

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



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Individual Project  
MBA Final Thesis Defense

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# Photographic Evidence with Pertamina



## Abstract



## Introduction

Industry Background, Company Background, Problem Background, Expected Output



## Evidence Review

Related Theories, GCG, Anti Bribery Management, WBS, Synergy and Coordination



## Methodology

Strategic Business Methods, Project Timeline, Deliverables, Project Flow



## Findings, Analysis, Discussion



## Conclusion and Recommendations



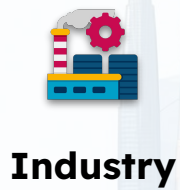
## References

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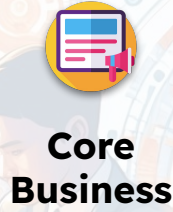
<b>Project Overview &amp; Industry</b>	<p>This project investigates the implementation of ISO 37001 and ISO 37002 at PT Pertamina (Persero) within the oil and gas industry, with a focus on anti-bribery management and whistleblowing systems. It addresses challenges such as difficulties in applying the 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. Thus, future projects should enhance data collection, use varied methods, and extend timelines.</p>
<b>Problems</b>	
<b>Objectives / Expected Output</b>	
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<b>Timeline</b>	
<b>Deliverables</b>	
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<b>Limitations &amp; Future Project Suggestions</b>	

# Abstract

**Keywords:** *Good Corporate Governance, anti-bribery management system, whistleblowing management systems, Synergy*



Industry



**Aspect Focus**



**Anti-Bribery Management System**



**Whistleblowing Management System**

# Introduction

## Industry Background

- **Industry Context:** Pertamina operates in the oil and gas sector.
- **Project Focus:** This case study centers on anti-bribery and whistleblowing management system.

# Company Background

**PT Pertamina**, established as Indonesia's strategic energy holding company in 2020, has evolved over six decades from managing domestic oil fields to becoming a global player in energy, committed to national energy independence and future growth through significant investments and strategic acquisitions.



## 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



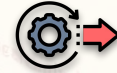
## Mission

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



## Values

- Trustworthy** : Upholding the trust entrusted to us.
- Collaborative** : Building synergistic partnerships.
- Harmonious** : Caring and respecting differences.
- Loyal** : Dedicated and prioritizing the interests of the nation and country.
- Adaptive** : Continuously innovating and enthusiastically navigating or facing change.
- Competent** : Committed to learning and developing capabilities.



## Problem Background

## Research Questions

## Objectives

1

**Implementation challenges** highlight the difficulties Pertamina faces in applying ISO 37001 and ISO 37002

1

How can Pertamina overcome the main difficulties in applying ISO 37001 and ISO 37002?

1

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

2

**Evaluating** how effectively ISO 37001 and ISO 37002 enhance the Anti Bribery and WBS system at Pertamina compared to international standards.

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?

2

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

3

**Effectiveness of collaboration** between Pertamina's holding company, subsidiaries, and affiliates in implementing ISO 37001 and ISO 37002.

3

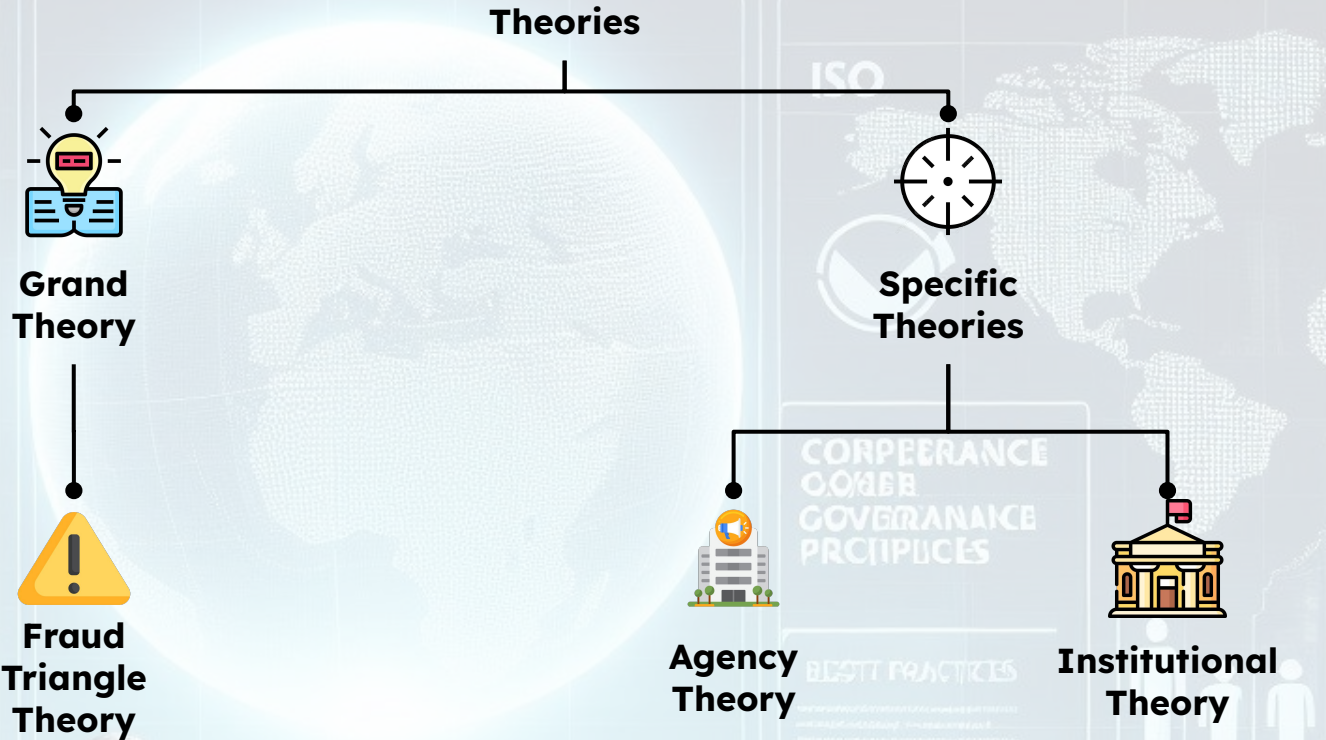
How can Pertamina's Holding Company, subsidiaries, and affiliates enhance their collaboration in implementing ISO 37001 and ISO 37002?

3

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



## Evidence Review Related Theories



Financial fraud occurs when **pressure, rationalization, and opportunity** intersect, creating the conditions for dishonest behavior. (Cressey, 1953; Suryandari et al., 2023)

Key framework in economics and finance that examines the dynamics between the principal and the agent within a corporation (Jensen & Meckling, 1976).

Explores how established **norms, values, and social conventions** shape organizational and individual behavior (DiMaggio & Powell, 1983).





**Good Corporate Governance (GCG)** is defined by transparency, accountability, responsibility, independence, and fairness, ensures effective and ethical company management. (Ministry of State-Owned Enterprises of the Republic of Indonesia, 2023; Karsono, 2023)



**Anti-Bribery Management System (ABMS)** aligned with **ISO 37001** prevents, detects, and addresses bribery through comprehensive policies and controls, ensuring ethical standards and regulatory compliance. (ISO 37001; Putri et al., 2022; Ali et al, 2024)



**Whistleblowing System** ensures transparency and accountability by allowing secure, confidential reporting of unethical or illegal activities without fear of retaliation, with **ISO 37002:2021** providing a structured framework for managing such systems, emphasizing confidentiality, protection against retaliation, and effective reporting processes. (ISO 37002; Kartika, 2024; Andriansyah, 2024)



**Synergy and coordination** are pivotal concepts in organizational management, essential for enhancing efficiency and achieving collective goals. (Castañer and Oliveira, 2020; Rosanti, 2022)



## Evidence Review



The project includes **Pertamina to obtain ISO 37001 and 37002 certification and solve issues related to synergy and coordination**

# Strategic Business Method



## SWOT Analysis

Identifies an organization's Strengths, Weaknesses, Opportunities, and Threats to aid strategic planning. (Kumar, 2023)



## TOWS Matrix

Extends SWOT analysis by matching internal Strengths and Weaknesses with external Opportunities and Threats to develop strategic options. (Dandage et al, 2019)



## Gap Analysis

Identifies the difference between current performance and desired goals to determine necessary improvements. (Surianugraha et al, 2020)



## ISO 37001

Standard for anti-bribery management systems to prevent, detect, and address bribery.



## ISO 37002

Guidelines for effective whistleblowing management systems to ensure integrity and protect whistleblowers.

# Source of Data

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**Data Source**



**Aspect**



**Description**

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→ **Primary**

- Interview
- FGD
- Case Study






Data collection for ISO 37001 and ISO 37002 includes interviews for insights, focus group discussions for common themes, and case studies to assess implementation challenges and impacts on governance.

→ **Secondary**

- Journal
- Book
- Legal Regulations

Provides peer-reviewed articles on governance and ISO standards, comprehensive books, and legal regulations on national and international anti-bribery compliance.

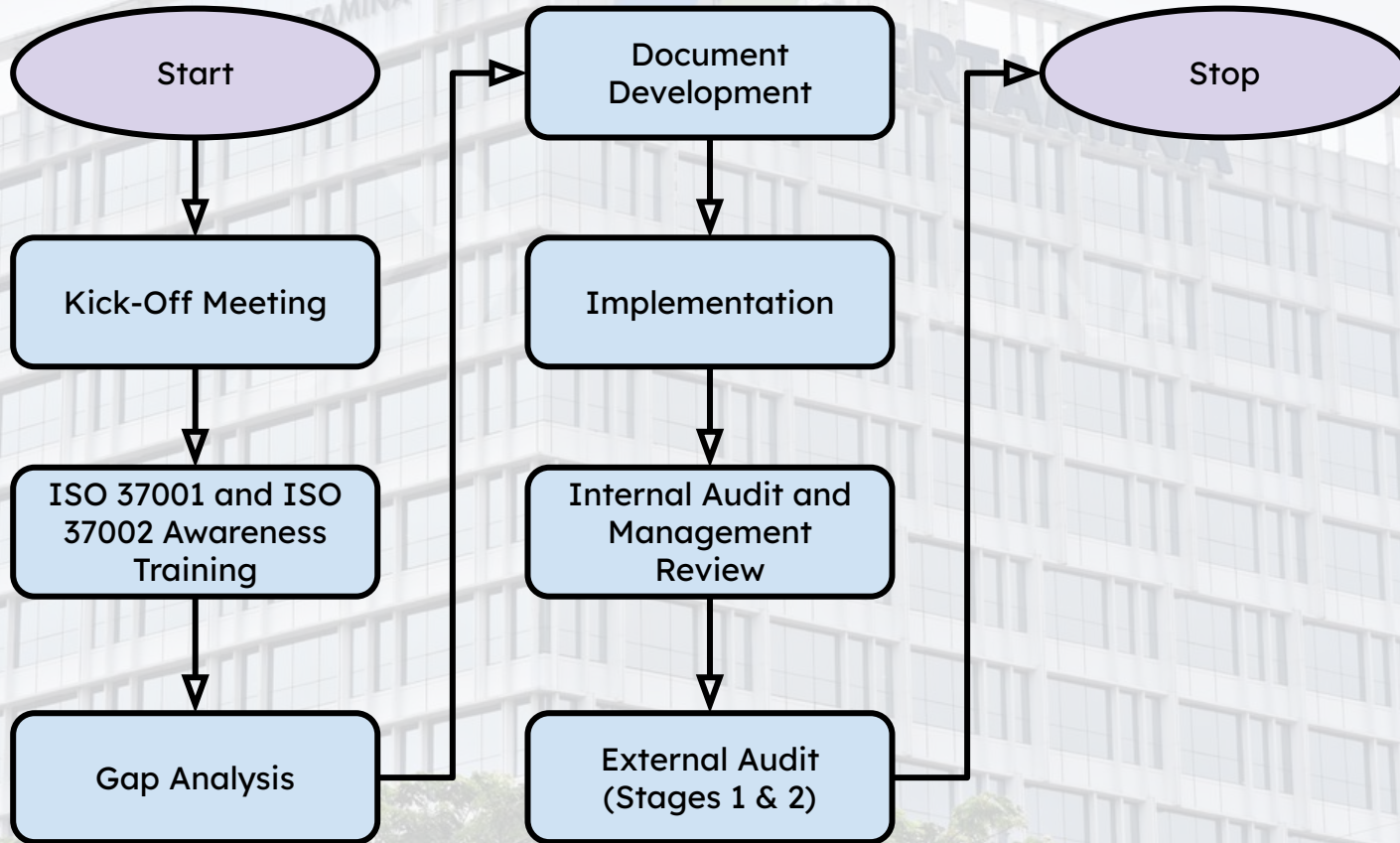
# Relevant Departments

Company	Department	Job Description
Pertamina Pusat	 <p>Quality Assurance (QA)</p>	<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>
	 <p>Whistleblowing System (WBS)</p>	<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>
Pertamina Power	 <p>Internal Audit</p>	<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	 <p>Compliance</p>	<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	 <p>Internal Audit</p>	<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>

# Project Timeline

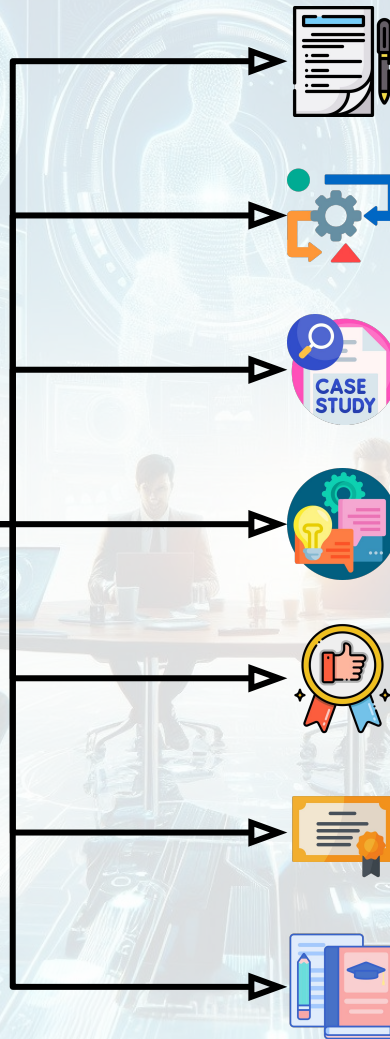
Month	Agenda	Description
1	Kick-Off Meeting	Final Schedule and Agreements
	ISO 37001 and 37002 Awareness Training	Training Certification
	Gap Analysis	Gap Analysis Report
2	Drafting Documents (Manuals, Policies, SOPs, etc.)	Draft Manuals, Policies, SOPs, Work Instructions
	Approval of Documents	Approved Manuals, Policies, SOPs, Work Instructions
	Document Awareness Training	Proof of Document Training
3	Implementation of Documents	Evidence of ISO 37001 and 20400 Implementation
	Monitoring and Improvements	Implementation Refinements, Effectiveness Report
4	Internal Audit Training	Training Certificates, Audit Methodology Understanding
	Conducting Internal Audit	Internal Audit Report
	Management Review	Management Review Report
	Preparation for Stage 1 External Audit	Stage 1 Audit Preparation
5	Stage 1 External Audit	Stage 1 Audit Report
	Addressing Stage 1 Findings	Report on Stage 1 Audit Findings
	Stage 2 External Audit	Stage 2 Audit Report
	Addressing Stage 2 Findings	Report on Stage 2 Audit Findings
6	Project Continuity Review	Continuity and Sustainability Plan
	Ongoing Monitoring and Improvement	Continuous Improvement Reports

# Project Flow





# Deliverables



**Summary:** Overview of research on GCG, ISO 37001, and ISO 37002, emphasizing their role in promoting transparency and ethical conduct.



**Methodology:** Details on research methods, data collection, sampling, and addressing limitations for robust findings.



**Case Study:** Analysis of ISO 37001 and ISO 37002 implementation at Pertamina, including challenges, strategies, and results.



**Findings and Discussion:** Presentation and interpretation of data, assessing the impact on Pertamina's governance practices.



**Recommendations:** Practical suggestions for improving GCG and anti-bribery measures at Pertamina.



**Certification:** Issuance of certificates to Pertamina holdings for compliance with ISO standards, validating their ethical achievements.



**Final Thesis:** Comprehensive report integrating research summary, methodology, case study, findings, recommendations, and certification details.

# SWOT Analysis



## Strengths

- **Leadership and Management Support:** Strong commitment from top management to implement anti-bribery and whistleblowing standards.
- **Internal Resources:** Skilled and experienced personnel in risk management and compliance.
- **Integrated Organizational Structure:** A structure that allows for coordination between the holding company, subsidiaries, and affiliates.
- **Previous Experience:** Experience in implementing various international standards can support the adoption of ISO standards



## Weakness

- **Coordination Among Entities:** Challenges in achieving effective synergy between the holding company and its related entities.
- **Resistance to Change:** Potential resistance from staff towards new procedures and policies.
- **Lack of Specific Knowledge:** Limited in-depth knowledge of ISO 37001 and ISO 37002 within some parts of the organization.



## Opportunities

- **Enhanced Reputation:** Implementing these standards can improve Pertamina's reputation as a company committed to integrity and transparency.
- **Improved Internal Processes:** Opportunity to enhance internal processes and policies related to anti-bribery and whistleblowing systems.
- **Capability Development:** Opportunity to develop internal capabilities and expertise in compliance.
- **Compliance to Legal Regulations:** To Enhance reputation, avoid penalties, and improve operational efficiency by aligning with industry standards and fostering stakeholder trust



## Threats

- **Implementation Challenges:** Difficulties in consistently implementing the standards across different entities.
- **Regulatory Changes:** Risk of changes in regulations or policies that may impact compliance with ISO standards.
- **Potential Evasion:** Risk of externals or individuals/groups attempting to circumvent the anti-bribery or reporting systems.
- **Implementation Costs:** Financial burden associated with training, technology, and audits, which could impact the company's budget.



# TOWS Matrix



## Strengths



## Weakness



## Opportunities

### SO

- **Leverage Leadership and Management Support:** Use strong management backing to drive widespread adoption of ISO standards, promoting Pertamina's reputation for integrity and transparency in international markets.
- **Capitalize on Previous Experience:** Apply past experience with international standards to effectively implement ISO 37001 and ISO 37002, enhancing internal processes and seizing opportunities for global market access.

### WO

- **Utilize Internal Resources to Address Implementation Challenges:** Deploy skilled personnel to overcome difficulties in consistent implementation and address potential regulatory changes.
- **Overcome Resistance by Developing Internal Capabilities:** Address resistance to change by focusing on capability development.

### ST

- **Overcome Lack of Specific Knowledge Through Training:** Address gaps in knowledge by implementing comprehensive training programs to build expertise in ISO 37001 and ISO 37002, thereby improving internal processes and policies.
- **Mitigate Coordination Issues with Structured Programs:** Develop structured coordination programs to enhance collaboration among entities, leveraging opportunities to improve processes and internal capabilities.

### WT

- **Manage Resistance to Change with Communication:** Address potential resistance from staff by establishing clear communication and change management strategies to ensure smooth adoption of new procedures.
- **Prepare for Regulatory Changes with Flexible Planning:** Develop flexible implementation plans and contingency strategies to adapt to potential regulatory changes, minimizing the impact of external threats on compliance efforts.



## Threats

# Gap Analysis

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.

- **Previous State:** Partial anti-bribery measures, inadequate whistleblowing mechanisms, limited employee awareness, inconsistent policies, and lack of whistleblower confidentiality.

- **Current State:** Full implementation of ISO 37001 and ISO 37002, established training programs, standardized policies, whistleblower protections, and clear feedback mechanisms.

- **Recommendations:** Monitor effectiveness, conduct refresher training, perform audits, promote whistleblowing, and ensure transparency in investigations.



## CONCLUSION

### For Problem 1

Implementation challenges highlight the difficulties Pertamina faces in applying ISO 37001 and ISO 37002

**Create a Clear Strategy and Provide Training:** Develop a comprehensive strategy for implementation and offer targeted training to staff to ensure proper understanding and application of the standards.

### For Problem 2

Evaluating how effectively ISO 37001 and ISO 37002 enhance the Anti Bribery and WBS system at Pertamina compared to international standards.

### Conduct Rigorous Assessments and Develop Metrics:

Implement rigorous assessments to evaluate the effectiveness of the standards and define clear, measurable compliance metrics based on international benchmarks.

### For Problem 3

Effectiveness of collaboration between Pertamina's holding company, subsidiaries, and affiliates in implementing ISO 37001 and ISO 37002.

**Foster Transparency and Enhance Collaboration:** Address resistance by fostering a culture of transparency, improving communication, aligning processes across subsidiaries, and conducting regular audits to ensure effective integration of the systems.

# Recommendations



## For Organizations

- **Develop a clear strategy** with timelines, resources, and responsibilities for ISO 37001 and ISO 37002 implementation.
- **Promote a culture of integrity** through training, communication, and leadership commitment.
- **Regularly monitor and evaluate** anti-bribery and whistleblowing systems via internal audits and performance metrics.
- **Enhance collaboration** across subsidiaries with centralized guidelines and regular updates.



## For the Industry

- **Standardize best practices** with comprehensive industry-wide guidelines and benchmarks.
- **Encourage knowledge sharing** through conferences and collaborative platforms.
- **Align industry standards** with regulatory bodies to simplify compliance.
- **Invest in technology and innovation** to advance anti-bribery and whistleblowing practices.



## For the Business

- **Develop a strategic plan** with clear timelines, resources, and responsibilities for ISO 37001 and ISO 37002.
- **Foster a culture of integrity** with regular training and leadership commitment.
- **Conduct regular audits and reviews**, using performance metrics to drive improvements.
- **Ensure consistent application of standards** across all entities through structured communication and coordination.



## For Customers

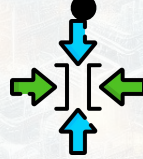
- **Demand transparency** from businesses regarding anti-bribery and whistleblowing policies.
- Support companies committed to **high ethical standards**.
- **Provide feedback** on ethical practices and reporting mechanisms.
- **Stay informed** about standards to make better decisions and advocate for ethical practices.

# Project Limitations



## Limited Data Access

Restricted access to internal and proprietary data may hinder a comprehensive assessment of the standards' effectiveness and integration.



## Methodological Constraints

The use of SWOT analysis, the TOWS matrix, and gap analysis may not fully capture the complexities of the implementation challenges, with potential biases and overlooked variables.



## Timeline

The five-month project duration may not allow for an in-depth longitudinal study or the evaluation of long-term effects, limiting iterative feedback and adjustments.



## Specific Focus

The findings may be less generalizable due to Pertamina's unique organizational structure and industry context, potentially limiting broader applicability.



## Future Project Suggestions



### Improve Data Access

Enhance data collection and stakeholder collaboration.



### Expanded Methodologies

Use diverse approaches like longitudinal studies and interviews.



### Broaden Scope

Include multiple organizations to enhance generalizability.

# References

<b>Legal Regulations</b>	<b>1</b>
<b>Journals</b>	<b>17</b>
<b>Websites</b>	<b>3</b>
<b>Books</b>	<b>1</b>
<b>Total</b>	<b>22</b>

## Insights

The references provide crucial insights for PT Pertamina's project, supporting both essential information and project continuity.

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**Thank you!**







# Checklist for Gap Analysis and Proof of Compliance with ISO 37001



LAPORAN DAN CHECKLIST GAP ANALISIS ISO 37K									
NO	NAMA DOKUMEN	KLAUSUL	REFERENSI DOKUMEN EXISTING	FUNGSI TERKAIT	DIISI PENILAI/AUDITOR/KONSULTAN				KETERANGAN/ToDo List
					STATUS	BOBOT (1-5)	RATING (0-1)	SKOR	
1	Tindak Lanjut hasil audit eksternal sebelumnya	10	Laporan hasil audit eksternal	FKAP	Tidak Cukup Bukti	4	0	0	Perlu delusuri lebih lanjut
<b>KONTEKS ORGANISASI (KLAUSUL 4)</b>									
2	Update dokumen hasil audit eksternal sebelumnya	4.1	Isu Internal dan eksternal	COE / HSSE / Corsec	Tidak Cukup Bukti	4	0	0	Perlu update dokumen isu internal dan eksternal
3	Update dokumen Kebutuhan dan Harapan stakeholder terkait anti penyuapan	4.2	Dokumen kebutuhan dan harapan stakeholder	COE / HSSE / Corsec	Tidak Cukup Bukti	4	0	0	Perlu update dokumen kebutuhan dan harapan stakeholder
4	Dokumen pernyataan penetapan ruang lingkup implementasi SMAP di organisasi	4.3	Nolueni rapat direksi Pedoman SMAP bab ruang lingkup	Corsec	Cukup Bukti	1	1	1	Done
5	Dokumen proses bisnis perusahaan, terutama terkait dengan ruang lingkup yang implementasikan/sertifikasi	4.4	Bisnis Proses, Pedoman SMAP	COE / HSSE / Corsec	Cukup Bukti	1	1	1	Done

LAPORAN DAN CHECKLIST GAP ANALISIS ISO 37K									
<p>PT Pertamina Geothermal Energy Gedung Pertamina - Tower Pertamina Lantai 7 Jl. Medan Merdeka Timur No. 11-13 Gedung Jakarta Pusat 10110 Indonesia</p> <p>Hasil Certificate No: <b>IABMS 729131</b> and operates an Anti-Bribery Management System which complies with the requirements of ISO 37001:2016 for the following scope:</p> <p>The Provision of Geothermal Energy Including Business Process Related to Portfolio and Business Development, Exploration, Exploitation, Drilling, Project Development, Covering Project Management, On-Hoisting, Supply Chain Management, Procurement, Human Capital, Corporate Secretary or Corporate Social Responsibility and Licensing Activity and Information and Communication Technology in Head Office</p> <p>For and on behalf of BSI: Managing Director BSI Indonesia</p> <p>Original Registration Date: 2020-11-26 Latest Revision Date: 2023-12-09</p> <p>Effective Date: 2023-12-09 Expiry Date: 2025-11-25</p> <p>Page: 1 of 2</p> <p>...making excellence a habit.™</p>									

# Checklist for Gap Analysis and Proof of Compliance with ISO 37002

LAPORAN DAN CHECKLIST GAP ANALYSIS ISO 37002								
NAMA DOKUMEN	KLAUS	REFERENSI DOKUMEN EXISTING	FUNGSI TERK	DI	ENILAI/AU	R/KONSULT		
<p>e. Memuat tata cara pelaporan melalui jalur alamat pos dsb</p>		Pengaduan						
<p>23 Terdapat tata cara dan bukti untuk melakukan penilaian dari laporan tindakan yang salah, meliputi: a. Tata cara penilaian untuk memastikan impartial assesment, triage dan manajemen laporan b. Tata cara penilaian dan pencegahan dari risiko perilaku yang merugikan</p>	8,3	<p>1. sub bab analisis awal laporan pengaduan pada Dokumen Kebijakan Interim SMPP 2. Pedoman Pengelolaan Pengaduan</p>	FMPP	Cukup Bukti	5	1	5	Done
<p>24 Terdapat tata cara addressing report dari perilaku yang salah, memuat: a. Addressing laporan perilaku yang salah b. Perlindungan dan dukungan pada whistleblower c. Addressing perilaku yang merugikan d. Perlindungan pada subjek terlapor e. Perlindungan pada stakeholder terkait</p>	8,4	<p>1. sub bab penanganan pengaduan pada Dokumen Kebijakan Interim SMPP 2. Pedoman Pengelolaan Pengaduan</p>	FMPP	Tidak Cukup Bukti	5	0	0	<p>1. NDA untuk investigator terkait impartiality (akan dimasukkan ke PI jika dalam pedoman investigasi yang terkini belum memasukkan) 2. Output: Laporan LHA 3. Remediasi perlu di up (akan dimasukkan dalam prosedur interim)</p>
<p>25 Terdapat tata cara menyimpulkan kasus Whistleblowing</p>	8,5	<p>1. sub bab penyelesaian laporan pengaduan pada Dokumen Kebijakan Interim SMPP 2. Surat Keputusan Perlindungan terhadap pelapor dugaan pronsip tata kelola perusahaan yang baik</p>	FMPP	Tidak Cukup Bukti	5	0	0	<p>1. Resume hasil penanganan (RHP) 2. Monitoring hasil LHA 3. Masukkan dalam kalusul 8.5 tentang saran perbaikan (akan dimasukkan ke prosedur interim)</p>
<b>PERFORMANCE EVALUATION</b>								

# Letter of Formation for a Task Force within Pertamina



## **SURAT PERINTAH**

No. Prin- 27 /C00000/2019-S0

**TENTANG  
FUNGSI KEPATUHAN ANTI PENYUAPAN  
TERKAIT PENERAPAN SISTEM MANAJEMEN ANTI PENYUAPAN  
DI PT PERTAMINA (PERSERO)**

**DIREKTUR UTAMA PT PERTAMINA (PERSERO)**

- Menimbang:**
1. Bahwa PT Pertamina (Persero) ("Pertamina") telah berkomitmen untuk menerapkan Sistem Manajemen Anti Penyusapan ("SMAP") berdasarkan ISO 37001 sebagai salah satu upaya pencegahan tindak pidana korporasi oleh Pertamina sesuai Risalah Rapat Direksi Pertamina No. RRD-036/C00000/2018-S0 tanggal 20 Maret 2018 perihal Penerapan ISO 37001:2016 tentang SMAP.
  2. Bahwa berdasarkan Surat Perintah Direktur Utama Pertamina No. Prin-24/C00000/2018-S0 tanggal 9 Juli 2018, Fungsi Procurement

## Inputs from Dr Yulita



There must be clear **research objectives**.

DONE



**The project timeline must include specific dates** and should not be copied directly from the project's original timeline. It must adhere to the guidelines and be tailored for the thesis.

DONE



**References should be diverse**; do not rely on just one source.

DONE