday operations. It is crucial that all levels of the organization understand the importance of these standards and are actively engaged in the implementation process. A well-structured plan not only facilitates smoother integration but also ensures that the organization remains aligned with its compliance goals.

Fostering a culture of integrity within the organization is equally important. This can be achieved by implementing regular training programs and communication strategies that emphasize transparency and ethical behavior.



Engaging leadership in advocating for and demonstrating commitment to anti-bribery and whistleblowing practices sets a positive example and reinforces the importance of these standards. When leaders actively support ethical practices, it helps to embed these values deeply into the organizational culture.

Monitoring and evaluating the effectiveness of the anti-bribery and whistleblowing systems are critical for maintaining compliance and identifying areas for improvement. Organizations should conduct regular internal audits and external reviews to assess how well their systems align with ISO standards. Utilizing performance metrics to measure compliance allows for data-driven adjustments and continuous improvement of the systems. This ongoing evaluation ensures that the organization can address any gaps and enhance the overall effectiveness of its anti-bribery and whistleblowing practices.

For organizations with multiple subsidiaries or affiliates, enhancing collaboration across entities is essential. Establishing structured communication and coordination mechanisms can ensure that the implementation of ISO standards is consistent throughout the entire organization. Centralized guidelines and shared resources will facilitate uniform application of standards, while regular cross-entity meetings and updates will promote alignment and integration of anti-bribery and whistleblowing practices across all organizational levels. This collaborative approach ensures that the standards are applied uniformly and effectively, reinforcing the organization's commitment to ethical practices.

### **5.2.2 For the Industry**

To enhance anti-bribery and whistleblowing practices across the sector, it is crucial to standardize best practices by developing comprehensive industry-wide guidelines and benchmarks. Establishing uniform standards for implementing these systems ensures consistency and comparability among organizations. Such standardization helps all entities within the industry align their practices with common goals, promoting a cohesive approach to managing ethical risks and reinforcing the integrity of the sector as a whole.

Promoting knowledge sharing within the industry is another key recommendation. By encouraging the exchange of best practices and lessons

learned through conferences, workshops, and collaborative platforms, industry peers can benefit from each other's experiences. This collaborative approach allows organizations to learn from successful implementations and avoid common pitfalls, leading to continuous improvement and refinement of anti-bribery and whistleblowing systems. Knowledge sharing also fosters a culture of openness and collective progress in addressing ethical challenges.

Supporting regulatory alignment is essential for simplifying compliance and enhancing effectiveness. Industry stakeholders should actively work with regulatory bodies to ensure that industry standards are harmonized with international best practices and local regulations. This alignment helps to create a more coherent regulatory environment, reducing the complexity of compliance and enabling organizations to meet their obligations more effectively. Clear and consistent regulations facilitate better implementation and monitoring of anti-bribery and whistleblowing systems.

Investing in technology and innovation is critical for advancing anti-bribery and whistleblowing practices. The industry should advocate for the adoption of cutting-edge technologies, such as automated monitoring tools and data analytics, to improve the effectiveness of these systems. Advanced technological solutions can enhance the ability to detect and address unethical behavior, streamline reporting processes, and provide more robust data for evaluating system performance. Embracing innovation ensures that industry practices remain relevant and effective in an ever-evolving landscape.

### **5.2.3 For the Business**

For Pertamina to effectively implement and enhance its anti-bribery and whistleblowing systems, it is crucial to develop a comprehensive and strategic approach. This strategy should include clearly defined timelines, resource allocations, and responsibilities for integrating ISO 37001 and ISO 37002 standards into the company's operations. Ensuring that all levels of Pertamina's organization understand and are committed to this implementation is essential for achieving cohesive and successful integration. By laying out a structured plan,

Pertamina can systematically address potential challenges and align its processes with these international standards.

Fostering a culture of integrity within Pertamina is equally important. The company should implement regular training programs and robust communication strategies to promote transparency and ethical behavior across all departments. Engaging leadership to advocate for and actively demonstrate a commitment to anti-bribery and whistleblowing practices will set a strong example for employees. When top management visibly supports and prioritizes ethical practices, it reinforces the company's dedication to maintaining high standards of integrity and helps embed these values throughout the organization.

To ensure that Pertamina's anti-bribery and whistleblowing systems are effective, it is essential to conduct regular internal audits and external reviews. This process involves evaluating how well current practices align with ISO 37001 and ISO 37002 standards and identifying areas for improvement. Utilizing performance metrics to monitor compliance and impact will enable Pertamina to make data-driven adjustments and enhance the overall effectiveness of its systems. Benchmarking against international best practices can also provide valuable insights and guide necessary adjustments to meet or exceed the standards.

Finally, enhancing collaboration across Pertamina's holding company, subsidiaries, and affiliates is vital for consistent implementation of ISO standards. The company should establish structured communication and coordination mechanisms to ensure that all entities are aligned in their application of anti-bribery and whistleblowing practices. Developing centralized guidelines and shared resources will support uniformity in adherence to the standards. Cross-entity workshops and training sessions can further build a unified understanding and commitment to these practices, ensuring effective and consistent application across Pertamina's entire corporate structure.

#### **5.2.4 For Customers**

Customers have a significant role in influencing the ethical standards of businesses through their expectations and actions. One of the primary ways

customers can contribute is by demanding transparency from companies regarding their anti-bribery and whistleblowing policies. By inquiring about how businesses handle ethical concerns and protect whistleblowers, customers can ensure that companies are committed to maintaining high standards of integrity. This transparency not only helps customers make informed choices but also pressures businesses to uphold and communicate their ethical practices more clearly.

Supporting ethical companies is another crucial recommendation for customers. By choosing to engage with businesses that demonstrate a strong commitment to integrity and compliance with international standards, customers can drive the broader adoption of ethical practices across industries. This support not only rewards companies that prioritize ethical behavior but also encourages others to follow suit, fostering a more responsible and transparent business environment overall.

Providing feedback to companies about their ethical practices and reporting mechanisms is essential for driving improvements. Customers should actively engage with businesses to share their opinions and concerns regarding how ethical issues are addressed. Constructive feedback can prompt companies to enhance their practices, ensure that customer concerns are adequately addressed, and refine their systems for handling unethical behavior. This ongoing dialogue helps maintain a high standard of accountability and responsiveness within businesses.

Finally, staying informed about anti-bribery and whistleblowing standards equips customers to make better decisions and advocate for ethical practices. By educating themselves about the relevant standards and practices, customers can better understand the principles behind these policies and support companies that align with their values. This knowledge empowers customers to not only make informed choices but also to advocate effectively for higher ethical standards within the businesses they interact with.

### **5.3 Project Limitations**

The investigation into the implementation of ISO 37001 and ISO 37002 at PT Pertamina (Persero) is subject to several limitations that may impact the depth and breadth of the findings. First, the project's scope is constrained by the limited access to detailed internal data and proprietary information. Given the sensitive nature of anti-bribery and whistleblowing systems, obtaining comprehensive and accurate data can be challenging. This limitation might affect the ability to fully assess the effectiveness of the standards and the actual integration of these systems across all levels of the organization.

Additionally, the project's reliance on SWOT analysis, the TOWS matrix, and gap analysis introduces inherent limitations in the assessment process. These methodologies, while valuable, may not capture the full complexity of the challenges faced by Pertamina. For example, the subjective nature of SWOT analysis could result in biases, and the TOWS matrix might not fully account for unforeseen variables that affect the implementation and effectiveness of the standards. Similarly, gap analysis is dependent on the accuracy of the information provided and may not fully address all discrepancies between the standards and Pertamina's practices.

Another significant limitation is the relatively short project timeline of five months. This period may not allow for an in-depth longitudinal study or the opportunity to observe long-term effects of the implemented standards. The time frame might restrict the ability to thoroughly evaluate the sustained impact of ISO 37001 and ISO 37002 on Pertamina's anti-bribery and whistleblowing systems. Moreover, the five-month duration limits the scope for extensive iterative feedback and adjustments that could further refine the implementation process and ensure a more robust assessment.

Finally, the project's focus on Pertamina specifically may limit the generalizability of the findings. The unique organizational structure, industry context, and local operational practices of Pertamina might mean that the challenges and solutions identified are not directly applicable to other organizations or industries. This limitation could affect the extent to which the

recommendations and insights from the project can be extrapolated to broader contexts or different entities.

#### **5.4 Future Project Suggestions**

Given the limitations encountered in the investigation of ISO 37001 and ISO 37002 implementation at PT Pertamina (Persero), future projects could benefit from several strategic adjustments to enhance their scope and impact. To address the challenge of limited access to detailed internal data, future projects should consider incorporating more comprehensive data collection methods and securing greater access to proprietary information. This could involve establishing stronger collaboration with internal stakeholders to facilitate data sharing while ensuring confidentiality. Enhanced data collection and access will enable a more thorough evaluation of the effectiveness and integration of anti-bribery and whistleblowing systems.

Expanding the methodological approach beyond SWOT analysis, the TOWS matrix, and gap analysis could provide a more nuanced understanding of implementation challenges. Future research might incorporate additional methodologies, such as longitudinal studies, case comparisons, and qualitative interviews, to capture the complex dynamics affecting the application of these standards. By employing a combination of methodologies, researchers can mitigate biases, account for unforeseen variables, and obtain a richer, more comprehensive assessment of the standards' impact and effectiveness.

To overcome the limitation of the short project timeline, future projects should consider extending their duration to allow for more in-depth analysis and long-term observation. A longer timeframe would facilitate the monitoring of sustained impacts and provide opportunities for iterative feedback and refinement of implementation strategies. This extended period would enable researchers to assess the long-term effects of ISO 37001 and ISO 37002, making the evaluation more robust and reflective of real-world outcomes.

Lastly, addressing the issue of generalizability, future projects could benefit from a broader comparative analysis involving multiple organizations across various industries. By examining the implementation of anti-bribery and

whistleblowing standards in diverse organizational contexts, researchers can identify common challenges and effective strategies, enhancing the applicability of their findings. This broader approach will facilitate the development of more universally applicable recommendations and insights, extending the impact of the research beyond a single organizational context.

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# APPENDICES

## Appendix 1: Anti-Bribery Management System as Per ISO 37001:2016



**Appendix 2: Anti-Bribery Management System as Per ISO 37001:2016**



## Appendix 3: Certificate of Registration Anti-Bribery Management System



# Certificate of Registration

ANTI-BRIBERY MANAGEMENT SYSTEM - ISO 37001:2016

This is to certify that:

PT Pertamina Geothermal Energy  
Graha Pertamina - Tower Pertamax Lantai 7  
Jl. Medan Merdeka Timur No. 11-13  
Gambir, Jakarta Pusat 10110  
Indonesia

Holds Certificate No:

**IABMS 739131**

and operates an Anti-Bribery Management System which complies with the requirements of ISO 37001:2016 for the following scope:

The Provision of Geothermal Energy Including Business Process Related to Portfolio and Business Development, Exploration, Exploitation, Drilling, Project Development Covering Project Management On Hululais, Supply Chain Management/Procurement, Human Capital, Corporate Secretary on Corporate Social Responsibility and Licensing Activity and Information and Communication Technology in Head Office

For and on behalf of BSI:

Managing Director BSI Indonesia

Original Registration Date: 2020-11-26

Latest Revision Date: 2021-12-09

Effective Date: 2021-12-09

Expiry Date: 2023-11-25

Page: 1 of 2



...making excellence a habit.™

Appendix 4: PT Asuransi Tugu Pratama Indonesia Tbk Anti-Bribery

UD 2024.06.01

ERTIFIKAT ◆ CERTIFICATE ◆ CERTIFICADO ◆ CERTIFIKAT ◆ 認 證 書 ◆ CERTIFICATE ◆ CERTIFICATE ◆ ERTIFIKAT



# CERTIFICATE

The Certification Body  
of PT TÜV SÜD Indonesia  
certifies that

**PT Asuransi Tugu Pratama Indonesia Tbk**  
Wisma Tugu I  
Jl. HR Rasuna Said Kav. C 8-9  
Jakarta 12920  
Indonesia

has established and applies  
an Anti-bribery Management System for

**Anti-Bribery Management System in the Procurement, Claim,  
and Human Capital Process**

Proof has been furnished that the requirements  
according to

**ISO 37001 : 2016**

are fulfilled. The certificate is valid from 2024-05-20 to 2027-05-19  
Certificate Registration No. 2023-6-0006  
Date of Print : 2024-05-20

  
Yuan Handayana  
President Director

  
TUV  
SUD  
ISO 37001

  
KAN  
Komite Akreditasi Nasional  
LSSMAP-024-IDN

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**Appendix 5: ISO 37001:2016 PT Tugu Reasuransi Indonesia**

