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Prime Lending Rate

Prime Lending Rate
31 March 2024

Based on Business Segmentation	Prime Lending Rate(%)
Corporate Lending	8.06 %
Retail Lending	9.07 %
Micro Lending	NIHIL
Consumption Lending	8.51 %
	KPR(Mortgage)
	Non Mortgage
	NIHIL

Credit Card



Announcement

- New Service La
- Corporate Social
- Bancassurance
- Bank ICBC Indo

FX Rate

2024-04-17 18:35:56

Currency	Buy	Sell
USD	16070.00	16370.00

05

Tata Kelola Perusahaan

Corporate Governance

Tata Kelola Perusahaan

Corporate Governance



PENDAHULUAN

Bagi Bank ICBC Indonesia, penerapan tata kelola perusahaan yang baik (*Good Corporate Governance* – GCG) dalam era persaingan global saat ini, sudah menjadi kebutuhan yang mutlak dalam menjalankan segala kegiatan usaha Bank. Dengan adanya penerapan GCG maka Bank telah memiliki fondasi yang kokoh dan bekal yang cukup untuk mencapai visi dan misi Bank, serta mampu menjadi perusahaan yang tangguh dan terus berkembang.

Untuk itu, Bank senantiasa berupaya menyempurnakan penerapan praktik-praktik terbaik GCG pada seluruh tingkatan organisasi secara berkesinambungan. Bank menyadari bahwa GCG merupakan salah satu komponen utama dalam rangka meningkatkan kinerja Bank, melindungi kepentingan para pemangku kepentingan, dan meningkatkan kepatuhan terhadap peraturan perundang-undangan, serta nilai-nilai etika yang berlaku umum pada industri perbankan.

FOREWORD

For Bank ICBC Indonesia, the implementation of Good Corporate Governance (GCG) in today's global competitive era is a much-needed element in undertaking The Bank's business activities. The GCG implementation will enable The Bank to create solid foundation and adequate endeavor to achieve The Bank's vision and mission, as well as to become a sustainable strong corporation.

Therefore, The Bank strives to refine the sustainable implementation of its GCG best practices in all levels of organization. The Bank realizes that GCG becomes one of the main components in the improvement of The Bank's performance, to protect the stakeholders' interests, and enhance compliance with prevailing regulations and ethics values in the banking industry.

DASAR PENERAPAN TATA KELOLA PERUSAHAAN

Penerapan GCG Bank berdasarkan pada peraturan perundangan-undangan berikut:

Undang-Undang (UU) Republik Indonesia:

1. UU No. 10 Tahun 1998 tentang Perubahan atas Undang-Undang No. 7 Tahun 1992 tentang Perbankan;
2. UU No. 40 Tahun 2007 tentang Perseroan Terbatas;
3. UU No. 25 Tahun 2007 tentang Penanaman Modal;
4. UU No. 27 Tahun 2022 tentang Perlindungan Data Pribadi.

Peraturan Otoritas Jasa Keuangan (POJK)

1. POJK No. 17 Tahun 2023 tanggal 14 September 2023 tentang Penerapan Tata Kelola bagi Bank Umum;
2. SEOJK No. 13/SEOJK.03/2017 tanggal 17 Maret 2017 tentang Penerapan Tata Kelola bagi Bank Umum;
3. POJK No. 45/POJK.03/2015 tanggal 23 Desember 2015 tentang Penerapan Tata Kelola dalam Pemberian Remunerasi bagi Bank Umum;
4. POJK No. 4/POJK.03/2016 tanggal 26 Januari 2016 tentang Penilaian Tingkat Kesehatan Bank Umum;
5. POJK No. 18/POJK.03/2016 tanggal 16 Maret 2016 tentang Penerapan Manajemen Risiko bagi Bank Umum;
6. POJK No. 46/POJK.03/2017 tanggal 12 Juli 2017 tentang Pelaksanaan Fungsi Kepatuhan Bank Umum;
7. POJK No. 51/POJK.03/2017 tanggal 18 Juli 2017 tentang Penerapan Keuangan Berkelanjutan bagi Lembaga Jasa Keuangan, Emiten, dan Perusahaan Publik;
8. POJK No. 37/POJK.03/2019 tanggal 19 Desember 2019 tentang Transparansi dan Publikasi Laporan Bank;
9. POJK No. 12/POJK.03/2020 tanggal 16 Maret 2020 tentang Konsolidasi Bank Umum;
10. POJK No. 63/POJK.03/2020 tanggal 22 Desember 2020 tentang Pelaporan Bank Umum Melalui Sistem Pelaporan Otoritas Jasa Keuangan;
11. POJK No. 12/POJK.03/2021 tanggal 30 Juli 2021 tentang Bank Umum;
12. SEOJK No. 40/SEOJK.03/2016 tanggal 26 September 2016 tentang Penerapan Tata Kelola dalam Pemberian Remunerasi bagi Bank Umum;
13. SEOJK No. 13/SEOJK.03/2017 tanggal 17 Maret 2017 tentang Penerapan Tata Kelola bagi Bank Umum;

CORPORATE GOVERNANCE LEGAL REFERENCES

The Bank's GCG implementation refers to the following regulatory standards:

Law (UU) of the Republic of Indonesia:

1. Law No. 10 of 1998 on Amendment to Law No. 7 of 1992 concerning Banking;
2. Law No. 40 of 2007 concerning Limited Liability Companies;
3. Law No. 25 of 2007 concerning Capital Investment;
4. Law No. 27 Tahun 2022 concerning Personal Data Protection.

Regulation of the Financial Services Authority (POJK)

1. POJK No. 17 Year 2023 dated September 14, 2023 concerning the Implementation of Good Corporate Governance for Commercial Banks;
2. SEOJK No. 13/SEOJK.03/2017 dated March 17, 2017 concerning the Implementation of Good Corporate Governance for Commercial Banks;
3. POJK No. 45/POJK.03/2015 dated December 23, 2015 concerning Implementation of Governance in Providing Remuneration for Commercial Banks;
4. POJK No. 4/POJK.03/2016 dated January 26, 2016 concerning the Assessment of Commercial Bank Soundness Level;
5. POJK No. 18/POJK.03/2016 dated March 16, 2016 concerning Implementation of Risk Management for Commercial Banks;
6. POJK No. 46/POJK.03/2017 dated July 12, 2017 concerning the Implementation of the Compliance Function of Commercial Banks;
7. POJK No. 51/POJK.03/2017 dated July 18, 2017 concerning Implementation of Sustainable Finance for Financial Services Institutions, Issuers, and Public Companies;
8. POJK No. 37/POJK.03/2019 dated December 19, 2019 concerning Transparency and Publication of Bank Reports;
9. POJK No. 12/POJK.03/2020 dated March 16, 2020 concerning Consolidation of Commercial Banks;
10. POJK No. 63/POJK.03/2020 dated December 22, 2020 concerning Commercial Bank Reporting Through the Financial Services Authority Reporting System;
11. POJK No. 12/POJK.03/2021 dated July 30, 2021 concerning Commercial Bank;
12. SEOJK No. 40/SEOJK.03/2016 dated September 26, 2016 concerning Implementation of Governance in Providing Remuneration for Commercial Banks;
13. SEOJK No. 13/SEOJK.03/2017 dated March 17, 2017 concerning the Implementation of Governance for Commercial Banks;

Lain-lain

1. *Roadmap* Tata Kelola Perusahaan Indonesia Menuju Tata Kelola Emiten dan Perusahaan Publik yang Lebih Baik yang diterbitkan oleh OJK tanggal 4 Februari 2014;
2. Anggaran Dasar Perusahaan yang tertuang dalam Akta Pernyataan Keputusan Rapat dan Perubahan Anggaran Dasar PT Bank ICBC Indonesia No. 198 tanggal 28 Maret 2022.

PENDEKATAN TATA KELOLA PERUSAHAAN

Bank memahami bahwa industri perbankan memiliki peran penting dalam perekonomian nasional. Oleh karena itu, kualitas tata kelola yang tidak baik akan berdampak negatif bagi perekonomian nasional. Penyelenggaraan kegiatan perbankan yang baik disertai dasar penerapan GCG yang kuat akan berdampak positif terhadap kinerja Bank secara keseluruhan, yang pada akhirnya akan memperkuat posisi Bank, baik dalam persaingan industri perbankan lokal maupun global.

Penegasan yang kuat terhadap pentingnya hubungan yang harmonis antara entitas usaha dan pemangku kepentingan telah berlangsung secara berkesinambungan di Indonesia, yang didukung komitmen dari regulator dan para pemangku kepentingan lainnya. Hubungan harmonis ini diharapkan akan membentuk dunia usaha yang berkelanjutan, serta mampu berkontribusi dalam jangka panjang guna pengembangan sosial dan lingkungan di sekitarnya.

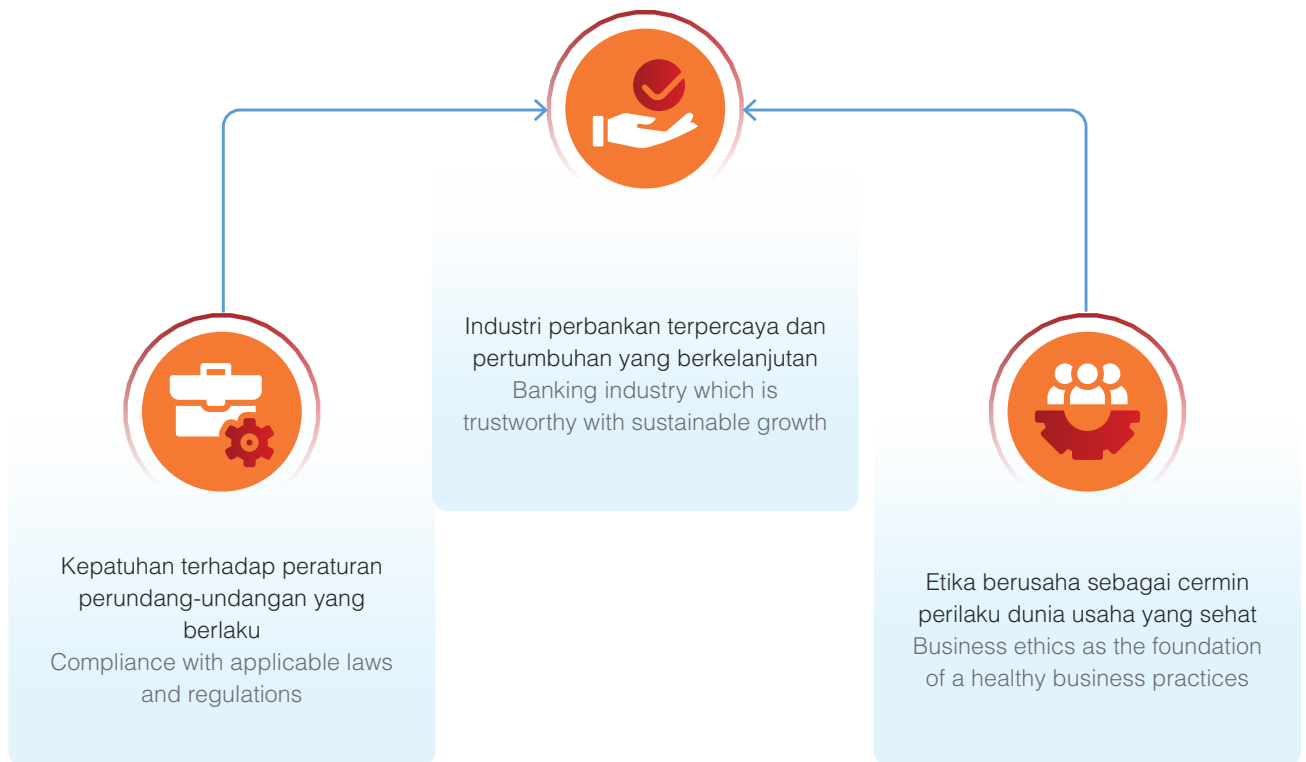
Others

1. Indonesian Corporate Governance Roadmap Towards Better Governance of Issuers and Public Companies issued by OJK on February 4, 2014;
2. The Company's Articles of Association contained in the Deed of Statement of Meeting Resolutions and Amendments to the Articles of Association of PT Bank ICBC Indonesia No. 198 dated March 28, 2022.

CORPORATE GOVERNANCE APPROACH

The Bank understands that banking industry holds a pivotal role in the national economy. Therefore, bad governance will render negative impact to our economy. Good banking implementation and strong GCG application will deliver positive performances for The Bank, which eventually will strengthen The Bank's position in the competition of local and global banking industry.

In Indonesia, the regulators together with other stakeholders render a strong affirmation of the importance of harmonious relationship between business entities and stakeholders. This harmonious relationship is expected to create a sustainable business culture, and able to contribute in the long-term for the surrounding social and environmental development.



PRINSIP-PRINSIP TATA KELOLA PERUSAHAAN

Penerapan prinsip-prinsip GCG di Bank dilandasi komitmen untuk menciptakan perusahaan yang transparan dan terpercaya melalui manajemen bisnis yang dapat dipertanggungjawabkan.

Dalam melaksanakan kinerjanya dan pada setiap pengambilan keputusan strategis, Bank terus memperhatikan dan menerapkan 5 (lima) prinsip GCG, yaitu Transparansi, Akuntabilitas, Pertanggungjawaban, Independensi, dan Kewajaran.

Penerapan prinsip-prinsip utama tersebut diyakini oleh Bank sebagai instrumen yang dapat diandalkan dalam mengatur segala aspek bisnis yang dijalankan oleh Bank melalui sistem internal yang melibatkan Dewan Komisaris, Direksi dan segenap karyawan Bank sehingga diharapkan dapat menciptakan keseimbangan dalam operasional usaha Bank secara menyeluruh.

CORPORATE GOVERNANCE PRINCIPLES

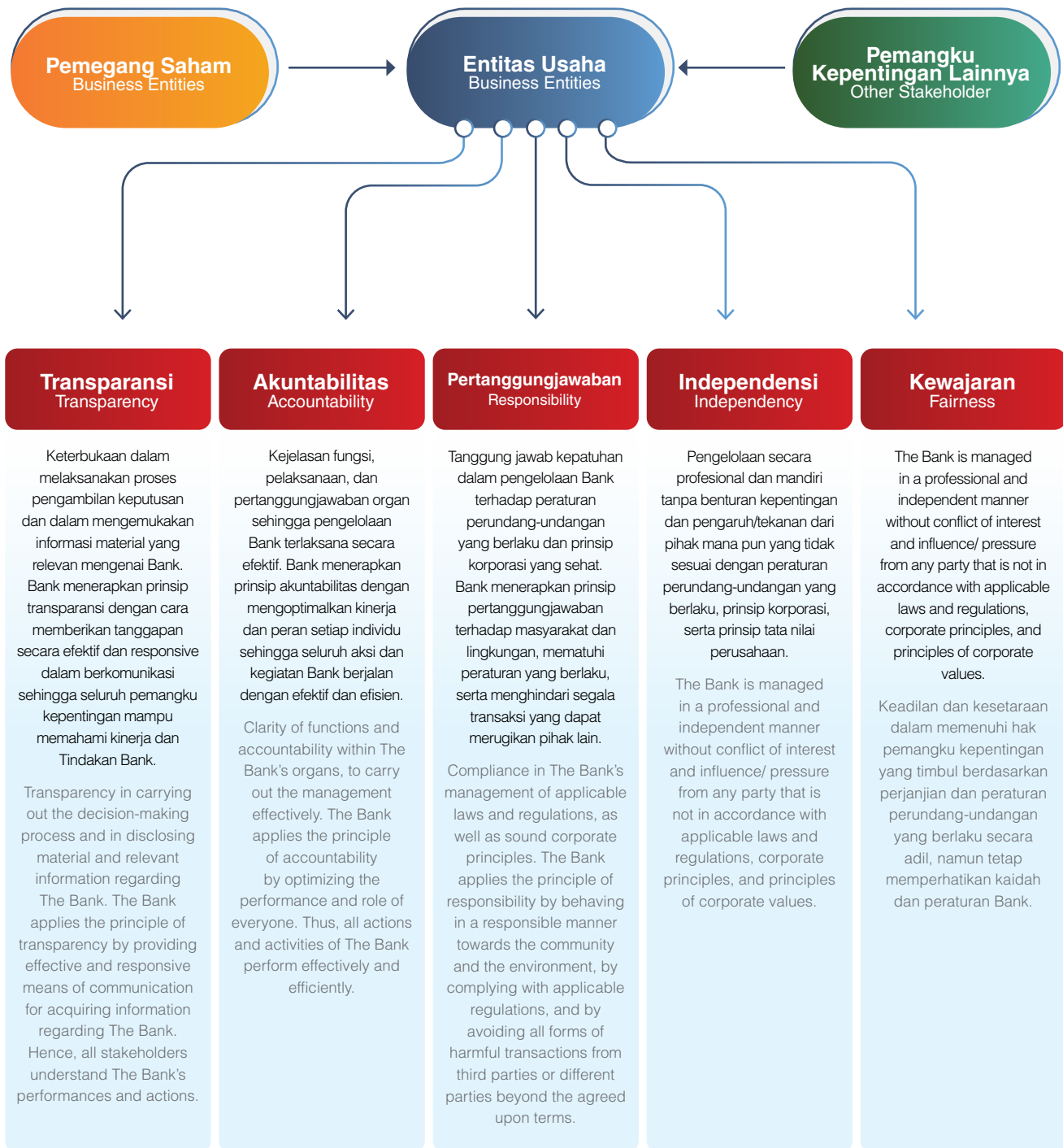
GCG principles implementation in The Bank is constituted upon the commitment to create a transparent and reliable company through accountable business management.

In its business performance and every strategic decision-making, The Bank continually takes into account on the 5 (five) GCG principles namely Transparency, Accountability, Responsibility, Independency, and Fairness.

The implementation of those principles is believed as a reliable instrument in regulating The Bank's business aspects through internal system that involves the Board of Commissioners, Board of Directors and all employees; hence is expected to deliver comprehensive balance of The Bank's business operations.

HARMONISASI ENTITAS USAHA DENGAN PEMEGANG SAHAM DAN PEMANGKU KEPENTINGAN

HARMONIOUS RELATIONS OF BUSINESS ENTITIES WITH SHAREHOLDERS AND OTHER STAKEHOLDERS



ROADMAP TATA KELOLA PERUSAHAAN

Dalam rangka meningkatkan kualitas penerapan GCG secara konsisten dan berkesinambungan, Bank telah memiliki *roadmap* GCG yang mencakup tahapan-tahapan yang telah dicapai dalam membangun nilai-nilai tata

CORPORATE GOVERNANCE ROADMAP

To improve the quality of consistent and continuous GCG implementation, The Bank has established GCG roadmap, which includes the stages that have been achieved in building the values of governance based on the provisions

kelola berdasarkan ketentuan Penerapan Tata Kelola bagi Bank Umum. Dalam 3 (tiga) tahun terakhir, Bank telah melaksanakan beberapa inisiatif dalam penyempurnaan pelaksanaan GCG sebagai berikut:

of Governance Implementation for Commercial Banks. In the last 3 (three) years, The Bank has implemented several initiatives to improve the implementation of GCG, as follows:

2021

- | | |
|--|---|
| <ol style="list-style-type: none"> 1. Penerapan prinsip-prinsip GCG secara konsisten dan berkesinambungan. 2. Pelaksanaan komite-komite di bawah Direksi sesuai dengan ketentuan yang berlaku. 3. Melakukan pengawasan atas periode reuiv ketentuan internal yang tertuang pada kebijakan, prosedur, dan/ atau pedoman, serta memonitor atas pelaksanaan sosialisasi ketentuan internal. Ketentuan internal tersebut dibuat mengikuti peraturan regulator, praktik perbankan lokal, dan pedoman dari <i>parent bank</i>. 4. Melanjutkan peningkatan <i>four-eyes principles</i> pada <i>Governance Process</i> melalui penerapan mekanisme <i>reward and punishment</i>. | <ol style="list-style-type: none"> 1. Consistent and continuous application of GCG principles. 2. Implementation of committees under the Board of Directors in accordance with prevailing regulations. 3. Supervise the reviewing of internal regulations contained in the policies, procedures, and/or guidelines, and monitor the implementation of its socialization. These internal regulations are made in accordance with regulatory provisions, local banking practices, and parent bank guidelines. 4. Continue to improve the four-eyes principles on the Governance Process through the application of reward and punishment mechanism. |
|--|---|

2022

- | | |
|---|---|
| <ol style="list-style-type: none"> 1. Penerapan prinsip-prinsip GCG secara konsisten dan berkesinambungan pada seluruh tingkatan atau jenjang organisasi. 2. Pelaksanaan komite-komite di bawah Direksi secara berkelanjutan sesuai dengan ketentuan yang berlaku. 3. Melakukan pengawasan atas periode reuiv dan kesesuaian informasi antar bagian pada ketentuan internal yang tertuang pada kebijakan, prosedur, dan/ atau pedoman, serta memonitor atas pelaksanaan sosialisasi ketentuan internal. Ketentuan internal tersebut dibuat mengikuti peraturan regulator, praktik perbankan lokal, dan pedoman dari <i>parent bank</i>. 4. Meneruskan peningkatan <i>four-eyes principles</i> pada <i>Governance Process</i> melalui penerapan mekanisme <i>reward and punishment</i> yang dilakukan reuiv secara berkala akan kesesuaian parameter pengukuran. | <ol style="list-style-type: none"> 1. Consistent and continuous application of GCG principles at all levels of the organization. 2. Implementation of committees under the Board of Directors continuously conducted in accordance with prevailing regulations. 3. Supervise the reviewing period and conformity of information between sections in internal regulations contained in the policies, procedures, and/or guidelines, and monitor the implementation of its socialization. These internal regulations are made in accordance with regulatory provisions, local banking practices, and parent bank guidelines. 4. Continue to improve the four-eyes principles on the Governance Process through the application of reward and punishment mechanism which conducted a periodic review of the suitability of measurement parameters. |
|---|---|

2023

- | | |
|---|---|
| <ol style="list-style-type: none"> 1. Penerapan prinsip-prinsip GCG secara konsisten dan berkesinambungan pada seluruh tingkatan atau jenjang organisasi. 2. Pelaksanaan komite-komite di bawah Direksi maupun komite di bawah Komisaris terus dilakukan secara berkelanjutan sesuai dengan ketentuan yang berlaku. 3. Melakukan pengawasan atas periode reuiv dan kesesuaian informasi antar bagian pada ketentuan internal yang tertuang pada kebijakan, prosedur, dan/atau pedoman, serta memonitor atas pelaksanaan sosialisasi ketentuan internal. Ketentuan internal tersebut dibuat mengikuti peraturan regulator, praktik perbankan lokal, dan pedoman dari <i>parent bank</i>. 4. Meneruskan peningkatan <i>four-eyes principles</i> pada <i>Governance Process</i> melalui penerapan mekanisme <i>reward and punishment</i> yang dilakukan reuiv secara berkala akan kesesuaian parameter pengukuran. | <ol style="list-style-type: none"> 1. Consistent and continuous application of GCG principles at all levels of the organization. 2. Implementation of committees under the Board of Directors and Board of Commissioner continuously conducted in accordance with prevailing regulations. 3. Supervise the reviewing period and conformity of information between sections in internal regulations contained in the policies, procedures, and/or guidelines, and monitor the implementation of its socialization. These internal regulations are made in accordance with regulatory provisions, local banking practices, and parent bank guidelines. 4. Continue to improve the four-eyes principles on the Governance Process through the application of reward and punishment mechanism which conducted a periodic review of the suitability of measurement parameters. |
|---|---|

IMPLEMENTASI TATA KELOLA PERUSAHAAN TAHUN 2023

Bank terus meningkatkan pelaksanaan GCG dengan praktik terbaik berlandaskan pada prinsip-prinsip GCG dan kriteria pencapaian, serta standar implementasi GCG, yang dirumuskan berdasarkan peraturan terkait, masukan dari para pemangku kepentingan, hasil *assessment* dan *benchmarking*.

CORPORATE GOVERNANCE IMPLEMENTATION IN 2023

The Bank continues to improve its GCG implementation with the best practice based on GCG principles and achievements criteria, as well as GCG implementation standards, which are formulated based on relevant laws, stakeholders' feedback, assessment and benchmarking results.

Pelaksanaan GCG menjadi salah satu perhatian utama Bank sebagai proses berkesinambungan yang terutama bertujuan untuk:

1. Meningkatkan kinerja Bank;
2. Melindungi kepentingan para pemangku kepentingan; dan
3. Meningkatkan kepatuhan terhadap peraturan perundang-undangan serta nilai etika yang berlaku umum di industri perbankan.

Pada tahun 2023, Bank telah melaksanakan pelaporan penerapan GCG yang meliputi:

1. Departemen Kepatuhan Bank telah menyampaikan laporan GCG semester I dan II tahun 2023 secara tepat waktu.
2. Penyampaian kertas kerja *self-assessment* GCG untuk semester I dan II tahun 2023, dengan pencapaian peringkat 2 (dua) yang mengindikasikan “Baik” atas kategori penerapan GCG Bank.

PELAKSANAAN SELF-ASSESSMENT TATA KELOLA PERUSAHAAN

Sesuai Surat Edaran Otoritas Jasa Keuangan (SEOJK) No. 13/SEOJK.03/2017 tentang Pelaksanaan Tata Kelola Perusahaan bagi Bank Umum, Bank melaksanakan *self-assessment* terhadap pelaksanaan GCG sesuai dengan periode penilaian *Risk-Based Bank Rating* (RBBR) yang dilakukan per semester.

Bank melaksanakan *self-assessment* GCG juga dengan tujuan mengukur kedalaman implementasi praktik GCG sekaligus mendapatkan umpan baik bagi perbaikannya di masa mendatang.

Untuk itu, Bank melaksanakan *self-assessment* terhadap 11 (sebelas) faktor penilaian pelaksanaan GCG secara berkala, yang meliputi:

1. Pelaksanaan tugas dan tanggung jawab Dewan Komisaris.
2. Pelaksanaan tugas dan tanggung jawab Direksi.
3. Kelengkapan dan pelaksanaan tugas komite.
4. Penanganan benturan kepentingan.
5. Penerapan fungsi kepatuhan.
6. Penerapan fungsi audit internal.
7. Penerapan fungsi audit eksternal.
8. Penerapan manajemen risiko termasuk sistem pengendalian internal.
9. Penyediaan dana kepada pihak terkait dan penyediaan dana besar.
10. Transparansi kondisi keuangan dan non-keuangan Bank, laporan pelaksanaan GCG dan pelaporan internal.
11. Rencana strategis Bank.

The Bank places its main concern on GCG implementation, as a continuous process that aims to:

1. Improve The Bank's performance;
2. Protect the interests of stakeholders; and
3. Improve the compliance with the prevailing laws and banking ethics values.

In 2023, The Bank has conducted GCG implementation reporting which includes:

1. The Bank's Compliance Department has submitted GCG report for the first and second semesters of 2023 in a timely manner.
2. Submission of GCG self-assessment working papers for the first and second semesters of 2023, with an achievement of rating 2 (two) indicating “Good” for The Bank's GCG implementation category

CORPORATE GOVERNANCE SELF-ASSESSMENT IMPLEMENTATION

Pursuant to the Circular Letter of Financial Services Authority (SEOJK) No. 13/SEOJK.03/2017 concerning the Implementation of Corporate Governance for Commercial Banks, The Bank carried out a self-assessment on GCG implementation in accordance with the Risk-Based Bank Rating (RBBR) evaluation period at every semester.

The Bank also conducted GCG self-assessment that aims to measure the depth of GCG practices at the same time to attain feedbacks for future improvements.

Therefore, The Bank's self-assessment is carried out periodically towards 11 (eleven) factors of GCG implementation, as follows:

1. The Board of Commissioners' duties and responsibilities implementation.
2. The Board of Directors' duties and responsibilities implementation.
3. Comprehensiveness and duties implementation of the committee.
4. Conflict of interest handling.
5. Compliance function implementation.
6. Internal audit function implementation.
7. External audit function implementation.
8. Risk management implementation including internal control system.
9. Funding to related parties and large exposures.
10. The Bank's financial and non-financial condition transparency, GCG implementation report and internal reporting.
11. The Bank's strategic plan.

Penilaian faktor-faktor GCG tersebut di atas menjadi dasar penilaian kualitas manajemen Bank atas pelaksanaan prinsip-prinsip GCG, dengan memperhatikan materialitas permasalahan terhadap penerapan GCG secara *bank-wide*, sesuai skala, karakteristik dan kompleksitas usaha Bank.

Selanjutnya, penilaian dikelompokkan dalam sistem *governance* yang terdiri dari 3 (tiga) aspek *governance*, yaitu:

1. *Governance Structure*;
2. *Governance Process*; dan
3. *Governance Outcome*.

HASIL DAN TINDAK LANJUT SELF-ASSESSMENT TATA KELOLA PERUSAHAAN

Bank telah melaksanakan *self-assessment* GCG untuk periode semester II tahun 2023 dengan hasil akhir peringkat 2 (dua) yang terkategori “Baik”. Penilaian berdasarkan 11 (sebelas) indikator dapat dilihat sebagai berikut:

The above GCG factors represent the assessment of The Bank’s management quality on GCG principles implementation, with due observance to the materiality of issues on GCG application bank-wide, according to The Bank’s business scales, characteristics and complexities.

Furthermore, the assessment is grouped under 3 (three) governance systems of the following aspects:

1. Governance Structure;
2. Governance Process; and
3. Governance Outcome.

CORPORATE GOVERNANCE SELF-ASSESSMENT RESULTS AND FOLLOW-UP

The Bank has undertaken GCG self-assessment for the second semester of 2023 with the assessment result of rating 2 (two), categorized as “Good”. The assessment was based on the following 11 (eleven) indicators:

No.	Faktor Penilaian Pelaksanaan GCG GCG Assessment Factors	Skor Score
1	Pelaksanaan tugas dan tanggung jawab Dewan Komisaris The Board of Commissioners’ duties and responsibilities implementation	1
2	Pelaksanaan tugas dan tanggung jawab Direksi The Board of Directors’ duties and responsibilities implementation	1
3	Kelengkapan dan pelaksanaan tugas komite Comprehensiveness and duties implementation of the committee	2
4	Penanganan benturan kepentingan Conflict of interest handling	1
5	Penerapan fungsi kepatuhan Compliance function implementation	2
6	Penerapan fungsi audit internal Internal audit function implementation	2
7	Penerapan fungsi audit eksternal External audit function implementation	1
8	Penerapan manajemen risiko termasuk sistem pengendalian internal Risk management implementation including internal control system	2
9	Penyediaan dana kepada pihak terkait dan penyediaan dana besar Funding to related parties and large exposures	2
10	Transparansi kondisi keuangan dan non-keuangan Bank, laporan pelaksanaan GCG dan pelaporan internal The Bank’s financial and non-financial condition transparency, GCG implementation report and internal reporting	2
11	Rencana strategis Bank The Bank’s strategic plan	2
Penilaian Peringkat Komposit GCG GCG Composite Rating Assessment		2

REKOMENDASI DAN TINDAK LANJUT BANK

Atas semua temuan Otoritas Jasa Keuangan (OJK) tahun 2022 pada kantor pusat Bank, Bank telah menindaklanjuti seluruh komitmen yang memerlukan tindakan perbaikan secara tepat waktu, di antaranya pemenuhan komitmen atas penyempurnaan kebijakan, administrasi kredit, serta melakukan otomatisasi sistem pelaporan Bank.

Terkait pemenuhan atas komitmen temuan pemeriksaan OJK tahun 2023 pada kantor pusat dan kantor cabang Bank, Bank telah menindaklanjuti seluruh komitmen temuan pemeriksaan dengan target waktu Desember 2023 dan bukti pendukung telah disampaikan kepada OJK.

PENILAIAN PERIODE TAHUN 2023

Pada tahun 2024, Bank melaksanakan *self-assessment* GCG untuk periode semester II tahun 2023 dengan hasil akhir penilaian 2 (dua) dengan kategori "Baik".

Berdasarkan hasil *self-assessment* terhadap 11 (sebelas) indikator penilaian *rating* GCG tahun 2023, dapat disimpulkan sebagai berikut:

Struktur Tata Kelola

Faktor-faktor positif aspek struktur tata kelola:

- Jumlah dan komposisi Dewan Komisaris telah sesuai ketentuan yang berlaku.
- Jumlah dan komposisi Direksi telah sesuai dengan kompleksitas usaha serta sesuai dengan ketentuan yang berlaku.
- Seluruh anggota Direksi memiliki integritas, kompetensi dan reputasi keuangan yang memadai.
- Bank telah memiliki pedoman dan tata tertib kerja Dewan Komisaris dan Direksi yang memadai.
- Bank memiliki Satuan Kerja Audit Intern, Satuan Kerja Kepatuhan dan Satuan Kerja Manajemen Risiko yang menjalankan tugas sesuai ketentuan yang berlaku.
- Bank telah memiliki Komite Audit, Komite Pemantau Risiko, dan Komite Remunerasi dan Nominasi, di mana jumlah dan komposisi komite-komite telah sesuai dengan ketentuan berlaku.
- Seluruh komite-komite telah melaksanakan fungsinya sesuai dengan ketentuan yang berlaku

Proses Tata Kelola

Faktor-faktor positif aspek proses tata kelola:

- Pelaksanaan tugas dan tanggung jawab Dewan Komisaris telah sesuai dengan ketentuan yang berlaku.
- Direksi telah melaksanakan prinsip-prinsip Tata Kelola Perusahaan dalam setiap kegiatan usaha Bank pada seluruh tingkatan atau jenjang organisasi.

THE BANK'S RECOMMENDATIONS AND FOLLOW-UP ACTIONS

Based on the Financial Services Authority (OJK) inspection in 2022 at The Bank's head office, The Bank has followed up all commitments that require improvement in a timely manner, including the fulfillment of policy improvement, credit administrative, as well as improve and automation of the Bank's reporting system.

Regarding the fulfillment of OJK's audit findings commitment in 2023 at The Bank's head office and branch offices, The Bank has followed up all audit findings commitment with a target date in December 2023 and supporting documents have been submitted to OJK.

ASSESSMENT FOR THE PERIOD OF 2023

In 2024, The Bank conducted GCG self-assessment for the second semester of 2023 with final assessment result of 2 (two) categorized as "Good".

Based on the self-assessment results of 11 (eleven) indicators for GCG rating in 2023, it can be concluded as follows:

Governance Structure

Positive factors in the governance structure aspect:

- Number and composition of BOC are in accordance with the prevailing regulations.
- Number and composition of BOD are in accordance with the complexities of the business and in accordance with the prevailing regulations.
- All BOD members have integrity, competency, and adequate financial reputation.
- Bank has adequate guidelines and work rules for BOC and BOD.
- Bank has an Internal Audit, Compliance Unit and Risk Management Unit that fulfill duties in accordance with applicable regulations.
- Bank has an Audit Committee, a Risk Monitoring Committee and a Remuneration and Nomination Committee are in accordance with prevailing regulations.
- All Committee has carried out its functions in accordance with prevailing regulations.

Governance Process

Positive factors in the governance process aspect:

- Implementation of the duties and responsibilities of BOC is in accordance with the prevailing regulations.
- BOD has implemented the Good Corporate Governance principles in all Bank's business activities at all the level organization level.

- Dewan Komisaris telah memastikan bahwa komite yang dibentuk telah menjalankan tugasnya secara efektif melalui pertemuan-pertemuan komite yang menghasilkan rekomendasi.
- Direksi telah secara aktif menyelesaikan tindak lanjut temuan regulator.
- Seluruh komite telah menjalankan tugasnya dengan baik dan sangat membantu Dewan Komisaris dalam memantau risiko yang mungkin terjadi.
- Satuan Kerja Audit Intern (SKAI), Satuan Kerja Kepatuhan dan Satuan Kerja Manajemen Risiko telah menjalankan tugas sesuai dengan ketentuan yang berlaku.

Faktor-faktor yang perlu mendapat perhatian pada aspek *Governance Process*:

- Masih terdapat denda yang dikenakan kepada Bank terkait keterlambatan penyampaian pelaporan dan ketidakakuratan pelaporan pada tahun 2023 yang disebabkan *Human Error*, namun Bank telah melakukan perbaikan pelaporan tersebut dan akan terus meningkatkan *awareness* dan *dual control* dalam pelaporan.

Hasil Tata Kelola

Faktor-faktor positif aspek hasil tata kelola:

- Tidak terdapat hasil audit terkait dengan benturan kepentingan.
- Bank telah memiliki rencana audit yang telah disetujui oleh Presiden Direktur dan Dewan Komisaris.
- Tidak terdapat permasalahan terkait penunjukan, komunikasi, independensi, dan cakupan pekerjaan auditor eksternal.
- Tidak terdapat pelanggaran atau pelanggaran Batas Maksimum Pemberian Kredit (BMPK) pada tahun 2023.

Faktor-faktor yang perlu mendapat perhatian pada aspek hasil tata kelola:

- Pada tahun 2023, masih terdapat denda yang dikenakan kepada Bank terkait dengan keterlambatan penyampaian laporan, ketidakakuratan penyampaian laporan ke OJK dan BI dan hasil pemeriksaan OJK pada tahun 2023 yaitu kesalahan pelaporan pada SLIK, namun Bank telah melakukan perbaikan pelaporan tersebut dan akan terus meningkatkan *awareness* dan *dual control* dalam pelaporan

PERKEMBANGAN PENILAIAN DAN HASILNYA

Bank secara berkala melakukan penilaian dengan tujuan melakukan pemantauan, evaluasi, serta perbaikan terhadap penerapan praktik GCG di lingkup Bank. Bank mencapai peringkat 2 (dua) pada semester II tahun 2023. Pencapaian tersebut mencerminkan penerapan praktik GCG di lingkup Bank telah berjalan dengan baik didukung dengan kesinambungan yang konsisten

- Board of Commissioners has ensured that the committees have performed their functions effectively through committee meetings resulting in recommendations.
- Board of Directors has actively followed up on regulatory audit findings rectification.
- All committees have performed their duty well and able to assist Board of Commissioners in monitoring probable risk event
- Internal Audit, Risk Management and Compliance Unit carry out their duties and responsibilities in accordance with applicable regulations.

Factors that needed attention of Governance Process aspect:

- There are still fines imposed on Bank related to late submission of reporting and reporting inaccuracies in 2023 due to Human Error, however Bank has improved the reporting and will continue to increase awareness and dual control.

Governance Outcome

Positive factors of governance outcome aspect:

- There were no audit results related to the conflict of interest.
- The Bank has organized its audit plan approved by the President Director and Board of Commissioners.
- There were no issues related to the appointment, communication, independence, and scope of work of the external auditor.
- There was no breach or exceed on Legal Lending Limit (LLL) during 2023.

Factors that needed attention of the governance outcome aspect:

- In 2023, there are still fines imposed on Bank related to late submission of reports, inaccuracies in submitting reports to OJK and BI and OJK inspection results in 2023, namely reporting errors in SLIK, however Bank has improved the reporting and will continue to increase awareness and dual control.

ASSESSMENT PROGRESS AND RESULTS

The Bank regularly carries out the assessment aims at monitoring, evaluating, and improving the implementation of GCG practices within The Bank. The Bank achieved rating 2 (two) in the second semester of 2023. This achievement reflects well implementation of GCG practices within The Bank supported with consistent sustainability.

STRUKTUR TATA KELOLA PERUSAHAAN

Struktur GCG Bank dibentuk berdasarkan fungsi, kewenangan dan tanggung jawab masing-masing organ sesuai dengan Undang-Undang No. 40 Tahun 2007, Peraturan Otoritas Jasa Keuangan terkait, dan Anggaran Dasar Bank.

Struktur GCG Bank secara garis besar terbagi atas Organ Utama dan Organ Pendukung.

Organ Utama Bank adalah sebagai berikut:

1. Rapat Umum Pemegang Saham (RUPS)
Rapat Umum Pemegang Saham (RUPS) merupakan forum bagi pemegang saham untuk melakukan pembahasan dan pengambilan keputusan strategis usaha Bank dan didasarkan pada Anggaran Dasar Bank serta peraturan perundang-undangan.
2. Dewan Komisaris
Dewan Komisaris adalah organ yang secara kolektif memiliki tugas dan tanggung jawab untuk melaksanakan fungsi pengawasan dan pemberian arahan terhadap pengelolaan usaha Bank serta memastikan terpenuhinya kepentingan para pemangku kepentingan berdasarkan prinsip-prinsip GCG.
3. Direksi
Direksi adalah organ yang secara kolektif memiliki tugas dan tanggung jawab untuk melaksanakan pengelolaan Bank sesuai dengan arah dan tujuan yang telah ditetapkan, serta bertindak atas nama Bank dalam urusan di dalam maupun di luar pengadilan

Selanjutnya Organ Pendukung terdiri dari komite di bawah Dewan Komisaris serta komite dan fungsi di bawah Direksi. Bank juga telah memiliki *soft structure* atau perangkat kebijakan yang akan memberikan definisi batasan-batasan tugas, peran dan tanggung jawab dari masing-masing organ Bank, sebagai berikut:

- Kode Etik
- *Speak Up*
- Kebijakan GCG
- Pedoman Kerja Direksi
- Pedoman Kerja Dewan Komisaris
- Piagam Kepatuhan
- Piagam Audit Internal
- Piagam Komite Audit

CORPORATE GOVERNANCE STRUCTURE

The Bank governance structure is established based on the functions, authorities, and responsibilities of each organ in accordance with the Law No. 40 of 2007, relevant Financial Services Authority Regulations, and The Bank's Articles of Association.

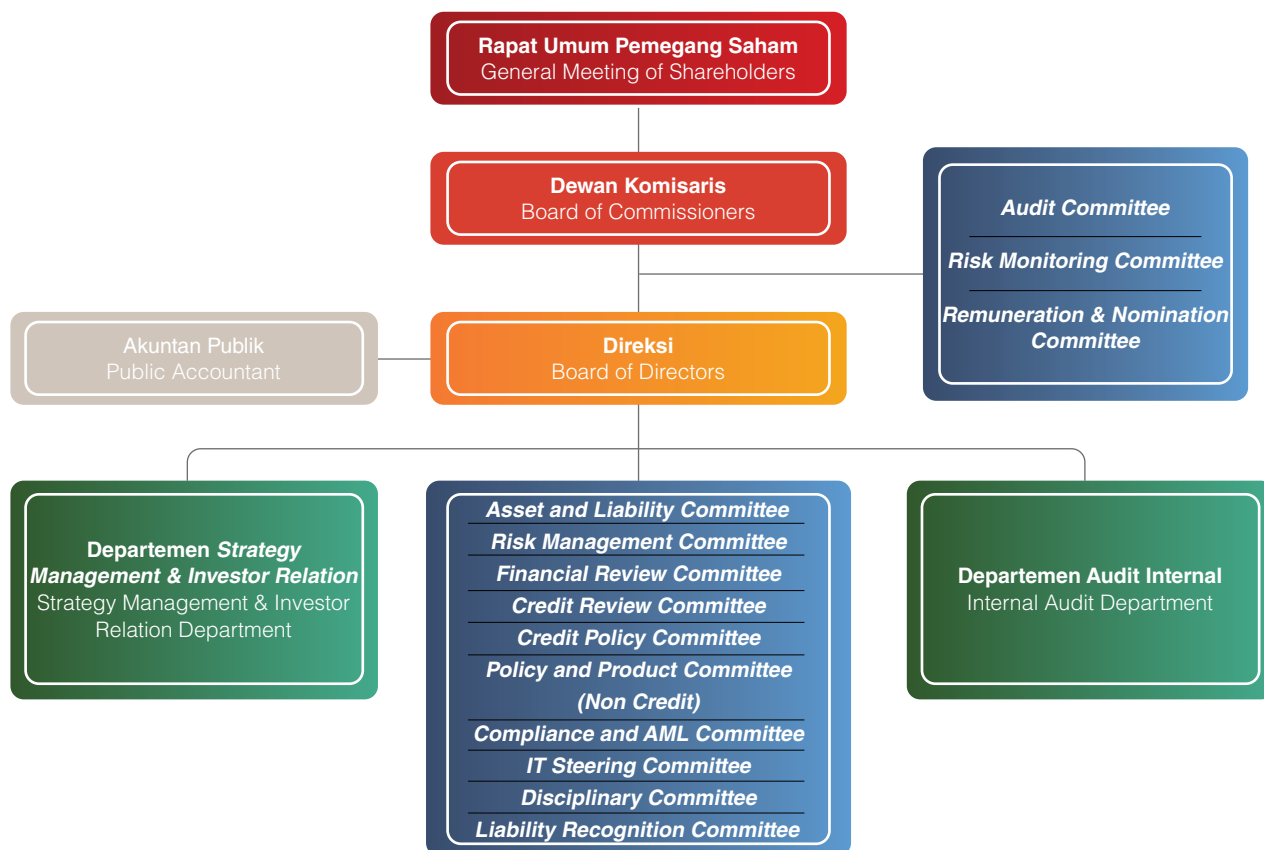
The Bank governance structure is broadly divided into Primary Organs and Supporting Organs.

The Primary Organs are as follows:

1. General Meeting of Shareholders (GMS)
The General Meeting of Shareholders (GMS) is a strategic discussion and decision-making forum for the shareholders, in relation with The Bank interests and is based on Articles of Association as well as laws and regulations.
2. Board of Commissioners
The Board of Commissioners is an organ collectively assigned with supervisory and advisory functions on the management of The Bank as well as ensuring that all stakeholders' interests are met based on the governance principles.
3. Board of Directors
The Board of Directors is an organ collectively responsible for managing The Bank in accordance with the predetermined direction and objectives, as well as acting on behalf of The Bank in both legal and non-legal settings.

The Supporting Organs consist of committees under the Board of Commissioners as well as committees and functions under the Board of Directors. The Bank also has in place the soft structures or policies that define the boundaries of duties, roles, and responsibilities of each of The Bank's organs, as follows:

- Code of Conduct
- Speak Up
- GCG Policy
- BOD Charter
- BOC Charter
- Compliance Charter
- Internal Audit Charter
- Audit Committee Charter



RENCANA PENINGKATAN PENERAPAN TATA KELOLA PERUSAHAAN

Sebagai tindak lanjut dan komitmen yang tinggi atas kesinambungan peningkatan praktik GCG pada seluruh level organisasi, Bank merencanakan beberapa kegiatan penting terkait praktik GCG. Kegiatan dimaksud mencakup di antaranya:

1. Melengkapi seluruh *soft structure* yang disesuaikan dengan peraturan yang berlaku dan praktik terbaik penerapan GCG serta melakukan kajian bagi penyempurnaan yang sudah ada guna meningkatkan kualitas penerapan GCG.
2. Melakukan *monitoring*, pelaporan secara reguler, dan mengkaji penerapan GCG serta memfasilitasi *assessment* oleh pihak independen terhadap implementasi GCG di Bank untuk mendapatkan *feedback* penerapan GCG.

CORPORATE GOVERNANCE IMPLEMENTATION IMPROVEMENT PLANS

As a follow-up and high commitment on sustainability of GCG practices at all operational level, The Bank has planned key activities related to GCG practices. The activities include as follows:

1. Complete all soft structures in accordance with prevailing regulations and best practices for GCG implementation as well as review the existing improvements in order to improve the quality of GCG implementation.
2. Conduct monitoring, regular reporting, and reviewing the GCG implementation as well as facilitating the independent assessment of GCG implementation in The Bank to obtain GCG implementation feedbacks.

Rapat Umum Pemegang Saham

General Meeting of Shareholders

Rapat Umum Pemegang Saham (RUPS) adalah organ perusahaan dengan kewenangan yang tidak diberikan kepada Dewan Komisaris atau Direksi dalam batas yang ditentukan dalam Anggaran Dasar dan peraturan perundang-undangan yang berlaku. RUPS merupakan forum bagi pemegang saham untuk menggunakan haknya, menjalankan wewenang, mengemukakan pendapat, memberikan suara serta meminta informasi berkaitan dengan pengambilan keputusan strategis ataupun pengelolaan Bank.

Anggaran Dasar Bank menyatakan bahwa RUPS dibagi menjadi 2 (dua), yaitu RUPS Tahunan dan RUPS Luar Biasa (LB). RUPS Tahunan diselenggarakan sekurang-kurangnya 1 (satu) kali dalam setahun dan harus diselenggarakan paling lambat 6 (enam) bulan setelah berakhirnya tahun buku. Sedangkan, RUPS Luar Biasa (LB) diselenggarakan sewaktu-waktu sesuai dengan kebutuhan Bank.

PEMEGANG SAHAM DAN INFORMASI TENTANG PEMEGANG SAHAM MAYORITAS

Pemegang saham mayoritas Bank adalah ICBC Limited dengan kepemilikan sebesar 98,61%, sedangkan pemegang saham minoritas adalah PT Intidana Wijaya dengan kepemilikan sebesar 1,39%. Sebagai pemegang saham mayoritas, ICBC Limited telah memenuhi persyaratan kemampuan, kepatutan, dan kepatuhan terhadap regulasi yang ditetapkan oleh OJK, Bank Indonesia, serta perundang-undangan terkait perbankan yang berlaku di Indonesia.

HAK PEMEGANG SAHAM

- Menghadiri dan memberikan suara dalam suatu RUPS, berdasarkan ketentuan 1 (satu) saham memberi hak kepada pemegangnya untuk mengeluarkan 1 (satu) suara;
- Memperoleh informasi material secara tepat waktu dan teratur sehingga memungkinkan bagi pemegang saham untuk membuat keputusan;
- Menerima bagian keuntungan dari Bank dalam bentuk dividen dan bentuk pembagian keuntungan lainnya;
- Menerima bagian atas saham baru yang hendak dikeluarkan dengan mengambil bagian yang seimbang dengan jumlah saham yang mereka miliki (proporsional);

The General Meeting of Shareholders (GMS) is a company's organ with authorities not granted to the Board of Commissioners and Board of Directors within threshold as set forth under the Articles of Association and prevailing regulations. The GMS serves as a forum for shareholders to exercise rights, initiate authorities, and submission of opinions, voting, and request of information relating to the strategic decision-making or The Bank management.

The Bank's Articles of Association states that the GMS is divided into 2 (two), namely the Annual GMS and Extraordinary GMS. The Annual GMS is to be held at least once a year and shall be held no later than 6 (six) months after the end of the fiscal year. Meanwhile, the Extraordinary GMS may be held at anytime in accordance with the needs of The Bank.

SHAREHOLDERS AND INFORMATION ON THE MAJORITY SHAREHOLDERS

The majority shareholder of The Bank is ICBC Limited with shares ownership of 98.61%. Meanwhile, the minority shareholder is PT Intidana Wijaya with shares ownership of 1.39%. As the controlling shareholder of The Bank, ICBC Limited has fulfilled the requirements of ability, propriety and compliance with regulations stipulated by the Financial Services Authority (OJK), Bank Indonesia, and applicable banking related legislation in Indonesia.

SHAREHOLDERS RIGHTS

- Attending and voting in a General Meeting of Shareholders (GMS), under the condition that 1 (one) share entitles the holder to issue 1 (one) vote;
- Receiving material information in a timely and orderly manner so as to enable the shareholders to make informed decisions;
- Receiving a share of The Bank's profits in the form of dividends and other forms of profit sharing;
- Receiving a portion of new shares that will be issued with the proportion value equals to number of shares owned by each individual shareholder;

- Meminta Direksi untuk mengeluarkan surat saham pengganti atas surat saham yang rusak;
 - Melihat daftar pemegang saham dan daftar khusus pada waktu jam kerja kantor Bank;
 - Menjual atau mengalihkan saham-saham yang dimiliki dengan menawarkan secara tertulis kepada pemegang saham lainnya dan sebaliknya, membeli saham yang ditawarkan oleh pemegang saham lainnya;
 - Menyelenggarakan RUPS dalam hal Dewan Komisaris dan/atau Direksi lalai menyelenggarakan RUPS Tahunan dan/atau RUPS Luar Biasa, setelah mendapat izin dari Ketua Pengadilan Negeri setempat;
 - Atas nama Bank, pemegang saham yang mewakili paling sedikit $\frac{1}{10}$ (satu per sepuluh) bagian dari jumlah seluruh saham dengan hak suara dapat mengajukan gugatan melalui pengadilan negeri terhadap anggota Dewan Komisaris dan/atau Direksi yang karena kesalahan atau kelalaiannya menimbulkan kerugian pada Bank;
 - Setiap pemegang saham berhak mengajukan gugatan terhadap Bank ke pengadilan negeri apabila dirugikan karena tindakan Bank yang dianggap tidak adil dan tanpa alasan wajar sebagai akibat keputusan RUPS, Dewan Komisaris, dan/atau Direksi; dan
 - Meminta secara tertulis untuk penyelenggaraan Rapat Dewan Komisaris, Rapat Direksi, dan RUPS Luar Biasa bila dipandang perlu.
- Requesting the Board of Directors to issue a share certificate replacement for any defaced share certificate;
 - Viewing the shareholder register and special register during the office hour of The Bank;
 - Selling or transferring shares owned through offering in writing to other shareholders, and conversely buying shares offered by other shareholders;
 - Organizing a GMS in the event that the Board of Commissioners and/or the Board of Directors fails to hold an Annual GMS and/or an Extraordinary GMS, after obtaining a permission from the local District Court Chairman;
 - On behalf of The Bank, a shareholder representing at least $\frac{1}{10}$ (one-tenth) of the total number of shares with voting rights may file a lawsuit through the district court against a member of the Board of Commissioners and/or the Board of Directors whose fault or negligence incurs a loss to The Bank;
 - Each shareholder is entitled to file a lawsuit against The Bank to the district court if they are impaired by The Bank's actions deemed unfair and unreasonable as a result of the resolutions of the GMS, the Board of Commissioners, and/or the Board of Directors; and
 - Requesting in writing for the holding of a Board of Commissioners Meeting, a Board of Directors Meeting, and an Extraordinary GMS if deemed necessary.

WEWENANG RAPAT UMUM PEMEGANG SAHAM

RUPS memiliki wewenang antara lain untuk:

- Menetapkan perubahan Anggaran Dasar Bank;
- Menetapkan perubahan modal Bank dan/atau pengeluaran saham-saham baru untuk keperluan modal Bank;
- Memberikan persetujuan atas atau menolak pemindahan hak atas saham Bank;
- Memutuskan penggabungan, peleburan, pemisahan, pengambilalihan, serta pembubaran dan likuidasi Bank;
- Memberikan persetujuan atas atau menolak untuk mengalihkan, menjadikan jaminan utang, melepaskan hak atas seluruh atau sebagian dari jumlah kekayaan Bank dalam 1 (satu) tahun buku, baik dalam satu transaksi atau beberapa transaksi yang berdiri sendiri ataupun yang berkaitan satu sama lain;
- Menyetujui atau menolak Rencana Tahun Buku Bank;
- Mengangkat dan memberhentikan Dewan Komisaris dan Direksi;
- Menilai kinerja Dewan Komisaris dan Direksi;
- Menetapkan pembagian tugas dan wewenang setiap anggota Direksi;

GENERAL MEETING OF SHAREHOLDERS AUTHORITIES

The GMS has the authorities to do the following:

- Deciding on amendments to The Bank's Articles of Association;
- Deciding on changes in The Bank's capital and/or issuance of new shares for The Bank's capital requirements;
- Approving or rejecting the transfer of rights to The Bank's shares;
- Making decisions involving merger, consolidation, segregation, acquisition, dissolution, and liquidation of The Bank;
- Approving or refusing to transfer, make debt guarantees, waive rights to all or some of The Bank's total assets within a fiscal year, either in one transaction or in several transactions that are independent or related to one another;
- Approving or rejecting The Bank's Fiscal Year Plan;
- Appointing and dismissing the Board of Commissioners and Board of Directors;
- Assessing the performance of the Boards of Commissioners and Board of Directors;
- Establishing the distribution of duties and authorities of each member of the Board of Directors;

- Mengesahkan laporan tahunan dan perhitungan tahunan yang diajukan Direksi;
 - Menetapkan penggunaan laba bersih Bank termasuk menentukan jumlah penyisihan untuk dana cadangan;
 - Menetapkan auditor eksternal berdasarkan usulan yang diterima dari Dewan Komisaris;
 - Menetapkan remunerasi (gaji dan/atau tunjangan) Dewan Komisaris dan Direksi;
 - Menyetujui apabila Direksi menawarkan sisa saham baru yang hendak dikeluarkan kepada pihak lain;
 - Menetapkan surat saham yang rusak dan tidak dapat dipakai lagi untuk dimusnahkan;
 - Menyetujui setiap gadai atau pembebanan terhadap saham dalam Bank atau penerbitan pemberian opsi, waran, hak, atau jaminan lainnya yang dapat ditukar dengan saham di dalam Bank;
 - Memutuskan agar jumlah dari dana cadangan yang melebihi jumlah yang ditentukan oleh Anggaran Dasar Bank untuk digunakan bagi keperluan Bank; dan
 - Wewenang lainnya sebagaimana diatur dalam peraturan perundang-undangan.
- Approving the annual report and annual calculations submitted by the Board of Directors;
 - Deciding on the use of The Bank's net income, including determining the amount of allowance for reserves;
 - Deciding on the external auditor based on proposals received from the Board of Commissioners;
 - Deciding on remuneration (salary and/or allowances) for the Boards of Commissioners and Board of Directors;
 - Approving the Board of Directors plan to offer the remaining new shares to be issued to other parties;
 - Deciding on defaced share certificate which can no longer be used for destruction;
 - Approving any liens or imposition of shares in The Bank or the issuance of options, warrants, rights, or other collaterals that can be exchanged for shares in The Bank;
 - Deciding on the amount of allowance for reserves which is greater than the amount stipulated in The Bank's Articles of Association to be used for the needs of The Bank; and
 - Other powers as regulated in legislation.

TATA CARA PELAKSANAAN RAPAT UMUM PEMEGANG SAHAM

Tata cara penyelenggaraan RUPS telah diatur dalam Anggaran Dasar Bank sebagai berikut:

- RUPS diadakan di tempat kedudukan Bank atau di tempat lain yang disetujui oleh pemegang saham dalam wilayah Republik Indonesia.
- Diselenggarakan dengan pemanggilan terlebih dahulu kepada para pemegang saham dengan surat tercatat.
- Pemanggilan dilakukan paling lambat 14 (empat belas) hari sebelum RUPS diadakan.
- Pemanggilan RUPS harus mencantumkan hari, tanggal, waktu, tempat, dan acara rapat dengan disertai pemberitahuan bahwa bahan yang akan dibicarakan dalam rapat tersedia di tempat kedudukan Bank mulai dari hari dilakukan pemanggilan sampai dengan tanggal RUPS.
- Pemanggilan RUPS tidak diperlukan jika semua pemegang saham menyetujui agenda rapat dan keputusan disetujui dengan suara bulat.
- RUPS dipimpin oleh Presiden Direktur.
- Dalam hal Presiden Direktur tidak hadir atau berhalangan, RUPS dipimpin oleh salah seorang anggota Direksi yang hadir, apabila seluruh anggota Direksi tidak hadir, RUPS dipimpin oleh Presiden Komisaris. Dalam hal Presiden Komisaris tidak hadir, RUPS dipimpin oleh salah satu anggota Komisaris yang hadir. Dalam hal seluruh anggota Dewan Komisaris tidak hadir, RUPS dipimpin oleh salah seorang yang dipilih di antara mereka yang hadir dalam rapat.

GENERAL MEETING OF SHAREHOLDERS CONVENTION PROCEDURES

The procedure for implementing the GMS has been arranged in the Articles of Association of The Bank, as follows:

- The GMS is to be held in the domicile of The Bank or at other places agreed by the shareholders within the territory of Republic of Indonesia.
- It is to be organized by informing the shareholders through registered mail.
- The call shall be made no later than 14 (fourteen) days before the GMS is held.
- The call shall include the day, date, time, place, and agenda of the meeting accompanied by a notification that the meeting material is available in the domicile of The Bank from the day of the call up to the date of the GMS.
- A GMS call is not required if all shareholders agree on the agenda of the meeting and the decision is approved unanimously.
- The GMS is chaired by the President Director.
- In the event that the President Director is absent or not present, the GMS is to be chaired by one of the members of the Board of Directors present. If all members of the Board of Directors are absent, the GMS is to be chaired by the President Commissioner. In the event that the President Commissioner is absent, the GMS is to be chaired by one of the members of the Board of Commissioners present. In the event that all members of the Board of Commissioners are absent, the GMS is to be presided over by one elected member among those present at the meeting.

- Dalam hal keputusan pemberhentian sementara anggota Direksi yang diajukan oleh Dewan Komisaris, maka RUPS dipimpin oleh Presiden Komisaris.
- Dalam hal Presiden Komisaris tidak hadir atau berhalangan, RUPS dipimpin oleh salah satu anggota Komisaris yang hadir. Dalam hal seluruh anggota Dewan Komisaris tidak hadir, RUPS dipimpin oleh salah seorang yang dipilih di antara mereka yang hadir dalam rapat.
- Segala hal yang dibicarakan dan diputuskan dalam RUPS harus dibuat berita acara rapat dan ditandatangani oleh Ketua Rapat dan seluruh pemegang saham atau kuasa pemegang saham yang hadir dalam rapat.
- RUPS dapat dilangsungkan apabila kuorum kehadiran sesuai undang-undang Perusahaan Terbatas dan Anggaran Dasar Bank telah dipenuhi.
- Pemegang saham dapat diwakili oleh pemegang saham lain atau orang lain dengan surat kuasa.
- Anggota Direksi dan Dewan Komisaris, serta karyawan Bank boleh bertindak selaku kuasa dalam rapat, namun mereka tidak memiliki hak suara dalam pemungutan suara.
- Suara blanko (*abstain*) tidak dihitung.
- Keputusan rapat diambil berdasarkan musyawarah untuk mufakat. Dalam hal keputusan secara musyawarah untuk mufakat tidak tercapai, maka keputusan diambil berdasarkan suara setuju lebih dari $\frac{1}{2}$ (setengah) jumlah suara yang sah dalam rapat. Dalam hal suara yang setuju dan tidak setuju berimbang maka usul harus dianggap ditolak.
- Pemegang saham dapat pula mengambil keputusan yang sah tanpa mengadakan RUPS dengan ketentuan semua pemegang saham telah diberitahu secara tertulis dan semua pemegang saham memberikan persetujuan dengan menandatangani persetujuan tersebut. Keputusan yang diambil dengan cara demikian mempunyai kekuatan yang sama dengan keputusan yang diambil dengan sah dalam RUPS.
- In the event of temporary dismissal of members of the Board of Directors submitted by the Board of Commissioners, the GMS is chaired by the President Commissioner.
- In the event that the President Commissioner is absent or not present, the GMS is to be chaired by one of the members of the Board of Commissioners present. In the event that all members of the Board of Commissioners are absent, the GMS is to be presided over by one elected member among those present at the meeting.
- All matters discussed and decided at the GMS shall be translated into the minutes of meeting and signed by the Chairperson of the meeting and all shareholders or the attorney of the shareholders present at the meeting.
- A GMS may be held if the quorum required by the law on Limited Liability Company and The Bank's Articles of Association have been fulfilled.
- Shareholders can be represented by other shareholders or other people with the power of attorney.
- Members of the Board of Directors and Board of Commissioners and The Bank's employees may act as an attorney in the meeting, but they do not have voting rights.
- Abstained votes are not counted.
- The decision of the meeting is based on deliberations to reach consensus. In the event that a consensus decision is not reached, a decision is made on the basis of agreed votes of more than $\frac{1}{2}$ (half) from the legitimate votes in the meeting. In the case of agreeing and disagreeing votes are equal then the proposal shall be deemed to be rejected.
- The shareholders may also make informed decisions without holding a GMS provided that all shareholders have been notified in writing and all shareholders agree on the proposal and sign the agreement. The decisions taken in this way have the same power as the decisions taken legitimately in the GMS.

PELAKSANAAN DAN HASIL KEPUTUSAN RAPAT UMUM PEMEGANG SAHAM TAHUN 2023

Pelaksanaan Rapat Umum Pemegang Saham (RUPS) Bank diselenggarakan secara sirkuler atau dilaksanakan tanpa adanya rapat secara fisik atau melalui Keputusan sirkuler (*circular resolution*). Selama tahun 2023, Bank menyelenggarakan 3 (tiga) kali RUPS sirkuler dengan keputusan yang telah disetujui sebagai berikut:

GENERAL MEETING OF SHAREHOLDERS CONVENTION AND RESOLUTIONS IN 2023

The Bank's General Meetings of Shareholders (GMS) are held by circular or without a physical meeting or by circular resolutions. During 2023, The Bank held 3 (three) circular GMS with the following resolutions approved:

RUPS Sirkuler Tanggal 6 Maret 2023

Circular GMS Dated March 6, 2023

Keputusan RUPS sirkuler tanggal 6 Maret 2023 adalah sebagai berikut:

The decision of circular GMS dated March 6, 2023 is as follows:

Hasil Keputusan Resolutions	Telah atau Belum Ditindaklanjuti Has Been or Yet to be Followed Up	Realisasi oleh Manajemen Follow-Up by Management
Menerima pengunduran diri anggota Direksi Perseroan sebagai berikut: - Tuan Zhang Jinxing selaku Presiden Direktur, terhitung sejak tanggal terakhir Pemegang Saham Perseroan menandatangani Keputusan Pemegang Saham ini. To accept the resignation of the member of the Board of Directors of the Company as follows - Mr. Zhang Jinxing as President Director commencing from the last date of the Company's Shareholders signed this Shareholders' Resolution.		
Mengangkat anggota Direksi Perseroan yang baru sebagai berikut: - Tuan Chen Yong selaku Presiden Direktur terhitung sejak tanggal diperolehnya persetujuan/perixinan sesuai ketentuan yang berlaku. To appoint new member of the Board of Directors of the Company as follows: - Mr. Chen Yong as President Director, commencing from the date after obtaining the approval/permit in accordance with the relevant regulations.		Akta No. 52 tanggal 6 Maret 2023. The Deed No. 52 dated March 6, 2023.
Mengangkat kembali anggota Direksi dan Dewan Komisaris Perseroan. To reappoint the member of the Board of Directors and Board of Commissioners of the Company.		

 Telah ditindaklanjuti | Has been followed up
 Belum ditindaklanjuti | Yet to be followed up

RUPS Sirkuler Tanggal 21 Juli 2023

Circular GMS Dated July 21, 2023

Keputusan RUPS sirkuler tanggal 21 Juli 2023 adalah sebagai berikut:

The decision of circular GMS dated Juli 21, 2023 is as follows:

Hasil Keputusan Resolutions	Telah atau Belum Ditindaklanjuti Has Been or Yet to be Followed Up	Realisasi oleh Manajemen Follow-Up by Management
Menerima dan menyetujui laporan tahunan di antaranya laporan keuangan Perseroan, urusan dan kepengurusan Perseroan, dan administrasi keuangan untuk tahun buku yang berakhir pada Desember 2022, termasuk menerima laporan mengenai tugas pengawasan yang telah dilakukan oleh Dewan Komisaris untuk tahun buku yang berakhir pada Desember 2022, serta laporan pelaksanaan Tanggung Jawab Sosial dan Lingkungan. To accept and approve the annual report containing among others, financial statements, the affairs and management of The Company, and financial administration for financial year ending in December 2022, including report on supervision duty that has been conducted by the Board of Commissioners for the financial year ending in December 2022, and report on the implementation of Corporate Social and Environmental Responsibility.		

Hasil Keputusan Resolutions	Telah atau Belum Ditindaklanjuti Has Been or Yet to be Followed Up	Realisasi oleh Manajemen Follow-Up by Management
Menyetujui Laba Bersih Perseroan tahun buku yang berakhir pada Desember 2022 untuk dibukukan menjadi Surplus Reserve (10%) dan laba yang belum didistribusikan (90%) untuk mengikuti Undang-Undang Perseroan Terbatas dan mendukung perkembangan bisnis Perseroan. To approve The Company's Net Profit of the financial year ending in December 2022 to be booked into Surplus Reserve (10%) and undistributed profit (90%) in order to follow the Company Law and to support The Company's business development.		
Membebaskan dan melepaskan anggota Dewan Komisaris dan Direksi dari segala kewajiban yang timbul dari pengurusan dan tanggung jawab yang dilakukan selama tahun buku yang berakhir pada Desember 2022 sepanjang tindakan mereka tercermin dalam laporan tahunan dan laporan keuangan untuk tahun buku yang berakhir pada Desember 2022. To release and discharge the members of the Board of Commissioners and Board of Directors from all liabilities arising from their management and responsibilities performed during the financial year ending in December 2022 to the extent that their actions are reflected in the annual report and financial statements for the financial year ending in December 2022.		
Memilih dan menyetujui Akuntan Publik Imelda & Rekan (terafiliasi dengan Deloitte), penugasan sebagai Kantor Akuntan Publik untuk melakukan audit atas buku Perseroan tahun buku yang berakhir pada tanggal 31 Desember 2023, dengan memperhatikan rekomendasi Dewan Komisaris melalui Surat Keputusan Sirkuler No. 005/SK.BOC/VI/2023 tanggal 16 Juni 2023 dan Surat Memorandum Internal Komite Audit No. 033/IM/SMD/VI/2023 tanggal 13 Juni 2023 sesuai dengan ketentuan yang berlaku. To choose and approve Imelda & Partners Registered Public Accountants (affiliated with Deloitte), assigned as a Public Accounting Firm to conduct audit on The Company's book for the financial year ending on December 31, 2023, by considering the recommendations of the Board of Commissioners through Circular Resolution Letter No. 005/SK.BOC/VI/2023 dated June 16, 2023 and Audit Committee Internal Memorandum Letter No. 033/IM/SMD/VI/2023 dated June 13, 2023 in accordance with prevailing regulations.		
Menunjuk dan memberi kuasa kepada Direksi Perseroan, dengan hak substitusi untuk melakukan tindakan-tindakan yang diperlukan, termasuk tetapi tidak terbatas untuk hadir di hadapan notaris untuk menyatakan kembali seluruh atau sebagian dari keputusan ini dalam bentuk suatu akta notaris, dan sejauh diperlukan untuk memberitahukan, melaporkan dan mendaftarkan keputusan ini kepada pihak-pihak berwenang yang relevan, termasuk tetapi tidak terbatas kepada Otoritas Jasa keuangan, dan Kementerian Hukum dan Hak Asasi Manusia, dan untuk membuat amandemen-amandemen dan/ atau tambahan-tambahan dalam bentuk apapun yang secara wajar diperlukan untuk memperoleh persetujuan demikian, dan untuk mengajukan dan menandatangani seluruh permohonan dan dokumen lain, serta untuk mengambil tindakan-tindakan yang mungkin diperlukan untuk melaksanakan keputusan ini. To appoint and authorize the Board of Directors of the Company, with the power of substitution to take actions deemed necessary, including without limitation to appear before a notary to restate all or part(s) of these resolutions in the form of a notary deed, and to the extent necessary to notify, report and register these resolutions with the relevant authorities, including but not limited to the Financial Service Authority, and the Ministry of Law and Human Rights, and to make amendments and/or additions in any form whatsoever reasonably required to obtain such approval, and to submit and sign all applications and other documents, as well as to take actions which may be required to implement these resolutions.		

 Telah ditindaklanjuti | Has been followed up
 Belum ditindaklanjuti | Yet to be followed up

RUPS Sirkuler Tanggal 16 Oktober 2023

CIRCULAR GMS DATED OCTOBER 16, 2023

Keputusan RUPS sirkuler tanggal 16 Oktober 2023 adalah sebagai berikut:

The decision of circular GMS dated October 16, 2023 is as follows:

Hasil Keputusan Resolutions	Telah atau Belum Ditindaklanjuti Has Been or Yet to be Followed Up	Realisasi oleh Manajemen Follow-Up by Management
Menetapkan remunerasi Dewan Komisaris dan Direksi Bank. Determined the remuneration of the Board of Commissioners and Board of Directors of The Bank.		
Menyetujui pemberian bonus tahun 2023 untuk Dewan Komisaris dan Direksi. Approved the 2023 year end bonus for the Board of Commissioners and Board of Directors of The Bank.		

 Telah ditindaklanjuti | Has been followed up
 Belum ditindaklanjuti | Yet to be followed up

PELAKSANAAN DAN HASIL KEPUTUSAN RAPAT UMUM PEMEGANG SAHAM TAHUN 2022

GENERAL MEETING OF SHAREHOLDERS CONVENTION AND RESOLUTIONS IN 2022

Pelaksanaan Rapat Umum Pemegang Saham (RUPS) Bank diselenggarakan secara sirkuler atau dilaksanakan tanpa adanya rapat secara fisik atau melalui keputusan sirkuler (*circular resolution*). Selama tahun 2022, Bank menyelenggarakan 3 (tiga) kali RUPS sirkuler dengan keputusan yang telah disetujui sebagai berikut:

The Bank's General Meetings of Shareholders (GMS) are held by circular or without a physical meeting or by circular resolutions. During 2022, The Bank held 3 (three) circular GMS with the following resolutions approved:

RUPS Sirkuler Tanggal 21 Maret 2022

CIRCULAR GMS DATED MARCH 21, 2022

Keputusan RUPS Sirkuler tanggal 21 Maret 2022 adalah sebagai berikut:

The decision of circular GMS dated March 21, 2023 is as follows:

Hasil Keputusan Resolutions	Telah atau Belum Ditindaklanjuti Has Been or Yet to be Followed Up	Realisasi oleh Manajemen Follow-Up by Management
Menyesuaikan Maksud dan Tujuan Perseroan dalam Pasal 3 ayat 1 dalam Anggaran Dasar Perseroan. To adjust the Purposes and Objectives of the Company in Article 3 paragraph 1 on the Company's Articles of Association.		Akta No. 198 tanggal 28 Maret 2022. The Deed No. 198 dated March 28, 2022.
Menambah poin (r) dalam Pasal 3 ayat 2 dalam Anggaran Dasar Perseroan. To add point (r) in Article 3 paragraph 2 on the Company's Article of Association.		

 Telah ditindaklanjuti | Has been followed up
 Belum ditindaklanjuti | Yet to be followed up

RUPS Sirkuler Tanggal 27 Juni 2022

CIRCULAR GMS DATED JUNE 27, 2022

Keputusan RUPS Sirkuler tanggal 27 Juni 2022 adalah sebagai berikut:

The decision of circular GMS dated June 27, 2022 is as follows:

Hasil Keputusan Resolutions	Telah atau Belum Ditindaklanjuti Has Been or Yet to be Followed Up	Realisasi oleh Manajemen Follow-Up by Management
Menerima dan menyetujui laporan tahunan di antaranya laporan keuangan Perseroan, urusan dan kepengurusan Perseroan, dan administrasi keuangan untuk tahun buku yang berakhir pada Desember 2021, termasuk menerima laporan mengenai tugas pengawasan yang telah dilakukan oleh Dewan Komisaris untuk tahun buku yang berakhir pada Desember 2021, serta laporan pelaksanaan Tanggung Jawab Sosial dan Lingkungan. To accept and approve the annual report containing among others, financial statements, the affairs and management of The Company, and financial administration for financial year ending in December 2021, including report on supervision duty that has been conducted by the Board of Commissioners for the financial year ending in December 2021, and report on the implementation of Corporate Social and Environmental Responsibility.		
Menyetujui Laba Bersih Perseroan tahun buku yang berakhir pada Desember 2021 untuk dibukukan menjadi Surplus Reserve (10%) dan laba yang belum didistribusikan (90%) untuk mengikuti Undang-Undang Perseroan Terbatas dan mendukung perkembangan bisnis Perseroan. To approve The Company's Net Profit of the financial year ending in December 2021 to be booked into Surplus Reserve (10%) and undistributed profit (90%) in order to follow the Company Law and to support The Company's business development.		
Membebaskan dan melepaskan anggota Dewan Komisaris dan Direksi dari segala kewajiban yang timbul dari pengurusan dan tanggung jawab yang dilakukan selama tahun buku yang berakhir pada Desember 2021 sepanjang tindakan mereka tercermin dalam laporan tahunan dan laporan keuangan untuk tahun buku yang berakhir pada Desember 2021. To release and discharge the members of the Board of Commissioners and Board of Directors from all liabilities arising from their management and responsibilities performed during the financial year ending in December 2021 to the extent that their actions are reflected in the annual report and financial statements for the financial year ending in December 2021.		

Hasil Keputusan Resolutions	Telah atau Belum Ditindaklanjuti Has Been or Yet to be Followed Up	Realisasi oleh Manajemen Follow-Up by Management
Memilih dan menyetujui Akuntan Publik Imelda & Rekan (terafiliasi dengan Deloitte), penugasan sebagai Kantor Akuntan Publik untuk melakukan audit atas buku Perseroan tahun buku yang berakhir pada tanggal 31 Desember 2022, dengan memperhatikan rekomendasi Dewan Komisaris melalui Surat Keputusan Sirkuler No. 005/SK.BOC/VI/2022 tanggal 8 Juni 2022 dan Surat Memorandum Internal Komite Audit No. 029/IM/SMD/VI/2022 tanggal 8 Juni 2022 sesuai dengan ketentuan yang berlaku. To choose and approve Imelda & Partners Registered Public Accountants (affiliated with Deloitte), assigned as a Public Accounting Firm to conduct audit on The Company's book for the financial year ending on December 31, 2022, by considering the recommendations of the Board of Commissioners through Circular Resolution Letter No. 005/SK.BOC/VI/2022 dated June 8, 2022 and Audit Committee Internal Memorandum Letter No. 029/IM/SMD/VI/2022 dated June 8, 2022 in accordance with prevailing regulations.		
Menunjuk dan memberi kuasa kepada Direksi Perseroan, dengan hak substitusi untuk melakukan tindakan-tindakan yang diperlukan, termasuk tetapi tidak terbatas untuk hadir di hadapan notaris untuk menyatakan kembali seluruh atau sebagian dari keputusan ini dalam bentuk suatu akta notaris, dan sejauh diperlukan untuk memberitahukan, melaporkan dan mendaftarkan keputusan ini kepada pihak-pihak berwenang yang relevan, termasuk tetapi tidak terbatas kepada Otoritas Jasa keuangan, dan Kementerian Hukum dan Hak Asasi Manusia, dan untuk membuat amandemen-amandemen dan/atau tambahan-tambahan dalam bentuk apapun yang secara wajar diperlukan untuk memperoleh persetujuan demikian, dan untuk mengajukan dan menandatangani seluruh permohonan dan dokumen lain, serta untuk mengambil tindakan-tindakan yang mungkin diperlukan untuk melaksanakan keputusan ini. To appoint and authorize the Board of Directors of the Company, with the power of substitution to take actions deemed necessary, including without limitation to appear before a notary to restate all or part(s) of these resolutions in the form of a notary deed, and to the extent necessary to notify, report and register these resolutions with the relevant authorities, including but not limited to the Financial Service Authority, and the Ministry of Law and Human Rights, and to make amendments and/or additions in any form whatsoever reasonably required to obtain such approval, and to submit and sign all applications and other documents, as well as to take actions which may be required to implement these resolutions.		

 Telah ditindaklanjuti | Has been followed up
 Belum ditindaklanjuti | Yet to be followed up

RUPS Sirkuler Tanggal 21 September 2022

CIRCULAR GMS DATED SEPTEMBER 21, 2022

Keputusan RUPS Sirkuler Tanggal 21 September 2022 adalah sebagai berikut:

The decision of circular GMS dated September 21, 2022 is as follows:

Hasil Keputusan Resolutions	Telah atau Belum Ditindaklanjuti Has Been or Yet to be Followed Up	Realisasi oleh Manajemen Follow-Up by Management
Menetapkan remunerasi bagi anggota Dewan Komisaris dan Direksi Perseroan. To determine the remuneration of members of the Board of Commissioners and Board of Directors of the Company.		
Menyetujui pemberian bonus tahun 2021 untuk Dewan Komisaris dan Direksi Perseroan. To approve the 2021 year end bonus for the Board of Commissioners and Board of Directors of the Company.		

 Telah ditindaklanjuti | Has been followed up
 Belum ditindaklanjuti | Yet to be followed up

Dewan Komisaris

Board of Commissioners

Dewan Komisaris merupakan organ Bank yang bertugas melakukan fungsi pengawasan secara umum dan/atau secara khusus, serta memberikan nasihat terhadap kegiatan pengelolaan Bank oleh Direksi sesuai dengan Anggaran Dasar Bank.

Dewan Komisaris tidak turut serta dalam pengambilan keputusan operasional. Kedudukan setiap anggota Dewan Komisaris termasuk Presiden Komisaris adalah setara. Dewan Komisaris memiliki lebih dari 1 (satu) orang anggota yang setiap anggota bertindak atas keputusan bersama dan mewakili Dewan Komisaris.

PEDOMAN KERJA DEWAN KOMISARIS

Dewan Komisaris Bank melaksanakan fungsi pengawasan berdasarkan Pedoman Kerja Dewan Komisaris, yang telah diperbarui pada tanggal 13 Desember 2023, yang antara lain mengatur komposisi, kriteria dan independensi Dewan Komisaris; masa jabatan Dewan Komisaris; tugas dan tanggung jawab Dewan Komisaris; wewenang Dewan Komisaris; etika dan pedoman berperilaku; waktu kerja Dewan Komisaris; kategori rapat; serta tata tertib rapat.

Bank berencana melakukan tinjauan atas Pedoman Kerja Dewan Komisaris ini pada tanggal 13 Desember 2026. Pedoman Kerja Dewan Komisaris pertama kali diterbitkan pada tanggal 24 Juli 2013 dan selanjutnya mengalami 5 (lima) kali perubahan pada tanggal 28 September 2015; 10 Oktober 2017; 26 September 2019; 2 November 2020; dan terakhir pada tanggal 13 Desember 2023.

TUGAS DAN TANGGUNG JAWAB

Tugas dan tanggung jawab Dewan Komisaris antara lain:

- Melaksanakan pengawasan terhadap Direksi Bank dalam pelaksanaan kebijakan Bank, tugas-tugas dan tanggung jawabnya sesuai dengan keputusan RUPS maupun semua ketentuan yang berlaku.
- Memberikan nasihat kepada Direksi mengenai hal-hal strategis yang berhubungan dengan kegiatan usaha Bank.
- Mengarahkan, memantau, dan mengevaluasi pelaksanaan kebijakan strategis Bank.

The Board of Commissioners is The Bank's organ that undertakes supervisory function generally and/or specifically, and provides advisory function to the Board of Directors management activities in accordance with The Bank's Articles of Association.

The Board of Commissioners does not take part in making operational decisions. The status of each member of the board, including the President Commissioner is equal. Each individual member acts on a joint decision and represents the board.

BOARD OF COMMISSIONERS CHARTER

The Bank's Board of Commissioners conducts the oversight function based on the Board of Commissioners Charter, which has been updated on December 13, 2023. The Board of Commissioners Charter among others regulates the composition, criteria and independency of the Board of Commissioners; term of office of the Board of Commissioners; duties and responsibilities of the Board of Commissioners; authorities of the Board of Commissioners; ethics and code of conduct; working time of the Board of Commissioners; meeting category; and meeting procedures.

The Bank plans to review the Board of Commissioners Charter on December 13, 2026. The Board of Commissioners Charter was first published on July 24, 2013 and was subsequently amended 5 (five) times on September 28, 2015; October 10, 2017; September 26, 2019; November 2, 2020; and finally on December 13, 2023.

DUTIES AND RESPONSIBILITIES

The duties and responsibilities of the Board of Commissioners are as follows:

- Conduct supervision on The Bank's Board of Directors in the implementation of The Bank's policies, duties and responsibilities of the Board of Directors as stipulated in the GMS resolutions and all applicable regulations.
- Advise the Board of Directors on strategic matters relating to The Bank's business activities.
- Direct, monitor, and evaluate the implementation of The Bank's strategic policies.

- Melaporkan kepada Otoritas Jasa Keuangan (OJK) paling lambat 7 (tujuh) hari sejak ditemukan pelanggaran perundang-undangan di bidang keuangan dan perbankan, keadaan atau perkiraan keadaan yang dapat membahayakan kelangsungan usaha Bank.
- Melaksanakan pengawasan terhadap rencana bisnis Bank yang dilakukan Direksi.
- Mengevaluasi pertanggungjawaban Direksi atas pelaksanaan kebijakan manajemen risiko Bank.
- Memberikan persetujuan pengangkatan dan pemberhentian Kepala Satuan Kerja Audit Internal (SKAI).
- Melakukan kajian atas perencanaan audit dan pelaksanaannya serta pemantauan atas tindak lanjut hasil audit dalam rangka menilai kecukupan pengendalian internal, termasuk kecukupan proses pelaporan keuangan.
- Memberikan laporan tentang tugas pengawasan yang telah dilakukan selama tahun buku sebelumnya kepada RUPS.
- Mengevaluasi laporan tahunan yang telah diaudit untuk diajukan dalam RUPST.
- Melakukan pengawasan terhadap pelaksanaan fungsi kepatuhan Bank.
- Memastikan terselenggaranya pelaksanaan tata kelola perusahaan yang baik dalam setiap kegiatan usaha Bank pada seluruh tingkatan atau jenjang organisasi.
- Memastikan bahwa Direksi Bank telah menindaklanjuti temuan audit dan rekomendasi dari SKAI, auditor eksternal, hasil pengawasan regulator.
- Membentuk Komite Audit, Komite Pemantau Risiko, dan Komite Remunerasi dan Nominasi, serta memastikan ketiga komite tersebut telah menjalankan tugasnya secara efektif.
- Menjamin SKAI dapat melaksanakan tugasnya secara independen.
- Memberikan persetujuan atas kebijakan dan prosedur penerapan program Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme (APU dan PPT), serta melakukan pengawasan atas pelaksanaan tanggung jawab Direksi terhadap program APU dan PPT.
- Menyetujui dan mengevaluasi kebijakan alih daya termasuk penyempurnaannya, termasuk mengevaluasi pertanggungjawaban Direksi atas penerapan manajemen risiko pada alih daya.
- Mengarahkan, memantau dan mengevaluasi rencana strategis Teknologi Informasi (TI) dan kebijakan Bank terkait dengan penyelenggaraan teknologi informasi.
- Memelihara dan memantau tingkat kesehatan Bank serta mengambil langkah-langkah yang diperlukan untuk memelihara dan/atau meningkatkan tingkat kesehatan Bank.
- Report to the Financial Services Authority (OJK) no later than 7 (seven) days since the date of violation of laws in the financial and banking fields, and for circumstances or estimates of circumstances that may compromise The Bank's business continuity.
- Implement oversight of The Bank's business plan conducted by the Board of Directors.
- Evaluate the Board of Directors' accountability for the implementation of The Bank's risk management policy.
- Provide approval on the appointment and dismissal of the Head of Internal Audit Department (IAD).
- Review the audit plan and its implementation process as well as monitor the follow-up of audit results in order to assess the adequacy of internal controls, including the adequacy of the financial reporting process.
- Provide reports on oversight duties that have been conducted during the previous financial year to the GMS.
- Evaluate audited annual reports for submission in the AGMS.
- Monitor the implementation of The Bank's compliance function.
- Ensure the implementation of good corporate governance in every business activity of The Bank at all levels of the organization.
- Ensure the Board of Directors of The Bank has followed up on audit findings and recommendations of The Bank's IAD, external auditor, the oversight results by regulators.
- Establish the Audit Committee, Risk Monitoring Committee, and Remuneration and Nomination Committee, and ensure the three committees have performed their duties effectively.
- Ensure the IAD can carry out its duties independently.
- Provide approval on the Anti Money Laundering and Countering Financing of Terrorism (AML and CFT) policies and procedures, as well as conduct supervision on the implementation of the Board of Directors' responsibilities towards AML and CFT programs.
- Approve and evaluate the outsourcing policy and its improvements, including evaluate the responsibility of the Board of Directors on the implementation of risk management on outsourcing.
- Direct, monitor and evaluate the strategic plan of Information Technology (IT) and The Bank's policy related to the implementation of information technology.
- Maintain and monitor The Bank's soundness rating and take necessary measures to maintain and/or to increase the soundness rating of The Bank.

- Sendiri dan/atau bersama-sama dengan Direksi dan/atau pemegang saham pengendali wajib menyampaikan rencana tindakan (*action plan*) kepada OJK yang memuat langkah-langkah perbaikan yang wajib dilaksanakan oleh Bank dalam rangka mengatasi permasalahan yang signifikan yang dihadapi oleh Bank beserta target waktu penyelesaiannya.
- Melakukan pengawasan aktif terhadap penerapan manajemen risiko dalam kegiatan keagenan produk keuangan luar negeri.
- Memantau dan memberikan persetujuan kepada Direksi untuk menetapkan kebijakan dan prosedur tentang transparansi penggunaan data pribadi nasabah serta kebijakan dan prosedur tentang transparansi informasi produk Bank.

PENGANGKATAN DAN PEMBERHENTIAN DEWAN KOMISARIS

Berikut ini adalah mekanisme serta prosedur pengangkatan Dewan Komisaris Bank:

- Setiap usulan atas kandidat anggota Dewan Komisaris harus memperhatikan rekomendasi dari Komite Remunerasi dan Nominasi.
- Kandidat anggota Dewan Komisaris yang telah dinominasikan melalui hasil rekomendasi dari Komite Remunerasi dan Nominasi akan diajukan kepada pemegang saham guna mendapatkan persetujuan awal.
- Setelah menerima persetujuan awal dari pemegang saham, kandidat akan diatur untuk menjalani tes Uji Kemampuan dan Kepatutan oleh regulator, tes kesehatan, dan bentuk pemeriksaan lainnya yang akan dilakukan oleh pemegang saham maupun Bank.
- Setelah kandidat memenuhi persyaratan Penilaian Kemampuan dan Kepatutan sesuai Peraturan Otoritas Jasa Keuangan (POJK) dan juga bentuk pemeriksaan lainnya yang akan dilakukan oleh pemegang saham dan Bank, maka pemegang saham akan melakukan RUPS untuk memutuskan secara formal anggota baru dan komposisi baru dari anggota Dewan Komisaris termasuk di dalamnya persetujuan atas paket remunerasi untuk anggota Dewan Komisaris yang baru. Persetujuan RUPS akan berupa keputusan pemegang saham dalam bentuk risalah rapat RUPS atau cara lain yang diatur dalam Anggaran Dasar Bank.
- Berdasarkan keputusan tersebut di atas, Departemen Sumber Daya Manusia akan mempersiapkan surat pemberitahuan kepada supervisor/regulator mengenai perubahan komposisi dari Dewan Komisaris.
- Untuk kandidat yang berasal dari pemegang saham atau dari internal (Pejabat Eksekutif Bank), proses seleksi secara umum akan berlaku sama, kecuali untuk beberapa poin yang mungkin tidak berlaku untuk kandidat yang berasal dari ICBC Limited seperti disebutkan di atas.

- Individually and/or collectively with the Board of Directors and/or controlling shareholders, to submit the action plans to OJK, in which contain the remedial measures that must be performed by The Bank in order to address the significant problems faced by The Bank, including their target completion time.
- Conduct active supervision on the implementation of risk management in the activities of foreign financial product agency.
- Monitor and provide approval to the Board of Directors to establish policy and procedures on the transparency use of customers personal data, as well as policy and procedures on the transparency of The Bank's product information

APPOINTMENT AND DISMISSAL OF THE BOARD OF COMMISSIONERS

The following are mechanisms and procedures for the appointment of members of The Bank's Board of Commissioners:

- Every proposal of candidates for the Board of Commissioners member must consider the recommendations of the Remuneration and Nomination Committee.
- The candidate for the Board of Commissioners member who has been nominated through the recommendation from the Remuneration and Nomination Committee will be proposed to the shareholders for initial approval.
- After receiving the initial approval from the shareholders, the candidate will be arranged to undergo the Fit and Proper Test by regulators, medical check-up, and other forms of inspection that will be carried out by the shareholders and The Bank.
- After the candidate meets the requirements for the Fit and Proper Test according to the Financial Services Authority Regulations (POJK) and other inspections carried out by the shareholders and The Bank, the shareholders will hold a GMS to formally decide a new member and new composition of the Board of Commissioners members, including the approval of the remuneration package for new Board of Commissioners member. The agreement will be in the form of shareholders' resolution and the GMS Minutes of Meeting (MoM) or other methods stipulated in The Bank's Articles of Association.
- Based on the aforementioned decision, the Human Resources Department will prepare a notification letter to the supervisors/regulators regarding changes in the composition of the Board of Commissioners.
- For candidates who are the shareholders or internal parties (Executive Officers of The Bank), the same general selection process applies, except for some points, which may not apply to candidates from ICBC Limited as mentioned above.

KRITERIA DAN PERSYARATAN ANGGOTA DEWAN KOMISARIS

Kriteria dan persyaratan minimum untuk Dewan Komisaris adalah:

- Dewan Komisaris terdiri dari paling sedikit 3 (tiga) orang dan paling banyak sama dengan jumlah anggota Direksi.
- Dewan Komisaris wajib dipimpin oleh Presiden Komisaris yang ditunjuk dari anggota Dewan Komisaris.
- Dari seluruh anggota Dewan Komisaris, paling sedikit 1 (satu) orang wajib berdomisili di Indonesia dan paling sedikit 1 (satu) orang Warga Negara Indonesia dipilih sebagai anggota Dewan Komisaris.
- Dewan Komisaris wajib terdiri dari Komisaris Independen dan Komisaris Non-Independen.
- Komisaris Independen wajib paling sedikit berjumlah 50% (lima puluh persen) dari jumlah anggota Dewan Komisaris
- Mantan anggota Direksi atau Pejabat Eksekutif Bank atau pihak-pihak yang mempunyai hubungan dengan Bank, yang dapat memengaruhi kemampuan yang bersangkutan untuk bertindak independen wajib menjalani masa tunggu (*cooling off*) paling singkat 1 (satu) tahun sebelum menjadi Komisaris Independen pada Bank. Ketentuan tersebut tidak berlaku bagi mantan anggota Direksi yang membawahi fungsi pengawasan atau Pejabat Eksekutif yang melakukan fungsi pengawasan pada Bank tersebut.
- Komisaris Non-Independen dapat beralih menjadi Komisaris Independen setelah memenuhi persyaratan sebagai Komisaris Independen.
- Komisaris Non-Independen yang akan beralih menjadi Komisaris Independen wajib menjalani masa tunggu (*cooling off*) paling singkat 6 (enam) bulan.
- Peralihan dari Komisaris Non-Independen menjadi Komisaris Independen wajib memperoleh persetujuan Otoritas Jasa Keuangan (OJK).
- Komisaris Independen yang telah menjabat selama 2 (dua) periode masa jabatan berturut-turut dapat diangkat kembali pada periode selanjutnya sebagai Komisaris Independen dalam hal Rapat Anggota Dewan Komisaris menilai bahwa Komisaris Independen tetap dapat bertindak independen; dan Komisaris Independen menyatakan dalam RUPS mengenai independensi yang bersangkutan.
- Pernyataan independensi Komisaris Independen wajib diungkapkan dalam laporan pelaksanaan tata kelola.
- Setiap usulan pengangkatan dan/atau penggantian anggota Dewan Komisaris kepada RUPS harus memperhatikan rekomendasi Komite Remunerasi dan Nominasi.

BOARD OF COMMISSIONERS CRITERIA AND MEMBER REQUIREMENTS

The minimum criteria and requirements for the Board of Commissioners are:

- At the very least the Board of Commissioners should consist of 3 (three) members and at the most equivalent to the members of the Board of Directors.
- The Board of Commissioners must be chaired by the President Commissioner who is appointed from the members of the Board of Commissioners.
- At least 1 (one) member of the Board of Commissioners must be domiciled in Indonesia and at least 1 (one) Indonesian Citizen is appointed as a member of the Board of Commissioners.
- The Board of Commissioners must consist of Independent Commissioners and Non-Independent Commissioners.
- Independent Commissioners must at the very least occupy 50% (fifty percent) of the total members of the Board of Commissioners.
- Former member of the Board of Directors or Executive Officer of The Bank, or other parties in relation to The Bank, which may affect the ability of concerned individual to act independently are required to undergo a cooling off period at the very least 1 (one) year prior to the appointment as an Independent Commissioner of The Bank. Such provision is not applicable for former member of the Board of Directors in charge of monitoring function or Executive Officer whose duty is to perform monitoring function.
- Non-Independent Commissioners can be appointed as Independent Commissioners after fulfilling the requirements to be Independent Commissioners.
- Non-Independent Commissioners who will be positioned as Independent Commissioners are required to undergo a cooling off period at the very least 6 (six) months.
- The transition from Non-Independent Commissioners to Independent Commissioners must be subjected to approval from the Financial Services Authority (OJK).
- Independent Commissioners who have held the position for 2 (two) office terms consecutively can be reappointed in the next period as an Independent Commissioner under the conditions of the Board of Commissioners' meeting concludes that Independent Commissioners could still act independently; and the Independent Commissioners state his/her independency in the GMS.
- The independency statement of Independent Commissioners must be disclosed in the GCG report.
- Every proposal on the appointment and/or changes in the members of the Board of Commissioners to the GMS must consider the recommendations of the Remuneration and Nomination Committee.

- Anggota Komite Remunerasi dan Nominasi yang memiliki benturan kepentingan (*conflict of interest*) dengan usulan yang direkomendasikan wajib mengungkapkan dalam usulan yang direkomendasikan.
 - Anggota Dewan Komisaris harus memenuhi persyaratan Penilaian Kemampuan dan Kepatutan sesuai POJK mengenai Penilaian Kemampuan dan Kepatutan bagi Pihak Utama Lembaga Jasa Keuangan.
 - Mayoritas anggota Dewan Komisaris dilarang saling memiliki hubungan keluarga sampai dengan derajat kedua dengan sesama anggota Dewan Komisaris dan/atau anggota Direksi.
 - Dalam waktu 5 (lima) tahun sebelum pengangkatannya tidak pernah dinyatakan pailit atau menjadi anggota Dewan Komisaris atau anggota Direksi yang dinyatakan bersalah menyebabkan suatu perusahaan dinyatakan pailit, dihukum karena melakukan tindak pidana yang merugikan keuangan negara dan/atau yang berkaitan dengan sektor keuangan.
 - Anggota Dewan Komisaris harus ditunjuk berdasarkan keputusan yang diambil berdasarkan suara yang setuju lebih dari 2/3 (dua pertiga) dari jumlah suara yang dikeluarkan secara sah di RUPS untuk periode 3 (tiga) tahun dimulai sejak tanggal anggota Dewan Komisaris tersebut lulus Uji Kemampuan dan Kepatutan yang dilakukan oleh Otoritas Jasa Keuangan (OJK). Anggota Dewan Komisaris yang masa jabatannya telah berakhir dapat dipilih kembali untuk periode 3 (tiga) tahun selanjutnya.
 - Gaji dan/atau remunerasi lainnya diberikan kepada anggota Dewan Komisaris, yang jumlahnya ditetapkan oleh RUPS.
 - Apabila oleh sebab apa pun jabatan anggota Dewan Komisaris lowong, RUPS harus diselenggarakan dalam jangka waktu 30 (tiga puluh) hari kalender sejak terjadi lowongan untuk mengisi posisi tersebut dengan memperhatikan ketentuan yang berlaku. Masa jabatan dari pihak yang ditunjuk untuk mengisi kekosongan oleh sebab apa pun adalah masa jabatan dari anggota Dewan Komisaris yang digantikan.
 - Seorang anggota Dewan Komisaris berhak mengundurkan diri dari jabatannya dengan memberitahukan secara tertulis mengenai maksud tersebut kepada Bank sekurang-kurangnya 30 (tiga puluh) hari kalender sebelum tanggal pengunduran dirinya.
 - Jabatan anggota Dewan Komisaris berakhir apabila:
 - a. Mengundurkan diri sesuai dengan ketentuan Anggaran Dasar Bank;
 - b. Masa jabatannya berakhir;
 - c. Tidak lagi memenuhi persyaratan sesuai dengan perundang-undangan yang berlaku;
 - d. Meninggal dunia;
 - e. Diberhentikan berdasarkan keputusan RUPS; dan
 - Members of the Remuneration and Nomination Committee who have conflict of interest with the recommended proposal should disclose their objection in the recommended proposal.
 - Members of the Board of Commissioners must fulfill the requirements for the Fit and Proper Test in accordance with POJK concerning the Fit and Proper Test for the Main Party of Financial Institutions.
 - Majority of the Board of Commissioners are prohibited to have family relations up to the second degree with other members of the Board of Commissioners and/or members of the Board of Directors.
 - Within 5 (five) years prior to the appointment have never been declared bankrupt or became member of the Board of Commissioners or member of the Board of Directors who was declared guilty for causing a company to be bankrupt, convicted of a criminal offense that is detrimental to the country's finances and/or related to financial sector.
 - Members of the Board of Commissioners must be appointed based on the decision taken by agreed votes of more than 2/3 (two-thirds) from legitimate votes at the GMS for a period of 3 (three) years, commencing from the date of concerned members of the Board of Commissioners passed the Fit and Proper Test by the Financial Services Authority (OJK). Members of the Board of Commissioners whose term of office has ended can be reappointed for the next 3 (three) years.
 - Salary and/or other remuneration are provided to members of the Board of Commissioners, which sums are determined by the GMS.
 - If for any reasons, the position of a member of the Board of Commissioners is vacant, the GMS must be convened within 30 (thirty) calendar days since the occurrence of such vacancy for further replacement by considering the applicable rules. The office term of the appointment for replacement due to any reasons is following the tenure of the replaced member of the Board of Commissioners.
 - A member of the Board of Commissioners has the rights to tender his/her resignation from a position by written notice of his/her intentions to The Bank at least 30 (thirty) calendar days prior to his/her date of resignation.
- The tenure of members of the Board of Commissioners ends if:
- a. Resigned in accordance with the provisions of The Bank's Articles of Association;
 - b. Term of office is over;
 - c. No longer meet the requirements to perform according to prevailing laws and regulations;
 - d. Passed away;
 - e. Dismissed pursuant to the GMS resolution; and

- f. Dinyatakan pailit oleh Institusi Pengadilan yang telah berkekuatan hukum tetap atau ditaruh di bawah pengampunan berdasarkan suatu keputusan pengadilan.

- f. Declared bankrupt by Court Institution which has permanent legal force or is put under pardon based on a court decision.

PROGRAM ORIENTASI DAN PENGENALAN DEWAN KOMISARIS BARU

Bank memiliki program orientasi dan pengenalan bagi anggota Dewan Komisaris dan komite di bawah Dewan Komisaris yang baru bergabung dengan tujuan untuk memberikan pengetahuan dan pemahaman tentang Bank dan lingkup pekerjaannya. Program orientasi dan pengenalan ini dipresentasikan oleh Presiden Direktur dan anggota Direksi lainnya yang meliputi: visi dan misi Bank; Kode Etik Bank; struktur organisasi Bank; Pedoman Kerja Dewan Komisaris dan komite-komite; informasi tentang segmen/bidang yang ada di Bank yang disampaikan oleh masing-masing Direktur bidang; serta peraturan-peraturan terkait lainnya.

Bank tidak mengadakan program orientasi dan pengenalan Dewan Komisaris baru karena tidak terdapat perubahan dalam susunan dan komposisi Dewan Komisaris di tahun 2023.

SUSUNAN DAN KOMPOSISI DEWAN KOMISARIS PADA 2023

Susunan Dewan Komisaris Bank pada 31 Desember 2023 terdiri dari 1 (satu) orang Presiden Komisaris, 2 (dua) orang Komisaris Independen, dan 1 (satu) orang Komisaris. Kedua Komisaris Independen dan satu Komisaris berdomisili di Indonesia. Dengan demikian, komposisi Dewan Komisaris Bank telah memenuhi Peraturan OJK tentang Pelaksanaan Tata Kelola bagi Bank Umum.

BOARD OF COMMISSIONERS' ORIENTATION AND INDUCTION PROGRAM

The Bank has an orientation and induction program for newly appointed Board of Commissioners members as well as for committees under the Board of Commissioners. The purpose is to provide knowledge and understanding of The Bank and the scope of its work. This orientation and induction program is to be presented by the President Director and members of the Board of Directors that covers: The Bank's vision and mission; The Bank's Code of Conduct; The Bank's organizational structure; the Board of Commissioners Charter and Committee Charter; information on segments/fields in The Bank delivered by each field Director; and other related regulations.

The Bank did not conduct Board of Commissioners' orientation and induction program since there was not a change in the Board of Commissioners' structure and composition in 2023.

BOARD OF COMMISSIONERS STRUCTURE AND COMPOSITION IN 2023

The composition of The Bank's Board of Commissioners as of December 31, 2023 consists of 1 (one) President Commissioner, 2 (two) Independent Commissioners, and 1 (one) Commissioner. The two Independent Commissioners and one Commissioner are domiciled in Indonesia. As such, the Board of Commissioners' composition has complied with OJK Regulations on the Implementation of Governance for Commercial Banks.

Nama Name	Jabatan Position	Periode Period	Dasar Penunjukan Appointment Legal Basis
Wang Kun	Presiden Komisaris President Commissioner	13 Desember 2017 – sekarang December 13, 2017 – current	Akta pengangkatan No. 108 tanggal 13 Desember 2017 Deed of appointment No. 108 dated December 13, 2017
Hendra Widjojo	Komisaris Independen Independent Commissioner	19 September 2007 – sekarang September 19, 2007 – current	Akta pengangkatan No. 024 tanggal 19 September 2007 Deed of appointment No. 024 dated September 19, 2007
H. Yunno Kusumo	Komisaris Independen Independent Commissioner	29 Agustus 2018 – sekarang August 29, 2018 – current	Akta pengangkatan No. 137 tanggal 29 Agustus 2018 Deed of appointment No. 137 dated August 29, 2018
Jeff S.V. Eman	Komisaris Commissioner	5 Juni 2020 – sekarang June 5, 2020 - current	Akta pengangkatan No. 19 tanggal 5 Juni 2020 Deed of appointment No. 19 dated June 5, 2020

UJI KEMAMPUAN DAN KEPATUTAN

Uji Kemampuan dan Kepatutan bagi Dewan Komisaris dilakukan setelah menerima persetujuan awal dari pemegang saham. Kandidat akan diatur untuk menjalani tes Uji Kemampuan dan Kepatutan oleh regulator, tes kesehatan, dan bentuk pemeriksaan lainnya yang akan dilakukan baik oleh pemegang saham maupun Bank.

Per 31 Desember 2023, seluruh anggota Dewan Komisaris Bank telah lulus Uji Kemampuan dan Kepatutan oleh regulator melalui keputusan di bawah ini:

Nama Name	Jabatan Position	Surat Uji Kemampuan dan Kepatutan Letter of Fit and Proper Test
Wang Kun	Presiden Komisaris President Commissioner	Surat No. KEP-203/D.03/2017 tanggal 3 November 2017 Letter No. KEP-203/D.03/2017 dated November 3, 2017
Hendra Widjojo	Komisaris Independen Independent Commissioner	Surat No. 9/9/DPIP/Prz/Sb/Rahasia tanggal 7 November 2007 Letter No. 9/9/DPIP/Prz/Sb/Rahasia dated November 7, 2007
H. Yunno Kusumo	Komisaris Independen Independent Commissioner	Surat No. SR-165/PB.12/2018 tanggal 9 Agustus 2018 Letter No. SR-165/PB.12/2018 dated August 9, 2018
Jeff S.V. Eman	Komisaris Commissioner	Surat No. SR-116/PB.12/2020 tanggal 5 Mei 2020 Letter No. SR-116/PB.12/2020 dated May 5, 2020

RANGKAP JABATAN

- Anggota Dewan Komisaris dilarang melakukan rangkap jabatan sebagai anggota Dewan Komisaris, anggota Direksi, dan/atau Pejabat Eksekutif:
 - a. Pada lembaga keuangan atau perusahaan keuangan, baik bank maupun bukan bank;
 - b. Pada lebih dari 1 (satu) lembaga bukan keuangan atau perusahaan bukan keuangan, baik yang berkedudukan di dalam maupun di luar negeri.
- Tidak termasuk rangkap jabatan dalam hal:
 - a. Anggota Dewan Komisaris menjabat sebagai anggota Dewan Komisaris, anggota Direksi, dan/atau Pejabat Eksekutif yang melaksanakan fungsi pengawasan pada 1 (satu) perusahaan anak bukan bank yang dikendalikan oleh bank;
 - b. Komisaris Non-Independen menjalankan tugas fungsional dari pemegang saham bank yang berbentuk badan hukum pada kelompok usaha bank; dan/atau
 - c. Anggota Dewan Komisaris menduduki jabatan pada organisasi atau lembaga nirlaba.

FIT AND PROPER TEST

The Fit and Proper Test of the Board of Commissioners should be conducted upon receiving the initial approval from the shareholders. The candidate will be required to undergo the Fit and Proper Test by regulators, medical check-up, and other forms of inspection that will be carried out by the shareholders and The Bank.

As of December 31, 2023, all members of The Bank's Board of Commissioners have passed the Fit and Proper Test by regulators through the following decrees:

MULTIPLE BOARD MEMBERSHIPS

- Members of the Board of Commissioners are prohibited to have a concurrent position as member of the Board of Commissioners, member of the Board of Directors, and/or Executive Officer:
 - a. At financial institutions or financial companies, bank or non-bank;
 - b. At more than 1 (one) non-financial institution or non-financial company, both located domestically and overseas.
- Conditions which do not fall as concurrent positions:
 - a. The Board of Commissioners member who has a concurrent position as member of the Board of Commissioners, member of the Board of Directors, and/or Executive Officer and who performs the monitoring function in 1 (one) non-bank subsidiary company that is controlled by the bank;
 - b. Non-Independent Commissioner who performs functional responsibility from the bank's shareholders in the form of legal entity in the bank business group; and/or
 - c. The Board of Commissioners member who assumes position in a non-profit organization or institution.

PEDOMAN PERILAKU

Dewan Komisaris telah bertindak profesional dan menghindari segala bentuk potensi benturan kepentingan secara langsung maupun tidak langsung, menjamin keamanan dan kerahasiaan informasi penting perusahaan.

Interaksi antara Dewan Komisaris dengan pemegang saham terjadi, antara lain ketika:

- Memberikan pendapat dan saran saat RUPS mengenai rencana jangka panjang perusahaan, anggaran dan rencana kerja perusahaan yang diusulkan Direksi.
- Mengawasi pengelolaan Bank, serta memberikan pendapat dan saran kepada RUPS mengenai setiap masalah yang dianggap penting.
- Melaporkan dengan segera kepada RUPS apabila terjadi gejala penurunan kinerja perusahaan.
- Hal-hal lain sesuai dengan ketentuan Anggaran Dasar Bank dan pedoman Bank yang berlaku.

Sementara itu, interaksi Dewan Komisaris dan Direksi antara lain terjadi ketika:

- Meneliti dan menelaah laporan berkala dan laporan tahunan yang disiapkan Direksi, serta menandatangani laporan tahunan.
- Melakukan pengawasan dan memberikan pendapat atas pengelolaan Bank.
- Melakukan penilaian atas kinerja Direksi.
- Hal-hal lain sesuai dengan ketentuan Anggaran Dasar Bank dan pedoman Bank yang berlaku.

LAPORAN PELAKSANAAN TUGAS DEWAN KOMISARIS TAHUN 2023

Dewan Komisaris telah melakukan pengawasan terhadap pelaksanaan rencana bisnis yang dijalankan oleh Direksi tahun 2023. Pengawasan dilakukan terhadap aspek-aspek penting antara lain:

- Penilaian Dewan Komisaris tentang aspek kualitatif maupun kuantitatif dari realisasi rencana bisnis.
- Hasil penilaian Dewan Komisaris tentang faktor-faktor yang memengaruhi kinerja dan tingkat kesehatan Bank.
- Pendapat Dewan Komisaris mengenai upaya untuk meningkatkan kinerja Bank.

Dewan Komisaris telah aktif berperan dalam hal pengawasan operasional Bank. Di tahun 2023, Dewan Komisaris telah mengadakan rapat Dewan Komisaris, di mana terdapat 17 (tujuh belas) proposal utama yang telah dibahas. Rapat Komite Pemantau Risiko dan Komite Audit yang berada di bawah Dewan Komisaris telah dilaksanakan dengan total 41 (empat puluh satu) topik yang menjadi perhatian utama telah dibahas dan ditinjau. Rapat Komite Remunerasi dan Nominasi yang berada di bawah Dewan Komisaris juga telah dilaksanakan.

CODE OF CONDUCT

The Board of Commissioners has acted professionally and avoided any form of potential conflict of interest directly or indirectly, ensured the security and confidentiality of corporate key information.

The interaction between the Board of Commissioners and shareholders occurred when they are:

- Providing opinions and suggestions during the GMS regarding the corporate long-term plan, budget and business plan proposed by the Board of Directors.
- Supervising the management of The Bank and providing opinions and suggestions to the GMS regarding any issues that are considered important.
- Reporting immediately to the GMS in the event of declining inclination of the company performance.
- Other matters stipulated in The Bank's Articles of Association and The Bank's prevailing guidelines.

Meanwhile, the interaction of the Board of Commissioners and the Board of Directors occurred when they are:

- Examining and reviewing the periodical reports and annual reports prepared by the Board of Directors, and signing these annual reports.
- Conducting supervision and providing opinions on the management of The Bank.
- Assessing the performance of the Board of Directors.
- Other matters stipulated in The Bank's Articles of Association and The Bank's prevailing guidelines.

REPORT ON THE DUTIES IMPLEMENTATION OF THE BOARD OF COMMISSIONERS IN 2023

The Board of Commissioners has supervised the implementation of the business plan performed by the Board of Directors in 2023. The supervision is carried out on important aspects such as:

- The assessment of the Board of Commissioners on the qualitative and quantitative aspects of the realization of The Bank's business plan.
- The results of the Board of Commissioners' assessment on the factors affecting The Bank's performance and soundness rating.
- The opinion of the Board of Commissioners on efforts to improve The Bank's performance.

The Board of Commissioners has been actively involved in the supervision of The Bank's operations. In 2023, the Board of Commissioners has held the Board of Commissioners meetings, during which 17 (seventeen) main proposals were discussed. The meetings of Risk Monitoring Committee and Audit Committee under the Board of Commissioners have been implemented, with 41 (forty one) topics respectively of major concerns being discussed and reviewed. The Remuneration and Nomination Committee meeting under the Board of Commissioners has also been implemented.

Selain itu, untuk memperkuat komunikasi dan koordinasi antara Dewan Komisaris dan Direksi, diselenggarakan rapat komunikasi Dewan Komisaris dan Direksi. Pada tahun 2023, rapat komunikasi Dewan Komisaris dan Direksi dilaksanakan dengan membahas strategi rencana bisnis untuk tahun 2024-2026.

PELATIHAN DAN PENGEMBANGAN KOMPETENSI

Bank memiliki kebijakan terkait pengembangan dan peningkatan kompetensi Dewan Komisaris, yang dilakukan melalui berbagai pelatihan dan pendidikan. Daftar pelatihan dan pengembangan kompetensi Dewan Komisaris dapat dilihat dalam Bab “Profil Perusahaan” pada Laporan Tahunan Keberlanjutan 2023 ini.

PENILAIAN KINERJA KOMITE DI BAWAH DEWAN KOMISARIS

Berdasarkan Peraturan OJK No. 17 tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum, komite telah melaporkan hasil kinerja setiap kuartal kepada Dewan Komisaris dan sudah diterima dengan baik oleh Dewan Komisaris.

Selama tahun 2023, Dewan Komisaris dan anggota komite di bawah Dewan Komisaris melakukan beberapa kegiatan sebagai berikut:

In addition, to strengthen the communication and coordination between the Board of Commissioners and Board of Directors, a communication meeting of the Board of Commissioners and Board of Directors has also been held. In 2023, the communication meeting of the Board of Commissioners and Board of Directors was held to discuss the business plan strategies in 2024-2026.

TRAINING AND DEVELOPMENT OF COMPETENCY

The Bank has its own policy related to the development and enhancement of the Board of Commissioners competency, which are conducted through various training and workshops. The training and development of the Board of Commissioners competency can be referred to the “Company Profile” section in this 2023 Annual Sustainability Report.

PERFORMANCE ASSESSMENT OF THE COMMITTEES UNDER THE BOARD OF COMMISSIONERS

In accordance with OJK Regulation No. 17 year 2023 on the Implementation of Governance for Commercial Banks, the committees have reported their quarterly performance results to the Board of Commissioners and those reports have been well received by the Board of Commissioners.

During 2023, the Board of Commissioners and committee members under the Board of Commissioners conducted several activities as follows:

Tanggal Date	Aktivitas Activity	Dewan Komisaris, Komite Audit, dan Komite Pemantau Risiko Board of Commissioners, Audit Committee, and Risk Monitoring Committee	Tempat Venue
23 Februari 2023 February 23, 2023	<i>The Role of GRC in Supporting Financial Sector Performance</i>	Hendra Widjojo Komisaris Independen Independent Commissioner H. Yunno Kusumo Komisaris Independen Independent Commissioner Arini Imamawati Anggota Komite Audit Audit Committee Member Aki H. Parwoto Anggota Komite Pemantau Risiko Risk Monitoring Committee Member Douval Anggota Komite Pemantau Risiko Risk Monitoring Committee Member	Pelatihan dilakukan secara daring melalui aplikasi Zoom The training was held online via Zoom application

Tanggal Date	Aktivitas Activity	Dewan Komisaris, Komite Audit, dan Komite Pemantau Risiko Board of Commissioners, Audit Committee, and Risk Monitoring Committee	Tempat Venue
2-4 Mei 2023 May 2-4, 2023	Anti-Fraud Strategy Policy	Wang Kun Presiden Komisaris President Commissioner Hendra Widjojo Komisaris Independen Independent Commissioner H. Yunno Kusumo Komisaris Independen Independent Commissioner Jeff S.V. Eman Komisaris Commissioner	Pelatihan dilakukan secara daring melalui aplikasi E-link The training was held online via E-link application
8-10 Mei 2023 May 8-10, 2023	Anti Bribery Management System (ABMS) Policy	Hendra Widjojo Komisaris Independen Independent Commissioner Yunno Kusumo Komisaris Independen Independent Commissioner Jeff S.V. Eman Komisaris Commissioner	Pelatihan dilakukan secara daring melalui aplikasi E-link The training was held online via E-link application
15-17 Mei 2023 May 15-17, 2023	Bootcamp Investment Banking	Douval Anggota Komite Pemantau Risiko Risk Monitoring Committee Member	Pelatihan dilakukan secara daring melalui aplikasi Zoom The training was held online via Zoom application
22-26 Mei 2023 May 22-26, 2023	IT Helpdesk, ID Management, & IT Asset Management	Wang Kun Presiden Komisaris President Commissioner Hendra Widjojo Komisaris Independen Independent Commissioner H. Yunno Kusumo Komisaris Independen Independent Commissioner Jeff S.V. Eman Komisaris Commissioner	Pelatihan dilakukan secara daring melalui aplikasi E-link The training was held online via E-link application
29 Agustus - 1 September 2023 29 August - 1 September 2023	2023 IIA Indonesia National Conference	H. Yunno Kusumo Komisaris Independen Independent Commissioner	Pelatihan dilakukan secara luring di Batam, Indonesia The training was held offline in Batam, Indonesia
11-12 September 2023 September 11-12, 2023	Recognition Current Competency	Douval Anggota Komite Pemantau Risiko Risk Monitoring Committee Member	Pelatihan dilakukan secara daring melalui aplikasi Zoom The training was held online via Zoom application

Tanggal Date	Aktivitas Activity	Dewan Komisaris, Komite Audit, dan Komite Pemantau Risiko Board of Commissioners, Audit Committee, and Risk Monitoring Committee	Tempat Venue
27 September 2023 September 27, 2023	<i>Certification in Audit Committee Practices</i>	Aki H. Parwoto Anggota Komite Pemantau Risiko Risk Monitoring Committee Member	Pelatihan dilakukan secara luring di Jakarta, Indonesia The training was held offline in Jakarta, Indonesia
14-26 Oktober 2023 October 14-26, 2023	<i>Enhancing Governance Synergy and Effectiveness for A New Chapter in Internationalized and Diversified Operation, 2023 Corporate Governance Forum</i>	Wang Kun Presiden Komisaris President Commissioner Hendra Widjojo Komisaris Independen Independent Commissioner H. Yunno Kusumo Komisaris Independen Independent Commissioner Jeff S.V. Eman Komisaris Commissioner	Pelatihan dilakukan secara luring di Beijing, China The training was held offline in Beijing, China
19 Oktober 2023 October 19, 2023	Mengawal Keberlanjutan dan Pertumbuhan Perseroan Melalui Pengawasan dan Pengendalian Risiko Overseeing the Company's Sustainability and growth through risk monitoring and control	Richard S. Dompas Anggota Komite Audit Audit Committee Member	Pelatihan dilakukan secara luring di Jakarta, Indonesia The training was held offline in Jakarta, Indonesia
20 November 2023 November 20, 2023	Metodologi Asesmen dan Manajemen Risiko Perbankan Assessment Methodology and Banking Risk Management	Richard S. Dompas Anggota Komite Audit Audit Committee Member	Pelatihan dilakukan secara luring di Jakarta, Indonesia The training was held offline in Jakarta, Indonesia
24 November 2023 November 24, 2023	<i>Sustainable Finance for Executive Level</i>	Hendra Widjojo Komisaris Independen Independent Commissioner H. Yunno Kusumo Komisaris Independen Independent Commissioner Jeff S.V. Eman Komisaris Commissioner	Pelatihan dilakukan secara daring melalui aplikasi Zoom The training was held online via Zoom application

Tanggal Date	Aktivitas Activity	Dewan Komisaris, Komite Audit, dan Komite Pemantau Risiko Board of Commissioners, Audit Committee, and Risk Monitoring Committee	Tempat Venue
29 November 2023 November 29, 2023	ICBC Value Refreshment Campaign	Hendra Widjojo Komisaris Independen Independent Commissioner H. Yunno Kusumo Komisaris Independen Independent Commissioner Jeff S.V. Eman Komisaris Commissioner Richard S. Dompas Anggota Komite Audit Audit Committee Member Denny A. Nasir Anggota Komite Audit Audit Committee Member Aki H. Parwoto Anggota Komite Pemantau Risiko Risk Monitoring Committee Member Douval Anggota Komite Pemantau Risiko Risk Monitoring Committee Member	Pelatihan dilakukan secara daring di Jakarta, Indonesia The training was held online in Jakarta, Indonesia
30 November 2023 November 30, 2023	Exit Meeting with OJK	H. Yunno Kusumo Komisaris Independen Independent Commissioner	Rapat dilakukan secara luring di kantor OJK, Jakarta, Indonesia The meeting was held offline in the OJK Office, Jakarta Indonesia
5 Desember 2023 December 5, 2023	Pendalaman Pasar Keuangan dan SRO untuk BOD dan BOC Financial Market Deepening and Self Regulatory Organization (SRO) for BOD and BOC	Hendra Widjojo Komisaris Independen Independent Commissioner H. Yunno Kusumo Komisaris Independen Independent Commissioner Jeff S.V. Eman Komisaris Commissioner	Pelatihan dilakukan secara luring di Jakarta, Indonesia The training was held offline in Jakarta, Indonesia
28-30 Desember 2023 December 28-30, 2023	Continous Professional Development (CPD) 30 CPD Hours in 2023 as a requirement of CPA Australia Holder	Douval Anggota Komite Pemantau Risiko Risk Monitoring Committee Member	Pelatihan dilakukan secara daring melalui website CPA Australia The training was held online via CPA Australia website

KOMISARIS INDEPENDEN

Komisaris Independen Bank memiliki peranan penting dalam menjaga pelaksanaan pengawasan Dewan Komisaris yang objektif dan memastikan kewajaran terhadap berbagai kepentingan, termasuk kepentingan pemegang saham minoritas.

INDEPENDENT COMMISSIONER

The Independent Commissioners of The Bank have significant roles in promoting objective and fairness supervision in order to maintain the interests of shareholders, including the minorities.

Kriteria Penentuan Komisaris Independen

Berdasarkan Peraturan OJK No. 17 tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum, Komisaris Independen adalah anggota Dewan Komisaris yang tidak memiliki hubungan keuangan, kepengurusan, kepemilikan saham dan/atau hubungan keluarga dengan anggota Dewan Komisaris lain, anggota Direksi dan/atau pemegang saham pengendali, atau hubungan dengan Bank yang dapat memengaruhi kemampuan yang bersangkutan untuk bertindak independen.

Peraturan juga mensyaratkan bahwa setidaknya 50% (lima puluh persen) dari anggota Dewan Komisaris adalah Komisaris Independen, dengan ketentuan masa jabatan 2 (dua) periode masa jabatan berturut-turut dan dapat diangkat kembali pada periode selanjutnya sebagai Komisaris Independen dengan ketentuan sebagai berikut:

- Hasil penilaian kinerja
- Hasil penilaian rapat Dewan Komisaris
- Hasil penilaian kepala SKAI (Satuan Kerja Audit Internal) dan PE (Pejabat Eksekutif) yang membawahkan fungsi SDM
- Komisaris Independen menyatakan dalam RUPS mengenai independensi yang bersangkutan.

Bank telah memenuhi peraturan di atas, dengan komposisi keanggotaan Komisaris Independen berjumlah 2 (dua) orang, atau 50% (lima puluh persen) dari jumlah keseluruhan Dewan Komisaris yang sebanyak 4 (empat) orang, yaitu Hendra Widjojo dan H. Yunno Kusumo.

Pernyataan Independensi Dewan Komisaris

Dewan Komisaris wajib bersifat independen dalam melaksanakan tugasnya termasuk dalam memberikan keputusan strategis terkait Bank yang bebas dari tekanan atau kepentingan pihak tertentu.

Masing-masing anggota Dewan Komisaris Bank wajib menghindari adanya benturan kepentingan dalam bentuk hubungan keuangan maupun hubungan keluarga dengan sesama anggota Dewan Komisaris, Direksi, pemegang saham pengendali, maupun pihak eksternal yang memiliki hubungan bisnis dengan Bank.

Seluruh anggota Dewan Komisaris Bank telah menandatangani surat pernyataan tersebut pada tanggal 2 Januari 2024 yang menyatakan pemenuhan seluruh kriteria dan independensi jabatannya sesuai kriteria yang disyaratkan oleh peraturan perundang-undangan yang berlaku.

Independent Commissioner Stipulation Criteria

Pursuant to OJK Regulation No. 17 year 2023 on the Implementation of Governance for Commercial Banks, Independent Commissioners are members of the Board of Commissioners who have no financial relations, management, share ownership and/or family relations with other members of the Board of Commissioners, members of the Board of Directors, and/or controlling shareholders, or any relations with The Bank that may affect the ability of concerned members to act independently.

The regulation also requires that at least 50% (fifty percent) of the Board of Commissioners members are Independent Commissioners, subject to the term of office of 2 (two) periods of consecutive terms and may be reappointed in the following period as an Independent Commissioner with the following provisions:

- Performance appraisal result
- Result of the assessment of the Board of Commissioners
- Assessment result of the head of Internal Audit Department and Executive Officers in charge of the HR function.
- The Independent Commissioners state his/her independency in the GMS.

The Bank has complied with the above regulations, in which the composition of its Independent Commissioners consists of 2 (two) members, or 50% (fifty percent) of the overall 4 (four) members of the Board of Commissioners, namely Hendra Widjojo and H. Yunno Kusumo.

Independency Statement of the Board of Commissioners

The Board of Commissioners must be independent in carrying out its duties including in providing strategic decisions pertaining with The Bank that are free from pressure or interest of certain parties.

Each member of The Bank's Board of Commissioners must avoid any conflict of interest in the form of financial or family relations with other members of the Board of Commissioners, Board of Directors, controlling shareholders, or any external party having business relations with The Bank.

All members of The Bank's Board of Commissioners have signed a statement certifying fulfillment of criteria as well as his/her independency of position on January 2, 2024 in accordance with the criteria as set under prevailing regulations.

ICBC  **PT. BANK ICBC INDONESIA**

**PRESIDENT COMMISSIONER
GOOD CORPORATE GOVERNANCE
ANNUAL STATEMENT LETTER¹
As of 31 December 2023**

To comply with with OJK Regulation No.17 Year 2023, dated September 14th, 2023 regarding The Implementation of Good Corporate Governance, as President Commissioner of PT Bank ICBC Indonesia, herewith I declare the following:

1. With regard to holding multiple positions, I have complied with the prevailing regulation, as stated on "Multi Occupations Form" (attachment 1);
2. I have no not have financial and family relationship up to second degree with other members of the Board of Commissioners and members of the Board of Directors, as stated on "Financial and Family Relationship Form" (attachment 2);
3. I own/do not own² shares of PT Bank ICBC Indonesia and/or other bank and/or non-bank financial institution and/or other company, as stated on "Shares Ownership Form" (attachment 3);
4. I never use the Bank for self, family, and other party's interests which may cause a loss or decrease the profit of the Bank;
5. I never taking and/or receiving a personal gain from the Bank other than remuneration and other facilities as stipulated in the General Meeting of Shareholders;
6. I never get any intervention or influence from related parties or other parties that may affect my independency.

I certify that the information made in this form is true and this Statement Letter is made to be used as it is appropriate.

Beijing, 2 January 2024


Wang Yan
President Commissioner

¹This statement letter is an integral part of following attachments:
• Attachment 1 : Multi Occupations Form
• Attachment 2 : Financial and Family Relationship Form
• Attachment 3 : Shares Ownership Form
• Attachment 4 : Definitions and Requirements
²Case as necessary

ICBC  **PT. BANK ICBC INDONESIA**

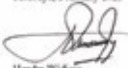
**INDEPENDENT COMMISSIONER
GOOD CORPORATE GOVERNANCE
ANNUAL STATEMENT LETTER¹
As of 31 December 2023**

To comply with with OJK Regulation No.55/POJK.03/2016, dated December 7th, 2016 regarding The Implementation of Good Corporate Governance, as Independent Commissioner of PT Bank ICBC Indonesia, herewith I declare the following:

1. I do not have any financial, management, share ownership, and/or family relationship up to second degree with other members of the Board of Commissioners, members of the Board of Directors, and/or Controlling Shareholder or any other relationship with Bank that influence my ability to act independently as stipulated in Bank Indonesia Regulation regarding the Implementation of Good Corporate Governance for Commercial Bank;
2. In regard holding multiple positions, I have complied with the prevailing regulation, as stated on "Multi Occupations Form" (attachment 1);
3. I own/do not own² shares of PT Bank ICBC Indonesia and/or other bank and/or non-bank financial institution and/or other company, as stated on "Shares Ownership Form" (attachment 2);
4. I never use the Bank for self, family, and other party's interests which may cause a loss or decrease the profit of the Bank;
5. I never taking and/or receiving a personal gain from the Bank other than remuneration and other facilities as stipulated in the General Meeting of Shareholders;
6. I never get any intervention or influence from related parties or other parties that may affect my independency.

I certify that the information made in this form is true and this Statement Letter is made to be used as it is appropriate.

Surabaya, 2 January 2023


Hendra Widagda
Independent Commissioner

¹This statement letter is an integral part of following attachments:
• Attachment 1 : Multi Occupations Form
• Attachment 2 : Financial and Family Relationship Form
• Attachment 3 : Shares Ownership Form
• Attachment 4 : Definitions and Requirements
²Case as necessary

ICBC  **PT. BANK ICBC INDONESIA**

**INDEPENDENT COMMISSIONER
GOOD CORPORATE GOVERNANCE
ANNUAL STATEMENT LETTER¹
As of 31 December 2023**

To comply with with OJK Regulation No.17 Year 2023, dated September 14th, 2023 regarding The Implementation of Good Corporate Governance, as Independent Commissioner of PT Bank ICBC Indonesia, herewith I declare the following:

1. I do not have any financial, management, share ownership, and/or family relationship up to second degree with other members of the Board of Commissioners, members of the Board of Directors, and/or Controlling Shareholder or any other relationship with Bank that influence my ability to act independently as stipulated in Financial Service Authority (FSO) Regulation regarding the Implementation of Good Corporate Governance for Commercial Bank;
2. In regard holding multiple positions, I have complied with the prevailing regulation, as stated on "Multi Occupations Form" (attachment 1);
3. I own/do not own² shares of PT Bank ICBC Indonesia and/or other bank and/or non-bank financial institution and/or other company, as stated on "Shares Ownership Form" (attachment 2);
4. I never use the Bank for self, family, and other party's interests which may cause a loss or decrease the profit of the Bank;
5. I never taking and/or receiving a personal gain from the Bank other than remuneration and other facilities as stipulated in the General Meeting of Shareholders;
6. I never get any intervention or influence from related parties or other parties that may affect my independency.

I certify that the information made in this form is true and this Statement Letter is made to be used as it is appropriate.

Jakarta, 2 January 2024


H. Yanto Kusuma
Independent Commissioner

¹This statement letter is an integral part of following attachments:
• Attachment 1 : Multi Occupations Form
• Attachment 2 : Financial and Family Relationship Form
• Attachment 3 : Shares Ownership Form
• Attachment 4 : Definitions and Requirements
²Case as necessary

ICBC  **PT. BANK ICBC INDONESIA**

**COMMISSIONER
GOOD CORPORATE GOVERNANCE
ANNUAL STATEMENT LETTER¹
As of 31 December 2023**

To comply with with OJK Regulation No.17 Year 2023, dated September 14th, 2023 regarding The Implementation of Good Corporate Governance, as Commissioner of PT Bank ICBC Indonesia, herewith I declare the following:

1. With regard to holding multiple positions, I have complied with the prevailing regulation, as stated on "Multi Occupations Form" (attachment 1);
2. I have no not have financial and family relationship up to second degree with other members of the Board of Commissioners and members of the Board of Directors, as stated on "Financial and Family Relationship Form" (attachment 2);
3. I own/do not own² shares of PT Bank ICBC Indonesia and/or other bank and/or non-bank financial institution and/or other company, as stated on "Shares Ownership Form" (attachment 3);
4. I never use the Bank for self, family, and other party's interests which may cause a loss or decrease the profit of the Bank;
5. I never taking and/or receiving a personal gain from the Bank other than remuneration and other facilities as stipulated in the General Meeting of Shareholders;
6. I never get any intervention or influence from related parties or other parties that may affect my independency.

I certify that the information made in this form is true and this Statement Letter is made to be used as it is appropriate.

Akutan, 2 January 2024


M. A. V. Esmas
Commissioner

¹This statement letter is an integral part of following attachments:
• Attachment 1 : Multi Occupations Form
• Attachment 2 : Financial and Family Relationship Form
• Attachment 3 : Shares Ownership Form
• Attachment 4 : Definitions and Requirements
²Case as necessary

Direksi

Board of Directors

Direksi adalah organ Bank yang berwenang dan bertanggung jawab penuh atas pengurusan Bank untuk kepentingan Bank, sesuai dengan maksud dan tujuan Bank serta mewakili Bank baik di dalam maupun di luar pengadilan sesuai dengan ketentuan Anggaran Dasar Bank.

PEDOMAN KERJA DIREKSI

Bank memiliki pedoman kerja bagi Direksi (*Board of Directors Charter*) yang telah diperbarui pada tanggal 28 Desember 2023, yang bersifat mengikat bagi setiap anggota Direksi.

Board of Directors Charter berfungsi sebagai pedoman bagi masing-masing anggota Direksi untuk menjaga hubungan kerja yang profesional dan produktif secara efisien dalam menjalankan tugasnya serta untuk memahami peran serta wewenang masing-masing.

Pedoman Kerja Direksi tersebut diantaranya mengatur tentang tugas dan tanggung jawab, wewenang, etika dan pedoman berperilaku, tata tertib rapat, mekanisme pengambilan keputusan, dan risalah rapat. Pedoman Kerja Direksi pertama kali diterbitkan pertama kali pada tanggal 3 September 2014 yang selanjutnya mengalami perubahan pertama pada tanggal 11 Desember 2020 serta perubahan kedua pada tanggal 28 Desember 2023. Perubahan berikutnya direncanakan pada Desember 2026.

TUGAS DAN TANGGUNG JAWAB

Berkaitan dengan pelaksanaan tugas, Direksi Bank mengacu pada Pedoman Kerja Direksi berdasarkan Undang-Undang No. 40 Tahun 2007 tanggal 16 Agustus 2007 tentang Perseroan Terbatas; POJK No. 17 Tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum; serta Anggaran Dasar Bank.

Tanggung Jawab

Direksi Bank bertanggung jawab dalam hal-hal sebagai berikut:

- Bertanggung jawab penuh atas pelaksanaan pengurusan Bank untuk kepentingan dan tujuan Bank.
- Bertanggung jawab penuh atas pelaksanaan tugas kepada pemegang saham melalui RUPS.

The Board of Directors is The Bank's organ that has the authority and is fully responsible for managing The Bank for the interests of The Bank, in accordance with the aims and objectives of The Bank, as well as representing The Bank in both legal and non-legal settings in accordance with the provisions of The Bank's Articles of Association.

BOARD OF DIRECTORS CHARTER

The Bank has in place the Board of Directors Charter, which was updated on December 28, 2023 and binding on each member of the Board of Directors.

The Board of Directors Charter serves as a guideline for each member of the Board of Directors to maintain professional and productive working relations in an efficient manner in performing their duties as well as understanding each roles and authorities.

The Board of Directors Charter governs among others the duties and responsibilities, authorities, ethics and code of conduct, meeting rules, decision-making mechanisms, and minutes of meetings. The Board of Directors Charter was first published on September 3, 2014 and was amended for the first time on December 11, 2020 as well as the second amendment on December 28, 2023. The next amendment is scheduled in December 2026.

DUTIES AND RESPONSIBILITIES

In implementing its duties, the Board of Directors of The Bank refers to the Board of Directors Charter, which is based on Law No. 40 of 2007 dated August 16, 2007 concerning Limited Liability Company; POJK No. 17 Year 2023 concerning Implementation of Governance for Commercial Banks; and The Bank's Articles of Association.

Responsibilities

The Bank's Board of Directors is responsible for the following matters:

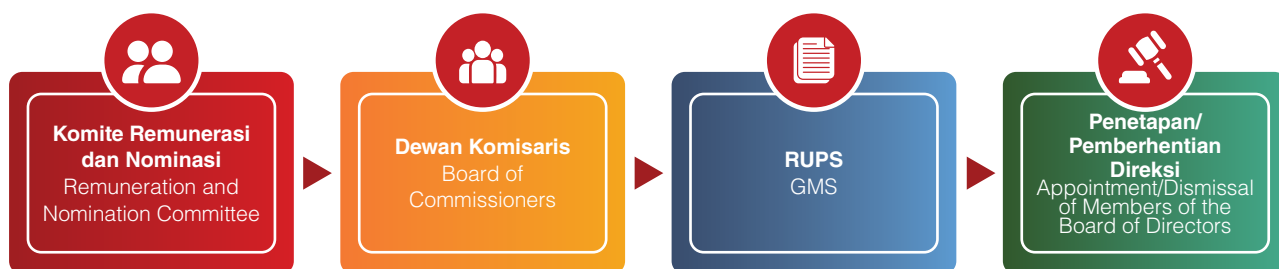
- Fully responsible for the execution of The Bank's management in the interests and objectives of The Bank.
- Fully responsible for the performance of duties to shareholders through the GMS.

- Wajib mengelola Bank sesuai dengan kewenangan dan tanggung jawab Direksi sebagaimana diatur dalam Anggaran Dasar dan peraturan perundang-undangan.
- Wajib menerapkan prinsip-prinsip tata kelola yang baik dalam setiap kegiatan usaha Bank pada seluruh tingkatan atau jenjang organisasi.
- Direksi paling sedikit wajib membentuk Satuan Kerja Audit Internal (SKAI); Satuan Kerja Manajemen Risiko (SKMR) dan Komite Manajemen Risiko; dan Satuan Kerja Kepatuhan.
- Wajib menciptakan struktur pengendalian internal, menjamin terselenggaranya fungsi audit internal dalam setiap tingkatan manajemen dan menindaklanjuti temuan audit dan rekomendasi dari SKAI Bank, auditor eksternal, hasil pengawasan OJK dan/atau otoritas lain, serta melaporkan kegiatan tersebut kepada RUPS.
- Wajib mengungkapkan kepada karyawan mengenai kebijakan Bank yang bersifat strategis di bidang kepegawaian.
- Wajib menyediakan data dan informasi yang akurat, relevan dan tepat waktu kepada Dewan Komisaris.
- Mendorong terciptanya budaya kepatuhan melalui perumusan strategi, kebijakan kepatuhan, menetapkan sistem dan prosedur kepatuhan, dan memastikan bahwa seluruh kebijakan, ketentuan, sistem, dan prosedur, serta kegiatan usaha yang dilakukan Bank telah sesuai dengan ketentuan OJK dan peraturan perundang-undangan.
- Wajib memastikan terlaksananya fungsi kepatuhan Bank.
- Sesuai dengan POJK No. 46/POJK.03/2017, Direktur yang membawahi fungsi kepatuhan wajib melaporkan pelaksanaan tugas dan tanggung jawabnya kepada Presiden Direktur dengan tembusan kepada Dewan Komisaris, serta menyampaikan laporan kepada OJK tentang pelaksanaan tugasnya.
- Memastikan bahwa Bank memiliki kebijakan dan prosedur penerapan program APU dan PPT, serta melakukan pengawasan atas kepatuhan unit kerja yang dibentuk dalam menerapkan program APU dan PPT.
- Menyusun dan menyempurnakan kebijakan dan proseduralih daya, termasuk memantau, mengevaluasi, dan bertanggung jawab atas penerapan manajemen risiko atas alih daya.
- Menetapkan rencana strategis Teknologi Informasi (TI) dan kebijakan Bank terkait penggunaan teknologi informasi, dan memastikan penerapan proses manajemen risiko dalam penggunaan teknologi informasi dilaksanakan secara memadai dan efektif.
- Memelihara dan memantau tingkat kesehatan Bank serta mengambil langkah-langkah yang diperlukan untuk memelihara dan/atau meningkatkan tingkat kesehatan Bank.
- Responsible to manage The Bank in accordance with the authorities and responsibilities of the Board of Directors as stipulated in the Articles of Association, laws and regulations.
- Responsible to apply the good governance principles in each of The Bank's business activities at all levels of the organization.
- The Board of Directors must at least form the Internal Audit Department (IAD); Risk Management Department (RMD) and Risk Management Committee; and Compliance Department.
- Responsible to establish internal control structures, ensure the implementation of The Bank's internal audit function at all levels of management and follow-up on audit findings and recommendations of The Bank's IAD, external auditor, the oversight results by OJK and/or other authorities, and report those activities to the GMS.
- Responsible to inform the employees on The Bank's strategic policies in the area of employment.
- Responsible to provide data and information in an accurate, relevant, and timely manner to the Board of Commissioners.
- Encourage the creation of compliance culture through strategy formulation, compliance policy, compliance systems and procedures, and ensure that all policies, regulations, systems, procedures and business activities conducted by The Bank are in compliance with the provisions of OJK, laws and regulations.
- Responsible to ensure the implementation of The Bank's compliance function.
- In reference to POJK No. 46/POJK.03/2017, the Director in charge of compliance function must report the execution of its duties and responsibilities to the President Director with copies to the Board of Commissioners, and submit a report to OJK concerning the performance of its duties.
- Ensure that The Bank has policies and procedures for implementing AML and CFT programs, and supervise the compliance of established work units in implementing the AML and CFT programs.
- Develop and refine the outsourcing policy and procedures, including monitoring, evaluating, and being responsible for the implementation of risk management on outsourcing.
- Establish the strategic plan of Information Technology (IT) and The Bank's policy regarding the use of information technology and ensure that the implementation of risk management process in the use of information technology is carried out adequately and effectively.
- Maintain and monitor The Bank's soundness rating and take necessary measures to maintain and/or to increase the soundness rating of The Bank.

- Sesuai dengan POJK No. 4/POJK.03/2016, Direksi bersama-sama dengan Dewan Komisaris, dan/atau pemegang saham pengendali wajib menyampaikan rencana tindakan (*action plan*) kepada OJK.
- Menetapkan rencana, kebijakan dan prosedur Bank untuk aktivitas keagenan produk keuangan luar negeri, termasuk memantau dan mengevaluasinya.
- Menetapkan kebijakan dan prosedur tertulis terkait transparansi informasi produk Bank dan penggunaan data pribadi nasabah.
- Menyusun dan melaksanakan rencana bisnis secara efektif, dan mengkomunikasikan rencana bisnis kepada pemegang saham Bank dan seluruh jenjang organisasi yang ada pada Bank.
- Menyusun kebijakan dan strategi manajemen risiko secara tertulis dan komprehensif, serta bertanggung jawab atas pelaksanaan kebijakan manajemen risiko dan eksposur risiko yang diambil oleh Bank secara keseluruhan.
- Direksi bersama-sama dengan Dewan Komisaris Bank wajib menumbuhkan budaya dan kepedulian *anti-fraud* pada seluruh jajaran organisasi Bank.
- Wajib menilai dan memantau kualitas aset, serta mengambil langkah-langkah yang diperlukan agar kualitas aset senantiasa baik.
- Menyusun kebijakan remunerasi yang paling sedikit memuat struktur remunerasi, skala remunerasi berdasarkan tingkat dan jabatan, serta komponen remunerasi, termasuk metode dan mekanisme penetapan remunerasi.
- Pursuant to POJK No. 4/POJK.03/2016, the Board of Directors together with the Board of Commissioners and/or controlling shareholders must submit the action plans to OJK.
- Establish The Bank's plans, policy and procedures for the activities of foreign financial product agency, including its monitoring and evaluation.
- Establish the policies and procedures on the transparency of The Bank's product information, as well as the use of customers personal data.
- Prepare and implement the business plan effectively, and to communicate the business plan to The Bank's shareholders and all levels of the organization in The Bank.
- Develop the risk management policy and strategy comprehensively in writing and be responsible for the implementation of risk management policy and risk exposure taken by The Bank as a whole.
- The Board of Directors together with the Board of Commissioners of The Bank must foster the culture of and concern for anti-fraud in all levels of The Bank's organization.
- Responsible to assess and monitor the assets quality, including taking the necessary measures to ensure well-maintained assets quality.
- Develop remuneration policy covering at least the remuneration structure, remuneration scale based on level and position, and remuneration component, including the method and mechanism for determining remuneration.

PENGANGKATAN DAN PEMBERHENTIAN DIREKSI

APPOINTMENT AND DISMISSAL OF THE BOARD OF DIRECTORS



Berikut ini adalah mekanisme serta prosedur pengangkatan Direksi Bank:

- Direksi, Dewan Komisaris atau pemegang saham akan memberikan proposal kandidat anggota Direksi kepada Komite Remunerasi dan Nominasi yang akan memproses kandidat lebih lanjut.
- Sebelum diajukan kepada pemegang saham melalui Dewan Komisaris, kandidat akan menjalani proses seleksi. Kandidat yang telah memenuhi kriteria selanjutnya akan diwawancara. Kandidat yang lulus wawancara akan dicek latar belakangnya oleh pihak eksternal dan secara internal.

The following are mechanisms and procedures for the appointment of members of The Bank's Board of Directors:

- The Board of Directors, Board of Commissioners or shareholders will give proposal of candidates for the Board of Directors member to the Remuneration and Nomination Committee who will then process the candidate.
- Prior to be proposed to shareholders through the Board of Commissioners, the candidates will go through the selection process. Those who meet the criteria will be arranged for interview. Candidates who pass the interview will get his/her background check by external party and internally.

- Setelah melakukan beberapa proses seleksi di atas, kandidat yang terpilih akan dinominasikan oleh Komite Remunerasi dan Nominasi kepada Dewan Komisaris yang kemudian akan diajukan kepada RUPS.
- Setelah menerima persetujuan awal dari pemegang saham, kandidat akan diatur untuk menjalani Uji Kemampuan dan Kepatutan oleh regulator, tes kesehatan, dan bentuk pemeriksaan lainnya yang akan dilakukan oleh pemegang saham maupun Bank.
- Kandidat yang telah lolos akan diusulkan oleh Dewan Komisaris dan Direksi untuk ditunjuk oleh pemegang saham. Proposal akan termasuk di dalamnya paket remunerasi untuk kandidat anggota Direksi.
- Berdasarkan persetujuan dari pemegang saham, Departemen Sumber Daya Manusia akan memberikan penawaran kepada kandidat anggota Direksi.
- Setelah meninjau proposal dari Dewan Komisaris, dan persetujuan penawaran dari kandidat anggota Direksi, maka pemegang saham akan melakukan RUPS untuk memutuskan secara formal anggota baru dan komposisi baru dari anggota Direksi termasuk di dalamnya persetujuan atas paket remunerasi untuk anggota Direksi yang baru.
- Persetujuan RUPS akan berupa keputusan pemegang saham dalam bentuk risalah rapat RUPS atau cara lain yang diatur dalam Anggaran Dasar Bank.
- Berdasarkan keputusan tersebut, Departemen Sumber Daya Manusia akan mempersiapkan surat pemberitahuan kepada regulator mengenai perubahan komposisi Direksi.
- Untuk kandidat yang datang dari pemegang saham atau dari internal (Pejabat Eksekutif Bank), proses seleksi secara umum akan berlaku sama. Kecuali untuk beberapa poin yang mungkin tidak berlaku untuk kandidat yang berasal dari ICBC Limited seperti disebutkan di atas.
- After going through the above selection process, the chosen candidate will be nominated by the Remuneration and Nomination Committee to the Board of Commissioners, who will then propose to the GMS.
- After receiving the initial approval from the shareholders, the candidate will be arranged to undergo the Fit and Proper Test by regulators, medical check-up, and other forms of inspection that will be carried out by the shareholders and The Bank.
- Candidate who has passed the aforementioned process will be proposed by the Board of Commissioners and Board of Directors to be appointed by the shareholders. The proposal will include the remuneration package for the candidate of the Board of Directors member.
- Based on the approval from the shareholders, the Human Resources Department will give the offer to candidate of the Board of Directors member.
- After reviewing the proposal from the Board of Commissioners and approving the offer from the candidate of the Board of Directors member, the shareholders will hold a GMS to formally decide a new member and new composition of the Board of Directors members, including the approval of the remuneration package for new Board of Directors member.
- The agreement will be in the form of shareholders' resolution and The GMS Minutes of Meeting (MoM) or other methods stipulated in The Bank's Articles of Association.
- Based on the above-mentioned decision, the Human Resources Department will prepare a notification letter to the regulators regarding changes in the composition of the Board of Directors.
- For candidates who are the shareholders or internal parties (Executive Officers of The Bank), the same general selection process applies, except for some points, which may not apply to candidates from ICBC Limited as mentioned above.

KRITERIA DAN PERSYARATAN ANGGOTA DIREKSI

Kriteria dan persyaratan minimum untuk Direksi adalah sebagai berikut:

- Bank diurus dan dipimpin oleh suatu Direksi yang terdiri dari sekurang-kurangnya 3 (tiga) Direktur, satu di antaranya akan ditunjuk sebagai Presiden Direktur.
- Presiden Direktur diangkat dari calon yang dinominasikan oleh pemegang saham mayoritas di dalam RUPS.
- Presiden Direktur haruslah seseorang yang independen dari pemegang saham pengendali.

BOARD OF DIRECTORS CRITERIA AND MEMBER REQUIREMENTS

The minimum requirements for the Board of Directors are:

- The Bank is managed and chaired by the Board of Directors, which consists of at the very least 3 (three) Directors, with one of which will be appointed as President Director.
- President Director is appointed from the nominated candidates by majority shareholders in the GMS.
- President Director must be independent from the controlling shareholders.

- Mereka yang diangkat sebagai anggota Direksi adalah sebagai berikut:
 - a. Mayoritas anggota Direksi harus Warga Negara Indonesia;
 - b. Mayoritas anggota Direksi harus memiliki setidaknya 5 (lima) tahun pengalaman dalam operasional perbankan sebagai Pejabat Eksekutif Bank;
 - c. Bertempat tinggal di Indonesia dan bersedia tinggal di Indonesia (apabila kandidat adalah warga negara asing);
 - d. Tidak merangkap jabatan sebagai anggota Dewan Komisaris, anggota Direksi atau Pejabat Eksekutif di bank, perusahaan atau institusi lain, kecuali yang telah diatur oleh Anggaran Dasar Bank;
 - e. Tidak secara sendiri-sendiri atau bersama-sama memiliki saham untuk jumlah lebih dari 25% (dua puluh lima persen) dari modal disetor di Bank dan/atau perseroan terbatas lainnya;
 - f. Anggota Direksi tidak boleh memiliki hubungan keluarga sampai derajat kedua dengan sesama anggota Direksi dan/atau Dewan Komisaris;
 - g. Dalam waktu 5 (lima) tahun sebelum pengangkatannya tidak pernah dinyatakan pailit atau menjadi anggota Direksi atau anggota Dewan Komisaris yang dinyatakan bersalah menyebabkan suatu perusahaan dinyatakan pailit, dihukum karena melakukan tindak pidana yang merugikan keuangan negara dan/atau yang berkaitan dengan sektor keuangan;
 - h. Lulus Uji Kemampuan dan Kepatutan sesuai dengan Peraturan Otoritas Jasa Keuangan (POJK).
- Anggota Direksi harus ditunjuk berdasarkan keputusan yang diambil berdasarkan suara yang setuju lebih dari 2/3 (dua pertiga) dari jumlah suara yang dikeluarkan secara sah di RUPS untuk periode 3 (tiga) tahun dimulai sejak tanggal penunjukan anggota Direksi tersebut dan setelah lulus Uji Kemampuan dan Kepatutan yang dilakukan oleh Otoritas Jasa Keuangan (OJK). Anggota Direksi yang masa jabatannya telah berakhir dapat dipilih kembali untuk periode 3 (tiga) tahun selanjutnya.
- Setiap usulan pengangkatan dan/atau penggantian anggota Direksi oleh Dewan Komisaris kepada RUPS, harus memperhatikan rekomendasi Komite Remunerasi dan Nominasi.
- Gaji dan/atau remunerasi lainnya diberikan kepada anggota Direksi, yang jumlahnya ditetapkan oleh RUPS dan wewenang tersebut oleh RUPS dapat dilimpahkan kepada Dewan Komisaris.
- Those appointed as members of the Board of Directors are as follows:
 - a. Majority of the Board of Directors must be Indonesian Citizen;
 - b. Majority of the Board of Directors should have minimum of 5 (five) years' experience in banking operations as The Bank's Executive Officer;
 - c. Reside in Indonesia and willing to stay in Indonesia (if the candidate is non-Indonesian citizen);
 - d. Do not hold a concurrent position as member of the Board of Commissioners, member of the Board of Directors or Executive Officer in other banks, companies or institutions, except for those stipulated in The Bank's Articles of Association;
 - e. Not individually or jointly own more than 25% (twenty five percent) shares of capital paid to The Bank and/or in other limited liability companies;
 - f. Board of Directors members are prohibited to have family relations up to the second degree, with other members of the Board of Directors and/or members of the Board of Commissioners;
 - g. Within 5 (five) years prior to the appointment have never been declared bankrupt or became member of the Board of Directors or member of the Board of Commissioners who was declared guilty for causing a company to be bankrupt, convicted of a criminal offense that is detrimental to the country's finances and/or related to financial sector;
 - h. Have passed Fit and Proper Test in accordance with the Financial Services Authority Regulations (POJK).
- Members of the Board of Directors must be appointed based on the decision taken by agreed votes of more than 2/3 (two-thirds) from legitimate votes at the GMS for a period of 3 (three) years commencing from the date of appointment of concerned members of the Board of Directors and he/she has passed the Fit and Proper Test by the Financial Services Authority (OJK). Members of the Board of Directors whose term of office has ended can be reappointed for the next 3 (three) years.
- Every proposal on the appointment and/or changes in the members of the Board of Directors by Board of Commissioners to the GMS must consider the recommendations of the Remuneration and Nomination Committee.
- Salary and/or other remuneration are provided to members of the Board of Directors, which sums are determined by the GMS and such authority may be delegated by the GMS to the Board of Commissioners.

- Apabila oleh sebab apa pun jabatan anggota Direksi lowong, RUPS harus diselenggarakan dalam jangka waktu 30 (tiga puluh) hari kalender sejak terjadi lowongan untuk mengisi kekosongan tersebut dengan memperhatikan ketentuan yang berlaku. Masa jabatan dari pihak yang ditunjuk untuk mengisi kekosongan oleh sebab apa pun adalah masa jabatan dari anggota Direksi yang digantikan.
- Seorang anggota Direksi berhak mengundurkan diri dari jabatannya dengan memberitahukan secara tertulis mengenai maksudnya tersebut kepada Bank sekurang-kurangnya 30 (tiga puluh) hari kalender sebelum tanggal pengunduran dirinya.
- Jabatan anggota Direksi berakhir apabila:
 - a. Mengundurkan diri sesuai dengan ketentuan pada Anggaran Dasar Bank;
 - b. Masa jabatannya berakhir;
 - c. Tidak lagi memenuhi persyaratan untuk menjabat sesuai perundang-undangan yang berlaku;
 - d. Meninggal dunia;
 - e. Diberhentikan berdasarkan keputusan RUPS; dan
 - f. Dinyatakan pailit oleh Institusi Pengadilan yang telah berkekuatan hukum tetap atau ditaruh di bawah pengampunan berdasarkan suatu keputusan pengadilan.
- If for any reasons, the position of a member of the Board of Directors is vacant, the GMS must be convened within 30 (thirty) calendar days since the occurrence of such vacancy for further replacement by considering the applicable rules. The office term of the appointment for replacement due to any reasons is following the tenure of the replaced member of the Board of Directors.
- A member of the Board of Directors has the rights to tender his/her resignation from a position by written notice of his/her intentions to The Bank at least 30 (thirty) calendar days prior to his/her date of resignation.
- The tenure of members of the Board of Directors ends if:
 - a. Resigned in accordance with the provisions of The Bank's Articles of Association;
 - b. Term of office is over;
 - c. No longer meet the requirements to perform according to prevailing laws and regulations;
 - d. Passed away;
 - e. Dismissed pursuant to the GMS resolution; and
 - f. Declared bankrupt by Court Institution which has permanent legal force or is put under pardon based on a court decision.

RANGKAP JABATAN

- Anggota Direksi dilarang melakukan rangkap jabatan sebagai anggota Direksi, anggota Dewan Komisaris, dan/atau Pejabat Eksekutif pada bank, perusahaan dan/atau lembaga lain baik di Indonesia maupun di luar negeri.
- Tidak termasuk rangkap jabatan dalam hal:
 - a. Anggota Direksi bertanggung jawab terhadap pengawasan atas penyertaan bank pada perusahaan anak;
 - b. Menjalankan tugas fungsional menjadi anggota Dewan Komisaris pada perusahaan anak bukan bank yang dikendalikan oleh bank.

PROGRAM ORIENTASI DIREKSI BARU

Anggota Direksi yang baru ditunjuk wajib diberikan program pengenalan mengenai Bank dan dilakukan sesegera mungkin setelah pengangkatannya. Tanggung jawab untuk mengadakan program pengenalan bagi Direksi yang baru berada pada Presiden Direktur, atau jika Presiden Direktur berhalangan, maka tanggung jawab pelaksanaan program pengenalan tersebut berada pada Direksi yang ada. Program pengenalan ini dapat dilaksanakan dalam bentuk presentasi/seminar/workshop, pertemuan, kunjungan ke lokasi, pengkajian dokumen atau bentuk lainnya yang dianggap sesuai.

MULTIPLE BOARD MEMBERSHIPS

- Members of the Board of Directors are prohibited to have a concurrent position as member of the Board of Directors, member of the Board of Commissioners, and/or Executive Officer at other banks, companies and/or institutions both in Indonesia or in foreign countries.
- Conditions which do not fall as concurrent positions:
 - a. The Board of Directors member performs the monitoring function in subsidiary company of the bank;
 - b. Performs functional responsibility as member of the Board of Commissioners in non-bank subsidiary company that is controlled by the bank.

BOARD OF DIRECTORS' ORIENTATION PROGRAM

A newly appointed member of the Board of Directors must be provided an induction program regarding The Bank and the program must be conducted immediately following the appointment. The responsibility to hold an induction program for a new member of the Board of Directors lies on the President Director, or in the event that the President Director is absent, then the responsibility for the implementation of induction program rests with the existing Directors. This induction program can be carried out in the form of presentations/seminars/workshops, meetings, site visits, document review, or any other forms deemed appropriate.

Program pengenalan kepada anggota Direksi baru mencakup hal-hal sebagai berikut:

- Gambaran mengenai Bank berkaitan dengan visi dan misi, nilai dan budaya Bank, tujuan dan strategi Bank, kinerja keuangan dan operasi, rencana usaha jangka pendek dan jangka panjang, aplikasi teknologi informasi, manajemen risiko, kondisi persaingan usaha, dan masalah strategis lainnya.
- Penjelasan mengenai tugas dan tanggung jawab Dewan Komisaris, Direksi, serta komite di bawah Dewan Komisaris dan komite di bawah Direksi.
- Penjelasan mengenai pemangku kepentingan utama Bank dan tanggung jawab sosial Bank.
- Sistem pengendalian internal, sistem audit dan temuan audit yang belum ditindaklanjuti secara tuntas serta kasus hukum yang melibatkan Bank.
- Pelaksanaan GCG di lingkungan Bank.

SUSUNAN DAN KOMPOSISI DIREKSI TAHUN 2023

Komposisi Direksi Bank telah memperhitungkan dan disesuaikan dengan kondisi Bank di mana masing-masing anggota Direksi memiliki kemampuan sesuai kebutuhan Bank dalam menjalankan tugasnya baik secara individu maupun kolektif.

Jumlah anggota Direksi Bank per 31 Desember 2023 sebanyak 7 (tujuh) orang dan masing-masing memiliki pengalaman yang baik di bidang perbankan. Seluruh anggota Direksi Bank berdomisili di Indonesia dan memiliki integritas serta kompetensi yang memadai sesuai dengan persyaratan Uji Kemampuan dan Keputusan regulator.

The induction program for the new member of the Board of Directors includes the following:

- Description on The Bank's vision and mission, values and culture, The Bank's goals and strategies, financial and operating performance, short-term and long-term business plans, information technology applications, risk management, business competition conditions, and other strategic issues.
- Description on the duties and responsibilities of the Board of Commissioners, Board of Directors, as well as the committees under the Board of Commissioners and committees under the Board of Directors.
- Description on The Bank's key stakeholders and The Bank's social responsibility.
- Internal control system, audit system and audit findings that have not been followed up completely, as well as legal cases involving The Bank.
- Implementation of GCG within The Bank.

BOARD OF DIRECTORS STRUCTURE AND COMPOSITION IN 2023

The composition of the Board of Directors has taken into account and in accordance with The Bank's condition whereby each member of the Board of Directors has the ability based on The Bank's needs to perform the duty both individually and collectively.

As of December 31, 2023, The Bank's Board of Directors consists of 7 (seven) members and respectively has good experience in banking. All members of The Bank's Board of Directors are domiciled in Indonesia and have adequate integrity and competence in accordance with regulatory requirements on the Fit and Proper Test.

Nama Name	Jabatan Position	Periode Period	Dasar Penunjukan Appointment Legal Basis
Chen Yong	Presiden Direktur President Director	27 Maret 2023 – sekarang March 27, 2023 - current	Akta pengangkatan No. 52 tanggal 6 Maret 2023 Deed of appointment No. 52 dated March 6, 2023
Zhang Wen	Direktur - Kredit Director - Credit	8 Februari 2021 – sekarang February 1, 2021 - current	Akta pengangkatan No. 4 tanggal 1 Februari 2021 Deed of appointment No. 4 dated February 1, 2021
Liu Hongbo	Direktur - Marketing Director – Marketing	8 Februari 2021 – sekarang February 1, 2021 - current	Akta pengangkatan No. 4 tanggal 1 Februari 2021 Deed of appointment No. 4 dated February 1, 2021
Sandy T. Muliana	Direktur - Kepatuhan & Manajemen Risiko Director – Compliance & Risk Management	24 November 2009 – sekarang November 24, 2009 – current	Akta pengangkatan No. 35 tanggal 24 November 2009 Deed of appointment No. 35 dated November 24, 2009

Nama Name	Jabatan Position	Periode Period	Dasar Penunjukan Appointment Legal Basis
Fransisca Nelwan Mok	Direktur - Sumber Daya Manusia & Hukum Director - Human Resources & Legal	13 April 2017 – sekarang April 13, 2017 – current	Akta pengangkatan No. 71 tanggal 13 April 2017 Deed of appointment No. 71 dated April 13, 2017
Dini Suprihatini	Direktur - Operasional Director - Operations	5 Juni 2020 - sekarang June 5, 2020 - current	Akta pengangkatan No. 19 tanggal 5 Juni 2020 Deed of appointment No. 19 dated June 5, 2020
Lukito Adisubrata S.	Direktur - Marketing Director – Marketing	2 September 2021 – sekarang September 2, 2021 - current	Akta pengangkatan No. 16 tanggal 2 September 2021 Deed of appointment No. 16 dated September 2, 2021

PEMBAGIAN LINGKUP TUGAS ANGGOTA DIREKSI

Dalam menjalankan tugasnya, setiap anggota Direksi memiliki lingkup tugas dan tanggung jawab masing-masing yaitu:

BOARD OF DIRECTORS DELEGATION OF DUTIES

In performing their duties, the members of the Board of Directors have their respective duties and responsibilities as follows:

Nama Name	Jabatan Position	Lingkup Tugas dan Tanggung Jawab Scope of Duties and Responsibilities
Chen Yong	Presiden Direktur President Director	• Internal Audit • Strategy Management and Investor Relation
Zhang Wen	Direktur – Kredit Director - Credit	• Credit Review • Credit Management • Financial Management
Liu Hongbo	Direktur - Marketing Director - Marketing	• Corporate Banking I • Global Markets & Financial Institution • Transaction Banking
Sandy T. Muliana	Direktur - Kepatuhan & Manajemen Risiko Director – Compliance & Risk Management	• Compliance • Anti Money Laundering • Risk Management
Fransisca Nelwan Mok	Direktur - Sumber Daya Manusia & Hukum Director - Human Resources & Legal	• Human Resources • General Affairs • Special Asset Management • Legal
Dini Suprihatini	Direktur - Operasional Director - Operations	• Information Technology • Management Information & Accounting • Operations Management • Loan Operation • Bills Center
Lukito Adisubrata S.	Direktur – Marketing Director - Marketing	• Retail Banking • Corporate Banking II • Corporate Banking Surabaya • Branches

UJI KEMAMPUAN DAN KEPATUTAN

Sebagai bentuk kepatuhan dan komitmen terhadap GCG, proses penetapan Direksi Bank dilakukan melalui Uji Kemampuan dan Kepatutan yang dilaksanakan oleh Otoritas Jasa Keuangan (OJK). Bank mengajukan dan melengkapi *administrative compliance checklist* kepada OJK yang ditandatangani oleh Direktur yang membawahi fungsi kepatuhan.

FIT AND PROPER TEST

As a form of compliance and commitment to GCG, the process of determining The Bank's Board of Directors is carried out through the Fit and Proper Test conducted by the Financial Services Authority (OJK). This is done through The Bank's proposal that has filled out an administrative compliance checklist to OJK, signed by the Director in charge of the compliance function.

Seluruh anggota Direksi Bank telah lulus Uji Kemampuan dan Kepatutan oleh regulator melalui keputusan di bawah ini:

All members of The Bank's Board of Directors have passed the Fit and Proper Test by regulators through the following decrees:

Nama Name	Jabatan Position	Surat Uji Kemampuan dan Kepatutan Letter of Fit and Proper Test
Chen Yong	Presiden Direktur President Director	Surat No. SR-3/PB.02/2023 tanggal 28 Februari 2023 Letter No. SR-3/PB.02/2023 dated February 28, 2023
Zhang Wen	Direktur – Kredit Director - Credit	Surat No. SR-18/PB.12/2021 tanggal 21 Januari 2021 Letter No. SR-18/PB.12/2021 dated January 21, 2021
Liu Hongbo	Direktur – Marketing Director - Marketing	Surat No. SR-18/PB.12/2021 tanggal 21 Januari 2021 Letter No. SR-18/PB.12/2021 dated January 21, 2021
Sandy T. Muliana	Direktur – Kepatuhan & Manajemen Risiko Director – Compliance & Risk Management	Surat No. 11/109/GBI/DPIP/Rahasia tanggal 21 Agustus 2009 Letter No. 11/109/GBI/DPIP/Rahasia dated August 21, 2009
Fransisca Nelwan Mok	Direktur – Sumber Daya Manusia & Hukum Director – Human Resources & Legal	Surat No. SR-22/PB.12/2017 tanggal 8 Februari 2017 Letter No. SR-22/PB.12/2017 dated February 8, 2017
Dini Suprihatini	Direktur - Operasional Director - Operations	Surat No. SR-116/PB.12/2020 tanggal 5 Mei 2020 Letter No. SR-116/PB.12/2020 Dated May 5, 2020
Lukito Adisubrata S.	Direktur - Marketing Director – Marketing	Surat No. SR-219/PB.12/2021 tanggal 12 Agustus 2021 Letter No. SR-219/PB.12/2021 dated August 12, 2021

PELATIHAN DAN PENGEMBANGAN KOMPETENSI

Bank memiliki kebijakan terkait pengembangan dan peningkatan kompetensi Direksi, yang dilakukan melalui berbagai pelatihan dan pendidikan. Daftar pelatihan dan pengembangan kompetensi Direksi dapat dilihat dalam Bab “Profil Perusahaan” pada Laporan Tahunan Keberlanjutan 2023 ini.

TRAINING AND DEVELOPMENT OF COMPETENCY

The Bank has its own policy related to the development and enhancement of the Board of Directors competency, which are conducted through various training and workshops. The training and development of the Board of Directors competency can be referred to the “Company Profile” section in this 2023 Annual Sustainability Report.

PERNYATAAN INDEPENDENSI DIREKSI

Direksi Bank wajib bersifat independen dalam memutuskan hal-hal terkait kepentingan Bank. Masing-masing anggota Direksi wajib menghindari adanya benturan kepentingan dari pihak manapun termasuk hubungan keuangan dan hubungan keluarga dengan sesama anggota Direksi, Dewan Komisaris, pemegang saham pengendali maupun pihak eksternal yang memiliki hubungan bisnis dengan Bank.

INDEPENDENCY STATEMENT OF THE BOARD OF DIRECTORS

The Bank's Board of Directors must be independent in deciding matters concerning the interests of The Bank. Each member of The Bank's Board of Directors must avoid any conflict of interest from any party including financial and family relations with other members of the Board of Directors, Board of Commissioners, controlling shareholders or any external party having business relations with The Bank.

Seluruh anggota Direksi Bank telah menandatangani surat pernyataan pada tanggal 31 Desember 2023 yang menyatakan pemenuhan seluruh kriteria dan independensi jabatannya sesuai kriteria yang disyaratkan oleh peraturan perundang-undang yang berlaku.

All members of The Bank's Board of Directors have signed a statement certifying fulfillment of criteria as well as his/her independency of position on December 31, 2023 in accordance with the criteria as set under prevailing regulations.

ICBC  **PT. BANK ICBC INDONESIA**

**PRESIDENT DIRECTOR
GOOD CORPORATE GOVERNANCE
ANNUAL STATEMENT LETTER¹
As of 31 December 2023**

To comply with OJK Regulation No.17 Year 2023, dated September 14th, 2023 regarding The Implementation of Good Corporate Governance, as President Director of PT Bank ICBC Indonesia, herewith I declare the following:

1. I do not have any financial, management, share ownership, and/or family relationship up to second degree with controlling shareholders;
2. I do not hold another position as a member of the Board of Commissioners, the Board of Directors or Executive Officer at a bank, company and/or other institution;
3. I do not hold concurrent position in the field of functional duties at bank financial institutions domiciled at domestic or overseas;
4. I do not hold any other position that may cause conflict of interest in the performance of duties as a member of the Board of Directors;
5. I do not hold another position in accordance with the provisions of laws and regulations;
6. I do not own, individually or jointly, shares of more than 25% (twenty five percent) from the paid up capital of PT Bank ICBC Indonesia and/or another company;
7. I have/do not have² family and/or financial relationship up to the second degree with other members of the Board of Directors and/or members of the Board of Commissioners, as stated on "Financial and Family Relationship Form" (attachment 1);
8. I never extend a general power of attorney to other parties which will result in transfer of my tasks and functions;
9. With regard to having an individual advisory and/or professional service as a consultant, I have complied with the prevailing regulations;
10. I own/do not own³ shares of PT Bank ICBC Indonesia and/or other bank and/or non-bank financial institutions and/or other company, as stated on "Share Ownership Form" (attachment 2);
11. I never use the Bank for self, family, and other party's interests which may cause a loss or decrease the profit of the Bank;
12. I never take and/or receive a personal gain from the Bank other than remuneration and other facilities as stipulated in the General Meeting of Shareholders;
13. I never get any intervention or influence from related parties or other parties that may affect my independency.

I certify that the information made in this form is true and this Statement Letter is made to be used as it is appropriate.

Jakarta, 2 January 2024


Chen Yong
President Director

¹ This statement letter is an integral part of following attachment:
• Attachment 1: Financial and Family Relationship Form
• Attachment 2: Share Ownership Form
• Attachment 3: Declaration and Requirements
² Cross as necessary

ICBC  **PT. BANK ICBC INDONESIA**

**DIRECTOR
GOOD CORPORATE GOVERNANCE
ANNUAL STATEMENT LETTER¹
As of 31 December 2023**

To comply with OJK Regulation No.17 Year 2023, dated September 14th, 2023 regarding The Implementation of Good Corporate Governance, as Director of PT Bank ICBC Indonesia, herewith I declare the following:

1. I do not hold another position as a member of the Board of Commissioners, the Board of Directors or Executive Officer at a bank, company and/or other institution;
2. I do not hold concurrent position in the field of functional duties at bank financial institutions domiciled at domestic or overseas;
3. I do not hold any other position that may cause conflict of interest in the performance of duties as a member of the Board of Directors;
4. I do not hold another position in accordance with the provisions of laws and regulations;
5. I do not own, individually or jointly, shares of more than 25% (twenty five percent) from the paid up capital of PT Bank ICBC Indonesia and/or another company;
6. I have/do not have² family and/or financial relationship up to the second degree with other members of the Board of Directors and/or members of the Board of Commissioners, as stated on "Financial and Family Relationship Form" (attachment 1);
7. I never extend a general power of attorney to other parties which will result in transfer of my tasks and functions;
8. With regard to having an individual advisory and/or professional service as a consultant, I have complied with the prevailing regulations;
9. I own/do not own³ shares of PT Bank ICBC Indonesia and/or other bank and/or non-bank financial institutions and/or other company, as stated on "Share Ownership Form" (attachment 2);
10. I never use the Bank for self, family, and other party's interests which may cause a loss or decrease the profit of the Bank;
11. I never take and/or receive a personal gain from the Bank other than remuneration and other facilities as stipulated in the General Meeting of Shareholders;
12. I never get any intervention or influence from related parties or other parties that may affect my independency.

I certify that the information made in this form is true and this Statement Letter is made to be used as it is appropriate.

Jakarta, 31 December 2023


Zhang Wen
Director

¹ This statement letter is an integral part of following attachment:
• Attachment 1: Financial and Family Relationship Form
• Attachment 2: Share Ownership Form
• Attachment 3: Declaration and Requirements
² Cross as necessary

ICBC  **PT. BANK ICBC INDONESIA**

**DIRECTOR
GOOD CORPORATE GOVERNANCE
ANNUAL STATEMENT LETTER¹
As of 31 December 2023**

To comply with OJK Regulation No.17 Year 2023, dated September 14th, 2023 regarding The Implementation of Good Corporate Governance, as Director of PT Bank ICBC Indonesia, herewith I declare the following:

1. I do not hold another position as a member of the Board of Commissioners, the Board of Directors or Executive Officer at a bank, company and/or other institution;
2. I do not hold concurrent position in the field of functional duties at bank financial institutions domiciled at domestic or overseas;
3. I do not hold any other position that may cause conflict of interest in the performance of duties as a member of the Board of Directors;
4. I do not hold another position in accordance with the provisions of laws and regulations;
5. I do not own, individually or jointly, shares of more than 25% (twenty five percent) from the paid up capital of PT Bank ICBC Indonesia and/or another company;
6. I have/do not have² family and/or financial relationship up to the second degree with other members of the Board of Directors and/or members of the Board of Commissioners, as stated on "Financial and Family Relationship Form" (attachment 1);
7. I never extend a general power of attorney to other parties which will result in transfer of my tasks and functions;
8. With regard to having an individual advisory and/or professional service as a consultant, I have complied with the prevailing regulations;
9. I own/do not own³ shares of PT Bank ICBC Indonesia and/or other bank and/or non-bank financial institutions and/or other company, as stated on "Share Ownership Form" (attachment 2);
10. I never use the Bank for self, family, and other party's interests which will result in a loss or decrease the profit of the Bank;
11. I never take and/or receive a personal gain from the Bank other than remuneration and other facilities as stipulated in the General Meeting of Shareholders;
12. I never get any intervention or influence from related parties or other parties that may affect my independency.

I certify that the information made in this form is true and this Statement Letter is made to be used as it is appropriate.

Jakarta, 2 January 2024


Liu Jinghui
Director

¹ This statement letter is an integral part of following attachment:
• Attachment 1: Financial and Family Relationship Form
• Attachment 2: Share Ownership Form

ICBC **PT. BANK ICBC INDONESIA**

**DIRECTOR
GOOD CORPORATE GOVERNANCE
ANNUAL STATEMENT LETTER¹**
As of 31 December 2023

To comply with with GRI Regulation No.17 Year 2023, dated September 14th, 2023 regarding The Implementation of Good Corporate Governance, as Director of PT Bank ICBC Indonesia, herewith I declare the following:

1. I do not hold another position as a member of the Board of Commissioners, the Board of Directors or Executive Officer at a bank, company and/or other institution;
2. I do not hold concurrent position in the field of functional duties at bank financial institutions domiciled at domestic or overseas;
3. I do not hold any other position that may cause conflict of interest in the performance of duties as a member of the Board of Directors;
4. I do not hold another position in accordance with the provisions of laws and regulations;
5. I do not own, individually or jointly, shares of more than 25% (twenty five percent) from the paid in capital of PT Bank ICBC Indonesia and/or another company;
6. I herewith not have² family and/or financial relationship up to the second degree with other members of the Board of Directors and/or members of the Board of Commissioners, as stated on "Financial and Family Relationship Form" (attachment 1);
7. I never extend a general power of attorney to other parties which will result in transfer of my tasks and functions;
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10. I never use the Bank for self, family, and other party's interests which may cause a loss or decrease the profit of the Bank;
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Jakarta, 31 December 2023


Tjaya Tjaya Mulyana
Director

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• Attachment 3: Declaration and Requirements
² None as necessary

ICBC **PT. BANK ICBC INDONESIA**

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Jakarta, 2 January 2024


Eka Widiyanti
Director

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Jakarta, 31 December 2023


Dwi Supriatna
Director

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Penilaian Penerapan GCG 2023 Terhadap Dewan Komisaris dan Direksi

2023 GCG Assessment for the Board of Commissioners and Board of Directors

Bank melakukan *self-assessment* terhadap penerapan GCG tahun 2023 sejalan dengan periode penilaian *Risk-Based Bank Rating* (RBBR) yang dilakukan setiap semester sebagaimana dimaksud dalam Surat Edaran Otoritas Jasa Keuangan (SEOJK) No. 13/SEOJK.03/2017 tentang Pelaksanaan Tata Kelola bagi Bank Umum.

Berdasarkan acuan tersebut, Bank melakukan *self-assessment* secara berkala terhadap 11 (sebelas) faktor penilaian penerapan GCG, di mana 2 (dua) faktor di dalamnya merupakan Dewan Komisaris dan Direksi, yaitu:

1. Pelaksanaan tugas dan tanggung jawab Dewan Komisaris.
2. Pelaksanaan tugas dan tanggung jawab Direksi.

Hasil *self-assessment* tahun 2023 terhadap kedua aspek di atas menunjukkan berfungsinya perangkat organ Dewan Komisaris dan Direksi, dengan hasil sebagai berikut:

The Bank conducts *self-assessment* of GCG implementation in 2023 in accordance with the period of *Risk-Based Bank Rating* (RBBR) assessment conducted every semester as referred to Circular Letter of the Financial Services Authority (SEOJK) No. 13/SEOJK.03/2017 on the Implementation of Governance for Commercial Banks.

Based on the aforementioned guidelines, The Bank conducts *self-assessment* regularly for 11 (eleven) GCG implementation assessment factors, 2 (two) of which are concerning the Board of Commissioners and Board of Directors, namely:

1. The Board of Commissioners' duties and responsibilities implementation.
2. The Board of Directors' duties and responsibilities implementation.

The *self-assessment* results in 2023 towards the above aspects indicate the proper functioning of the organs of the Board of Commissioners and Board of Directors, with the following results:

Faktor Penilaian Penerapan GCG GCG Assessment Factors	Skor Score
Pelaksanaan tugas dan tanggung jawab Dewan Komisaris The Board of Commissioners' duties and responsibilities implementation	1
Pelaksanaan tugas dan tanggung jawab Direksi The Board of Directors' duties and responsibilities implementation	1

REALISASI/TINDAK LANJUT ATAS HASIL REKOMENDASI

Atas semua temuan Otoritas Jasa Keuangan (OJK) tahun 2022 pada kantor pusat Bank, Bank telah menindaklanjuti seluruh komitmen yang memerlukan tindakan perbaikan secara tepat waktu, di antaranya pemenuhan komitmen atas penyempurnaan kebijakan, administrasi kredit, serta melakukan Otomatisasi sistem pelaporan Bank.

Terkait pemenuhan atas komitmen temuan pemeriksaan OJK tahun 2023 pada kantor pusat dan kantor cabang Bank, Bank telah menindaklanjuti komitmen temuan pemeriksaan dengan target waktu Desember 2023 dan bukti pendukung telah disampaikan kepada OJK.

REALIZATION/FOLLOW-UP ON RECOMMENDATIONS

Based on the Financial Services Authority (OJK) inspection in 2022 at The Bank's head office, The Bank has followed up all commitments that require improvement in a timely manner, including the fulfillment of policy improvement, credit administrative, as well as automation of the Bank's reporting system.

Regarding the fulfillment of OJK's audit findings commitment in 2023 at The Bank's head office and branch offices, The Bank has followed up all audit findings commitment with a target date in December 2023 and supporting documents have been submitted to OJK.

PENILAIAN KINERJA DEWAN KOMISARIS DAN DIREKSI

Metode/Mekanisme Penilaian

Penilaian faktor GCG merupakan penilaian terhadap kualitas manajemen Bank atas pelaksanaan prinsip GCG, dengan memperhatikan signifikansi atau materialitas suatu permasalahan terhadap penerapan GCG secara *bank-wide*, sesuai skala, karakteristik dan kompleksitas usaha Bank. Penilaian tersebut dikelompokkan dalam suatu *governance system* yang terdiri dari 3 (tiga) aspek *governance*, yaitu: *governance structure*, *governance process*, dan *governance outcome*.

HASIL PENILAIAN

Struktur Tata Kelola

1. Dewan Komisaris secara aktif mengkomunikasikan dan memantau kondisi Bank seperti tindak lanjut terhadap audit OJK, manajemen risiko, kepatuhan dan APU.
2. Seluruh anggota Direksi dan Dewan Komisaris memiliki integritas, kompetensi dan reputasi keuangan yang memadai.
3. Bank melanjutkan implementasi tata kelola kebijakan dan prosedur termasuk sosialisasinya ke seluruh departemen/cabang yang berlaku.
4. Seluruh komite-komite di bawah Dewan Komisaris dan Direksi telah melaksanakan fungsinya sesuai dengan ketentuan yang berlaku.
5. Bank telah memiliki kebijakan yang mengatur tentang pihak terkait dan penyediaan dana besar termasuk limit sesuai dengan prinsip kehati-hatian.
6. Secara terus menerus, Bank telah memperbaiki Risk Control Self-Assessment sebagai operational risk management tools.
7. Bank telah memenuhi komposisi ketentuan Dewan Komisaris dan Direksi.

Proses Tata Kelola

1. Dewan Komisaris dan Direksi telah secara aktif berkomunikasi dengan regulator (OJK dan BI).
2. Direksi telah secara aktif menyelesaikan tindak lanjut temuan regulator untuk pemeriksaan tahun 2022 dan tindak lanjut pemeriksaan tahun 2023 dengan tenggat waktu penyampaian sampai dengan 31 Desember 2023.
3. Secara berkala, Bank terus melakukan pembaruan atas Kebijakan Manajemen Risiko, dan kebijakan tersebut menjadi dasar atas semua kebijakan dan prosedur Bank.
4. Secara berkelanjutan, Bank telah meningkatkan fungsi audit internal untuk mengidentifikasi isu yang ada.
5. Tata kelola terhadap pelaksanaan piagam komite pada tingkat Direksi dan Dewan Komisaris.

BOARD OF COMMISSIONERS AND BOARD OF DIRECTORS PERFORMANCE ASSESSMENT

Assessment Methods/Mechanisms

The GCG factors assessment is the assessment of The Bank management quality in implementing GCG principles, by taking into account the significance or materiality of an issue to the implementation of GCG bank-wide, based on the scale, characteristics and complexity of The Bank's business. The assessment is grouped into a governance system comprising 3 (three) aspects of governance: governance structure, governance process, and governance outcome.

ASSESSMENT RESULTS

Governance Structure

1. Board of Commissioners actively communicates and monitors The Bank conditions related to OJK audit rectification rate, risk management, compliance and AML concern.
2. All members of the Board of Directors and Board of Commissioners have integrity, competency, and adequate financial reputation.
3. The Bank continues the implementation of policy and procedure governance including its socialization to all respective departments/branches that applied.
4. All committees under the Board of Commissioners and Board of Directors have carried out their functions in accordance with prevailing regulations.
5. The Bank has a policy governing related parties and large exposures, including their limits in accordance with the prudential principles.
6. The Bank has continuously improved the Risk Control Self-Assessment as operational risk management tools.
7. The Bank has fulfilled the requirement for Board of Commissioners and Board of Directors composition.

Governance Process

1. Board of Commissioners and Board of Directors have actively communicated with regulators (OJK and BI).
2. Board of Directors has actively followed up on regulatory audit findings for 2022 audit and followed up on 2023 audit with target completion by December 31, 2023.
3. Periodically, The Bank continues to improve its Risk Management Policy and the policy will act as the foundation for all of The Bank's policies and procedures.
4. The Bank continuously improves the internal audit function to identify current issues.
5. Govern the implementation of committee charter at Board of Directors and Board of Commissioners level.

Hasil Tata Kelola

1. Tidak terdapat hasil audit terkait dengan benturan kepentingan.
2. Bank telah memiliki rencana audit yang telah disetujui oleh Presiden Direktur dan Dewan Komisaris.
3. Tidak terdapat permasalahan terkait penunjukan, komunikasi, independensi, dan cakupan pekerjaan auditor eksternal.
4. Bank telah menyelesaikan 35 (tiga puluh lima) temuan dari 35 (tiga puluh lima) temuan yang teridentifikasi untuk audit OJK tahun 2022.
5. Untuk komitmen temuan OJK tahun 2023 pada kantor pusat dan kantor cabang, telah ditindaklanjuti komitmen temuan pemeriksaan sampai dengan Desember 2023 sesuai dengan target komitmen.
6. Tidak terdapat pelanggaran atau pelampauan Batas Maksimum Pemberian Kredit (BMPK) pada tahun 2023.

Governance Outcome

1. There were no audit results related to the conflict of interest.
2. The Bank has organized its audit plan approved by the President Director and Board of Commissioners.
3. There were no issues related to the appointment, communication, independence, and scope of work of the external auditor.
4. The Bank has rectified 35 (thirty-five) audit findings of 35 (thirty-five) audit findings commitment identified for OJK inspection in 2022.
5. For OJK audit findings commitment in 2023 at The Bank's head office and branch offices, the audit findings commitment has been rectified until December 2023 as per agreed timeline.
6. There was no breach or exceed on Legal Lending Limit (LLL) during 2023.

Kebijakan Remunerasi Dewan Komisaris dan Direksi

Remuneration Policy of the Board of Commissioners and Board of Directors

Bank menerapkan kebijakan tata kelola remunerasi berdasarkan Peraturan Otoritas Jasa Keuangan (POJK) No. 45/POJK.03/2015 tentang Penerapan Tata Kelola dalam Pemberian Remunerasi bagi Bank Umum. Remunerasi merupakan imbalan yang ditetapkan dan diberikan kepada anggota Dewan Komisaris, anggota Direksi, dan/atau karyawan yang bersifat tetap maupun variabel dalam bentuk tunai maupun non tunai sesuai dengan tugas, wewenang, dan tanggung jawabnya. Sebagai perwujudan komitmen terhadap penerapan tata kelola (*good corporate governance*), maka Bank merasa perlu mengatur tata cara pemberian remunerasi dan fasilitas-fasilitas yang diberikan untuk mendorong dilakukannya *prudent risk taking* dalam rangka menjaga kelangsungan usaha Bank.

Terkait dengan remunerasi bagi Dewan Komisaris dan Direksi, Bank memiliki Kebijakan Remunerasi Anggota Direksi dan Anggota Dewan Komisaris No. 2021-HRD-004-L3. Untuk mengetahui posisi remunerasi Bank terhadap kondisi pasar, setiap tahun Bank berpartisipasi dalam *annual salary survey* yang diselenggarakan oleh pihak ketiga yang independen dan kompeten. Hasil kajian dari survei tersebut digunakan sebagai dasar dalam menyesuaikan strategi remunerasi Bank.

Berdasarkan Undang-Undang No. 40 Tahun 2007 tentang Perseroan Terbatas dan Anggaran Dasar Perseroan; penetapan gaji, honorarium, atau tunjangan anggota Dewan Komisaris dan Direksi harus dilakukan melalui pengambilan keputusan Rapat Umum Pemegang Saham (RUPS).

Dalam hal ini, Bank memiliki Komite Remunerasi dan Nominasi yang berfungsi merekomendasikan remunerasi Dewan Komisaris dan Direksi Bank, sebelum diserahkan kepada Dewan Komisaris untuk disampaikan kepada RUPS untuk mendapatkan persetujuan.

The Bank implements a remuneration governance policy based on the Financial Services Authority Regulation (POJK) No. 45/POJK.03/2015 concerning the Implementation of Governance for Commercial Banks in the Provision of Remuneration. Remuneration is a fixed and variable honorarium given to members of the Board of Commissioners, members of the Board of Directors, and/or employees in the form of cash and non-cash in accordance with their duties, authorities, and responsibilities. As a manifestation of commitment to the implementation of good corporate governance, The Bank feels the need to regulate the procedure of providing remuneration and facilities to encourage the implementation of prudent risk taking in maintaining The Bank's business continuity.

Regarding the remuneration for Board of Commissioners and Board of Directors, The Bank issued a Remuneration Policy for Members of the Board of Directors and Members of the Board of Commissioners No. 2021-HRD-004-L3 which has been updated on October 13, 2021. To ascertain The Bank's remuneration position against the market conditions, The Bank participates in an annual salary survey organized by independent and competent third party every year. The results of the survey are then used as the basis for adjusting The Bank's remuneration strategy.

Pursuant to Law No. 40 of 2007 concerning the Limited Liability Companies and Articles of Association; the arrangement of salary, honorarium, or benefits for the Board of Commissioners and Board of Directors members must be made through the decision making of the General Meeting of Shareholders (GMS).

In this case, The Bank has a Remuneration and Nomination Committee whose function is to recommend the remuneration of The Bank's Board of Commissioners and Board of Directors, before it is submitted to the Board of Commissioners for further submission to the GMS for approval.



INDIKATOR PENETAPAN REMUNERASI

Komite Remunerasi dan Nominasi menyusun rekomendasi remunerasi berdasarkan formulasi remunerasi yang mengacu kepada kebijakan internal Bank, peraturan eksternal yang berlaku, dan komparasi industri, dengan tetap mempertimbangkan kinerja Bank.

Komite Remunerasi dan Nominasi mengacu kepada prinsip-prinsip remunerasi Bank dan hasil penilaian atas pencapaian target (*goal setting*), peraturan yang berlaku, komparasi industri dan kinerja Bank untuk menetapkan remunerasi Dewan Komisaris dan Direksi.

REMUNERATION DETERMINATION INDICATORS

The Remuneration and Nomination Committee prepares remuneration recommendations based on remuneration formulations that refer to The Bank's internal policies, applicable external regulations, and industrial comparisons, while considering The Bank's performance.

The Remuneration and Nomination Committee refers to The Bank's remuneration principles and the assessment results of goal setting, applicable regulations, industrial comparisons, and The Bank's performances to determine the remuneration of the Board of Commissioners and Board of Directors.

CAKUPAN KEBIJAKAN REMUNERASI DAN IMPLEMENTASINYA

Ketentuan Remunerasi mencakup seluruh karyawan baik yang berada di kantor pusat dan kantor cabang. Termasuk kebijakan Bank memastikan bahwa kebijakan diterapkan dengan adil dan merata agar setiap karyawan mendapatkan imbal jasa yang sesuai.

SCOPE OF REMUNERATION POLICY AND ITS IMPLEMENTATION

Remuneration Policy covers all employees, located at the head office and branches. Bank ensures that the policies are implemented fairly and equitably to each employee with appropriate compensation.

REMUNERASI YANG DIKAITKAN DENGAN RISIKO

Dalam memberikan remunerasi, Bank selalu memperhatikan prinsip kehati-hatian yang bertujuan untuk mendorong dilakukannya *prudent risk taking* dalam rangka menjaga kelangsungan usaha Bank. Metode pengukuran kinerja dan jenis risiko dalam menetapkan pemberian remunerasi yang bersifat variabel disesuaikan dengan skala dan kompleksitas kegiatan usaha Bank. Dalam menetapkan kebijakan remunerasi, Bank memperhatikan jenis, kriteria, dampak serta perubahan penentuan jenis risiko utama dalam menetapkan remunerasi.

DISCLOSURE OF REMUNERATION RELATED TO RISKS

In providing remuneration, The Bank always pays attention to the prudential principles to encourage the implementation of prudent risk taking in maintaining The Bank's business continuity. The performance measurements and type of risks in determining the variable remuneration are adjusted to the scale and complexity of The Bank's business activities. In determining the remuneration policy, The Bank takes into account the types, criteria, impacts and changes in the determination of the main types of risk in determining the remuneration.

PENGUKURAN KINERJA DIKAITKAN DENGAN REMUNERASI

Penerapan strategi remunerasi Bank dilaksanakan dengan memperhatikan kinerja dari tiap-tiap individu (*based on performance*), kinerja unit kerja, dan kinerja Bank secara keseluruhan, namun tetap mempertimbangkan kemampuan finansial Bank.

PENYESUAIAN REMUNERASI DIKAITKAN DENGAN RISIKO DAN KINERJA

Bank memberikan remunerasi yang bersifat variabel yaitu remunerasi yang dikaitkan dengan kinerja dan risiko, antara lain bonus kinerja atau bentuk lain yang dipersamakan yang dikelola didalam Kebijakan Tata Kelola Pemberian Remunerasi bagi *Material Risk Taker* No. 2020-HRD-005-L3. Dalam kebijakan tersebut telah dicantumkan bahwa Bank dapat menunda pembayaran remunerasi yang bersifat variabel yang ditangguhkan (*Malus*) kepada pejabat yang tergolong *Material Risk Taker* (MRT), dengan ketentuan sebagai berikut:

1. Remunerasi yang bersifat variabel wajib ditangguhkan sebesar persentase tertentu yang ditetapkan oleh Bank bagi pejabat yang tergolong sebagai MRT.
2. Dalam implementasi remunerasi MRT, Bank selalu berpedoman terhadap ketentuan OJK dan kebijakan remunerasi Bank.

KONSULTAN EKSTERN

Dalam upaya memberikan remunerasi yang optimal kepada karyawan, Bank perlu melihat berbagai aspek dalam rangka menjaga remunerasi agar tetap kompetitif dan adil. Oleh karena itu, Bank menjalin kerja sama dengan menggunakan jasa konsultan eksternal independen Willis Tower Watson untuk mendapatkan informasi terkini mengenai remunerasi.

JUMLAH REMUNERASI DITERIMA DALAM 1 (SATU) TAHUN

Bank selalu berusaha menaati seluruh aturan yang berlaku terkait remunerasi kepada karyawan. Besaran remunerasi yang diberikan telah disesuaikan dengan ketentuan yang berlaku dan berada di atas standar upah minimum yang berlaku di wilayah operasional Bank. Dalam menerapkan tata kelola remunerasi, Bank senantiasa berupaya menjaga *gap* rasio gaji seluruh karyawan agar tidak terdapat perbedaan yang terlalu tinggi.

PERFORMANCE MEASUREMENT RELATED TO REMUNERATION

The Bank's remuneration strategy is carried out by taking in account the performances of each individual, work units, and The Bank as a whole, while still considering The Bank's financial capability.

REMUNERATION ADJUSTMENT RELATED TO RISK AND PERFORMANCE

The Bank provides variable remuneration relating to the performance and risk, including the performance bonuses or other equivalent forms. The Bank issued a Governance Policy for Providing Remuneration to Material Risk Taker No. 2020-HRD-005-L3 which has been updated on October 19, 2020. It was stated in the policy that The Bank might delay the payment of deferred variable remuneration (*Malus*) to officials classified as Material Risk Taker (MRT), with the following conditions:

1. Variable remuneration must be deferred at a certain percentage determined by The Bank for officials classified as MRT.
2. In the implementation of MRT remuneration, The Bank always complies with OJK provisions and The Bank's remuneration policy.

EXTERNAL CONSULTANTS

In an effort to provide optimal remuneration to employees, the Bank needs to observe various aspects to keep competitive and fair remuneration. Therefore, Bank collaborates with external consultant Willis Tower Watson to get the update information of the remuneration.

TOTAL REMUNERATION ACCEPTED IN 1 (ONE) YEAR

The Bank strives to comply with all applicable regulations regarding remuneration to employees. The amount of remuneration given has been adjusted to the applicable provisions and is above the minimum wage standard applied in The Bank's operational area. In implementing the remuneration governance, The Bank strives to maintain the gap in the salary ratio of all employees so that the differences are not significant.

Uraian Description	Komisaris Commissioners		Direktur Directors	
	Jumlah Orang Number of People	Jumlah dalam Juta Rupiah Total in Million Rupiah	Jumlah Orang Number of People	Jumlah dalam Juta Rupiah Total in Million Rupiah
Remunerasi				
Gaji/Honorarium, Bonus, tunjangan rutin dan fasilitas lainnya dalam bentuk non natura Salary/Honorarium, bonus, fixed allowance and other non-natura facilities	3	4.243	8	33.482
Fasilitas lainnya dalam bentuk natura (perumahan, transportasi, asuransi kesehatan, dan sebagainya) yang: Other natura facilities (housing, transportation, health insurance, and others), which:				
Dapat Dimiliki Can Be Owned	-	-	-	-
Perumahan Housing	-	-	3	1.610
Tidak Dapat Dimiliki Cannot Be Owned				
Transportasi Transportation	-	-	8	1.812
Tidak Dapat Dimiliki Cannot Be Owned				
Asuransi Kesehatan Health Insurance	3	67	8	581
Tidak Dapat Dimiliki Cannot Be Owned				
Jumlah Total				

Catatan | Note

Terjadi perubahan susunan Direksi di tahun 2023. Data termasuk Direksi/Dewan Komisaris yang Berakhir Masa Kerja pada tahun 2023
There were changes to the composition of Board of Directors in 2023. Data including Directors/Commissioners with End of Tenure in 2023

Total Remunerasi per Orang dalam 1 (Satu) Tahun Total Remuneration per Person in 1 (One) Year	Jumlah Komisaris Number of Commissioners	Jumlah Direktur Number of Directors
Di atas Rp2 miliar Above Rp2 billion	-	8
Di atas Rp1 miliar s.d. Rp2 miliar Above Rp1 billion up to Rp2 billion	3	-
Di atas Rp500 juta s.d. Rp1 miliar Above Rp500 million up to Rp1 billion	-	-
Di bawah Rp500 juta Rp500 million or less	-	-
Jumlah Total	3	8

Catatan | Note

Terjadi perubahan susunan Direksi di tahun 2023. Data termasuk Direksi/Dewan Komisaris yang Berakhir Masa Kerja pada tahun 2023
There were changes to the composition of Board of Directors in 2023. Data including Directors/Commissioners with End of Tenure in 2023

RASIO GAJI

Berikut adalah rasio gaji tertinggi dan terendah dalam lingkup organisasi Bank:

Rasio Gaji Salary Ratio	2023	2022	2021
Gaji Direktur tertinggi terhadap gaji Direktur terendah The highest salary of Directors compared to the lowest salary of Directors	1,44:1	1,80:1	2,09:1
Gaji Direktur tertinggi terhadap gaji Komisaris tertinggi The highest salary of Directors compared to the highest salary of Commissioners	3,7:1	4,63:1	5,15:1
Gaji Komisaris tertinggi terhadap gaji Komisaris terendah The highest salary of Commissioners compared to the lowest salary of Commissioners	1:1	1:1	1:1
Gaji Direktur tertinggi terhadap gaji karyawan tertinggi The highest salary of Directors compared to the highest salary of employees	1,86:1	2,47:1	2,27:1
Gaji karyawan tertinggi terhadap gaji karyawan terendah The highest salary of employees compared to the lowest salary of employees	22,31:1	21,97:1	25,04:1
Gaji karyawan terendah terhadap Upah Minimum Provinsi (UMP) The lowest salary of employees compared to the Provincial Minimum Wage (UMP)	1,06:1	1,07:1	1,08:1

SALARY RATIO

The ratio of the highest and lowest salaries within the scope of The Bank's organization is as follows:

OPSI SAHAM DAN BUY BACK

Hingga akhir tahun 2023, Bank tidak memiliki kebijakan mengenai Opsi Saham bagi Dewan Komisaris dan Direksi.

STOCK OPTIONS AND BUY BACK

By the end of 2023, The Bank does not have a policy on Stock Options for the Board of Commissioners and Board of Directors.

REMUNERASI YANG BERSIFAT VARIABEL

Pemberian remunerasi dalam bentuk variabel dikaitkan dengan kinerja dan risiko terdiri dari Bonus Kinerja.

Keputusan terkait remunerasi yang bersifat variabel merupakan hak penuh Bank dengan mempertimbangkan kinerja Bank secara keseluruhan.

VARIABLE REMUNERATION

The payment of variable remuneration is based on performance and risk, consisting of bonuses.

Decisions of the variable remuneration are the full right of the Bank with the consideration of Bankwide performance.

JUMLAH DIREKSI, DEWAN KOMISARIS, DAN PEGAWAI YANG MENERIMA REMUNERASI YANG BERSIFAT VARIABEL SELAMA 1 (SATU) TAHUN

NUMBER OF BOARD OF DIRECTORS, BOARD OF COMMISSIONERS AND EMPLOYEES WHO RECEIVED VARIABLE REMUNERATIONS IN 1 (ONE) YEAR

Remunerasi yang Bersifat Variabel Variable Remuneration	Komisaris Commissioners		Direktur Directors		Pegawai Employees	
	Orang People	Juta (Rupiah) Million (Rupiah)	Orang People	Juta (Rupiah) Million (Rupiah)	Orang People	Juta (Rupiah) Million (Rupiah)
Jumlah Total	3	899	8	8.500	693	36.700

JUMLAH PENERIMA DAN JUMLAH TOTAL REMUNERASI YANG BERSIFAT VARIABEL YANG DIJAMIN TANPA SYARAT AKAN DIBERIKAN OLEH BANK

Bank tidak memberikan remunerasi yang bersifat variabel yang dijamin tanpa syarat akan diberikan oleh Bank kepada calon Direksi, calon Dewan Komisaris, dan/atau calon Pegawai selama 1 (satu) tahun pertama bekerja sebagaimana dimaksud dalam Pasal 21 POJK Remunerasi.

NUMBER OF RECIPIENTS AND TOTAL AMOUNT OF VARIABLE REMUNERATION GUARANTEED UNCONDITIONALLY TO BE PROVIDED BY THE BANK

Bank does not provide any variable Remuneration that guaranteed without conditions to be provided by the Bank for candidates of the Board of Directors, Board of Commissioners, and/or employees for the first 1 (one) year of work period as referred in Article 21 of POJK Remuneration guideline.

RINCIAN REMUNERASI YANG DIBERIKAN DALAM 1 (SATU) TAHUN

TOTAL REMUNERATION PROVIDED IN 1 (ONE) YEAR

Remunerasi yang Bersifat Variabel Variable Remuneration	Komisaris Commissioners		Direktur Directors		Pegawai Employees	
	Orang People	Juta (Rupiah) Million (Rupiah)	Orang People	Juta (Rupiah) Million (Rupiah)	Orang People	Juta (Rupiah) Million (Rupiah)
Jumlah Total	3	4.310	8	34.063	693	265.742

JUMLAH REMUNERASI YANG BERSIFAT VARIABEL YANG DITANGGUHKAN

TOTAL AMOUNT OF DEFERRED VARIABLE REMUNERATION

Remunerasi yang Bersifat Variabel Variable Remuneration	Komisaris Commissioners		Direktur Directors	
	Jumlah Orang Number of People	Jumlah dalam Juta Rupiah Total in Million Rupiah	Jumlah Orang Number of People	Jumlah dalam Juta Rupiah Total in Million Rupiah
Jumlah Remunerasi yang Bersifat Variabel Total Amount of Variable Remuneration	-	-	10	3.446

Sampai dengan Desember 2023, total remunerasi yang bersifat variabel yang ditangguhkan oleh Bank dalam bentuk uang tunai sebesar Rp 3,45 miliar untuk 10 (sepuluh) anggota Direksi.

Until the end of December 2023, the total variable remuneration deferred by The Bank in the form of cash was IDR 3.45 million for 10 (tenth) members of the Board of Directors.

RINCIAN REMUNERASI YANG DIBERIKAN DALAM 1 (SATU) TAHUN UNTUK MRT

TOTAL REMUNERATION PROVIDED IN 1 (ONE) YEAR FOR MRT

A.	Remunerasi yang bersifat Tetap*) Fixed Remuneration*)	
1. Tunai Cash		21.955
2. Saham atau instrumen yang berbasis saham yang diterbitkan Bank Shares or shares-based instruments issued by the Bank		N/A

*) hanya untuk MRT I only for MRT

B.	Remunerasi yang bersifat Variabel*) Variable Remuneration*)	Tidak Ditangguhkan Non-Deferred	Ditangguhkan Deferred
1.	Tunai Cash	5.957	2.525
2.	Saham atau instrumen yang berbasis saham yang diterbitkan Bank Shares or shares-based instruments issued by the Bank	N/A	N/A

*) hanya untuk MRT I only for MRT

JUMLAH PEGAWAI YANG TERKENA PEMUTUSAN HUBUNGAN KERJA

Selama tahun 2023, Bank tidak melakukan pemutusan hubungan kerja (PHK) kepada karyawan.

NUMBER OF EMPLOYEES AFFECTED BY LAYOFFS

Throughout 2023, The Bank did not layoff any of its employees.

INFORMASI KUANTITATIF

QUANTITATIVE INFORMATION

Jenis Remunerasi yang Bersifat Variabel Types of Variable Remuneration	Sisa yang Masih Ditangguhkan Remaining Deferred Amount	Total Pengurangan Selama Periode Laporan Total Deductions During Reporting Period		
		Disebabkan Penyesuaian Eksplisit (A) Due to Explicit Adjustment (A)	Disebabkan Penyesuaian Implisit (B) Due to Implicit Adjustment	Total (A) + (B)
Tunai (dalam juta rupiah) Cash (in million rupiah)	3.446	-	-	-
Saham/instrumen yang berbasis saham yang diterbitkan Bank. (dalam lembar saham dan nominal juta rupiah yang merupakan konversi dari lembar saham tersebut) Shares/share-based instruments issued by The Bank. (in number of shares and a nominal of million rupiah which is a conversion to number of shares)	-	-	-	-

REMUNERASI YANG TELAH DIBAYARKAN KEPADA ANGGOTA KOMITE REMUNERASI DAN NOMINASI SELAMA SATU TAHUN

Tidak ada remunerasi yang dibayarkan oleh Bank kepada ketua dan anggota Komite Remunerasi dan Nominasi selain yang dibayarkan setiap bulan sebagai Komisaris atau Pejabat Eksekutif.

REMUNERATION PAID TO REMUNERATION AND NOMINATION COMMITTEE MEMBERS FOR ONE YEAR

No Remuneration is paid by Bank to Chief and members of the Nomination and Remuneration Committee other than those paid monthly as Commissioners or Executive Officer.

Rapat Dewan Komisaris dan Direksi

Board of Commissioners and Board of Directors Meetings

RAPAT DEWAN KOMISARIS

Rapat Dewan Komisaris dilaksanakan berdasarkan POJK No. 17 tahun 2023 dan Pedoman Kerja Dewan Komisaris mengenai penetapan rapat Dewan Komisaris yang diwajibkan untuk menyelenggarakan rapat secara berkala paling sedikit 4 (empat) kali dalam 1 (satu) tahun.

Kebijakan Rapat Dewan Komisaris

Kebijakan rapat Dewan Komisaris diatur dalam *Board of Commissioners Charter* dengan pokok-pokok sebagai berikut:

- Keputusan rapat Dewan Komisaris diambil berdasarkan musyawarah untuk mufakat. Dalam hal keputusan secara musyawarah untuk mufakat tidak tercapai, maka keputusan diambil berdasarkan suara setuju lebih dari $\frac{1}{2}$ (setengah) jumlah suara yang sah dalam rapat. Dalam hal suara yang setuju dan tidak setuju berimbang maka usul harus dianggap ditolak.
- Dewan Komisaris dapat pula mengambil keputusan yang sah tanpa mengadakan rapat Dewan Komisaris dengan ketentuan semua anggota Komisaris telah diberitahu secara tertulis dan semua anggota Komisaris memberikan persetujuan mengenai usul yang diajukan secara tertulis serta menandatangani persetujuan tersebut. Keputusan yang diambil dengan cara demikian mempunyai kekuatan yang sama dengan keputusan yang diambil dengan sah dalam rapat Dewan Komisaris. Keputusan Dewan Komisaris mengikat seluruh anggota Dewan Komisaris.

Agenda dan Frekuensi Rapat

Sepanjang tahun 2023, Dewan Komisaris menyelenggarakan rapat sebanyak 4 (empat) kali. Berikut disampaikan agenda dan tingkat kehadiran Dewan Komisaris dalam rapat-rapat tersebut.

BOARD OF COMMISSIONERS MEETINGS

The Board of Commissioners meetings are implemented pursuant to the POJK No. 17 year 2023 and Board of Commissioners Charter on the meeting convention by the Board of Commissioners at least 4 (four) times in a year.

Board of Commissioners Meeting Policy

The Board of Commissioners meeting policy is accommodated under the Board of Commissioners Charter with the following key points:

- The decision of the Board of Commissioners meetings is based on deliberations to reach consensus. In the event that a consensus decision is not reached, a decision is made on the basis of agreed votes of more than $\frac{1}{2}$ (half) from the legitimate votes in the meeting. In the case of agreeing and disagreeing votes are equal then the proposal shall be deemed to be rejected.
- The Board of Commissioners may also make informed decisions without holding a Board of Commissioners meeting provided that all members of the Board of Commissioners have been notified in writing and all members of the Board of Commissioners agree on the proposal submitted in writing and sign the agreement. The decisions taken in this way have the same power as the decisions taken legitimately in the Board of Commissioners meetings. The decisions of the Board of Commissioners are binding to all members of the Board of Commissioners.

Meetings Agenda and Frequency

Throughout 2023, the Board of Commissioners held 4 (four) meetings. The following are the Board of Commissioners meetings agenda and attendance.

Agenda Rapat Dewan Komisaris

Board of Commissioners Meetings Agenda

Tanggal Date	Tempat Venue	Agenda	Nomor Risalah Rapat MoM Number
31 Maret 2023 March 31, 2022	Online via Webex	1. Bankwide Financial Performance as of February 2023 2. 2022 Anti Money Laundering Department Report 3. 2022 Risk Management Department Report 4. 2022 Compliance Department Report 5. 2022 Internal Audit Achievements and 2023 Internal Audit Plans	001/MM/BOC/III/2023
26 Juni 2023 June 26, 2023	Hybrid (Online via Webex and Offline in KPNO)	1. Compliance Department Updates 2. Anti Money Laundering Department Updates 3. Risk Management Department Updates 4. Business Plan 2022 Revision	002/MM/BOC/VI/2023
30 Oktober 2023 October 30, 2023	Online via Webex	1. Bankwide Financial Performance as of September 2023 2. Anti Money Laundering Department Updates 3. Compliance Department Updates 4. Risk Management Department Updates 5. 2023 Internal Audit Achievement	003/MM/BOC/X/2022
27 November 2023 November 27, 2023	Hybrid (Online via Webex and Offline in KPNO)	1. Remuneration and Nomination Committee Performance in 2023 and Work Plan in 2024 2. Risk Monitoring Committee Performance in 2023 and Work Plan in 2024 3. Audit Committee Performance in 2023 and Work Plan in 2024	004/MM/BOC/XI/2023

Kehadiran Rapat Dewan Komisaris

Board of Commissioners Meetings Attendance

Dewan Komisaris Board of Commissioners	31 Mar 23	26 Jun 23	30 Oct 23	28 Dec 22	Total Kehadiran Total Attendance(s)	Total Rapat Total Meeting(s)	Persentase Kehadiran Percentage of Attendance
Wang Kun	1	1	1	1	4	4	100%
Hendra Widjojo	1	1	1	1	4	4	100%
H. Yunno Kusumo	1	1	1	1	4	4	100%
Jeff S.V. Eman	1	1	1	1	4	4	100%

RAPAT DIREKSI

BOARD OF DIRECTORS MEETINGS

Rapat Direksi dilaksanakan berdasarkan POJK No. 33/POJK.04/2014 tentang Direksi dan Dewan Komisaris Emiten atau Perusahaan Publik, di mana rapat Direksi wajib diselenggarakan minimum 1 (satu) kali sebulan. Selain dari kewajiban tersebut, rapat Direksi juga dapat dilaksanakan setiap waktu apabila dan ketika diperlukan sebagaimana yang diatur juga dalam Pedoman Kerja Direksi terkait dengan tata tertib rapat.

The Board of Directors meetings are implemented pursuant to POJK No. 33/POJK.04/2014 on the Board of Directors and Board of Commissioners of Issuers or Public Companies, whereby the meeting convention by the Board of Directors must be held at least once a month. Furthermore, the Board of Directors may convene a meeting when is deemed necessary as stipulated in the Board of Directors Charter on the Meetings Rules.

Kebijakan Rapat Direksi

Rapat Direksi dilaksanakan di kantor pusat Bank, lokasi usaha atau lokasi lain yang disetujui oleh Direksi. Namun, rapat juga dapat dilaksanakan melalui media komunikasi lainnya, yang mana para Direktur dapat berkomunikasi satu sama lainnya dan berpartisipasi seperti kehadiran dalam rapat.

Agenda dan Frekuensi Rapat

Sepanjang tahun 2023, Direksi menyelenggarakan rapat sebanyak 7 (tujuh) kali. Berikut disampaikan agenda dan tingkat kehadiran Direksi dalam rapat-rapat tersebut.

Board of Directors Meeting Policy

The Board of Directors meeting is held at The Bank head office, other business locations or places agreed by the Board of Directors. However, the meeting can also be done via other means of communication, through which the Directors can communicate with one another and participate as if they are present in that meeting.

Meetings Agenda and Frequency

Throughout 2023, the Board of Directors held 7 (seven) meetings. The following are the Board of Directors meetings agenda and attendance.

Agenda Rapat Direksi

Board of Directors Meetings Agenda

Tanggal Date	Tempat Venue	Agenda	Nomor Risalah Rapat MoM Number
8 Maret 2023 March 8 2023	Head Office	1. 2022 KPI Achievement Result 2. 2022 Performance Bonus	001/MM/BOD/III/2023
27 April 2023 April 27 2023	Head Office	Promotion for Head of CB Surabaya	002/MM/BOD/IV/2023
16 Juni 2023 June 16 2023	Head Office	1. 2023 Business Plan Revision 2. Directorate Adjustment within the Board of Director 3. Restructuring of the Policy Committee as the Policy and Product Committee 4. Candidate of Makassar Branch Manager 5. Promotion as Deputy Head of SAM Department 6. Contract Extension of Bills Center Department Head 7. Contract Extension of TCT Branch Manager	003/MM/BOD/VI/2023
17 Juli 2023 July 17 2023	Head Office	1. Signage in TCT 2. Organization Structure Adjustment	004/MM/BOD/VII/2023
30 Oktober 2023 October 30 2023	Head Office	1. Bankwide Financial Performance 2. 2024 Business Plan 3. Temporary Appointment of (Alt) Head of Retail Banking Department 4. Employee Shirt & Campaign Proposal 5. One-Stop Service Project 6. Branches Plan 7. Key Works Updates from the Board of Directors	005/MM/BOD/X/2023
17 November 2023 November 17 2023	Head Office	1. Bankwide Financial Performance 2. IT Security Report 3. Employee Meal Allowance Adjustment	006/MM/BOD/XI/2023
19 Desember 2023 December 19 2023	Head Office	1. Bankwide Financial Performance 2. Appointment of Head of Retail Banking Department 3. Appointment of Deputy Head Corporate Banking 4. 2024 BOD Meeting Schedule	007/MM/BOD/XII/2023

Kehadiran Rapat Direksi

Board of Directors Meeting Attendance

Tanggal Rapat Meeting Date	Direksi Board of Directors						
	Chen Yong	Zhang Wen	Liu Hongbo	Sandy T. Muliana	Fransisca Nelwan Mok	Dini Suprihatini	Lukito Adisubrata S.
8 Maret 2023 March 8 2023		1	1	1	1	1	1
27 April 2023 April 27 2023	1	1			1		1
16 Juni 2023 June 16 2023	1		1		1	1	1
17 Juli 2023 July 17 2023	1	1	1	1	1	1	1
30 Oktober 2023 October 30 2023	1	1	1	1	1	1	1
17 November 2023 November 17 2023	1		1	1	1	1	1
19 Desember 2023 December 19 2023	1	1	1	1	1	1	
Total Kehadiran Total Attendance(s)	6	5	6	5	7	6	6
Total Rapat Total Meeting(s)	7	7	7	7	7	7	7
Persentase Kehadiran Percentage of Attendance	86%	71%	86%	71%	100%	86%	86%

RAPAT GABUNGAN DEWAN KOMISARIS DAN DIREKSI

Rapat gabungan Dewan Komisaris dan Direksi dilaksanakan guna memelihara koordinasi, sinergi dan penyelaras antara Dewan Komisaris dan Direksi dalam menjalankan tugas mencapai tujuan Bank. Materi pembahasan rapat meliputi isu strategis termasuk tentang kelangsungan usaha Bank serta pelaporan kinerja Direksi. Berdasarkan Pedoman Kerja Direksi, rapat komunikasi Dewan Komisaris dan Direksi wajib diadakan paling sedikit 1 (satu) kali dalam setahun.

Agenda dan Frekuensi Rapat

Pada tahun 2023, rapat gabungan dilaksanakan 1 (satu) kali. Berikut agenda dan tingkat kehadiran Dewan Komisaris dan Direksi dalam rapat gabungan.

JOINT MEETINGS OF BOARD OF COMMISSIONERS AND BOARD OF DIRECTORS

The Board of Commissioners and Board of Directors joint meetings are implemented for coordination, synergy and alignment between the Board of Commissioners and Board of Directors in carrying out their duties to achieve The Bank's objectives. Meetings discussion includes strategic issues regarding The Bank business sustainability as well as the Board of Directors performance report. Based on the Board of Directors Charter, communication meetings between the Board of Commissioners and Board of Directors must be held at least once a year.

Meetings Agenda and Frequency

In 2023, a joint meeting was held 1 (one) time. The following are the joint meeting agenda and attendance of the Board of Commissioners and Board of Directors.

Agenda Rapat Gabungan

Joint Meeting Agenda

Tanggal Date	Tempat Venue	Agenda	Nomor Risalah Rapat MoM Number
27 November 2023 November 27, 2023	Hybrid (Online via Webex and Offline in KPNO)	Business Plan 2024-2026	001/MM/BOD-BOC/XI/2023

Kehadiran Rapat Gabungan

Joint Meeting Attendance

Dewan Komisaris Board of Commissioners	27 November 2023 November 27, 2023	Total Kehadiran Total Attendance	Total Rapat Total Meeting	Persentase Kehadiran Percentage of Attendance
Wang Kun	1	1	1	100%
Hendra Widjojo	1	1	1	100%
H. Yunno Kusumo	1	1	1	100%
Jeff S.V. Eman	1	1	1	100%

Direksi Board of Directors	27 November 2023 November 27, 2023	Total Kehadiran Total Attendance	Total Rapat Total Meeting	Persentase Kehadiran Percentage of Attendance
Zhang Wen	1	1	1	100%
Sandy T. Muliana	1	1	1	100%
Fransisca Nelwan Mok	1	1	1	100%
Lukito Adisubrata S.	1	1	1	100%

Informasi Mengenai Pemegang Saham Utama dan Pengendali

Information on Majority and Controlling Shareholders

Pemegang saham mayoritas Bank adalah ICBC Limited dengan kepemilikan sebesar 98,61%, sedangkan pemegang saham minoritas adalah PT Intidana Wijaya dengan kepemilikan sebesar 1,39%. Sebagai pemegang saham mayoritas, ICBC Limited telah memenuhi persyaratan kemampuan, kepatutan dan kepatuhan terhadap regulasi yang ditetapkan oleh OJK, Bank Indonesia, serta perundang-undangan terkait perbankan yang berlaku di Indonesia.

The majority shareholder of The Bank is ICBC Limited with shares ownership of 98.61%. Meanwhile, the minority shareholder is PT Intidana Wijaya with shares ownership of 1.39%. As the controlling shareholder of The Bank, ICBC Limited has fulfilled the requirements of ability, propriety and compliance with regulations stipulated by the Financial Services Authority (OJK), Bank Indonesia, and applicable banking related legislation in Indonesia.

Hubungan Afiliasi Antara Anggota Dewan Komisaris, Direksi, dan Pemegang Saham Utama dan/atau Pengendali

Affiliation Between Members of the Board of Commissioners, Board of Directors, and Majority and/or Controlling Shareholders

Pemegang saham mayoritas, Dewan Komisaris, dan Direksi saling menghormati pelaksanaan tugas, tanggung jawab, dan wewenang masing-masing sesuai peraturan perundang-undangan dan Anggaran Dasar. Pengungkapan hubungan afiliasi mencakup hubungan keluarga dan hubungan keuangan. Bentuk hubungan keluarga mencakup hubungan istimewa terutama yang disebabkan hubungan pertalian darah seperti suami/istri/anak/orang tua/saudara kandung/ipar, dan sebagainya; sementara bentuk hubungan keuangan termasuk di antaranya utang-piutang, kerja sama bisnis, dan sebagainya.

The majority shareholders, Board of Commissioners, and Board of Directors honor their respective duties, responsibilities, and authorities in accordance with the laws and the Articles of Association. The disclosure of affiliation includes family relations and financial relations. The form of family relations includes special relations primarily due to blood-related relationships such as spouses/children/parents/siblings/in-laws, and so forth; while the form of financial relations includes debts, business cooperation, and so forth.

Uraian Description	Hubungan Keluarga dengan Family Relations with			Hubungan Keuangan dengan Financial Relations with		
	Dewan Komisaris Board of Commissioners	Direksi Board of Directors	ICBC Limited (Pemegang Saham Utama/Pengendali) ICBC Limited (Majority/Controlling Shareholders)	Dewan Komisaris Board of Commissioners	Direksi Board of Directors	ICBC Limited (Pemegang Saham Utama/Pengendali) ICBC Limited (Majority/Controlling Shareholders)
Dewan Komisaris Board of Commissioners						
Wang Kun Presiden Komisaris President Commissioner	×	×	×	×	×	×
Hendra Widjojo Komisaris Independen Independent Commissioner	×	×	×	×	×	×
H. Yunno Kusumo Komisaris Independen Independent Commissioner	×	×	×	×	×	×
Jeff S.V. Eman Komisaris Commissioner	×	×	×	×	×	×

Uraian Description	Hubungan Keluarga dengan Family Relations with			Hubungan Keuangan dengan Financial Relations with		
	Dewan Komisaris Board of Commissioners	Direksi Board of Directors	ICBC Limited (Pemegang Saham Utama/Pengendali) ICBC Limited (Majority/Controlling Shareholders)	Dewan Komisaris Board of Commissioners	Direksi Board of Directors	ICBC Limited (Pemegang Saham Utama/Pengendali) ICBC Limited (Majority/Controlling Shareholders)
Direksi Board of Directors						
Chen Yong Presiden Direktur President Director	✗	✗	✗	✗	✗	✗
Zhang Wen Direktur - Kredit Director - Credit	✗	✗	✗	✗	✗	✗
Liu Hongbo Direktur – Marketing Director - Marketing	✗	✗	✗	✗	✗	✗
Sandy T. Muliana Direktur – Kepatuhan & Manajemen Risiko Director – Compliance & Risk Management	✗	✗	✗	✗	✗	✗
Fransisca Nelwan Mok Direktur - Sumber Daya Manusia & Hukum Director - Human Resources & Legal	✗	✗	✗	✗	✗	✗
Dini Suprihatini Direktur - Operasional Director - Operations	✗	✗	✗	✗	✗	✗
Lukito Adisubrata S. Direktur – Marketing Director - Marketing	✗	✗	✗	✗	✗	✗

✓ Terdapat hubungan | A relation with
✗ Tidak terdapat hubungan | No relation

Pengungkapan Rangkap Jabatan Dewan Komisaris Dan Direksi

Disclosure of Concurrent Positions of the Board of Commissioners and Board of Directors

Rangkap jabatan oleh Dewan Komisaris maupun Direksi dapat dilakukan sepanjang memenuhi kriteria dan persyaratan sesuai perundang-undangan yang berlaku.

Concurrent positions by members of the Board of Commissioners and Board of Directors can be done upon criteria and requirements in accordance with prevailing laws and regulations.

Berikut ini tabel yang menunjukkan rangkap jabatan Dewan Komisaris dan Direksi pada perusahaan/institusi lain dalam periode tahun 2023.

The following table illustrates the concurrent positions of the Board of Commissioners and Board of Directors in other companies/institutions in 2023.

Uraian Description	Kepengurusan pada Perusahaan/Institusi Lain Management of Other Companies/Institutions		
	Sebagai Anggota Dewan Komisaris As Board of Commissioners Member	Sebagai Anggota Direksi As Board of Directors Member	Jabatan Lainnya Other Position
Dewan Komisaris Board of Commissioners			
Wang Kun Presiden Komisaris President Commissioner	✗	✗	✓
Hendra Widjojo Komisaris Independen Independent Commissioner	✗	✗	✗
H. Yunno Kusumo Komisaris Independen Independent Commissioner	✗	✗	✗
Jeff S.V. Eman Komisaris Commissioner	✗	✗	✗
Direksi Board of Directors			
Chen Yong Presiden Direktur President Director	✗	✗	✗
Zhang Wen Direktur - Kredit Director - Credit	✗	✗	✗
Liu Hongbo Direktur – Marketing Director – Marketing	✗	✗	✗
Sandy T. Muliana Direktur Kepatuhan & Manajemen Risiko Director – Compliance & Risk Management	✗	✗	✗

Uraian Description	Kepengurusan pada Perusahaan/Institusi Lain Management of Other Companies/Institutions		
	Sebagai Anggota Dewan Komisaris As Board of Commissioners Member	Sebagai Anggota Direksi As Board of Directors Member	Jabatan Lainnya Other Position
Fransisca Nelwan Mok Direktur - Sumber Daya Manusia & Hukum Director - Human Resources & Legal	✗	✗	✗
Dini Suprihatini Direktur - Operasional Director - Operations	✗	✗	✗
Lukito Adisubrata S. Direktur - Marketing Director - Marketing	✗	✗	✗
✓ Wang Kun memegang jabatan sebagai Deputy Head of International Banking Department di ICBC Limited dan Non-Executive Director di ICBC Argentina Wang Kun serves as Deputy Head of International Banking Department at ICBC Limited and Non-Executive Director at ICBC Argentina ✗ Tidak terdapat hubungan kepengurusan No management relation			



Keberagaman Komposisi Dewan Komisaris dan Direksi

Diversity of The Board of Commissioners and Board of Directors

Keberagaman komposisi Dewan Komisaris dan Direksi merupakan bagian dari upaya Bank untuk mendorong proses pengambilan keputusan yang lebih objektif, komprehensif, dan optimal, serta memiliki dampak positif terhadap pengawasan dan pengelolaan Bank. Keberagaman ini diharapkan dapat memperkaya sudut pandang dan kepentingan dalam proses pengambilan keputusan baik di tubuh Dewan Komisaris maupun Direksi, sehingga mampu memberikan nilai tambah bagi kegiatan Bank, serta penerapan tata kelola perusahaan di lingkup Bank.

The diversity of the Board of Commissioners and Board of Directors is part of The Bank's efforts to encourage a more objective, comprehensive, and optimal decision-making process that has a positive impact on The Bank supervision and management. This diversity is expected to enrich the point of view and interest in the decision-making process in both of the Board of Commissioners and Board of Directors, thereby providing added value to The Bank's activities, as well as the implementation of corporate governance within the scope of The Bank.

Keberagaman Komposisi Dewan Komisaris

Board of Commissioners Diversity

Nama dan Jabatan Name and Position	Latar Belakang Pendidikan Educational Background	Pengalaman Kerja Work Experience	Usia Age	Jenis Kelamin Gender
Wang Kun Presiden Komisaris President Commissioner	<i>English Education & Literature</i>	Bekerja di ICBC Limited sejak tahun 2002 Careers at ICBC Limited since 2002	46	Laki-laki Male
Hendra Widjojo Komisaris Independen Independent Commissioner	<i>Economic</i>	Menjabat sebagai manajemen kunci PT Bank Halim Indonesia, pendahulu PT Bank ICBC Indonesia, sejak tahun 1989 Served as the key management of PT Bank Halim Indonesia, the predecessor of PT Bank ICBC Indonesia since 1989	60	Laki-laki Male
H. Yunno Kusumo Komisaris Independen Independent Commissioner	<i>Economic</i>	Pengawasan Perbankan Banking Supervision	67	Laki-laki Male
Jeff S.V. Eman Komisaris Commissioner	<i>Accounting</i>	Bekerja di PT Bank Halim Indonesia, pendahulu PT Bank ICBC Indonesia, sejak tahun 1990 Careers at PT Bank Halim Indonesia, the predecessor of PT Bank ICBC Indonesia since 1990	66	Laki-laki Male

Keberagaman Komposisi Direksi

Board of Directors Diversity

Nama dan Jabatan Name and Position	Latar Belakang Pendidikan Educational Background	Pengalaman Kerja Work Experience	Usia Age	Jenis Kelamin Gender
Chen Yong Presiden Direktur President Director	<i>Economic Information and Management, and Administrative Management and E-government Affairs</i>	Bekerja di ICBC Limited sejak tahun 1992 Careers at ICBC Limited since 1992	54	Laki-laki Male
Zhang Wen Direktur - Kredit Director - Credit	<i>Accounting, Business Administration, and Industrial Economic</i>	Bekerja di ICBC Limited sejak tahun 1991 Careers at ICBC Limited since 1991	52	Perempuan Female
Liu Hongbo Direktur – Marketing Director – Marketing	<i>Law</i>	Bekerja di ICBC Limited sejak 2001 Careers at ICBC Limited since 2001	48	Laki-laki Male
Sandy T. Muliana Direktur - Kepatuhan & Manajemen Risiko Director – Compliance & Risk Management	<i>Economic Management</i>	Perbankan Banking	59	Laki-laki Male
Fransisca Nelwan Mok Direktur – Sumber Daya Manusia & Hukum Director - Human Resources & Legal	<i>Husbandry and Finance</i>	Perbankan Banking	67	Perempuan Female
Dini Suprihatini Direktur - Operasional Director - Operations	<i>Agriculture</i>	Perbankan Banking	52	Perempuan Female
Lukito Adisubrata S. Direktur – Marketing Director - Marketing	<i>Economic Management</i>	Perbankan Banking	48	Laki-laki Male

Organ Pendukung Dewan Komisaris

Supporting Organs of the Board of Commissioners

SEKRETARIS DEWAN KOMISARIS

Dalam rangka mendukung pelaksanaan fungsi dan efektivitas tugasnya, Dewan Komisaris menunjuk Departemen *Strategy Management and Investor Relation* (SMIR) yang salah satu fungsi utamanya sebagai Sekretaris Dewan Komisaris untuk membantu Dewan Komisaris dalam melaksanakan tugas dan tanggung jawabnya terhadap Bank.

Departemen SMIR mengemban fungsi Sekretaris Perusahaan berdasarkan Surat Keputusan Direksi No. 028/KPTS.DIR/ICBC.IND/2019 tanggal 4 Desember 2019, di mana Kepala Departemen SMIR ditunjuk sebagai Pejabat Pelaksana Fungsi Sekretaris Perusahaan. Tugas dan tanggung jawab Sekretaris Perusahaan dapat dilihat pada bagian Sekretaris Perusahaan dalam Bab "Tata Kelola Perusahaan" pada Laporan Tahunan Keberlanjutan 2023 ini.

TUGAS DAN TANGGUNG JAWAB SEKRETARIS DEWAN KOMISARIS

Tugas Sekretaris Dewan Komisaris adalah sebagai berikut:

- Berperan membantu Dewan Komisaris dan komite dalam pengadaan rapat Dewan Komisaris dan rapat komite baik sebelum, selama, dan setelah rapat tersebut dilaksanakan, termasuk segala sesuatu yang berkaitan dengan agenda rapat antara lain penjadwalan, pengaturan agenda, koordinasi, persiapan, kehadiran, rekaman, risalah rapat, dan distribusi material.
- Mengatur jadwal rapat dan membuat draf agenda untuk rapat Dewan Komisaris dan rapat komite selama setahun sekaligus memastikan kepatuhan dengan persyaratan eksternal dan internal, dan bekerja sama dengan Dewan Komisaris dan komite dalam menciptakan, memelihara, dan merevisi agenda jika diperlukan.
- Mengkoordinasikan penyusunan dan penyebaran bahan rapat dalam bentuk *hard copy* atau *soft copy*, sekaligus memastikan kecukupan, konsistensi (dengan dokumen sebelumnya dan berikutnya), kemudahan penggunaan, dan kualitas bahan.
- Mendukung pemenuhan dokumen dari departemen terkait untuk rapat dan anggota komite dan Dewan Komisaris.

BOARD OF COMMISSIONERS' SECRETARY

To support the implementation of functions and effectiveness of its duties, the Board of Commissioners appoints Department of Strategy Management and Investor Relation (SMIR) as one of its main functions as Secretary of the Board of Commissioners, to assist the Board of Commissioners in carrying out its duties and responsibilities to The Bank.

SMIR Department carries a Corporate Secretary function based on the Board of Directors Decree No. 028/KPTS.DIR/ICBC.IND/2019 dated December 4, 2019, where the Head of SMIR Department is appointed as Executive in charge of Corporate Secretary Function. The duties and responsibilities of Corporate Secretary can be seen in the Corporate Secretary section in the "Good Corporate Governance" of this 2023 Annual Sustainability Report.

DUTIES AND RESPONSIBILITIES OF THE BOARD OF COMMISSIONERS' SECRETARY

The duties of the Board of Commissioners' Secretary are as follows:

- Assist the Board of Commissioners and committees in the meeting arrangement both before, during and after the meeting, as well as everything related to the meeting agenda including scheduling, agenda setting, coordination, preparation, attendance, recording, minutes of meeting (MoM), and material distribution.
- Arrange the meeting schedule as well as draft the annual agenda for the Board of Commissioners and committees meetings while ensuring the compliance with external and internal requirements, and coordinate with the Board of Commissioners and committees in any changes or revision to the agenda as necessary.
- Coordinate the preparation and distribution of meeting materials both in hard copy and soft copy form, while ensuring adequate, consistency (between previous and subsequent documents), ease of use, and quality of materials.
- Support the fulfillment of documents from relevant departments for the meeting and members of the committees and Board of Commissioners.

- Menghadiri rapat anggota Dewan Komisaris dan rapat komite, mencatat dan mengedarkan risalah rapat yang mencakup antara lain keputusan, informasi, tindakan, dan arahan.
- Laporan mengenai agenda yang tertunda dan mengambil tindakan untuk memastikan informasi diberikan kepada anggota Dewan Komisaris dan komite pada waktu yang tepat.
- Melakukan aktivitas sekretariat, sistem pengarsipan, dan surat resmi masuk/keluar (aliran dokumen) yang sejalan dengan panduan yang ada untuk keperluan dalam memastikan keamanan dan kepatuhan dengan prosedur dan sistem yang telah ada.
- Bertanggung jawab atas terselenggaranya dengan baik kegiatan korespondensi surat menyurat antara Dewan Komisaris dan komite dengan pihak internal maupun eksternal.
- Melakukan fungsi peninjauan dan pengecekan untuk surat keluar resmi yang dikeluarkan oleh Dewan Komisaris dan komite dalam rangka untuk memastikan keakuratan informasi yang diberikan.
- Menyusun agenda kegiatan Dewan Komisaris dan komite sesuai dengan instruksi yang diterima.
- Menyusun konsep laporan dan dokumen untuk keperluan tugas Dewan Komisaris dan komite sesuai dengan diskusi dan instruksi.
- Mengatur perjalanan dinas untuk Dewan Komisaris dan komite, serta penyelesaian seluruh pengeluaran yang terjadi selama perjalanan dinas termasuk pemesanan tiket, hotel, aplikasi visa, dll.
- Turut mengambil bagian untuk melaksanakan kegiatan dan acara *bank-wide* dengan departemen terkait.
- Turut mengambil bagian dalam aktivitas pelaksanaan tanggung jawab sosial *bank-wide*.
- Attend the Board of Commissioners and committees meetings, record and circulate MoM that includes among others, decision, information, action, and direction.
- Provide report on any pending agenda and take action to ensure the information is provided to the Board of Commissioners and committees at appropriate times
- Conduct secretarial activities, filing systems, and official incoming/outgoing letters (document flows) in line with existing guidelines to ensure security and compliance with existing procedures and systems.
- Responsible for the proper implementation of correspondence activities between the Board of Commissioners and committees with internal or external parties.
- Conduct review and check function for an official outgoing letter issued by the Board of Commissioners and committees in order to ensure the accuracy of the information provided.
- Arrange the agenda of activities of the Board of Commissioners and committees in accordance with the instructions received.
- Prepare the concept of reports and documents for the purposes of the Board of Commissioners and committees in accordance with the discussions and instructions received.
- Arrange business travel for the Board of Commissioners and committees, as well as the completion of all expenses incurred during official travel, including ticket bookings, hotels, visa applications, etc.
- Participate in carrying out bank-wide activities and events with relevant departments.
- Participate in the implementation of bank-wide social responsibility activities.

PELAKSANAAN TUGAS SEKRETARIS DEWAN KOMISARIS TAHUN 2023

Pada tahun 2023, Sekretaris Dewan Komisaris telah melaksanakan tugas yang secara garis besar terbagi atas pengadaan rapat Dewan Komisaris dan komite, penyusunan laporan sebagai pemenuhan peraturan OJK, pelaksanaan kegiatan terkait tata kelola perusahaan, dan administrasi atas surat keputusan Dewan Komisaris dan Direksi.

THE IMPLEMENTATION OF DUTIES OF THE BOARD OF COMMISSIONERS' SECRETARY IN 2023

In 2023, the Board of Commissioners' Secretary has carried out duties that in general are divided into the implementation of the Board of Commissioners and committees meetings, preparation of reports in compliance with OJK regulations, implementation of activities related to the corporate governance, and administration on the decrees of the Board of Commissioners and Board of Directors.

Lingkup Tugas Scope of Duty	Pelaksanaan pada Tahun 2023 Implementation in 2023
Pengadaan rapat Dewan Komisaris dan komite Implementation of the Board of Commissioners and committees meetings	• Menyelenggarakan rapat Dewan Komisaris sebanyak 4 (empat) kali. • Menyelenggarakan rapat gabungan Dewan Komisaris dan Direksi sebanyak 1 (satu) kali. • Menyelenggarakan rapat Komite Audit sebanyak 13 (tiga belas) kali. • Menyelenggarakan rapat Komite Pemantau Risiko sebanyak (dua belas) kali. • Menyelenggarakan rapat Komite Remunerasi dan Nominasi sebanyak 7 (tujuh) kali. • Membuat, mendistribusikan, mengarsip risalah rapat Dewan Komisaris, rapat gabungan Dewan Komisaris dan Direksi, serta rapat komite. • Convened 4 (four) times of the Board of Commissioners meetings. • Convened 1 (one) joint meeting of the Board of Commissioners and Board of Directors. • Convened 13 (thirteen) times of the Audit Committee meetings. • Convened 12 (twelve) times of the Risk Monitoring Committee meetings. • Convened 7 (seven times of the Remuneration and Nomination Committee meetings. • Develop, distribute, filing minutes of meetings of the Board of Commissioners, joint meeting of the boards, as well as meetings of the committees
Penyusunan laporan sebagai pemenuhan peraturan OJK Preparation of reports in compliance with OJK regulations	• Membantu dalam menyusun laporan rutin pengawasan Dewan Komisaris, laporan evaluasi Komite Audit terhadap kinerja Akuntan Publik dan/atau Kantor Akuntan Publik kepada OJK. • Menyusun laporan manajemen dan hasil pengawasan Dewan Komisaris kepada Bank Indonesia (BI). • Assist in the preparation of regular supervision report of the Board of Commissioners, Audit Committee evaluation report on Public Accountant and/or Public Accounting Firm performance to OJK. • Prepare management report and supervisory result of the Board of Commissioners to Bank Indonesia (BI)
Kegiatan terkait tata kelola perusahaan Activities related to corporate governance	Melengkapi GCG self-assessment dan risk assessment pada aspek yang terkait dengan tugas dan tanggung jawab Dewan Komisaris, Direksi dan komite. Complete the GCG self-assessment and risk assessment on aspects related to duties and responsibilities of the Board of Commissioners, Board of Directors, and committees.
Administrasi atas surat keputusan Dewan Komisaris dan Direksi Administration on the decrees of the Board of Commissioners and Board of Directors	Mempersiapkan surat keputusan yang memerlukan persetujuan Dewan Komisaris dan Direksi. Prepare the decree requiring the approval from the Board of Commissioners and Board of Directors.

Komite Audit

Audit Committee

Komite Audit dibentuk oleh dan bertanggung jawab kepada Dewan Komisaris dengan tujuan untuk membantu Dewan Komisaris dalam menjalankan fungsi pengawasan terhadap Bank.

PIAGAM KOMITE AUDIT

Komite Audit memiliki suatu pedoman kerja berupa Piagam Komite Audit yang mengatur mengenai:

- Tugas, tanggung jawab dan kewenangan;
- Komposisi dan struktur keanggotaan;
- Persyaratan keanggotaan;
- Tata cara dan prosedur kerja;
- Penyelenggaraan rapat dan pelaporan;
- Penanganan pengaduan atau pelaporan sehubungan dugaan pelanggaran terkait pelaporan keuangan; dan
- Masa tugas.

Piagam Komite Audit diterbitkan pertama kali pada tanggal 24 Juli 2013 dan selanjutnya mengalami perubahan masing-masing pada tanggal 21 Februari 2017, 6 September 2017, 18 Juli 2019, 2 November 2020, dan terakhir 1 Agustus 2023. Piagam Komite Audit ini direncanakan akan ditinjau pada 1 Agustus 2026.

TUGAS DAN TANGGUNG JAWAB KOMITE AUDIT

Dalam melaksanakan fungsinya, Komite Audit memiliki tugas dan tanggung jawab sebagai berikut:

- Melakukan pemantauan dan evaluasi atas perencanaan dan pelaksanaan audit serta pemantauan atas tindak lanjut hasil audit dalam rangka menilai kecukupan pengendalian internal termasuk kecukupan proses pelaporan keuangan.
- Dalam rangka melaksanakan tugas pada butir tersebut di atas dan guna memberi rekomendasi kepada Dewan Komisaris, Komite Audit melakukan pemantauan dan evaluasi terhadap:
 - a. Pelaksanaan tugas Satuan Kerja Audit Internal (SKAI).
 - b. Kesesuaian pelaksanaan audit oleh Kantor Akuntan Publik dengan standar audit yang berlaku.
 - c. Memberikan pendapat independen dalam hal terjadi perbedaan pendapat antara manajemen dan Kantor Akuntan Publik atas jasa yang diberikannya.

The Audit Committee is formed by and responsible to the Board of Commissioners, with the objective to support the Board of Commissioners in performing its supervisory function towards The Bank.

AUDIT COMMITTEE CHARTER

Audit Committee has an Audit Committee Charter which regulates:

- Duties, responsibilities and authorities;
- Organizational composition and structure;
- Membership requirements;
- Procedures and work procedures;
- Implementation of meetings and reporting;
- Handling complaints/reports regarding alleged violations related to financial reporting; and
- Term of duty.

The Audit Committee Charter was firstly issued on July 24, 2013 and subsequently amended on February 21, 2017K, September 6, 2017, July 18, 2019, November 2, 2020, and finally on August 1, 2023. The Audit Committee Charter is scheduled to be reviewed on August 1, 2026

DUTIES AND RESPONSIBILITIES OF THE AUDIT COMMITTEE

In performing its functions, the Audit Committee has the following duties and responsibilities:

- Monitor and evaluate the planning and execution of audits, and monitor the follow-up of audit results in order to assess the adequacy of internal control, including financial reporting process.
- In order to carry out the duties mentioned above and to provide recommendations to the Board of Commissioners, the Audit Committee should monitor and evaluate:
 - a. The implementation of duties of the Internal Audit Department (IAD).
 - b. Compliance of audit conducted by Public Accounting Firm with applicable audit standards.
 - c. Provide an independent opinion in the event of dissenting opinions between the management and a Public Accounting Firm for its services.

- d. Pelaksanaan tindak lanjut oleh Direksi atas hasil temuan SKAI, Akuntan Publik, Bank Indonesia dan hasil pengawasan Otoritas Jasa Keuangan (OJK).
- Melakukan penelaahan atas informasi keuangan lainnya yang akan dikeluarkan Bank kepada publik dan/atau pihak otoritas seperti proyeksi, dan laporan lainnya terkait dengan informasi keuangan Bank.
 - Melakukan penelaahan atas kepatuhan Bank terhadap peraturan perundang-undangan di bidang perbankan dan peraturan perundang-undangan lainnya.
 - Memberikan pendapat independen dalam hal terjadi perbedaan pendapat antara manajemen dan Kantor Akuntan Publik atas jasa yang diberikan.
 - Memberikan rekomendasi kepada Dewan Komisaris mengenai penunjukan Akuntan Publik atau Kantor Akuntan Publik, yang didasarkan pada independensi, ruang lingkup penugasan dan fee untuk disampaikan kepada pemegang saham melalui Dewan Komisaris.
 - Melakukan penelaahan atau pelaksanaan pemeriksaan oleh auditor eksternal dan mengawasi pelaksanaan tindak lanjut oleh Direksi atas temuan auditor internal.
 - Menelaah pengaduan yang berkaitan dengan proses akuntansi dan pelaporan keuangan Bank.
 - Menelaah dan memberikan saran kepada Dewan Komisaris terkait dengan adanya potensi benturan kepentingan Bank.
 - Menjaga kerahasiaan dokumen, data dan informasi Bank
- a. Follow-up actions by the Board of Directors on findings made by IAD, Public Accountant, Bank Indonesia, as well as the supervision results by the Financial Services Authority (OJK).
- Review other financial information to be issued to the public and/or authorities such as projections, and other reports related to The Bank's financial information.
 - Review The Bank's compliance with laws and regulations in the banking sector and other laws and regulations.
 - Provide an independent opinion in the event of dissenting opinions between the management and a Public Accounting Firm for its services.
 - Provide recommendations to the Board of Commissioners regarding the appointment of a Public Accountant or Public Accounting Firm. This recommendation is based on the independence, scope of assignment and fee of Public Accounting Firm to be submitted to the shareholders through the Board of Commissioners.
 - Conduct reviewing or inspection by external auditors and supervise the implementation of follow-up actions by the Board of Directors on the findings of internal auditors.
 - Review any complaints related to The Bank's accounting and financial reporting processes.
 - Review and provide advices to the Board of Commissioners on potential conflicts of interest in The Bank.
 - Maintain confidentiality of documents, data, and The Bank's information

KEWENANGAN KOMITE AUDIT

Dalam melaksanakan tugasnya, Komite Audit mempunyai wewenang sebagai berikut:

- Mengakses dokumen, data, dan informasi Bank terkait karyawan, dana, aset, dan sumber daya Bank yang diperlukan.
- Melakukan komunikasi langsung dengan karyawan, termasuk Direksi dan pihak yang menjalankan fungsi audit internal, manajemen risiko, akuntansi dan sistem informasi, unit kerja terkait, dan Akuntan Publik terkait tugas dan tanggung jawab Komite Audit.
- Jika diperlukan, melibatkan pihak independen di luar anggota Komite Audit yang diperlukan untuk membantu pelaksanaan tugasnya.
- Melakukan kewenangan lain yang diberikan oleh Dewan Komisaris.

AUTHORITIES OF THE AUDIT COMMITTEE

In performing its duties, the Audit Committee has the following authorities:

- Access to the documents, data, and information of The Bank on its employees, funds, assets, and resources required.
- The ability to communicate directly with employees, including the Board of Directors and parties performing internal audit functions, risk management, accounting and information system, relevant work units, and Public Accountant related to the duties and responsibilities of Audit Committee.
- Where necessary, the committee may involve independent parties from outside of the Audit Committee members to assist the committee in performing its duties.
- To exercise other powers granted by the Board of Commissioners.

KRITERIA ANGGOTA KOMITE AUDIT

Keanggotaan Komite Audit harus memenuhi persyaratan sebagai berikut:

- Wajib memiliki integritas yang tinggi, kemampuan, pengetahuan, pengalaman sesuai dengan bidang pekerjaannya, serta mampu berkomunikasi dengan baik.
- Wajib memahami laporan keuangan, bisnis bank, proses audit, manajemen risiko, dan peraturan perundang-undangan terkait lainnya.
- Wajib mematuhi kode etik Bank yang berlaku.
- Bersedia meningkatkan kompetensi secara terus menerus melalui pendidikan dan pelatihan.
- Wajib memiliki paling sedikit 1 (satu) anggota yang berlatar belakang pendidikan dan keahlian di bidang akuntansi dan keuangan.
- Bukan merupakan orang dalam Kantor Akuntan Publik, Kantor Konsultan Hukum, Kantor Jasa Penilai Publik atau pihak lain yang memberi jasa audit, jasa non-audit, jasa penilai dan/atau jasa konsultasi lain kepada bank dalam waktu 6 (enam) bulan terakhir.
- Bukan merupakan orang yang bekerja atau mempunyai wewenang dan tanggung jawab untuk merencanakan, memimpin, mengendalikan, atau mengawasi kegiatan bank dalam waktu 6 (enam) bulan terakhir.
- Tidak mempunyai saham langsung maupun tidak langsung pada Bank.
- Dalam hal anggota Komite Audit memperoleh saham Bank baik langsung maupun tidak langsung akibat suatu peristiwa hukum, saham tersebut wajib dialihkan kepada pihak lain dalam jangka waktu paling lama 6 (enam) bulan setelah diperolehnya saham tersebut.
- Tidak mempunyai hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, atau pemegang saham utama Bank.
- Tidak mempunyai hubungan usaha baik langsung maupun tidak langsung yang berkaitan dengan kegiatan usaha Bank.

KETENTUAN MASA JABATAN

Berdasarkan Piagam Komite Audit tanggal 1 Agustus 2023, Masa jabatan anggota Komite Audit yang berasal dari Pihak Independen ditentukan berdasarkan kebutuhan atau penilaian Bank, sedangkan masa jabatan anggota Komite Audit yang berasal dari Komisaris ditentukan berdasarkan Rapat Umum Pemegang Saham (RUPS);

CRITERIA OF THE AUDIT COMMITTEE MEMBERS

Criteria of the Audit Committee members must meet the following requirements:

- Having high integrity, ability, knowledge, experience in accordance with his/her educational background, and able to communicate well.
- Understand the financial statements, bank's business, audit processes, risk management, and other relevant laws and regulations.
- Comply with the prevailing Code of Conduct of The Bank.
- Willing to improve competence continuously through education and training.
- Must at least have 1 (one) member with educational background and expertise in accounting and finance.
- Not an insider in a Public Accounting Firm, Legal Consultant Office, Public Appraisal Company or any other party providing audit services, non-audit services, appraisal services, and/or other consulting services to bank within the last 6 (six) months.
- Not a person who works or having the authority and responsibility to plan, lead, control, or supervise bank's activities within the last 6 (six) months.
- Not having any shares directly or indirectly to The Bank.
- In the event that a member of Audit Committee obtains The Bank's shares either directly or indirectly as a result of a legal event, the shares must be transferred to other party within a maximum period of 6 (six) months after the acquisition of shares.
- Has no affiliation with members of the Board of Commissioners, members of the Board of Directors, or majority shareholders of The Bank.
- Has no direct or indirect business relation relating to The Bank's business activities.

TERMS OF OFFICE

Based on Audit Committee Charter dated August 1, 2023, the term of office of members of the Audit Committee from Independent Party is determined based on the needs or assessment of the Bank, while the term of office of the members of the Audit Committee from the Commissioners is determined based on the General Meeting of Shareholders (GMS);

KOMPOSISI, STRUKTUR, DAN KEANGGOTAN

Komposisi, Struktur, dan keanggotaan Komite Audit adalah sebagai berikut:

1. Anggota Komite Audit diangkat dan diberhentikan berdasarkan keputusan rapat Dewan Komisaris dan diformalkan dengan surat keputusan Direksi.
2. Keanggotaan Komite Audit paling sedikit terdiri dari:
 - 1 (satu) orang Komisaris Independen;
 - 1 (satu) orang dari Pihak Independen yang memiliki keahlian di bidang keuangan atau akuntansi dengan pengalaman kerja paling sedikit 5 (lima) tahun; dan
 - 1 (satu) orang dari Pihak Independen yang memiliki keahlian di bidang hukum atau perbankan dengan pengalaman kerja paling sedikit 5 (lima) tahun.
3. Komite Audit diketuai oleh Komisaris Independen yang merangkap sebagai anggota.
4. Anggota Direksi dilarang menjadi anggota Komite Audit.
5. Mantan anggota Direksi atau Pejabat Eksekutif Bank atau pihak yang mempunyai hubungan dengan Bank yang dapat memengaruhi kemampuan yang bersangkutan untuk bertindak independen tidak dapat menjadi Pihak Independen dalam anggota komite sebelum menjalani masa tunggu (*cooling off*) paling singkat 6 (enam) bulan.
6. Masa tunggu (*cooling off*) paling singkat 6 (enam) bulan tidak berlaku bagi mantan anggota Direksi yang membawahi fungsi pengawasan atau Pejabat Eksekutif yang melakukan fungsi pengawasan pada Bank tersebut.
7. Komisaris Independen dan Pihak Independen yang menjadi anggota Komite Audit paling sedikit berjumlah 51% (lima puluh satu persen) dari jumlah anggota Komite Audit.

SUSUNAN DAN PROFIL KOMITE AUDIT

Komite Audit terdiri dari seorang ketua yang merupakan Komisaris Independen, 1 (satu) Komisaris dan 2 (dua) orang pihak independen sebagai anggota. Ketua dan anggota-anggota Komite Audit memiliki latar belakang, kompetensi, dan pengalaman yang memadai.

COMPOSITION, STRUCTURE, AND MEMBERSHIP

The composition, structure, and membership of Audit Committee are as follows:

1. Audit Committee members are appointed and dismissed based on the Board of Commissioners' meeting resolutions and formalized by a decision letter of the Board of Directors.
2. Audit Committee members must at least consist of:
 - 1 (one) Independent Commissioner;
 - 1 (one) Independent Party who expertises in financial or accounting field with a minimum experience of 5 (five) years; and
 - 1 (one) Independent Party who expertises in law or banking field with a minimum experience of 5 (five) years.
3. Audit Committee is chaired by an Independent Commissioner who also represents as a committee member.
4. Members of the Board of Directors are prohibited from becoming members of the Audit Committee.
5. Former members of the Board of Directors or Executive Officers of The Bank or parties that have relation with The Bank which may affect the ability of concerned individuals to act independently are prohibited from becoming an Independent Party in the committee before undergoing a cooling off period of at least 6 (six) months.
6. The minimum cooling off period of 6 (six) months shall not apply to former members of the Board of Directors who in charge of the supervisory function or Executive Officers who carry out the supervisory function of The Bank.
7. Independent Commissioners and Independent Parties who are the members of Audit Committee must at least comprise 51% (fifty-one percent) of the total members of Audit Committee.

STRUCTURE AND PROFILE OF THE AUDIT COMMITTEE

The Audit Committee consists of a chairman who is an Independent Commissioner, 1 (one) Commissioner and 2 (two) members from independent parties. The chairman and members of the Audit Committee have adequate background, competence and experience.

Kronologi susunan Komite Audit Bank sepanjang tahun 2023 adalah sebagai berikut:

The chronology of The Bank's Audit Committee composition in 2023 is as follows:

1 Januari – 31 Desember 2023 January 1 – December 31, 2023	
H. Yunno Kusumo Ketua Komite Audit & Komisaris Independen Chairman of Audit Committee & Independent Commissioner	
Jeff S.V. Eman Anggota Komite Audit & Komisaris Audit Committee Member & Commissioner	
Richard S. Dompas Anggota Komite Audit/Pihak Independen Audit Committee Member/Independent Party	
Arini Imamawati (January 1 - July 5, 2023) Anggota Komite Audit/Pihak Independen Audit Committee Member/Independent Party	
Denny Admiral Nasir (July 6 - December 31, 2023) Anggota Komite Audit/Pihak Independen Audit Committee Member/Independent Party	

Profil Komite Audit per 31 Desember 2023 adalah sebagai berikut:

The following is the Audit Committee profile as of December 31, 2023:

H. Yunno Kusumo Ketua Komite Audit & Komisaris Independen Chairman of Audit Committee & Independent Commissioner	Profil H. Yunno Kusumo sebagai Ketua Komite Audit tersedia pada bagian Profil Dewan Komisaris dalam Bab "Profil Perusahaan" di Laporan Tahunan Keberlanjutan 2023 ini. H. Yunno Kusumo's profile as the Chairman of Audit Committee is available in the Board of Commissioners' Profile section in the "Company Profile" of this 2023 Annual Sustainability Report.
Jeff S.V. Eman (1 Januari - 5 November 2023) (January 1 - November 5, 2023) Anggota Komite Audit & Komisaris Audit Committee Member & Commissioner	Profil Jeff S.V. Eman sebagai anggota Komite Audit tersedia pada bagian Profil Dewan Komisaris dalam Bab "Profil Perusahaan" di Laporan Tahunan Keberlanjutan 2023 ini. Jeff S.V. Eman's profile as a member of Audit Committee is available in the Board of Commissioners' Profile section in the "Company Profile" of this 2023 Annual Sustainability Report.
Hendra Widjojo (6 November - 31 Desember 2023) (November 5 - December 31, 2023) Anggota Komite Audit & Komisaris Independen Audit Committee Member & Independent Commissioner	Profil Hendra Widjojo sebagai anggota Komite Audit tersedia pada bagian Profil Dewan Komisaris dalam Bab "Profil Perusahaan" di Laporan Tahunan Keberlanjutan 2023 ini. Hendra Widjojo's profile as a member of Audit Committee is available in the Board of Commissioners' Profile section in the "Company Profile" of this 2023 Annual Sustainability Report.

Richard S. Dompas
Anggota Komite Audit/Pihak Independen
Audit Committee Member/Independent Party

Pengalaman Kerja/Jabatan

Richard S. Dompas memiliki sertifikasi Asesor LSPP di bidang Perbankan dalam bidang Manajemen Risiko, Audit Internal, Kepatuhan, dan SPUUR (Sistem Pembayaran dan Pengelolaan Uang Rupiah) (2021-sekarang), Sekjen dan Direktur Lembaga Sertifikasi Profesi Perbankan (LSPP) (2011–2021), Senior Vice President, Head Internal Audit/Kepala Satuan Kerja Audit Internal, Head Compliance Monitoring, dan Head Compliance PT Bank Permata Tbk (2006–2011), Vice President, Division Head Audit Support & Centralized Operations PT Bank Danamon Indonesia Tbk (2001–2006), Senior Vice President Asset Management Credit/AMC, Badan Penyehatan Perbankan Nasional (IBRA) (1999–2001), Assistant Vice President, Accounting & Reporting Manager The Chase Manhattan Bank, Jakarta (1990–1999), dan Supervisor Internal Audit PT Huffco Indonesia, a subsidiary of Roy M. Huffington, Inc. (1984–1990).

Latar Belakang Pendidikan

B.Sc. (Strata-1) Business Administration dari The American University, Washington DC, Amerika Serikat (1983).

Work Experience

Richard S. Dompas has an Assessor Certification LSPP in Banking in the fields of Risk Management, Internal Audit, Compliance, and SPUUR (Payment System and Rupiah Money Management) (2021-present), Secretary General and Director of the Banking Profession Certification Organization (LSPP) (2011–2021), Senior Vice President, Head of Internal Audit, Head of Compliance Monitoring, and Head of Compliance of PT Bank Permata Tbk (2006–2011), Vice President, Division Head of Audit Support & Centralized Operations of PT Bank Danamon Indonesia Tbk (2001–2006), Senior Vice President of Asset Management Credit/AMC of Indonesian Bank Restructuring Agency (IBRA) (1999–2001), Assistant Vice President, Accounting & Reporting Manager of The Chase Manhattan Bank, Jakarta (1990–1999), and Supervisor Internal Audit of PT Huffco Indonesia, a subsidiary of Roy M. Huffington, Inc. (1984–1990).

Education

B.Sc. (Strata-1) Business Administration from The American University, Washington DC, United States (1983).

Arini Imamawati
(1 Januari - 5 Juli 2023)
(January 1 - July 5, 2023)
Anggota Komite Audit/Pihak Independen
Audit Committee Member/Independent Party

Pengalaman Kerja/Jabatan

Arini Imamawati menjabat sebagai Financial Controller PT Chandra Sakti Utama Leasing (Grup TMT) (2021-sekarang), Vice President, Head Finance dan Head Internal Audit PT Danareksa (Persero) (2014–2021), Anggota Komite Audit PT Dahana (Persero) (2014), Anggota Komite Audit PT Danareksa (Persero) (2009–2014), Anggota Komite Audit PT Bank ICB Bumiputera Tbk. (2010–2013), Manajer Audit KAP Purwantono, Sarwoko & Sandjaja (Member of Ernst & Young Global) (2007–2009), Accounting & Administration Manager PT Flowserve (2005–2006), dan Auditor Senior KAP Haryanto Sahari & Rekan (Member of PricewaterhouseCoopers Global) (2000–2005).

Latar Belakang Pendidikan

Sarjana (S1) Ekonomi, jurusan Akuntansi dari Universitas Trisakti, Jakarta (2000), dan Magister (S2) Manajemen Bisnis dari Prasetya Mulya Business School, Jakarta (2012).

Work Experience

Arini Imamawati served as Financial Controller of PT Chandra Sakti Utama Leasing (Member of TMT Group) (2021-present), Vice President, Head of Finance and Head of Internal Audit of PT Danareksa (Persero) (2014–2021), Audit Committee Member of PT Dahana (Persero) (2014), Audit Committee Member of PT Danareksa (Persero) (2009–2014), Audit Committee Member of PT Bank ICB Bumiputera Tbk. (2010–2013), Audit Manager of KAP Purwantono, Sarwoko & Sandjaja (Member of Ernst & Young Global) (2007–2009), Accounting & Administration Manager of PT Flowserve (2005–2006), and Senior Auditor of KAP Haryanto Sahari & Partners (Member of PricewaterhouseCoopers Global) (2000–2005).

Education

Bachelor of Economic, majoring in Accounting from University of Trisakti, Jakarta (2000) and Master of Business Management from Prasetya Mulya Business School, Jakarta (2012).

Denny Admiral Nasir
(1 Juli - 31 Desember)
(July 1 - December 31, 2023)
Anggota Komite Audit/Pihak Independen
Audit Committee Member/Independent Party

Pengalaman Kerja/Jabatan

Denny Admiral Nasir menjabat sebagai Business Development Advisor PT Bumi Daya Plaza (2023-sekarang), Pendiri DNA Business Empowerment (2016-sekarang), Senior Vice President / Group Head (CRE Group) PT Bank Mandiri (Persero) (2013-2015), Vice President / Deputy Regional Manager – Regional VII, PT Bank Mandiri (Persero) (2009-2012), Vice President / Kepala Departmen – Micro Banking Group, PT Bank Mandiri (Persero) (2005 - 2009), Vice President / Kepala Department – Small Business Group, PT Bank Mandiri (Persero) (2003-2005), Pelatih Senior CITIBANK Course Program - Training Group (2000 - 2003), Pelatih Senior PT Bank Mandiri (Persero) (2000-2003), Vice President / Group Head – Network Development; Personal Banking & Service Quality Management, PT Bank Mandiri (Persero) (1999-2000), Team Leader / Network Development – Bank Mandiri Merger Process (February - August 1999), dan berbagai posisi di Bank Bumi Daya; Senior Relation Manager untuk divisi Corporate Credit; Bank Dealer untuk Foreign Exchange, Money Market & Capital Market; Product Development Officer; Kepala Retail Banking Credit; Kepala Cabang Jakarta Muara Karang (1984-1999).

Latar Belakang Pendidikan

Sarjana (S1) Agribisnis dari Universitas Padjajaran, Bandung (1983), dan Magister (S2) Marketing Agribisnis dari Universitas Purdue, USA (1992).

Work Experience

Denny Admiral Nasir served as Business Development Advisor PT Bumi Daya Plaza (2023-now), Founder of DNA Business Empowerment (2016-now), Senior Vice President / Group Head (CRE Group) PT Bank Mandiri (Persero) (2013-2015), Vice President / Deputy Regional Manager – Regional VII, PT Bank Mandiri (Persero) (2009-2012), Vice President / Department Head of Micro Banking Group, PT Bank Mandiri (Persero) (2005 - 2009), Vice President / Department Head of Small Business Group, PT Bank Mandiri (Persero) (2003-2005), Senior Trainer CITIBANK Course Program - Training Group (2000 - 2003), Senior Trainer PT Bank Mandiri (Persero) (2000-2003), Vice President / Group Head – Network Development; Personal Banking & Service Quality Management, PT Bank Mandiri (Persero) (1999-2000), Team Leader / Network Development – Bank Mandiri Merger Process (February - August 1999), and various position in Bank Bumi Daya; Senior Relation Manager for Corporate Credit Division; Bank Dealer for Foreign Exchange, Money Market & Capital Market; Product Development Officer; Head of Retail Banking Credit; Branch Manager Jakarta Muara Karang (1984-1999).

Education

Bachelor (S1) in Agribusiness from Padjadjaran University, Bandung (1983), and Master (S2) in Agribusiness Marketing from Purdue University, USA (1992).

PEMBAGIAN TUGAS DAN TANGGUNG JAWAB DALAM KEANGGOTAAN KOMITE AUDIT

Komite Audit diketuai oleh seorang Komisaris Independen dan beranggotakan 1 (satu) Komisaris Independen dan 2 (dua) pihak independen. Per 31 Desember 2023, keanggotaan Komite Audit adalah sebagai berikut:

1. H. Yunno Kusumo, sebagai ketua sekaligus mewakili peran Komisaris Independen dalam Komite Audit.
2. Hendra Widjojo, sebagai anggota komite yang juga merupakan Komisaris Independen.
3. Richard S. Dompas, sebagai pihak independen yang memiliki keahlian dalam bidang keuangan.
4. Denny Admiral Nasir, sebagai pihak independen yang memiliki keahlian dalam bidang keuangan.

SEPARATION OF DUTIES AND RESPONSIBILITIES BETWEEN MEMBERS OF THE AUDIT COMMITTEE

The Audit Committee is chaired by an Independent Commissioner and comprised of 1 (one) Independent Commissioner and 2 (two) independent parties. As of December 31, 2023, the membership of the Audit Committee is as follows:

1. H. Yunno Kusumo, as a chairman who also represents the role of Independent Commissioner in the Audit Committee.
2. Hendra Widjojo, as a committee member who is also a Independent Commissioner.
3. Richard S. Dompas, as an independent party with an expertise in finance.
4. Denny Admiral Nasir, as an independent party with an expertise in finance.

INDEPENDENSI

Sesuai dengan kriteria yang telah ditetapkan Bank dan regulasi yang berlaku, Komite Audit wajib memiliki independensi atas beberapa aspek yang berhubungan dengan kepengurusan Bank. Berikut disampaikan transparansi independensi Komite Audit.

INDEPENDENCY

In accordance with the criteria established by The Bank and prevailing regulations, the Audit Committee should have independence over several aspects relating to the management of The Bank. Below is an outline of the independence of the Audit Committee.

Aspek Independensi Independency Aspects	Komite Audit Audit Committee					
	H. Yunno Kusumo	Jeff S.V. Eman	Hendra Widjojo	Richard S. Dompas	Arini Imamawati	Denny A. Nasir
Merupakan orang dalam Kantor Akuntan Publik, Kantor Konsultan Hukum, Kantor Jasa Penilai Publik atau pihak lain yang memberi jasa audit, jasa non-audit, jasa penilai dan/atau jasa konsultasi lain kepada bank dalam waktu 6 (enam) bulan terakhir. Is an insider in a Public Accounting Firm, Legal Consultant Office, Public Appraisal Company or any other party providing audit services, non-audit services, appraisal services and/or other consulting services to bank within the last 6 (six) months.	✗	✗	✗	✗	✗	✗
Merupakan orang yang bekerja atau mempunyai wewenang dan tanggung jawab untuk merencanakan, memimpin, mengendalikan, atau mengawasi kegiatan bank dalam waktu 6 (enam) bulan terakhir. Is a person who works or having the authority and responsibility to plan, lead, control, or supervise bank's activities within the last 6 (six) months.	✗	✗	✗	✗	✗	✗
Mempunyai saham langsung maupun tidak langsung pada Bank. Own shares directly or indirectly to The Bank.	✗	✗	✗	✗	✗	✗
Mempunyai hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, atau pemegang saham utama Bank. Has affiliation with members of the Board of Commissioners, members of the Board of Directors, or majority shareholders of The Bank.	✗	✗	✗	✗	✗	✗

Aspek Independensi Independency Aspects	Komite Audit Audit Committee					
	H. Yunno Kusumo	Jeff S.V. Eman	Hendra Widjojo	Richard S. Dompas	Arini Imamawati	Denny A. Nasir
Mempunyai hubungan usaha baik langsung maupun tidak langsung yang berkaitan dengan kegiatan usaha Bank. Has direct or indirect business relation relating to The Bank's business activities.						

 Terdapat hubungan | A relation with
 Tidak terdapat hubungan | No relation

RAPAT KOMITE AUDIT

- Rapat Komite Audit diselenggarakan sesuai dengan kebutuhan Bank, sekurang-kurangnya 1 (satu) kali dalam 3 (tiga) bulan.
- Rapat Komite Audit hanya dapat dilaksanakan apabila dihadiri oleh setidaknya 51% (lima puluh satu persen) dari jumlah anggota komite termasuk 1 (satu) orang Komisaris Independen dan 1 (satu) orang Pihak Independen.
- Keputusan rapat Komite Audit diambil berdasarkan musyawarah untuk mufakat.
- Dalam hal tidak tercapai mufakat, pengambilan keputusan dilakukan berdasarkan pemungutan suara setuju 2/3 (dua per tiga) anggota Komite Audit yang hadir.
- Hasil rapat Komite Audit wajib dituangkan dalam risalah rapat dan didokumentasikan sesuai dengan peraturan perundang-undangan.
- Apabila terdapat perbedaan pendapat (*dissenting opinion*) yang terjadi dalam rapat Komite Audit, wajib dicantumkan secara jelas dalam risalah rapat berserta alasan perbedaan pendapat, yang kemudian ditandatangani oleh seluruh anggota Komite Audit yang hadir dan disampaikan kepada Dewan Komisaris.

Selama tahun 2023, Komite Audit menyelenggarakan rapat sebanyak 13 (tiga belas) kali. Berikut disampaikan agenda dan risalah rapat, kehadiran, serta rekapitulasi tingkat kehadiran anggota Komite Audit dalam rapat-rapat tersebut.

AUDIT COMMITTEE'S MEETINGS

- The Audit Committee's meetings are held in accordance with the needs of The Bank, at least once in 3 (three) months.
- Audit Committee meetings can only be held if attended by at least 51% (fifty-one percent) of the total committee members, including 1 (one) Independent Commissioner and 1 (one) Independent Party.
- The decisions of Audit Committee meetings are made based on deliberation results.
- If there is no consensus, the decision is made based on voting, with approval by 2/3 (two thirds) of Audit Committee members, who are present in the meeting.
- Results of Audit Committee meetings must be recorded in minutes of meeting and documented in accordance with laws and regulations.
- If there is a dissenting opinion that occurs during the Audit Committee meeting, must be stated clearly in minutes of meeting along with the reasons for the argument, which is then signed by all members of the Audit Committee present and submitted to the Board of Commissioners.

Throughout 2023, the Audit Committee held 13 (thirteen) meetings. The following are the details of the agenda and minutes of meeting, attendance, and recapitulation of the attendance of Audit Committee members in those meetings.

Tanggal Date	Tempat Venue	Agenda	Nomor Risalah Rapat MoM Number
30 Januari 2023 January 30, 2023	Offline at head office	Internal Audit Activity Report	001/MM/AC/I/2023
27 Februari 2023 February 27, 2023	Offline at head office	Internal Audit Activity Report	002/MM/AC/II/2023
20 Maret 2023 March 20, 2023	Online via Zoom	External Audit Activity Report (Exit Meeting with Deloitte)	003/MM/AC/III/2023
16 Mei 2023 May 16, 2023	Offline at head office	Internal Audit Activity Report	004/MM/AC/IV/2023

Tanggal Date	Tempat Venue	Agenda	Nomor Risalah Rapat MoM Number
27 Juni 2023 June 27, 2023	Offline at head office	Internal Audit Activity Report	005/MM/AC/VI/2023
24 Juli 2023 July 24, 2023	Offline at head office	External Audit Activity Report (External Quality Assurance Review Of Internal Audit Function with KPMG)	006/MM/AC/VII/2023
24 Juli 2023 July 24, 2023	Offline at head office	Internal Audit Activity Report	007/MM/AC/VII/2023
25 Juli 2023 July 25, 2023	Offline at head office	Risk Management Department Updates	007A/MM/AC/VII/2023
22 Agustus 2023 August 22, 2023	Offline at head office	External Audit Activity Report (External Quality Assurance Review Of Internal Audit Function with KPMG - Exit Meeting)	008/MM/AC/VIII/2023
22 Agustus 2023 August 22, 2023	Offline at head office	Internal Audit Activity Report	009/MM/AC/IX/2023
6 Oktober 2023 October 5, 2023	Offline at head office	Internal Audit Activity Report	010/MM/AC/X/2023
2 November 2023 November 2, 2023	Offline at head office	Internal Audit Activity Report	011/MM/AC/XI/2023
27 November 2023 November 27, 2023	Offline at head office	External Audit Activity Report (Exit Meeting with Deloitte)	012/MM/AC/XI/2023
15 Desember 2023 December 15, 2023	Offline at head office	Internal Audit Activity Report	013/MM/AC/XII/2023

Komite Audit Audit Committee	30 Jan 23	27 Feb 23	20 Mar 23	16 May 23	27 Jun 23	24 Jul 23	24 Jul 23	25 Jul 23	22 Aug 23	22 Aug 23	6 Oct 23	27 Nov 23	15 Dec 23	Total Rapat Total Meeting(s)	Total Kehadiran Total Atten- dance(s)
H. Yunno Kusumo	1	1	1	1	1	1	1	1	1	1	1	1	1	13	13
Jeff S.V. Eman	1	1	1	1	1	1	1	1	1	1	1			11	11
Hendra Widjojo												1	1	2	2
Richard S. Dompas	1	1	1	1	1	1	1	1	1	1	1	1	1	13	13
Arini Imamawati	1	1	1	1	1									5	5
Denny A. Nasir						1	1	1	1	1	1	1	1	2	2

LAPORAN SINGKAT PELAKSANAAN KEGIATAN KOMITE AUDIT TAHUN 2023

Komite Audit telah menjalankan program kerja pada 2023, antara lain sebagai berikut:

1. Menyampaikan kepada Dewan Komisaris mengenai progres dan tindak lanjut atas hasil temuan SKAI.
2. Mengawasi dan mengevaluasi kebijakan, prosedur, program dan penerapan SKAI.
3. Mengawasi dan mengevaluasi tindakan manajemen atas hasil temuan SKAI, audit eksternal, dan OJK.
4. Memberikan rekomendasi kepada Dewan Komisaris mengenai penunjukan Kantor Akuntan Publik.
5. Mengawasi dan memberikan rekomendasi terhadap isu-isu di Bank yang menjadi perhatian regulator.
6. Mengevaluasi dan memberikan rekomendasi terhadap rencana kerja audit.
7. Mengevaluasi laporan profil risiko, pemenuhan ICAAP, dan RBBR Bank.
8. Mengevaluasi kinerja Satuan Kerja Internal Audit (SKAI).

PELATIHAN DAN PENGEMBANGAN KOMPETENSI

Bank memiliki kebijakan terkait pengembangan dan peningkatan kompetensi Komite Audit, yang dilakukan melalui berbagai pelatihan dan pendidikan dengan pendanaan sepenuhnya menjadi tanggung jawab Bank. Informasi terkait pelatihan dan pengembangan kompetensi Komite Audit tersedia dalam Bab "Profil Perusahaan" pada Laporan Tahunan Keberlanjutan 2023 ini.

BRIEF SUMMARY OF THE ACTIVITIES OF THE AUDIT COMMITTEE IN 2023

The Audit Committee has carried out work programs in 2023 as follows:

1. Submit the progress and follow-up on IAD findings to the Board of Commissioners.
2. Oversee and evaluate the policies, procedures, programs and implementation of IAD.
3. Oversee and evaluate management actions on findings of IAD, external auditor, and OJK.
4. Provide recommendations to the Board of Commissioners regarding the appointment of a Public Accounting Firm.
5. Oversee and provide recommendations on issues at The Bank that are of concern to regulators.
6. Evaluate and provide recommendations on the audit work plan.
7. Evaluate The Bank's risk profile report, ICAAP fulfillment, and RBBR.
8. Evaluate the performance of Internal Audit Department (IAD).

TRAINING AND DEVELOPMENT OF COMPETENCY

The Bank has its own policy related to the development and improvement of the competency of the Audit Committee. This is done through various training and education programs with full funding being the responsibility of The Bank. The list of training and development of competency of the Audit Committee is available in the "Company Profile" section in this 2023 Annual Sustainability Report.

Komite Remunerasi dan Nominasi

Remuneration and Nomination Committee

Komite Remunerasi dan Nominasi Bank dibentuk dalam rangka membantu pelaksanaan tugas Dewan Komisaris terkait evaluasi dan rekomendasi atas kebijakan remunerasi yang berlaku bagi Dewan Komisaris, Direksi dan karyawan Bank serta memberikan rekomendasi kepada Dewan Komisaris atas tindak lanjut temuan audit internal dan/atau audit eksternal serta hasil pengawasan OJK tentang kebijakan di bidang manajemen SDM.

PEDOMAN KOMITE REMUNERASI DAN NOMINASI

Komite Remunerasi dan Nominasi memiliki Pedoman Kerja Komite Remunerasi dan Nominasi yang mengatur mengenai:

- Tugas dan tanggung jawab;
- Komposisi dan struktur keanggotaan;
- Tata cara dan prosedur kerja;
- Penyelenggaraan rapat dan pelaporan; dan
- Masa jabatan.

Pedoman Kerja Komite Remunerasi dan Nominasi ini diterbitkan pertama kali pada tanggal 24 Juli 2013 yang selanjutnya mengalami perubahan masing-masing pada tanggal 6 September 2017, 2 November 2020, dan terakhir pada tanggal 1 Agustus 2023. Rencana peninjauan atas Pedoman Kerja Komite Remunerasi dan Nominasi ini akan dilakukan pada 1 Agustus 2026.

TUGAS DAN TANGGUNG JAWAB KOMITE REMUNERASI DAN NOMINASI

Komite Remunerasi dan Nominasi bertindak independen dalam menjalankan fungsinya dan bertanggung jawab untuk memberikan rekomendasi kepada Dewan Komisaris, termasuk namun tidak terbatas pada hal-hal sebagai berikut:

- Terkait dengan kebijakan remunerasi wajib:
 - Melakukan evaluasi terhadap kebijakan remunerasi yang didasarkan atas kinerja, risiko, kewajaran dengan *peer group*, sasaran, dan strategi jangka panjang Bank, pemenuhan

The Bank's Remuneration and Nomination Committee was established to support the implementation of duties of the Board of Commissioners concerning the evaluation and recommendation on prevailing remuneration policy for the Board of Commissioners, Board of Directors and employees of The Bank, as well as to provide recommendations to the Board of Commissioners on the follow-up actions pursuant to findings from internal auditors and/or external auditors and OJK supervision on human resources management policy.

REMUNERATION AND NOMINATION COMMITTEE CHARTER

The Remuneration and Nomination Committee has a Remuneration and Nomination Committee Charter which regulates:

- Duties and responsibilities;
- Organizational composition and structure;
- Procedures and work procedures;
- Implementation of meetings and reporting; and
- Term of office.

The Remuneration and Nomination Committee Charter was firstly issued on July 24, 2013 and subsequently amended on September 6, 2017; November 2, 2020; and finally on August 1, 2023. . The scheduled review of this Remuneration and Nomination Committee Charter will be conducted on August 1, 2026.

DUTIES AND RESPONSIBILITIES OF THE REMUNERATION AND NOMINATION COMMITTEE

The Remuneration and Nomination Committee acts independently in carrying out its functions and is responsible to provide recommendations to the Board of Commissioners, including but not limited to the following matters:

- In relation to remuneration policy:
 - Perform evaluation of the remuneration policy based on the performance, risks, fairness with peer group, targets, and long-term strategies of The Bank, the fulfillment of reserves as regulated

- cadangan sebagaimana diatur dalam peraturan perundang-undangan, dan potensi pendapatan Bank pada masa yang akan datang;
- b. Menyampaikan hasil evaluasi dan rekomendasi kepada Dewan Komisaris mengenai:
 - Kebijakan remunerasi bagi Dewan Komisaris dan Direksi untuk disampaikan kepada RUPS; dan
 - Kebijakan remunerasi bagi pegawai secara keseluruhan untuk disampaikan kepada Direksi.
 - c. Memastikan bahwa kebijakan remunerasi telah sesuai dengan ketentuan; dan
 - d. Melakukan evaluasi secara berkala terhadap penerapan kebijakan remunerasi.
2. Terkait dengan kebijakan nominasi:
- a. Menyusun dan memberikan rekomendasi mengenai sistem serta prosedur pemilihan dan/atau penggantian anggota Dewan Komisaris dan anggota Direksi kepada Dewan Komisaris untuk disampaikan kepada RUPS;
 - b. Memberikan rekomendasi mengenai calon anggota Dewan Komisaris dan/atau calon anggota Direksi kepada Dewan Komisaris untuk disampaikan kepada RUPS; dan
 - c. Memberikan rekomendasi mengenai pihak independen yang akan menjadi anggota komite kepada Dewan Komisaris.

KETENTUAN MASA JABATAN

Berdasarkan Pedoman Kerja Komite Remunerasi dan Nominasi tanggal 1 Agustus 2023, masa jabatan anggota Komite Remunerasi dan Nominasi yang berasal dari Pejabat Eksekutif yang membawahi fungsi sumber daya manusia atau perwakilan pegawai ditentukan berdasarkan kebutuhan atau penilaian Bank. Sementara masa jabatan anggota Komite Remunerasi dan Nominasi yang berasal dari Komisaris ditentukan berdasarkan Rapat Umum Pemegang Saham (RUPS).

KOMPOSISI, STRUKTUR DAN KEANGGOTAN

Komposisi, struktur dan keanggotaan Komite Remunerasi dan Nominasi adalah sebagai berikut:

1. Anggota Komite Remunerasi dan Nominasi diangkat dan diberhentikan berdasarkan surat keputusan rapat Dewan Komisaris dan diformalkan dengan surat keputusan Direksi.
2. Komite Remunerasi dan Nominasi beranggotakan paling sedikit:
 - a. 1 (satu) orang Komisaris Independen yang merangkap sebagai Ketua;
 - b. 1 (satu) orang Komisaris; dan

in legislation, and potential future revenue of The Bank;

- b. Submit evaluation results and recommendations to the Board of Commissioners concerning:
 - The remuneration policy for the Board of Commissioners and Board of Directors to be submitted to the GMS; and
 - The remuneration policy for employees as a whole to be submitted to the Board of Directors.
 - c. Ensure remuneration policy is in accordance with the provision; and
 - d. Conduct periodic evaluation of the implementation of remuneration policy.
2. In relation to nomination policy:
- a. Prepare and provide recommendations on the system and procedure in selecting and/or replacing members of the Board of Commissioners and members of the Board of Directors to the Board of Commissioners to be submitted to the GMS;
 - b. Submit recommendations on candidate for members of the Board of Commissioners and/or members of the Board of Directors to the Board of Commissioners to be submitted to the GMS; and
 - c. Submit recommendations on independent parties who will be the committees' members to the Board of Commissioners.

TERMS OF OFFICE

Based Remuneration and Nomination Committee Charter dated August 1, 2023, the tenure of members of Remuneration and Nomination Committee originated from Executive Officers in charge of the human resources function or employee representatives is determined by the needs or assessment of The Bank. Meanwhile the tenure of members of Remuneration and Nomination Committee originated from the Commissioners is determined through General Meeting of Shareholders (GMS).

COMPOSITION, STRUCTURE AND MEMBERSHIP

The composition, structure and membership of Remuneration and Nomination Committee are as follows:

1. Remuneration and Nomination Committee members are appointed and dismissed based on the Board of Commissioners' meeting resolution and formalised by a decision letter of the Board of Directors.
2. Remuneration and Nomination Committee must at least consist of:
 - a. 1 (one) Independent Commissioner who also serves as Chairman;
 - b. 1 (one) Commissioner; and

- c. 1 (satu) orang Pejabat Eksekutif yang membawahi fungsi sumber daya manusia atau 1 (satu) orang perwakilan pegawai.
3. Ketua dari Komite Remunerasi dan Nominasi dilarang merangkap jabatan sebagai ketua komite lebih dari 1 (satu) pada komite lain.
4. Anggota Komite Remunerasi dan Nominasi sebagian besar tidak dapat berasal dari pihak yang menduduki jabatan manajerial di bawah Direksi yang membidangi sumber daya manusia.
5. Anggota Komite Remunerasi dan Nominasi yang berasal dari luar Bank wajib memenuhi persyaratan sebagai berikut:
 - a. Tidak mempunyai hubungan afiliasi dengan Bank, anggota Direksi, anggota Dewan Komisaris atau pemegang saham utama Bank;
 - b. Memiliki pengalaman terkait remunerasi dan/atau nominasi; dan
 - c. Tidak merangkap jabatan sebagai anggota komite lainnya di Bank.
6. Anggota Direksi dilarang menjadi anggota Komite Remunerasi dan Nominasi.
7. Dalam hal anggota Komite Remunerasi dan Nominasi ditetapkan lebih dari 3 (tiga) orang, maka anggota Komisaris Independen paling sedikit berjumlah 2 (dua) orang

SUSUSAN DAN PROFIL KOMITE REMUNERASI DAN NOMINASI

Komite Remunerasi dan Nominasi Bank dikepalai oleh seorang Komisaris Independen dan terdiri atas Komisaris Independen serta pihak yang menduduki jabatan manajerial di bawah Direksi yang membidangi sumber daya manusia.

Kronologis susunan Komite Remunerasi dan Nominasi Bank sepanjang tahun 2023 adalah sebagai berikut:

- c. 1 (one) Executive Officer in charge of Human Resources or 1 (one) employee representative.
4. The Chairman of Remuneration and Nomination Committee is prohibited to hold concurrent positions as the chairman of more than 1 (one) committee in another committee.
5. Most members of the Remuneration and Nomination Committee cannot come from those who hold managerial positions under the Board of Directors in charge of human resources.
6. Members of the Remuneration and Nomination Committee who come from outside of The Bank must meet the following requirements:
 - a. Has no affiliation with The Bank, members of the Board of Directors, members of the Board of Commissioners or major shareholders of The Bank;
 - b. Has experience related to remuneration and/or nomination; and
 - c. Do not hold concurrent position as a member of another committee at The Bank.
6. Members of the Board of Directors are prohibited from becoming members of the Remuneration and Nomination Committee.
7. In the event that there are more than 3 (three) members of the Remuneration and Nomination Committee, there must be at least 2 (two) Independent Commissioners.

STRUCTURE AND PROFILE OF THE REMUNERATION AND NOMINATION COMMITTEE

The Bank's Remuneration and Nomination Committee is chaired by an Independent Commissioner and comprised of Independent Commissioner and personnel within managerial level below the Board of Directors in charge of human resources.

The chronology of The Bank's Remuneration and Nomination Committee composition in 2023 is as follows:

1 Januari – 31 Desember 2023
January 1 – December 31, 2023

Hendra Widjojo
Ketua Komite Remunerasi dan Nominasi & Komisaris Independen
Chairman of Remuneration and Nomination Committee & Independent Commissioner

H. Yunno Kusumo
Anggota Komite Remunerasi dan Nominasi & Komisaris Independen
Remuneration and Nomination Committee Member & Independent Commissioner

Wang Kun*
Anggota Komite Remunerasi dan Nominasi & Presiden Komisaris
Remuneration and Nomination Committee Member & President Commissioner

Ambar Wulandari
Anggota Komite Remunerasi dan Nominasi & Kepala Departemen Sumber Daya Manusia
Remuneration and Nomination Committee Member & Head of Human Resources Department

*) efektif 6 November 2023 | effective November 6, 2023

Profil Komite Remunerasi dan Nominasi per 31 Desember 2023 adalah sebagai berikut:

The following is the Remuneration and Nomination Committee profile as of December 31, 2022:

Hendra Widjojo Ketua Komite Remunerasi dan Nominasi & Komisaris Independen Chairman of Remuneration and Nomination Committee & Independent Commissioner	Profil Hendra Widjojo sebagai Ketua Komite Remunerasi dan Nominasi tersedia pada bagian Profil Dewan Komisaris dalam Bab "Profil Perusahaan" di Laporan Tahunan Keberlanjutan 2023 ini. Hendra Widjojo's profile as the Chairman of Remuneration and Nomination Committee is available in the Board of Commissioners' Profile section in the "Company Profile" of this 2023 Annual Sustainability Report.
H. Yunno Kusumo Anggota Komite Remunerasi dan Nominasi & Komisaris Independen Remuneration and Nomination Committee Member & Independent Commissioner	Profil H. Yunno Kusumo sebagai anggota Komite Remunerasi dan Nominasi tersedia pada bagian Profil Dewan Komisaris dalam Bab "Profil Perusahaan" di Laporan Tahunan Keberlanjutan 2023 ini. H. Yunno Kusumo's profile as a member of Remuneration and Nomination Committee is available in the Board of Commissioners' Profile section in the "Company Profile" of this 2023 Annual Sustainability Report.
Wang Kun* Anggota Komite Remunerasi dan Nominasi & Presiden Komisaris Remuneration and Nomination Committee Member & President Commissioner	Profil Wang Kun sebagai anggota Komite Remunerasi dan Nominasi tersedia pada bagian Profil Dewan Komisaris dalam Bab "Profil Perusahaan" di Laporan Tahunan Keberlanjutan 2023 ini. Wang Kun's profile as the member of Remuneration and Nomination Committee is available in the Board of Commissioners' Profile section in the "Company Profile" of this 2023 Annual Sustainability Report.
Ambar Wulandari Anggota Komite Remunerasi dan Nominasi & Kepala Departemen Sumber Daya Manusia Remuneration and Nomination Committee Member & Head of Human Resources Department	Profil Ambar Wulandari sebagai anggota Komite Remunerasi dan Nominasi tersedia pada bagian Profil Pejabat Eksekutif dalam Bab "Profil Perusahaan" di Laporan Tahunan Keberlanjutan 2023 ini. Ambar Wulandari's profile as a member of Remuneration and Nomination Committee is available in the Executive Officer Profile section in the "Company Profile" of this 2023 Annual Sustainability Report.

*) efektif 6 November 2023 | effective November 6, 2023

PEMBAGIAN TUGAS DAN TANGGUNG JAWAB DALAM KEANGGOTAAN KOMITE REMUNERASI DAN NOMINASI

SEPARATION OF DUTIES AND RESPONSIBILITIES BETWEEN MEMBERS OF THE REMUNERATION AND NOMINATION COMMITTEE

Berikut komposisi Komite Remunerasi dan Nominasi:

The composition of the Remuneration and Nomination Committee is as follows:

1. Hendra Widjojo, sebagai ketua yang juga mewakili peranan Komisaris Independen dalam komite.
2. H. Yunno Kusumo, sebagai anggota komite yang juga merupakan Komisaris Independen.
3. Wang Kun, sebagai anggota komite yang juga merupakan Presiden Komisaris.
4. Ambar Wulandari, sebagai anggota komite yang merupakan Pejabat Eksekutif yang membawahi bagian sumber daya manusia Bank.

1. Hendra Widjojo, as a chairman who also represents the role of Independent Commissioner in the committee.
2. H. Yunno Kusumo, as a committee member who is also an Independent Commissioner.
3. Wang Kun, as a committee member who is also a President Commissioner.
4. Ambar Wulandari, as a committee member who is an Executive Officer in charge of The Bank's human resources.

INDEPENDENSI

Sesuai dengan kriteria yang telah ditetapkan Bank dan regulasi yang berlaku, seluruh anggota Komite Remunerasi dan Nominasi tidak memiliki hubungan keuangan, kepengurusan, kepemilikan saham, dan/atau hubungan keluarga dengan anggota Dewan Komisaris, Direksi dan/atau pemegang saham pengendali atau hubungan dengan Bank, yang dapat memengaruhi kemampuan untuk bertindak independen.

RAPAT KOMITE REMUNERASI DAN NOMINASI

1. Rapat Komite Remunerasi dan Nominasi diselenggarakan secara berkala, sekurang-kurangnya 1 (satu) kali dalam 4 (empat) bulan.
2. Rapat Komite Remunerasi dan Nominasi hanya dapat dilaksanakan apabila dihadiri oleh setidaknya 51% (lima puluh satu persen) dari jumlah anggota komite termasuk 1 (satu) orang Komisaris Independen dan 1 (satu) orang Pejabat Eksekutif yang membawahi sumber daya manusia atau 1 (satu) orang perwakilan pegawai.
3. Keputusan rapat Komite Remunerasi dan Nominasi diambil berdasarkan musyawarah untuk mufakat.
4. Dalam hal tidak tercapai mufakat, pengambilan keputusan dilakukan berdasarkan pemungutan suara setuju 2/3 (dua per tiga) anggota Komite Remunerasi dan Nominasi yang hadir.
5. Hasil rapat Komite Remunerasi dan Nominasi wajib dituangkan dalam risalah rapat dan didokumentasikan sesuai dengan peraturan perundang-undangan.
6. Apabila terdapat perbedaan pendapat (dissenting opinion) yang terjadi dalam rapat Komite Remunerasi dan Nominasi, wajib dicantumkan secara jelas dalam risalah rapat berserta alasan perbedaan pendapat, yang kemudian ditandatangani oleh seluruh anggota Komite Remunerasi dan Nominasi yang hadir dan disampaikan kepada Dewan Komisaris.

Selama tahun 2023, Komite Remunerasi dan Nominasi menyelenggarakan rapat sebanyak 7 (tujuh) kali. Berikut disampaikan agenda dan risalah rapat, kehadiran, serta rekapitulasi tingkat kehadiran anggota Komite Remunerasi dan Nominasi dalam rapat-rapat tersebut.

INDEPENDENCY

In accordance with the criteria established by The Bank and prevailing regulations, all members of the Remuneration and Nomination Committee have no financial relations, management, share ownership, and/or family relations with members of the Board of Commissioners, Board of Directors and/or controlling shareholders or any relations with The Bank, which may affect the ability to act independently

REMUNERATION AND NOMINATION COMMITTEE'S MEETINGS

1. The Remuneration and Nomination Committee's meetings are held regularly at least once in every 4 (four) months.
2. Remuneration and Nomination Committee meetings can only be held if attended by at least 51% (fifty-one percent) of the total committee members, including 1 (one) Independent Commissioner and 1 (one) Executive Officer in charge of human resources or 1 (one) employee representative.
3. The decisions of Remuneration and Nomination Committee meetings are made based on deliberation results.
4. If there is no consensus, the decision is made based on voting, with approval by 2/3 (two thirds) of Remuneration and Nomination Committee members, who are present in the meeting.
5. Results of Remuneration and Nomination Committee meetings must be recorded in minutes of meeting and documented in accordance with laws and regulations.
6. If there is a dissenting opinion that occurs during the Remuneration and Nomination Committee meeting, must be stated clearly in minutes of meeting along with the reasons for the argument, which is then signed by all members of the Remuneration and Nomination Committee present and submitted to the Board of Commissioners.

Throughout 2023, the Remuneration and Nomination Committee held 7 (seven) meetings. The following are the details of the agenda and minutes of meeting, attendance, and recapitulation of the attendance of Remuneration and Nomination Committee members in those meetings.

Tanggal Date	Lokasi Venue	Agenda	Nomor Risalah Rapat MoM Number
4 Januari 2023 January 4, 2023	Online via Webex	1. <i>Nomination of New President Director Candidate</i>	001/MM/RNC/I/2023
16 Maret 2023 March 16, 2023	Online via Webex	1. <i>Performance Bonus Staff 2022</i> 2. <i>Performance Bonus BOD & BOC 2022 (Advance Payment)</i> 3. <i>Existing Committee Member Contract for year 2023</i>	002/MM/RNC/III/2023
27 April 2023 April 27, 2023	Online via Webex	1. <i>Salary Review for Staff 2023</i> 2. <i>Existing Committee Member Contract</i> 3. <i>Discussion for New Candidate in Committee Member</i>	003/MM/RNC/IV/2023
15 Juni 2023 June 15, 2023	Hybrid (Online via Webex and Offline at Head Office)	1. <i>Discussion about Committee Member contract</i> 2. <i>Appointment Mr. Denny Admiral Nasir as New Audit Committee Member of PT Bank ICBC Indonesia</i>	004/MM/RNC/VI/2023
21 September 2023 September 21, 2023	Hybrid (Online via Webex and Offline at Head Office)	1. <i>Performance Bonus 2022 for BOD and BOC</i> 2. <i>Updated on Deferred Bonus for Material Risk Takers (MRT) Policy</i> 3. <i>Existing Committee Members Contract</i>	005/MM/RNC/IX/2023
5 Oktober 2023 October 5, 2023	Offline at Head Office	1. <i>Salary Review for BOD</i>	006/MM/RNC/X/2023
2 November 2023 November 2, 2023	Offline at Head Office	1. <i>Remuneration and Nomination Committee Member</i> 2. <i>Audit Committee Member</i>	007/MM/RNC/XII/2023

Komite Remunerasi dan Nominasi Remuneration and Nomination Committee	4 Jan 24	16 Mar 23	27 Apr 23	15 Jun 23	21 Sep 23	5 Oct 23	2 Nov 23	Total Rapat Total Meeting(s)	Total Kehadiran Total Attendance(s)	Persentase Kehadiran Percentage of Attendance
Hendra Widjojo	1	1	1	1	1	1	1	7	7	100%
H. Yunno Kusumo	1	1	1	1	1	1	1	7	7	100%
Wang Kun*								0	0	100%
Ambar Wulandari	1	1	1	1	1	1	1	7	7	100%

*) efektif 6 November 2023 | effective November 6, 2023

LAPORAN SINGKAT PELAKSANAAN KEGIATAN KOMITE REMUNERASI DAN NOMINASI TAHUN 2023

Di sepanjang tahun 2023, Komite Remunerasi dan Nominasi melaksanakan tugas sebagai berikut:

1. Mengevaluasi gaji Direksi untuk tahun 2023.
2. Mengevaluasi gaji karyawan untuk tahun 2023.
3. Mengevaluasi bonus kinerja karyawan untuk tahun 2022.
4. Proses perpanjangan kontrak anggota-anggota Komite Audit dan Komite Pemantau Risiko, serta pengangkatan anggota baru Komite Audit untuk disampaikan kepada Dewan Komisaris.
5. Mengevaluasi bonus kinerja untuk Dewan Komisaris dan Direksi tahun 2022.
6. Pembaruan tentang Bonus yang ditangguhkan pada Kebijakan Material Risk Takers (MRT).

BRIEF SUMMARY OF THE ACTIVITIES OF THE REMUNERATION AND NOMINATION COMMITTEE IN 2023

Throughout 2023, the Remuneration and Nomination Committee performed the following duties:

1. Evaluate the salary of the Board of Directors in 2023.
2. Evaluate employee salaries in 2023.
3. Evaluate employee performance bonuses in 2022.
4. The contract extension process for members of the Audit Committee and Risk Monitoring Committee, and appointment new Audit Committee Member to be submitted to the Board of Commissioners.
5. Evaluate performance bonuses for the Board of Commissioners and Board of Directors in 2022.
6. Update on Deferred Bonus for Material Risk Takers (MRT) Policy

PELATIHAN DAN PENGEMBANGAN KOMPETENSI

Bank memiliki kebijakan terkait pengembangan dan peningkatan kompetensi Komite Remunerasi dan Nominasi, yang dilakukan melalui berbagai pelatihan dan pendidikan dengan pendanaan sepenuhnya menjadi tanggung jawab Bank. Informasi terkait pelatihan dan pengembangan kompetensi Komite Remunerasi dan Nominasi tersedia dalam Bab “Profil Perusahaan” pada Laporan Tahunan Keberlanjutan 2023 ini.

KEBIJAKAN MENGENAI SUKSESI DIREKSI

Suksesi Direksi Bank diatur berdasarkan *Kebijakan Perubahan Susunan Anggota Direksi dan Dewan Komisaris di Bank No. 2023-SMD-003-L3* tanggal 28 Agustus 2023. Kebijakan ini termasuk mengatur suksesi bagi Direksi dan Dewan Komisaris, termasuk persyaratan jika nominasi berasal dari Pejabat Eksekutif internal Bank dan/atau pejabat dari ICBC Limited sebagai pemegang saham mayoritas. Kebijakan ini juga mengatur secara rinci terkait prosedur pengusulan untuk Dewan Komisaris dan Direksi jika berasal dari kalangan internal.

TRAINING AND DEVELOPMENT OF COMPETENCY

The Bank has its own policy related to the development and improvement of the competency of the Remuneration and Nomination Committee. This is done through various training and education programs with full funding being the responsibility of The Bank. The list of training and development of competency of the Remuneration and Nomination Committee is available in the “Company Profile” section in this 2023 Annual Sustainability Report.

POLICY CONCERNING THE SUCCESSION OF THE BOARD OF DIRECTORS

The succession of The Bank's Board of Directors is governed by the Policy on Changes in the Composition of the Bank's Board of Directors and Board of Commissioners No. 2023-SMD-003-L3 dated August 28, 2023. This policy regulates the succession of the Board of Directors and Board of Commissioners, including the requirements if the candidates are from The Bank's internal Executive Officers and/or officials of ICBC Limited as the majority shareholders. This policy also regulates in detail the procedure for proposals for the Board of Commissioners and Board of Directors if the members are from internal.

Komite Pemantau Risiko

Risk Monitoring Committee

Komite Pemantau Risiko bertugas untuk membantu Dewan Komisaris dalam mengawasi pelaksanaan manajemen risiko di lingkungan Bank. Komite ini diketuai oleh Komisaris Independen dan terdiri atas 1 (satu) Komisaris dan 2 (dua) orang anggota yang berasal dari pihak independen yang memiliki keahlian pada bidang keuangan dan manajemen risiko.

PEDOMAN KOMITE PEMANTAU RISIKO

Komite Pemantau Risiko memiliki Pedoman Kerja Komite Pemantau Risiko yang mengatur mengenai:

1. Tugas dan tanggung jawab;
2. Komposisi dan struktur keanggotaan;
3. Tata cara dan prosedur kerja;
4. Penyelenggaraan rapat dan pelaporan; dan
5. Masa jabatan.

Bank menerbitkan pertama kali Pedoman Kerja Komite Pemantau Risiko ini pada tanggal 24 Juli 2013 dan selanjutnya melakukan perubahan 3 (tiga) kali masing-masing pada tanggal 25 Agustus 2017, 2 November 2020, dan 1 Agustus 2023. Rencana peninjauan berikutnya atas pedoman kerja ini adalah pada tanggal 1 Agustus 2026.

TUGAS DAN TANGGUNG JAWAB KOMITE PEMANTAU RISIKO

Sebagaimana diatur dalam POJK no. 17 tahun 2023, Komite Pemantau Risiko wajib melakukan paling sedikit:

- Evaluasi tentang kesesuaian antara kebijakan dengan pelaksanaan manajemen risiko dari Bank;
- Pemantauan dan evaluasi pelaksanaan tugas Komite Manajemen Risiko dan Satuan Kerja Manajemen Risiko (SKMR).

Hasil dari evaluasi yang telah disebutkan di atas wajib disampaikan dan memberikan rekomendasi kepada Dewan Komisaris. Laporan hasil evaluasi tersebut wajib disampaikan secara triwulanan setiap tahun. Prioritas tugas Komite Pemantau Risiko adalah sebagai berikut:

- Mengevaluasi proposal kebijakan manajemen risiko termasuk strategi dan kerangka manajemen risiko, serta memberikan rekomendasi dan masukan kepada Dewan Komisaris terhadap proposal kebijakan tersebut.

The Risk Monitoring Committee has the duty to assist the Board of Commissioners in overseeing the implementation of risk management within The Bank. The committee is chaired by an Independent Commissioner and comprised of 1 (one) Commissioner and 2 (two) members from independent parties with expertise in the area of finance and risk management.

RISK MONITORING COMMITTEE CHARTER

Risk Monitoring Committee has a Risk Monitoring Committee Charter which regulates:

1. Duties and responsibilities;
2. Organizational composition and structure;
3. Procedures and work procedures;
4. Implementation of meetings and reporting; and
5. Term of office.

The Bank firstly published the Risk Monitoring Committee Charter on July 24, 2013 and subsequently amended the charter thrice, on August 25, 2017, November 2, 2020, and August 1, 2023 respectively. The next scheduled review of this charter is on August 1, 2026.

DUTIES AND RESPONSIBILITIES OF THE RISK MONITORING COMMITTEE

As stipulated in POJK no. 17 year 2023, the Risk Monitoring Committee should perform at least:

- Evaluate the conformity between The Bank's risk management policy and implementation;
- Monitor and evaluate the implementation of duties of Risk Management Committee and Risk Management Department (RMD).

The result of evaluation mentioned above is to be submitted to the Board of Commissioners along with its recommendation. The report on evaluation result should be submitted quarterly every year. Risk Monitoring Committee priority duties are as follows:

- Evaluate the risk management policy proposals including risk management strategies and framework, and provide recommendations and input to the Board of Commissioners on those policy proposals.

- Meninjau notulen rapat Komite Manajemen Risiko secara berkala, mengusulkan saran independen, dan memberikan rekomendasi untuk memperkuat panduan manajemen risiko Bank.
- Mengadakan rapat dengan SKMR dan departemen terkait paling sedikit sebulan sekali mengenai pengendalian risiko, risk appetite, dan risk tolerance. Memberikan panduan mengenai risiko potensial bisnis dan isu-isu manajemen risiko.
- Memberikan perhatian kepada peringkat kesehatan Bank serta memberikan rekomendasi praktisnya.
- Dalam setiap triwulan progres kerja, apabila ada temuan yang muncul maka perlu memberikan rekomendasi dan tindak lanjut dari rekomendasi tersebut serta memberikan laporan kepada Dewan Komisaris.
- Review minutes of Risk Management Committee meetings regularly, propose independent advices, and provide recommendations to strengthen The Bank's risk management guidelines.
- Conduct meeting at least once a month with RMD and other related departments regarding risk control, risk appetite, and risk tolerance. Provide guidance on potential business risks and risk management issues.
- Pay attention to The Bank's soundness rating and provide practical recommendations.
- In each quarter of work progress, if there are any findings, it is necessary to provide recommendations and follow-up on the recommendations and report to the Board of Commissioners

KETENTUAN MASA JABATAN

Berdasarkan Pedoman Kerja Komite Pemantau Risiko tahun 2023, masa jabatan anggota Komite Pemantau Risiko yang berasal dari Pihak Independen ditentukan berdasarkan kebutuhan atau penilaian Bank. Sementara masa jabatan anggota Komite Pemantau Risiko yang berasal dari Komisaris ditentukan berdasarkan Rapat Umum Pemegang Saham (RUPS).

KOMPOSISI, STRUKTUR DAN KEANGGOTAN

Komposisi, struktur dan keanggotaan Komite Pemantau Risiko adalah sebagai berikut:

1. Anggota Komite Pemantau Risiko diangkat dan diberhentikan berdasarkan keputusan rapat Dewan Komisaris dan diformalkan dengan surat keputusan Direksi.
2. Komite Pemantau Risiko beranggotakan paling sedikit:
 - 1 (satu) orang Komisaris Independen;
 - 1 (satu) orang Pihak Independen yang memiliki keahlian di bidang keuangan; dan
 - 1 (satu) orang Pihak Independen yang memiliki keahlian di bidang manajemen risiko.
3. Komite Pemantau Risiko diketuai oleh Komisaris Independen yang merangkap sebagai anggota.
4. Anggota Direksi dilarang menjadi anggota Komite Pemantau Risiko.
5. Mantan anggota Direksi atau Pejabat Eksekutif Bank atau pihak yang mempunyai hubungan dengan Bank yang dapat memengaruhi kemampuan yang bersangkutan untuk bertindak independen tidak dapat menjadi Pihak Independen dalam anggota komite sebelum menjalani masa tunggu (*cooling off*) paling singkat 6 (enam) bulan.

TERMS OF OFFICE

Based on Risk Monitoring Committee Charter 2023, the tenure of members of Risk Monitoring Committee originated from Independent Party is determined by the needs or assessment of The Bank. Meanwhile the tenure of members of Risk Monitoring Committee originated from the Commissioners is determined through General Meeting of Shareholders (GMS).

COMPOSITION, STRUCTURE AND MEMBERSHIP

The composition, structure and membership of Risk Monitoring Committee are as follows:

1. dismissed based on the Board of Commissioners' meeting resolutions and formalized by a decision letter of the Board of Directors.
2. Risk Monitoring Committee members must at least consist of:
 - (one) Independent Commissioner;
 - (one) Independent Party who expertises in finance; and
 - (one) Independent Party who expertises in risk management.
3. Risk Monitoring Committee is chaired by an Independent Commissioner who also represents as a committee member.
4. Members of the Board of Directors are prohibited from becoming members of the Risk Monitoring Committee.
5. Former members of the Board of Directors or Executive Officers of The Bank or parties that have relation with The Bank which may affect the ability of concerned individuals to act independently are prohibited from becoming an Independent Party in the committee before undergoing a cooling off period of at least 6 (six) months.

6. Masa tunggu (cooling off) paling singkat 6 (enam) bulan tidak berlaku bagi mantan anggota Direksi yang membawahi fungsi pengawasan atau Pejabat Eksekutif yang melakukan fungsi pengawasan pada Bank tersebut.
7. Komisaris Independen dan Pihak Independen yang menjadi anggota Komite Pemantau Risiko paling sedikit berjumlah 51% (lima puluh satu persen) dari jumlah anggota Komite Pemantau Risiko.

6. The minimum cooling off period of 6 (six) months shall not apply to former members of the Board of Directors who in charge of the supervisory function or Executive Officers who carry out the supervisory function of The Bank.
7. Independent Commissioners and Independent Parties who are the members of Risk Monitoring Committee must at least comprise 51% (fifty-one percent) of the total members of Risk Monitoring Committee.

SUSUNAN DAN PROFIL KOMITE PEMANTAU RISIKO

Kronologis susunan Komite Pemantau Risiko Bank di tahun 2023 adalah sebagai berikut:

STRUCTURE AND PROFILE OF THE RISK MONITORING COMMITTEE

The chronology of The Bank's Risk Monitoring Committee composition in 2023 is as follows:

1 Januari – 31 Desember 2023 January 1 – December 31, 2023	
Hendra Widjojo Ketua Komite Pemantau Risiko & Komisaris Independen Chairman of Risk Monitoring Committee & Independent Commissioner	
Jeff S.V. Eman Anggota Komite Pemantau Risiko & Komisaris Risk Monitoring Committee Member & Commissioner	
Aki H. Parwoto Anggota Komite Pemantau Risiko/Pihak Independen Risk Monitoring Committee Member/Independent Party	
Douval Anggota Komite Pemantau Risiko/Pihak Independen Risk Monitoring Committee Member/Independent Party	

Profil Komite Pemantau Risiko per 31 Desember 2023 adalah sebagai berikut:

The following is the Risk Monitoring Committee profile as of December 31, 2023:

Hendra Widjojo Ketua Komite Pemantau Risiko & Komisaris Independen Chairman of Risk Monitoring Committee & Independent Commissioner	Profil Hendra Widjojo sebagai Ketua Komite Pemantau Risiko tersedia pada bagian Profil Dewan Komisaris dalam Bab "Profil Perusahaan" di Laporan Tahunan Keberlanjutan 2023 ini. Hendra Widjojo's profile as the Chairman of Risk Monitoring Committee is available in the Board of Commissioners' Profile section in the "Company Profile" of this 2023 Annual Sustainability Report.
Jeff S.V. Eman Anggota Komite Pemantau Risiko & Komisaris Risk Monitoring Committee Member & Commissioner	Profil Jeff S.V. Eman sebagai anggota Komite Pemantau Risiko tersedia pada bagian Profil Dewan Komisaris dalam Bab "Profil Perusahaan" di Laporan Tahunan Keberlanjutan 2023 ini. Jeff S.V. Eman's profile as a member of Risk Monitoring Committee is available in the Board of Commissioners' Profile section in the "Company Profile" of this 2023 Annual Sustainability Report.

Aki H. Parwoto
Anggota Komite Pemantau
Risiko/Pihak Independen
Risk Monitoring Committee
Member/Independent Party

Pengalaman Kerja/Jabatan

Aki H. Parwoto saat ini menjabat sebagai anggota Komite Pemantau Risiko dan Komite Audit pada PT Bank Resona Perdania. Sebelumnya, beliau bergabung dengan PT Bank CIMB Niaga sejak tahun 2009 dan menjabat antara lain sebagai Senior Vice President Credit and Operations Policy (2015–2017), First Vice President Credit Risk Management Group Head (2010–2014), dan Vice President Credit Risk Management Group Head (2009–2010). Beliau juga pernah menjabat berbagai posisi strategis pada PT Bank Niaga untuk periode 1987–2008 antara lain sebagai Vice President pada Credit Risk Division Head (2004–2008), Risk Asset Audit Division Head (2001–2004), Assistant Vice President Compliance Management Group (2000), Assistant Vice President Credit Policy and Administration Group (1998–1999), Senior Manager – Branch Bali (1994–1997), Manager – Credit Audit (1988–1993) dan Officer Development Program (1987). Beliau memulai karier profesionalnya pada Kantor Akuntan Publik Amir Abadi Jusuf pada tahun 1986.

Sertifikasi

Certification in Audit Committee Practices; Risk Management Certification – Level 4

Latar Belakang Pendidikan

- Magister Manajemen, Universitas Gajah Mada, 2004;
- Sarjana Akuntansi, Fakultas Ekonomi, Universitas Indonesia, 1985.

Work Experience

Aki H. Parwoto is currently serving as a member of Risk Monitoring Committee and Audit Committee at PT Bank Resona Perdania. He previously joined at PT Bank CIMB Niaga in 2009 and served as Senior Vice President of Credit and Operations Policy (2015–2017), First Vice President of Credit Risk Management Group Head (2010–2014), and Vice President of Credit Risk Management Group Head (2009–2010). He also had various strategic positions at PT Bank Niaga for the period 1987–2008 including Vice President at Credit Risk Division Head (2004–2008), Risk Asset Audit Division Head (2001–2004), Assistant Vice President of Compliance Management Group (2000), Assistant Vice President of Credit Policy and Administration Group (1998–1999), Senior Manager - Branch Bali (1994–1997), Manager - Credit Audit (1988–1993) and Officer Development Program (1987). He began his professional career at Amir Abadi Jusuf Registered Public Accountants in 1986.

Certification

Certification in Audit Committee Practices; Risk Management Certification – Level 4

Education

- Master of Management, University of Gajah Mada, 2004;
- Bachelor of Accounting, Faculty of Economy, University of Indonesia, 1985.

Douval

Anggota Komite Pemantau Risiko/Pihak Independen
Risk Monitoring Committee
Member/Independent Party

Pengalaman Kerja/Jabatan

Douval saat ini menjabat sebagai anggota Komite Audit dan Komite Pemantau Risiko pada PT Bank Pembangunan Daerah Banten, Tbk (Bank Banten). Sebelumnya, beliau bergabung dengan PT Bank Pembangunan Daerah Sumatera Barat (Bank Nagari) pada tahun 2005, dan menjabat antara lain sebagai Pimpinan Grup Riset dan Pengembangan Bisnis Divisi Perencanaan Strategis (2020), Pimpinan Bagian Financial Institution and Settlement Divisi Dana dan Treasury (2020), dan Treasury Dealer Madya (2018-2020). Pada tahun 2016-2018, beliau mengambil unpaid leave dari Bank Nagari untuk melanjutkan pendidikan S2, Master of Economics di The University of Western Australia dalam skema Australia Awards Scholarship. Sebelumnya, beliau juga menjabat berbagai posisi strategis di Bank Nagari antara lain sebagai Analis Madya Bagian Perencanaan Bisnis Divisi Perencanaan Strategis (2010-2016), Analis Junior Bagian Perencanaan Bisnis Divisi Perencanaan Strategis (2006-2010), dan Analis Kredit di Kantor Cabang Simpang Empat (2005-2006). Beliau memulai karier perbankannya pada PT Bank Mandiri (Persero) Tbk Kantor Cabang Bukittinggi sebagai Frontliners pada tahun 2003-2005. Selain menjalani karier profesional di industri perbankan, beliau juga adalah seorang Akademisi/Dosen yang sejak 2019 sampai dengan saat ini menjabat sebagai Associate Faculty Member di BINUS Business School, Bina Nusantara University. Beliau juga memegang sertifikasi profesi dalam dan luar negeri di bidang Akuntansi, Investment Banking, Treasury, dan Manajemen Risiko, yaitu: Chartered Accountant (CA), Register Negara Akuntan (Ak.), Intermediate Treasury Dealer, BSMR Banking Risk Management Level-3, Certified Investment Banker (CIB), Certified Risk Professional (CRP), Certified Practising Accountant, Australia (CPA Aust.), dan ASEAN Chartered Professional Accountant (ASEAN CPA).

Latar Belakang Pendidikan

- Master of Economics, The University of Western Australia, 2018;
- Magister Manajemen, Universitas Negeri Padang, 2015;
- Sarjana Akuntansi, Fakultas Ekonomi, Universitas Andalas, 2002.

Work Experience

Douval currently serves as a member of the Audit Committee and Risk Monitoring Committee at PT Bank Pembangunan Daerah Banten, Tbk (Bank Banten). Previously, he joined PT Bank Pembangunan Daerah Sumatera Barat (Bank Nagari) in 2005 and served as the Head of Research and Business Development Group for Strategic Planning Division (2020), Head of Financial Institution and Settlement Sub-Division of Fund and Treasury Division (2020), and Intermediate Treasury Dealers (2018-2020). From 2016-2018, he took unpaid leave from Bank Nagari to continue his Master of Economics education at The University of Western Australia under the Australia Awards Scholarship scheme. Previously, he also had various strategic positions at Bank Nagari serving as a Senior Analyst of the Business Planning Sub-Division of the Strategic Planning Division (2010-2016), a Junior Analyst of the Business Planning Sub-Division of the Strategic Planning Division (2006-2010), and a Credit Analyst at the Simpang Empat Branch Office (2005-2006). He started his early banking career at PT Bank Mandiri (Persero) Tbk Bukittinggi Branch Office as Frontliners from 2003-2005. Apart from pursuing a professional career in the banking industry, he is also an Academic/Lecturer who since 2019 has served as an Associate Faculty Member at BINUS Business School, Bina Nusantara University. He also holds professional certifications at home and abroad in the fields of Accounting, Investment Banking, Treasury, and Risk Management, namely: Chartered Accountant (CA), State Register of Accountant (Ak.), Intermediate Treasury Dealer, BSMR Banking Risk Management Level-3, Certified Investment Banker (CIB), Certified Risk Professional (CRP), Certified Practising Accountant, Australia (CPA Aust.), and ASEAN Chartered Professional Accountant (ASEAN CPA).

Education

- Master of Economics, The University of Western Australia, 2018;
- Master of Management, Padang State University, 2015;
- Bachelor of Accounting, Faculty of Economics, Andalas University, 2002.

PEMBAGIAN TUGAS DAN TANGGUNG JAWAB DALAM KEANGGOTAAN KOMITE PEMANTAU RISIKO

Berikut komposisi Komite Pemantau Risiko:

- Hendra Widjojo, sebagai ketua yang juga mewakili peranan Komisaris Independen dalam komite.
- Jeff S.V. Eman, sebagai anggota komite yang juga merupakan Komisaris.
- Aki H. Parwoto, berperan sebagai pihak independen yang memiliki keahlian dalam bidang keuangan.
- Douval, berperan sebagai pihak independen yang memiliki keahlian dalam bidang perencanaan strategis, strategi bisnis, *treasury*, dan manajemen risiko yang profesional.

INDEPENDENSI

Sesuai dengan kriteria yang telah ditetapkan Bank dan regulasi yang berlaku, seluruh anggota Komite Pemantau Risiko tidak memiliki hubungan keuangan, kepengurusan, kepemilikan saham, dan/atau hubungan keluarga dengan anggota Dewan Komisaris, Direksi dan/atau pemegang saham pengendali atau hubungan dengan Bank, yang dapat memengaruhi kemampuan untuk bertindak independen.

RAPAT KOMITE PEMANTAU RISIKO

1. Rapat Komite Pemantau Risiko dipimpin oleh Ketua Komite Pemantau Risiko yang merupakan Komisaris Independen Bank atau oleh anggota Komisaris Independen lainnya yang ditunjuk untuk memimpin rapat saat terjadinya kekosongan pada posisi Ketua Komite Pemantau Risiko.
2. Rapat Komite Pemantau Risiko hanya dapat dilaksanakan apabila dihadiri oleh setidaknya 51% (lima puluh satu persen) dari jumlah anggota komite termasuk termasuk 1 (satu) orang Komisaris Independen dan 1 (satu) orang Pihak Independen.
3. Keputusan rapat Komite Pemantau Risiko diambil berdasarkan musyawarah untuk mufakat.
4. Dalam hal tidak tercapai mufakat, pengambilan keputusan dilakukan berdasarkan pemungutan suara setuju $\frac{2}{3}$ (dua per tiga) anggota Komite Pemantau Risiko yang hadir.
5. Hasil rapat Komite Pemantau Risiko wajib dituangkan dalam risalah rapat dan didokumentasikan sesuai dengan peraturan perundang-undangan.
6. Apabila terdapat perbedaan pendapat (*dissenting opinion*) yang terjadi dalam rapat Komite Pemantau Risiko, wajib dicantumkan secara jelas dalam risalah rapat beserta alasan perbedaan pendapat, yang kemudian ditandatangani oleh seluruh anggota Komite Pemantau Risiko yang hadir dan disampaikan kepada Dewan Komisaris.

SEPARATION OF DUTIES AND RESPONSIBILITIES BETWEEN MEMBERS OF THE RISK MONITORING COMMITTEE

The composition of the Risk Monitoring Committee is as follows:

- Hendra Widjojo, as a chairman who also represents the role of Independent Commissioner in the committee.
- Jeff S.V. Eman, as a committee member who is also a Commissioner.
- Aki H. Parwoto, as an independent party with an expertise in finance.
- Douval, as an independent party with an expertise in strategic planning, business strategy, treasury, and risk management professional.

INDEPENDENCY

In accordance with the criteria established by The Bank and prevailing regulations, all members of the Risk Monitoring Committee have no financial relations, management, share ownership, and/or family relations with members of the Board of Commissioners, Board of Directors and/or controlling shareholders or any relations with The Bank, which may affect the ability to act independently

RISK MONITORING COMMITTEE'S MEETINGS

1. The meeting of Risk Monitoring Committee is chaired by the Chairman of Risk Monitoring Committee, who is an Independent Commissioner of The Bank or by other Independent Commissioners appointed to lead the meeting when the position of Chairman of Risk Monitoring Committee is absent.
2. Risk Monitoring Committee meetings can only be held if attended by at least 51% (fifty-one percent) of the total committee members, including 1 (one) Independent Commissioner and 1 (one) Independent Party.
3. The decisions of Risk Monitoring Committee meetings are made based on deliberation results.
4. If there is no consensus, the decision is made based on voting, with approval by $\frac{2}{3}$ (two thirds) of Risk Monitoring Committee members, who are present in the meeting.
5. Results of Risk Monitoring Committee meetings must be recorded in minutes of meeting and documented in accordance with laws and regulations.
6. If there is a dissenting opinion that occurs during the Risk Monitoring Committee meeting, must be stated clearly in minutes of meeting along with the reasons for the argument, which is then signed by all members of the Risk Monitoring Committee present and submitted to the Board of Commissioners.

Selama tahun 2023, Komite Pemantau Risiko menyelenggarakan rapat sebanyak 12 (dua belas) kali. Berikut disampaikan agenda dan risalah rapat, kehadiran, serta rekapitulasi tingkat kehadiran anggota Komite Pemantau Risiko dalam rapat-rapat tersebut.

Throughout 2023, the Risk Monitoring Committee held 12 (twelve) meetings. The following are the details of the agenda and minutes of meeting, attendance, and recapitulation of the attendance of Risk Monitoring Committee members in those meetings.

Tanggal Date	Lokasi Venue	Agenda	Nomor Risalah Rapat MoM Number
31 Januari 2023 January 31, 2023	Offline at Head Office	1. Critical Function and Position by Human Resources Department 2. Branch Performance 2022 – Consumer Banking Department 3. Business Plan 2023 Highlights – Correction Highlight – SMIR and FM Department	001/MM/RMC/II/2023
28 Februari 2023 February 23, 2023	Offline at Head Office	1. Loan Pipelines by Corporate Banking I Department 2. Loan Pipelines by Corporate Banking II Department	002/MM/RMC/II/2023
28 Maret 2023 March 28, 2023	Offline at Head Office	1. Loan Pipelines by Trade Banking Department 2. Loan Pipelines by SME Department 3. Loan Pipelines by Global Market Department	003/MM/RMC/III/2023
18 April 2023 April 18, 2023	Online via Webex	1. Risk Management Department Report 2. Risk Profile Q1 2023 3. Regulatory Limit Dashboard 4. Credit Portfolio Monitoring 5. Risk Appetite Monitoring	004/MM/RMC/IV/2023
17 Mei 2023 May 17, 2023	Offline at Head Office	1. Summary SME Workload For Year 2022 and First Quarter 2023 2. Business Plan Realization Q1 2023	005/MM/RMC/IV/2023
26 Juni 2023 June 26, 2023	Offline at Head Office	1. Updates of Lombok Energy Dinamycs (LED) by Corporate Banking I Department 2. Updates of Indonesia Energi Dinamika (IED) by Corporate II Department	006/MM/RMC/VI/2023
25 Juli 2023 July 25, 2023	Offline at Head Office	1. Branch Performance Q2 2023 2. Risk Profile Q2 2023, RBBR S1 2023, Risk Appetite Monitoring by Management Department Updates	007/MM/RMC/VII/2023
21 Agustus 2023 August 21, 2023	Offline at Head Office	Corporate Banking II Department Updates	008/MM/RMC/VIII/2023
5 Oktober 2023 October 5, 2023	Offline at Head Office	1. Discussion About the Pricing with GMD and FM Department 2. Updates about POJK No. 17 Year 2023 regarding Implementation of Good Corporate Governance for Commercial Banks by Compliance Department	009/MM/RMC/X/2023
6 Oktober 2023 October 6, 2023	Offline at head office	1. Pipelines Updates by Corporate Banking I Department 2. Pipelines Updates by Corporate Banking II Department	010/MM/RMC/X/2023
3 November 2023 November 3, 2023	Offline at Head Office	1. Business Plan 2024 by SMIR Department 2. Pipelines Updates by Corporate Banking I Department 3. Pipelines Updates by Corporate Banking II Department	011/MM/RMC/XI/2023
15 Desember 2023 December 15, 2023	Offline at head office	1. Country Risk and Transfer Risk by Risk Management Department 2. Outsourcing Implementation 2023 and Outsourcing Plan 2024 by FM Department	012/MM/RMC/XII/2023

Komite Pemantau Risiko Risk Monitoring Committee	31 Jan 23	28 Feb 23	28 Mar 23	18 Apr 23	17 May 23	26 Jun 23	25 Jul 23	21 Aug 23	5 Oct 23	6 Oct 23	3 Nov 23	15 Dec 23	Total Rapat Total Meeting(s)	Total Kehadiran Total Attendance(s)	Persentase Kehadiran Percentage of Attendance
Hendra Widjojo	1	1	1	1	1	1	1	1	1	1	1	1	12	12	100%
Jeff S.V. Eman	1	1	1	1	1	1	1	1	1	1	1	1	12	12	100%
Aki H. Parwoto	1	1	1	1	1	1	1	1	1	1	1	1	12	12	100%
Douval	1	1	1	1	1	1	1	1	1	1	1	1	12	12	100%

LAPORAN SINGKAT PELAKSANAAN KEGIATAN KOMITE PEMANTAU RISIKO TAHUN 2023

Sepanjang tahun 2023, Komite Pemantau Risiko telah bekerja guna membantu Dewan Komisaris yang mencakup hasil evaluasi mengenai tugas dan tanggung jawab beserta dengan rekomendasinya.

Adapun kegiatan yang telah dilaksanakan komite ini sampai Desember 2023 adalah sebagai berikut:

- Melakukan pemantauan dan evaluasi pelaksanaan tugas Komite Pemantau Risiko dan Satuan Kerja Manajemen Risiko (SKMR).
- Melakukan evaluasi terhadap rencana kerja SKMR.
- Memberikan saran kepada manajemen dalam meningkatkan penerapan manajemen risiko dan sistem pengendalian internal untuk mempertahankan tingkat kesehatan Bank pada posisi yang stabil.
- Melakukan evaluasi Kualitas Penerapan Manajemen Risiko (KPMR) pada *Risk-Based Bank Rating* (RBBR).
- Melakukan evaluasi terhadap laporan profil risiko Bank per 3 (tiga) bulan, serta kecukupan kebijakan dan prosedur Bank.
- Melakukan evaluasi terhadap laporan pelaksanaan kepatuhan dan AML.
- Melakukan evaluasi terhadap pelaksanaan restrukturisasi kredit yang terdampak COVID-19 dan tidak terdampak COVID-19.
- Melakukan pemantauan dan evaluasi terhadap progress kinerja Bank yang menjadi perhatian dari regulator.
- Melakukan pemantauan dan evaluasi pelaksanaan tugas departemen terkait dalam mengatasi masalah kredit macet.
- Melakukan pemantauan terhadap kredit yang berada dalam kategori *watch list* dan *potential risk*, serta memberikan masukan untuk memastikan kredit tersebut tidak menjadi kredit macet.
- Melakukan evaluasi terhadap Rencana Bisnis Bank dan Rencana Korporasi.
- Memastikan penerapan manajemen risiko, kerangka kerja manajemen risiko, dan prinsip-prinsip *Good Corporate Governance* (GCG).

BRIEF SUMMARY OF THE ACTIVITIES OF THE RISK MONITORING COMMITTEE IN 2023

Throughout 2023, the Risk Monitoring Committee has assisted the Board of Commissioners, through the results of evaluation on its duties and responsibilities, as well as its recommendations.

The following are the activities carried out by the committee until December 2023:

- Monitor and evaluate the implementation of duties of the Risk Monitoring Committee and Risk Management Department (RMD).
- Evaluate the work plan of RMD.
- Provide advices to the management in enhancing the risk management implementation and internal control system to maintain The Bank's soundness rating at a stable position.
- Evaluate the quality of risk management implementation in Risk-Based Bank Rating (RBBR).
- Evaluate The Bank's risk profile report in a quarterly base, as well as the adequacy of The Bank policies and procedures.
- Evaluate the compliance and AML implementation report.
- Evaluate the implementation of loan restructuring affected by COVID-19 and unaffected by COVID-19.
- Monitor and evaluate the progress of The Bank's performances that are of concern to regulators.
- Monitor and evaluate the implementation of duties of the relevant departments in overcoming the bad loans issue.
- Monitor loans that are in the watch list and potential risk categories, as well as providing input to ensure these loans do not turn into bad loans.
- Evaluate The Bank's Business Plan and Corporate Plan.
- Ensure the implementation of risk management, risk management framework, and Good Corporate Governance (GCG) principles.

PELATIHAN DAN PENGEMBANGAN KOMPETENSI

Bank memiliki kebijakan terkait pengembangan dan peningkatan kompetensi Komite Pemantau Risiko, yang dilakukan melalui berbagai pelatihan dan pendidikan dengan pendanaan sepenuhnya menjadi tanggung jawab Bank. Informasi terkait pelatihan dan pengembangan kompetensi Komite Pemantau Risiko dapat dilihat pada Bab “Profil Perusahaan” dalam Laporan Tahunan Keberlanjutan 2023 ini.

TRAINING AND DEVELOPMENT OF COMPETENCY

The Bank has its own policy related to the development and improvement of the competency of Risk Monitoring Committee. This is done through various training and education programs with full funding being the responsibility of The Bank. The list of training and development of competency of the Risk Monitoring Committee can be seen in the “Company Profile” section in this 2023 Annual Sustainability Report.



Organ Pendukung Direksi

Supporting Organs of the Board of Directors

KOMITE-KOMITE EKSEKUTIF

Dalam menjalankan tugas pengelolaan Bank, Direksi memiliki komite-komite eksekutif yang masing-masing beranggotakan Direktur dan para Pejabat Eksekutif Bank. Seluruh komite bertanggung jawab dan melapor kepada Direksi.

ASSET AND LIABILITY COMMITTEE (ALCO)

Asset and Liability Committee (ALCO) bertugas untuk membantu Direksi dalam mengelola aset dan kewajiban, baik *on-* maupun *off-balance sheet*, termasuk mengelola risiko likuiditas, risiko valuta asing, risiko *Interest Rate Risk In Banking Book* (IRRBB), manajemen instrumen surat berharga, manajemen penentuan suku bunga, manajemen *Fund Transfer Pricing* (FTP) dan manajemen permodalan Bank. Pengelolaan aset dan likuiditas dilakukan dengan mengkoordinasikan keamanan likuiditas dan profitabilitas untuk mewujudkan perkembangan aset dan liabilitas yang stabil sehingga tercapai *profit* yang berkesinambungan. Selama tahun 2023, ALCO mengadakan rapat sebanyak 12 (dua belas) kali.

RISK MANAGEMENT COMMITTEE (RMC)

Tugas utama *Risk Management Committee* (RMC) adalah membantu Direksi dalam merumuskan kebijakan dan mengawasi pelaksanaan kebijakan yang berkaitan dengan manajemen risiko, memantau perkembangan dan kondisi profil risiko, serta memberikan saran dan perbaikan terkait dengan manajemen risiko. Selain itu, komite ini berwenang dan bertanggung jawab untuk menyusun kebijakan, strategi, dan pedoman pelaksanaan manajemen risiko termasuk penetapan limit, *risk appetite*, *risk tolerance*, dan *contingency plan*. Selama tahun 2023, RMC mengadakan rapat sebanyak 4 (empat) kali dengan cakupan agenda sebagai berikut:

1. Profil Risiko
2. Penilaian Kecukupan Permodalan
3. Tingkat Kesehatan Bank Berdasarkan Risiko
4. Parameter baru Risiko Negara & Risiko Transfer
5. Penentuan *peer bank*;
6. 11 agenda tematik untuk masing-masing 11 jenis risiko (9+X);

EXECUTIVE COMMITTEES

In carrying out The Bank's management duties, the Board of Directors has executive committees, each of which consists of Directors and Executive Officers of The Bank. All committees are responsible and report to the Board of Directors.

ASSET AND LIABILITY COMMITTEE (ALCO)

The Asset and Liability Committee (ALCO) is responsible for assisting the Board of Directors in managing The Bank's assets and liabilities, both on and off-balance sheet, including managing liquidity risk, foreign exchange risk, Interest Rate Risk In Banking Book (IRRBB), securities instrument management, interest rates pricing management, Fund Transfer Pricing (FTP) management, and capital management of The Bank. Asset and liquidity management is carried out by coordinating liquidity security and profitability to obtain stable assets and liabilities development so as to achieve sustainable profits. Throughout 2023, ALCO held 12 (twelve) meetings.

RISK MANAGEMENT COMMITTEE (RMC)

The main duties of the Risk Management Committee (RMC) are to assist the Board of Directors in formulating policy and observing the implementation of the policy related to risk management, to monitor the progress and condition of risk profile, and to provide suggestions and improvement associated with risk management. In addition, the committee is authorized and responsible to develop policies, strategies, and guidelines of risk management implementation, including limit setting, risk appetite, risk tolerance, and contingency plan. Throughout 2023, RMC conducted 4 (four) meetings with the following agendas:

1. Risk Profile
2. Internal Capital Adequacy Assessment Process (ICAAP)
3. Risk Based Bank Rating
4. Country Risk & Transfer Risk new parameter
5. Peer bank determination;
6. 11 thematic agendas for each of 11 risk types (9+X);

7. Pemantauan portofolio kredit;
8. Pemantauan *risk appetite*;
9. Manajemen risiko enterprise;
10. Dashboard limit regulator;
11. Kajian limit sektor kredit

FINANCIAL REVIEW COMMITTEE (FRC)

Tugas *Financial Review Committee* (FRC) adalah mengawasi, memeriksa, dan mengevaluasi kebutuhan pengeluaran dana dalam jumlah besar yang persetujuannya berada di luar wewenang Direksi. Biaya-biaya yang menggunakan dana dalam jumlah besar harus diperiksa sesuai dengan standar dan prosedur FRC yang berlaku melalui mekanisme rapat FRC. Selama tahun 2023, FRC mengadakan 44 (empat puluh empat) kali rapat untuk 51 (lima puluh satu) topik.

CREDIT REVIEW COMMITTEE (CRC)

Credit Review Committee (CRC) bertugas untuk memberikan rekomendasi atas usulan pinjaman yang memerlukan persetujuan Direksi. Selama 2023, CRC mengadakan rapat sebanyak 51 (lima puluh satu) kali untuk Kredit Korporasi & SME dan 31 (tiga puluh satu) kali untuk Kredit Konsumsi.

CREDIT POLICY COMMITTEE (CPC)

Credit Policy Committee (CPC) bertugas untuk:

- a. Merumuskan kebijakan kredit, mengawasi pelaksanaan kebijakan kredit, memantau kemajuan dan kondisi portofolio pinjaman, dan memberikan rekomendasi untuk perbaikan;
- b. Mendukung aktivitas pemberian kredit Bank dengan tetap memperhatikan prinsip kehati-hatian serta mengkaji strategi/profil/portofolio kredit Bank. Selama tahun 2023, CPC mengadakan rapat sebanyak 5 (lima) kali.

POLICY & PRODUCT COMMITTEE (NON-CREDIT)

Policy & Product Committee (Non-Credit) adalah komite yang bertugas membantu manajemen dalam melaksanakan prinsip-prinsip tata kelola, terutama dalam memantau kebijakan Bank dan memastikan kepatuhan terhadap peraturan yang berlaku serta kebijakan Bank Induk dan membantu manajemen dalam menerapkan tata kelola produk, terutama sebelum dan sesudah implementasi dan memastikan konvergensi dalam implementasi Produk Bank.

7. Credit portfolio monitoring;
8. Risk appetite monitoring;
9. Enterprise risk management;
10. Regulatory limit dashboard;
11. Credit sector limit review

FINANCIAL REVIEW COMMITTEE (FRC)

The duties of *Financial Review Committee* (FRC) are to oversee, examine, and evaluate the need for large exposures which approval is beyond the authority of the Board of Directors. Applications that require large exposures must be verified in accordance with the prevailing FRC standards and procedures, and through the FRC meeting mechanism. Throughout 2023, FRC conducted 44 (forty-four) meetings for 51 (fifty-one) topics.

CREDIT REVIEW COMMITTEE (CRC)

Credit Review Committee (CRC) is assigned to provide recommendations on loan proposals that require the approval of the Board of Directors. Throughout 2023, CRC conducted 51 (fifty-one) meetings for Corporate & SME Loans and 31 (thirty-one) meetings for Consumer Loans.

CREDIT POLICY COMMITTEE (CPC)

Credit Policy Committee (CPC) is responsible for:

- a. Formulating credit policies, overseeing the implementation of credit policies, monitoring the progress and condition of loan portfolio, and providing recommendations for improvement;
- b. Supporting The Bank's lending activities while still observing the prudential principles and reviewing The Bank's credit strategy/profile/portfolio. Throughout 2023, CPC held 5 (five) meetings.

POLICY & PRODUCT COMMITTEE (NON-CREDIT)

Policy & Product Committee (Non-Credit) is a committee tasked with assisting management in implementing governance principles, especially in monitoring Bank's policies and ensuring compliance towards prevailing regulations as well as parent bank's policies and assisting management in implementing product governance, especially prior and post implementation and ensuring convergence in the implementation of bank products

Kewenangan, tugas, dan tanggung jawab komite adalah:

1. Mengakselerasi koordinasi antar departemen yang terkait dalam penyusunan/revisi suatu kebijakan (khususnya yang bersifat segera) sehingga rekomendasi dapat segera disampaikan kepada penyetuju kebijakan;
2. Membantu Direksi dalam mengkaji efektivitas ketentuan internal dan memberikan saran perbaikan;
3. Menghindari benturan kepentingan, tumpang tindih dan/atau pertentangan antara satu kebijakan dengan kebijakan lainnya;
4. Memantau jatuh tempo ketentuan internal dan menyampaikan penjelasan/arahan kepada unit kerja terkait tindakan selanjutnya;
5. Koordinasi antar departemen terkait penerapan produk dan/atau aktivitas baru;
6. Meminta dokumen, laporan dan penjelasan dari Departemen terkait untuk mempercepat implementasi produk;
7. Memantau kesiapan penyerahan produk kepada Regulator.
8. Memantau alur dan kemajuan dari produk yang telah diimplementasi untuk memastikan efektivitas peluncuran produk.

Selama tahun 2023, *Policy & Product Committee (Non-Credit)* mengadakan rapat sebanyak 2 (dua) kali.

POLICY COMMITTEE

Policy Committee adalah komite yang bertugas membantu manajemen melaksanakan penerapan prinsip-prinsip tata kelola, khususnya dalam memantau kebijakan Bank dan memastikan kesesuaian terhadap peraturan yang berlaku serta kebijakan bank induk antara lain:

- a. Mengakselerasi koordinasi antar departemen yang terkait dalam penyusunan/revisi suatu kebijakan (khususnya yang bersifat segera) sehingga rekomendasi dapat segera disampaikan kepada penyetuju kebijakan;
- b. Menghindari benturan kepentingan, tumpang tindih dan/atau pertentangan antara satu kebijakan dengan kebijakan lainnya;
- c. Membantu Direksi dalam mengkaji efektivitas ketentuan internal dan memberikan saran perbaikan;
- d. Memberikan saran kepada Direksi untuk penyusunan/revisi ketentuan internal tertentu;
- e. Memantau perkembangan pengkinian ketentuan internal sesuai dengan tenggat waktu yang ditetapkan;
- f. Memantau jatuh tempo ketentuan internal dan menyampaikan penjelasan/arahan kepada unit kerja terkait tindakan selanjutnya;

Authority, Duties and Responsibilities of the Committee are:

1. Accelerate the inter-departmental coordination related to the establishment/revision of a policy (especially the immediate ones) so that recommendations can be immediately delivered to the policy approver;
2. Assist the Board of Directors in assessing the effectiveness of internal regulation and provide suggestions for improvement;
3. Avoid conflict of interest, overlaps and/or conflicts between one policy and another;
4. Monitor the maturity of internal regulation and submit explanations/directions to the relevant work units for further action;
5. Inter-departmental coordination related to the implementation of new product and/or activities;
6. Request documents, reports and explanation from respective Department to accelerate product implementation;
7. Monitor the readiness of product submission to the Regulator.
8. Monitor the flow and its progress upon product implementation to ensure effectiveness of product launching

Throughout 2023, Policy & Product Committee (Non-Credit) held 2 (two) meetings.

POLICY COMMITTEE

Policy Committee is a committee responsible for assisting the management in implementing the principles of Good Corporate Governance, especially in monitoring The Bank's policies and ensuring the adherence towards prevailing regulations as well as the parent bank's policies, among others:

- a. Accelerate the interdepartmental coordination related to the establishment/revision of a policy (especially the immediate ones) so that recommendations can be immediately delivered to the policy approver;
- b. Avoid conflict of interest, overlaps and/or conflicts between one policy and another;
- c. Assist the Board of Directors in assessing the effectiveness of internal regulation and provide suggestions for improvement;
- d. Provide suggestions to the Board of Directors for the establishment/revision of certain internal regulation;
- e. Monitor the progress of updating the internal regulation in accordance with established deadlines;
- f. Monitor the maturity of internal regulation and submit explanations/directions to the relevant work units for further action;

- g. Mengkaji ketentuan internal level 1 dan level 2, dan merekomendasikan penerbitan dan/atau pencabutannya sepanjang dipandang tepat;
- h. Dalam kondisi tertentu, ketentuan internal level 3 dapat dibahas pada rapat komite dengan persetujuan ketua komite terlebih dahulu.

Selama tahun 2023, *Policy Committee* mengadakan rapat sebanyak 4 (empat) kali.

KOMITE KEPATUHAN DAN ANTI PENCUCIAN UANG

Untuk mengimplementasikan prinsip GCG, serta menerapkan budaya kepatuhan dan anti pencucian uang yang kuat. Pembentukan komite ini adalah untuk mengawasi risiko-risiko kepatuhan dan anti pencucian uang Bank, untuk memastikan bahwa manajemen Bank memahami risiko-risiko kepatuhan dan anti pencucian uang yang mungkin dihadapi, dan memiliki kebijakan dan prosedur yang tepat serta tindakan untuk mengelola risiko tersebut.

Komite meninjau tindakan yang diambil untuk memastikan sistem kepatuhan dan anti pencucian uang yang kuat dan konsisten diterapkan, menciptakan budaya kepatuhan yang tinggi, dan membantu Direksi untuk mengurangi potensi permasalahan di area kepatuhan dan anti pencucian uang.

Tujuan Komite Kepatuhan dan Anti Pencucian Uang adalah untuk membantu Direksi dalam memenuhi tanggung jawab pengawasannya terkait dengan:

- a. Kepatuhan dan anti pencucian uang Bank sesuai peraturan yang berlaku;
- b. Memberikan saran untuk pengembangan dan pelaksanaan kontrol untuk mengelola dan memantau kualitas kegiatan kepatuhan dan anti pencucian uang Bank;
- c. Mengawasi risiko kepatuhan dan anti pencucian uang di Bank;
- d. Mendorong budaya kepatuhan yang tinggi dan prinsip anti pencucian uang; dan
- e. Memberikan saran kepada Direksi mengenai kesesuaian dan efisiensi sistem pengendalian internal Bank terkait dengan kepatuhan dan anti pencucian uang.

Selama 2023, Komite Kepatuhan dan Anti Pencucian Uang mengadakan rapat sebanyak 4 (empat) kali.

- g. Review internal regulation level 1 and level 2, and recommend the issuance and/or revocation when deemed appropriate;
- h. Under certain conditions, internal regulation level 3 may be discussed at committee meetings with prior approval from the committee chairman.

Throughout 2023, the Policy Committee held 4 (four) meetings.

COMPLIANCE AND AML COMMITTEE

To implement the GCG principles, compliance culture, and robust anti money laundering (AML). The objective of this committee is to observe the risk of compliance and AML in The Bank, to ensure that The Bank's management understands the risk of compliance and AML to which The Bank may be exposed, and to have in place appropriate policies and procedures as well as actions to manage such risks.

The committee reviews the actions taken to ensure a robust and consistent compliance and AML system is in place, promote a high compliance culture, and assist the Board of Directors to mitigate the risk of compliance and AML.

The purpose of the Compliance and AML Committee is to assist the Board of Directors in fulfilling their oversight responsibilities related to:

- a. The Bank's compliance and AML with regulatory requirements;
- b. Providing advice for the development and implementation of controls to manage and monitor The Bank's compliance and AML activities;
- c. Overseeing the risk of compliance and AML in The Bank;
- d. Promoting a high compliance culture and AML principle; and
- e. Providing advice to the Board of Directors on the suitability and efficiency of The Bank's internal control system related to compliance and AML.

Throughout 2023, the Compliance and AML Committee held 4 (four) meetings.

KOMITE PENGARAH TEKNOLOGI INFORMASI

Komite Pengarah Teknologi Informasi (TI) bertanggung jawab memberikan rekomendasi kepada Direksi paling sedikit terkait dengan:

- Rencana Strategis Teknologi Informasi yang sejalan dengan rencana korporasi Bank.
- Kebijakan, Standar, dan Prosedur Teknologi Informasi.
- Kesesuaian antara rencana pengembangan TI dan rencana strategis Teknologi Informasi.
- Kesesuaian antara pelaksanaan pengembangan Teknologi Informasi dan rencana pengembangan Teknologi Informasi.
- Kesesuaian antara TI dengan kebutuhan sistem informasi manajemen serta kebutuhan kegiatan usaha Bank;
- Efektivitas langkah-langkah dalam meminimalkan risiko atas investasi Bank pada sektor TI agar investasi Bank pada sektor Teknologi Informasi memberikan kontribusi terhadap pencapaian tujuan bisnis;
- Pemantauan atas kinerja Teknologi Informasi dan upaya peningkatan kinerja Teknologi Informasi;
- Upaya penyelesaian berbagai masalah terkait Teknologi Informasi yang tidak dapat diselesaikan oleh satuan kerja pengguna dan penyelenggara Teknologi Informasi secara efektif, efisien, dan tepat waktu; dan
- Kecukupan dan alokasi sumber daya terkait Teknologi Informasi yang dimiliki Bank.
- RSTI disampaikan paling lambat akhir bulan November sebelum periode awal RSTI dimulai
- Evaluasi atas efektifitas biaya Teknologi Informasi terhadap pencapaian manfaat yang direncanakan.

Selama 2023, Komite Pengarah Teknologi Informasi mengadakan rapat sebanyak 4 (empat) kali.

DISCIPLINARY COMMITTEE

Untuk menjamin kepercayaan masyarakat terhadap integritas Bank, maka Bank membentuk *Disciplinary Committee*. Komite ini memiliki satuan kerja khusus dan tim kerja disiplin, yang bertugas untuk melakukan investigasi dan mengajukan sanksi kepada pelanggar peraturan dan Kode Etik Bank. Selama 2023, *Disciplinary Committee* mengadakan rapat sebanyak 6 (enam) kali.

LIABILITY RECOGNITION COMMITTEE

Liability Recognition Committee (LRC) adalah komite yang bertugas untuk mendukung mekanisme akuntabilitas dan pelaksanaan tindakan perbaikan, menggerakkan penerapan manajemen risiko dan meningkatkan kepatuhan dengan kebijakan internal dan peraturan yang berlaku sebagai bagian dari penguatan kontrol internal. Selama 2023, LRC mengadakan rapat sebanyak 3 (tiga) kali.

INFORMATION TECHNOLOGY STEERING COMMITTEE

Information Technology (IT) Steering Committee is responsible for providing recommendations to the Board of Directors at the very least related to:

- Information Technology Strategic Plan in line with the Bank's corporate plan.
- Information Technology Policies, Standards and Procedures.
- Conformity between the IT development plan and the Information Technology strategic plan.
- Compatibility between the implementation of Information Technology development and Information Technology development plans.
- Suitability of IT and the needs in Management Information System as well as Bank's needs;
- The effectiveness of measures in minimizing Bank investment risk in the IT sector, so that Bank's IT sector contributes to the achievement of the Bank's business objectives;
- Monitoring IT performance and improvement measures;
- Measures to solve various problems related to IT which cannot be solved by user working unit and IT providers in an effective, efficient and timely manner; and
- Adequacy and allocation of resources related to Information Technology owned by the Bank.
- RSTI submitted no later than the end of November before the initial RSTI period begins
- Evaluation of the cost effectiveness of Information Technology in achieving the planned benefits.

Throughout 2023, Information Technology Steering Committee conducted 4 (four) meetings.

DISCIPLINARY COMMITTEE

The Bank formed a Disciplinary Committee to ensure public trust in the integrity of The Bank. The committee has a special working unit and a disciplinary working team, which conduct investigations and submit sanctions to violators of The Bank's rules and Code of Conduct. Throughout 2023, the Disciplinary Committee conducted 6 (six) meetings.

LIABILITY RECOGNITION COMMITTEE

Liability Recognition Committee (LRC) is a committee responsible for supporting the mechanisms for accountability and remediation, driving the risk management implementation and improving the compliance of internal policies and regulations as part of strengthening internal controls. Throughout 2023, LRC held 3 (three) meetings.

Sekretaris Perusahaan

Corporate Secretary

Sekretaris Perusahaan merupakan salah satu organ pendukung yang berperan penting dalam memfasilitasi komunikasi antar organ Bank, hubungan antara Bank dengan pemegang saham, regulator, dan pemangku kepentingan lainnya. Fungsi Sekretaris Perusahaan Bank diemban oleh Departemen *Strategy Management and Investor Relation* (SMIR).

FUNGSI SEKRETARIS PERUSAHAAN

Sekretaris Perusahaan memiliki fungsi sebagai berikut:

- Bertindak sebagai penghubung antara Direksi dengan Dewan Komisaris, pemegang saham, masyarakat, dan media massa termasuk mewakili Bank dalam berkomunikasi dengan masyarakat, regulator, lembaga atau asosiasi lain yang berkaitan dengan Bank.
- Bertindak sebagai administrator yang mengelola dokumen Bank.
- Mempersiapkan Rapat Umum Pemegang Saham (RUPS).
- Mengkoordinasikan dan menghadiri rapat Direksi dan rapat komunikasi antara Dewan Komisaris dan Direksi.
- Mempersiapkan undangan, jadwal, agenda, materi dan menyusun risalah rapat.
- Mengelola dan menyiapkan dokumen yang terkait dengan kegiatan Bank meliputi dokumen RUPS, risalah rapat Direksi, risalah rapat gabungan antara Dewan Komisaris dan Direksi, daftar pemegang saham, daftar khusus perusahaan dan dokumen-dokumen penting Bank lainnya.
- Mencatat daftar khusus berkaitan dengan Dewan Komisaris dan keluarganya serta Direksi dan keluarganya baik dalam Bank maupun afiliasinya yang mencakup kepemilikan saham, hubungan bisnis, dan peranan lain yang menimbulkan benturan kepentingan dengan kepentingan Bank.
- Menentukan kriteria mengenai jenis dan materi informasi yang dapat disampaikan kepada pemangku kepentingan, termasuk informasi yang dapat disampaikan sebagai dokumen publik.
- Memberikan informasi relevan yang dibutuhkan oleh pemangku kepentingan.
- Merencanakan dan melaksanakan kegiatan Bank yang melibatkan pihak eksternal yang bertujuan untuk membentuk citra Bank.
- Memelihara dan memperbarui informasi tentang Bank yang disampaikan kepada pemangku kepentingan baik melalui situs dan media informasi lainnya.

Corporate Secretary is one of the supporting organs taking an important role in facilitating The Bank's inter-organ communications, the relationship between The Bank and its shareholders, regulators, and other stakeholders. The Bank's Corporate Secretary function is carried out by the Strategy Management and Investor Relation (SMIR) Department.

CORPORATE SECRETARY FUNCTION

Corporate Secretary has the following functions:

- As a liaison between the Board of Directors and Board of Commissioners, shareholders, public, and mass media, including representing The Bank in communicating with the public, regulators, other institutions or associations related to The Bank.
- As an administrator who manages The Bank's documents.
- Prepare the General Meeting of Shareholders (GMS).
- Coordinate and attend the Board of Directors' meetings and communication meetings between the Board of Commissioners and Board of Directors.
- Prepare invitations, schedules, agendas, materials, and drafting minutes of meetings (MoM).
- Manage and prepare documents related to The Bank's activities including the GMS documents, MoM of the Board of Directors, minutes of joint meetings between the Board of Commissioners and Board of Directors, shareholders register, special register, and other important documents of The Bank.
- Record a special register with regard to the Board of Commissioners and their families as well as the Board of Directors and their families within The Bank, and their affiliates that include share ownership, business relation and other roles, which may create a conflict of interest with The Bank's interests.
- Decide on criteria for the types and materials of information that can be submitted to stakeholders, including information that may be disseminated as public documents.
- Provide relevant information required by the stakeholders.
- Plan and implement The Bank's activities that involve external parties with the aim to establish The Bank's image.
- Maintain and update information on The Bank to be submitted to stakeholders, both through the website and other information media.

TUGAS DAN TANGGUNG JAWAB FUNGSI SEKRETARIS PERUSAHAAN

Tugas dan tanggung jawab Sekretaris Perusahaan adalah sebagai berikut:

- Mengkoordinasikan kegiatan internal.
- Mengkoordinasikan rapat bulanan Dewan Komisaris dan Direksi.
- Mengkoordinasikan RUPS Tahunan dan RUPS Luar Biasa (LB).
- Mengkoordinasikan rapat kerja/rapat koordinasi Bank.
- Merencanakan dan melaksanakan kegiatan *Corporate Social Responsibility* (CSR) Bank.
- Mengkoordinasikan penanganan *legal* Bank baik internal maupun eksternal.
- Melaksanakan aktivitas *investor relation*.
- Memfasilitasi pengiriman dokumen/informasi penting dari pemegang saham.
- Menyiapkan Laporan Tahunan dan Laporan Keberlanjutan Bank.
- Menyusun Rencana Bisnis Bank (RBB) dan Rencana Aksi Keuangan Berkelanjutan (RAKB), serta memastikan realisasi dari rencana bisnis tersebut agar sejalan dengan yang telah disampaikan kepada regulator.

KUALIFIKASI

Dalam melaksanakan tugasnya, sesuai dengan Peraturan Otoritas Jasa Keuangan (POJK) No. 35/POJK.04/2014, maka Sekretaris Perusahaan wajib memiliki pengetahuan mengenai peraturan yang berkaitan dengan Bank, hubungan masyarakat, keterampilan administratif, dan pengalaman yang mendukung pelaksanaan tugasnya.

DUTIES AND RESPONSIBILITIES OF CORPORATE SECRETARY FUNCTION

The duties and responsibilities of the Corporate Secretary are as follows:

- Coordinate internal activities.
- Coordinate monthly meetings of the Board of Commissioners and Board of Directors.
- Coordinate the Annual GMS and Extraordinary GMS.
- Coordinate The Bank's work/coordination meetings.
- Plan and carry out The Bank's Corporate Social Responsibility (CSR) activities.
- Coordinate The Bank's internal and external legal handlings.
- Conduct investor relation activities.
- Facilitate the delivery of important documents/information from shareholders.
- Prepare The Bank's Annual Report and Sustainability Report.
- Prepare The Bank's Business Plan (RBB) and Sustainable Financial Action Plan (RAKB), and ensure the realization of the business plan is in line with what has been submitted to regulators.

QUALIFICATION

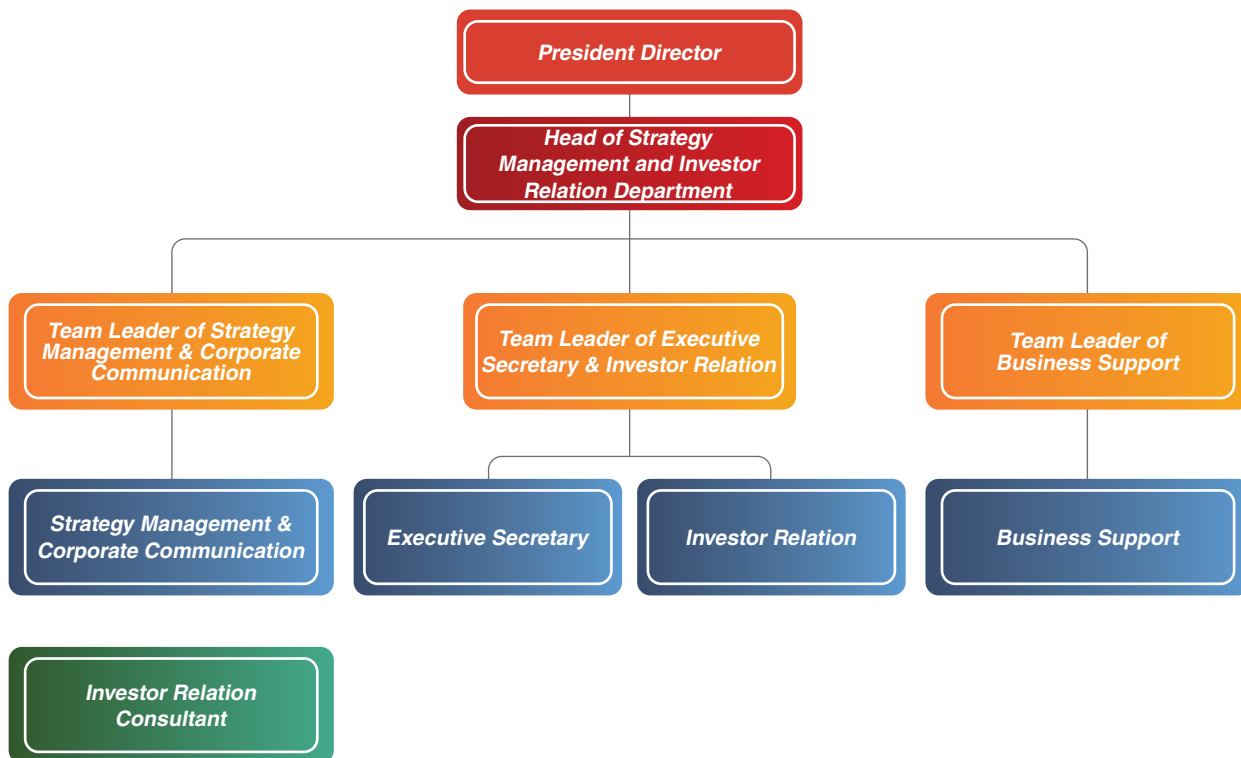
In carrying out their duties, pursuant to the Financial Services Authority Regulation (POJK) No. 35/POJK.04/2014, the Corporate Secretary should have the knowledge on regulations related to The Bank, public relations, administrative skills, and experiences that support the implementation of their duties.

PENGANGKATAN DAN PEMBERHENTIAN SEKRETARIS PERUSAHAAN

Sekretaris Perusahaan diangkat dan diberhentikan oleh Direksi.

APPOINTMENT AND DISMISSAL OF CORPORATE SECRETARY

The Corporate Secretary is appointed and dismissed by the Board of Directors.



PEJABAT PELAKSANA FUNGSI SEKRETARIS PERUSAHAAN

Berdasarkan Surat Keputusan Direksi No. 020A/KPTS.DIR/ICBC.IND/2017 tanggal 30 November 2017, Bank telah menunjuk Kepala Departemen SMIR sebagai Pejabat Pelaksana Fungsi Sekretaris Perusahaan.

EXECUTIVE IN CHARGE OF CORPORATE SECRETARY FUNCTION

Based on the Board of Directors Decree No. 020A/KPTS.DIR/ICBC.IND/2017 dated November 30, 2017, The Bank has appointed the Head of SMIR Department as Executive in Charge of Corporate Secretary Function.

Renault Yufarsim

Kepala Departemen *Strategy Management and Investor Relation* (SMIR) & Pejabat Pelaksana Fungsi Sekretaris Perusahaan
Head of Strategy Management and Investor Relation (SMIR) Department & Executive in Charge of Corporate Secretary Function

Profil Renault Yufarsim sebagai Pejabat Pelaksana Fungsi Sekretaris Perusahaan dapat dilihat pada bagian Profil Pejabat Eksekutif dalam Bab “Profil Perusahaan” di Laporan Tahunan Keberlanjutan 2023 ini.

Profile of Renault Yufarsim as Executive in Charge of Corporate Secretary Function can be seen in the Executive Officer Profile section in the “Company Profile” of this 2023 Annual Sustainability Report.

LAPORAN SINGKAT PELAKSANAAN TUGAS TAHUN 2023

Selama tahun 2023, Sekretaris Perusahaan telah melaksanakan tugas dan tanggung jawabnya, antara lain:

- Memfasilitasi pengiriman dan penerimaan sebanyak 308 (tiga ratus delapan) dokumen/ informasi penting yang berkenaan dengan pemegang saham.
- Menerjemahkan lebih kurang 438 (empat ratus tiga puluh delapan) halaman dokumen dari bahasa asing ke Bahasa Indonesia atau sebaliknya dengan tujuan menjembatani komunikasi antara para pemangku kepentingan.
- Melaksanakan tugas-tugas dalam 43 (empat puluh tiga) rapat yang berkaitan dengan Dewan Komisaris, Direksi, dan komite, dengan antara lain melakukan penjadwalan, pengaturan agenda, koordinasi, persiapan, kehadiran, rekaman, risalah rapat dan distribusi material.
- Memimpin inisiatif tanggung jawab sosial Bank dengan beberapa kegiatan CSR, diantaranya 2 (dua) kali kegiatan donor darah, 2 (dua) kegiatan Go Green dengan Yayasan Buddha Tzu Chi Indonesia, dan 1 (satu) kegiatan Penyaluran Dana CSR melalui beberapa panti asuhan dan panti werdha.
- Menjadi mitra yang aktif dengan Dewan Komisaris, Direksi, dan anggota komite dalam pemenuhan kewajiban tata kelola perusahaan (misalnya: kewajiban menghadiri jumlah tertentu dari rapat).
- Melakukan pengarsipan terhadap seluruh dokumen perusahaan yang terkait dengan pemegang saham, Dewan Komisaris, dan Direksi.
- Menyampaikan laporan-laporan yang bersifat wajib secara tepat waktu kepada regulator.

PELATIHAN DAN PENGEMBANGAN KOMPETENSI

Bank memiliki kebijakan terkait pengembangan dan peningkatan kompetensi Sekretaris Perusahaan, yang dilakukan melalui berbagai pelatihan dan pendidikan dengan pendanaan sepenuhnya menjadi tanggung jawab Bank. Berikut adalah daftar pelatihan yang diikuti oleh Sekretaris Perusahaan:

BRIEF REPORT OF DUTIES IMPLEMENTATION IN 2023

Throughout 2023, the Corporate Secretary has carried out their duties and responsibilities, among others:

- Facilitating the delivery and collection of 308 (three hundred and eight) important documents/information related to shareholders.
- Translating approximately 438 (four hundred thirty eight) pages of documents from foreign language into Indonesian or vice versa, with the aim of bridging communications among stakeholders.
- Implementing duties in 43 (forty three) meetings related to the Board of Commissioners, Board of Directors, and committees, including scheduling, agenda arrangement, coordination, preparation, attendance list, recording, minutes of meeting, and distribution of materials.
- Leading The Bank's social responsibility initiatives by launching several CSR activities, which are 2 (two) blood donation activities, 2 (two) Go Green activity with the Buddhist Tzu Chi Foundation, and 1 (one) activity regarding distribute CSR Funds through several orphanage and nursing home.
- Becoming an active partner with the Board of Commissioners, Board of Directors, and members of committees in fulfilling the corporate governance requirements (for instance: the requirement to attend certain number of meetings).
- Archiving all corporate documents in relation to shareholders, Board of Commissioners, and Board of Directors.
- Submitting mandatory reports in a timely manner to the regulators.

TRAINING AND COMPETENCY DEVELOPMENT

The Bank has its own policy related to the development and improvement of Corporate Secretary competency. This is done through various training and education programs with full funding being the responsibility of The Bank. The training programs participated by the Corporate Secretary are as follows:

Materi Pendidikan dan Pelatihan Education and Training Material	Tempat Place	Tanggal Date	Penyelenggara Organizer
CEO BANKING FORUM : LEADERSHIP SHARING - Menyambut Tahun Baru dengan lebih optimis	Offline	9-Jan-23 9-Jan-23	IBI - Perbanas
Organization Development - Critical Position	Offline	17-Jan-23 17-Jan-23	PT. Bank ICBC Indonesia
The Latest Fraud Trends in Banking and how effective the Industry in combating these types of Fraud (Refreshment Risk Mgmt Certification)	Daring Online	27-Jan-23 27-Jan-23	BSMR
Kredit Sindikasi	Offline	17-Mar-23 17-Mar-23	Asanka Kreasi Mandiri

Materi Pendidikan dan Pelatihan Education and Training Material	Tempat Place	Tanggal Date	Penyelenggara Organizer
Fungsi Kepatuhan Bank dan POJK No. 12/POJK.03/2021 tentang Bank Umum	Offline	28-Apr-23 28-Apr-23	PT Bank ICBC Indonesia
Socialization of Anti Fraud Strategy Policy	Daring Online	4-May-23 4-May-23	PT Bank ICBC Indonesia
Socialization of Anti Bribery Management System (ABMS) Policy	Daring Online	10-Mei-23 10-May-23	PT Bank ICBC Indonesia
Socialization fo POJK No. 6 tentang Perlindungan Konsumen dan Masyarakat di Sektor Jasa	Daring Online	17-Mei-23 17-May-23	PT Bank ICBC Indonesia
China Training Program	Offline	4-Jun-23 4-Jun-23	PT Bank ICBC Indonesia
Penerimaan Kunjungan Benchmark Kearsipan	Offline	27-Jul-23 27-Jul-23	BANK INDONESIA
Socialization of Financial Authorization and Operasional Expenses Standard Policy&Procedure Update 2023 - KPNO	Daring Online	25-Ags-23 25-Aug-23	PT Bank ICBC Indonesia
Project Management Study	Offline	24-Okt-23 24-Oct-23	PT Bank ICBC Indonesia
Socialization Security Management and Basic Fire Fighting	Daring Online	20-Nov-23 20-Nov-23	PT Bank ICBC Indonesia
Breaking The Wall	Offline	23-Nov-23 23-Nov-23	PT Bank ICBC Indonesia
END POINT SECURITY	Daring Online	24-Nov-23 24-Nov-23	PT Bank ICBC Indonesia
Sustainable Finance for Executive Level	Offline	24-Nov-23 24-Nov-23	LPPI
ICBC Value Refreshment Campaign	Daring Online	29-Nov-23 29-Nov-23	PT Bank ICBC Indonesia
CARAL	Daring Online	30-Nov-23 30-Nov-23	PT Bank ICBC Indonesia
Information Security Awareness	Daring Online	30-Nov-23 30-Nov-23	PT Bank ICBC Indonesia

PROGRAM KERJA SEKRETARIS PERUSAHAAN TAHUN 2024

Sekretaris Perusahaan telah menyusun program kerja yang akan dilaksanakan di tahun 2024, antara lain:

- Menerbitkan ketentuan-ketentuan baru maupun memperbaiki peraturan-peraturan yang telah ada guna meningkatkan tata kelola perusahaan ke tingkat yang lebih baik lagi.
- Meluncurkan kegiatan tanggung jawab sosial sesuai rencana.
- Meningkatkan efektivitas pelaksanaan tugas dan tanggung jawab melalui perbaikan prosedur.
- Memastikan kelancaran komunikasi dengan para pemangku kepentingan.
- Memastikan kepatuhan terhadap pengarsipan seluruh dokumen perusahaan yang terkait dengan pemegang saham, Dewan Komisaris, dan Direksi.
- Menyampaikan laporan-laporan yang bersifat wajib secara tepat waktu kepada regulator.
- Melanjutkan pekerjaan yang telah dikerjakan pada 2023.

CORPORATE SECRETARY WORK PROGRAM IN 2024

The Corporate Secretary has prepared work programs to be implemented in 2024, among others:

- Issuing new provisions and updating existing regulations to reach a higher level of corporate governance.
- Launching CSR activities according to the plan.
- Increasing the effectiveness of duties and responsibilities implementation through improvement in the procedures.
- Ensuring smooth communication with stakeholders.
- Ensuring the compliance with the archiving of all corporate documents in relation to shareholders, Board of Commissioners, and Board of Directors.
- Submitting mandatory reports in a timely manner to the regulators.
- Continuing the tasks executed in 2023.

Audit Internal

Internal Audit

VISI

Menjadi penyedia jasa pemberi jaminan yang berkomitmen dan dapat dipercaya di industri perbankan dan berperan sebagai *strategic partner* di organisasi, dengan auditor internal yang berkualitas dan berpengalaman.

MISI

Untuk memberikan keyakinan yang memadai dan jasa konsultasi, melalui aktivitas audit yang independen dan objektif yang dirancang untuk memberikan nilai tambah dan meningkatkan proses tata kelola, manajemen risiko, dan sistem pengendalian internal Bank, dengan memastikan kepatuhan Bank terhadap regulasi serta kebijakan dan prosedur yang berlaku.

FUNGSI DEPARTEMEN AUDIT INTERNAL

Bank memiliki fungsi audit internal yang dilaksanakan oleh Departemen Audit Internal (SKAI) dan dipimpin oleh seorang Kepala Departemen.

SKAI Bank bersifat independen dan bertanggung jawab langsung kepada Presiden Direktur, serta memiliki jalur komunikasi langsung kepada Dewan Komisaris melalui Komite Audit untuk menginformasikan hal-hal signifikan yang berhubungan dengan aktivitas audit internal.

SKAI memeriksa efektivitas sistem pengendalian internal, termasuk kepatuhan terhadap hukum dan peraturan yang berlaku, kecukupan proses tata kelola, manajemen risiko, dan sistem pengendalian internal Bank, serta memberikan rekomendasi untuk perbaikan di area Bank yang membutuhkan.

Rencana kerja SKAI 2023 disetujui oleh Presiden Direktur dan Dewan Komisaris dengan mempertimbangkan rekomendasi dari Komite Audit. Rencana tersebut dikaji ulang secara berkala untuk memastikan relevansinya dengan kondisi dan risiko bisnis Bank.

VISION

To become a committed and trusted assurance provider in banking industry and plays the role of a strategic partner in the organization with qualified and experienced internal auditor professionals.

MISSION

To provide reasonable assurance and consultancy services, through an independent and objective internal audit activity designed to provide added value and improve The Bank's governance, risk management, and internal control system, by ensuring The Bank's compliance with regulations and prevailing policies and procedures.

THE FUNCTIONS OF INTERNAL AUDIT DEPARTMENT

The Bank has internal audit function carried out by the Internal Audit Department (IAD) and led by a Head of Department.

The Bank's IAD has independent functions with direct responsibility to the President Director, and has direct communication channels to the Board of Commissioners through the Audit Committee to inform significant matters related with activities of the internal audit.

IAD examines the effectiveness of internal control system, including compliance with prevailing laws and regulations, adequacy of governance processes, risk management, and The Bank's internal control system, as well as provides recommendations for The Bank's areas in need of improvement.

IAD's work programs in 2023 were approved by the President Director and the Board of Commissioners by considering the recommendations of Audit Committee. The plans were reviewed periodically to ensure their relevance to The Bank's business conditions and risks.

PIAGAM AUDIT INTERNAL

SKAI memiliki Piagam Audit Internal sebagai pedoman kerja yang telah disahkan oleh Presiden Direktur setelah mendapat persetujuan dari Dewan Komisaris, dengan revisi terakhir yang berlaku efektif pada 29 Desember 2023.

Piagam ini merupakan dokumen resmi yang mendefinisikan tujuan, kewenangan dan tanggung jawab aktivitas audit internal. Kedudukan, kewenangan dan tanggung jawab yang dinyatakan secara formal dalam Piagam Audit Internal telah sesuai dengan Peraturan Otoritas Jasa Keuangan (POJK) No. 1/POJK.03/2019 yang berlaku sejak 29 Januari 2019 perihal Penerapan Fungsi Audit Internal pada Bank Umum dan POJK No. 56/POJK.04/2015 tentang Pembentukan dan Pedoman Penyusunan Piagam Audit Internal serta *best practice* yang mengacu pada *International Professional Practice Framework (IPPF)* oleh *Institute of Internal Auditor (IIA)*.

WEWENANG, TUGAS, DAN TANGGUNG JAWAB DEPARTEMEN AUDIT INTERNAL

SKAI memiliki wewenang sebagai berikut:

- Memperoleh akses yang tidak terbatas pada seluruh fungsi, kegiatan, catatan, sistem informasi manajemen, personel dan aset serta kewajiban Bank, baik di kantor pusat maupun cabang, agenda dan risalah rapat manajemen dan kertas kerja auditor eksternal, yang diperlukan terkait tugas dan fungsi SKAI.
- Melakukan komunikasi langsung dengan dan mempunyai akses kepada Dewan Komisaris, Direksi, dan Komite Audit, dengan penyelenggaraan rapat secara insidental.
- Mengalokasikan sumber daya, menetapkan jadwal, memilih subjek, menentukan ruang lingkup pemeriksaan dan menerapkan teknik yang dibutuhkan untuk memenuhi tujuan audit.
- Memperoleh bantuan yang dibutuhkan dari unit organisasi yang diaudit, serta layanan khusus lainnya, baik dari dalam maupun luar organisasi.
- Melakukan koordinasi kegiatan dengan pihak terkait lainnya seperti Departemen Kepatuhan, Departemen Manajemen Risiko, auditor eksternal, dan konsultan hukum.
- Mengikuti dan mengamati rapat yang bersifat strategi, seperti *Asset and Liability Committee (ALCO)* dan *Risk Management Committee (RMC)* atau forum pengambilan keputusan, tanpa memiliki hak suara.
- Mengatur lebih lanjut kebijakan, prosedur dan panduan mengenai audit internal.

INTERNAL AUDIT CHARTER

IAD has established an Internal Audit Charter as a working guideline as approved by the President Director after obtaining the approval from the Board of Commissioners, with the latest revision effectively applied on December 29, 2023.

This charter is an official document that defines the objectives, authorities and responsibilities of the internal audit activities. The positions, authorities and responsibilities that formally stated in the Internal Audit Charter are in conformity with the Financial Services Authority Regulation (POJK) No. 1/POJK.03/2019, which was effective since January 29, 2019 concerning the Implementation of Internal Audit Function for Commercial Banks and POJK No. 56/POJK.04/2015 concerning the Establishment and Guidelines for the Formulation of the Internal Audit Charter as well as with the best practices that refer to the International Professional Practice Framework (IPPF) by the Institute of Internal Auditors (IIA).

AUTHORITIES, DUTIES, AND RESPONSIBILITIES OF INTERNAL AUDIT DEPARTMENT

IAD has the following authorities:

- Acquiring unlimited access to all functions, activities, records, management information systems, personnel and assets as well as obligations of The Bank, both at the head office and branches, agenda and minutes of meetings of management and working papers of external auditors, which are required to support the duties and functions of IAD.
- Communicating directly to and having access to the Board of Commissioners, Board of Directors, and the Audit Committee, by holding meetings incidentally.
- Allocating resources, setting schedules, selecting subjects, determining the scope of audit, and applying techniques needed to meet the audit objectives.
- Obtaining the required assistance from the audited organizational units, as well as other special services, both within and outside the organization.
- Coordinating activities with other related parties such as the Compliance Department, Risk Management Department, external auditors, and legal consultants.
- Attending and observing strategic meetings, such as the Asset and Liability Committee (ALCO) and Risk Management Committee (RMC) or decision-making forum, without voting rights.
- Managing further the policies, procedures, and guidelines regarding internal audit.

SKAI tidak berwenang untuk:

- Melaksanakan tugas operasional Bank.
- Melaksanakan, menginisiasi, atau menyetujui transaksi akuntansi/operasional atau aktivitas non-operasional lainnya di luar audit yang dapat memengaruhi independensi termasuk apabila aktivitas tersebut mensyaratkan persetujuan SKAI sebelum dijalankan baik sementara maupun permanen.
- Mengarahkan aktivitas dari karyawan Bank yang tidak dipekerjakan oleh SKAI, kecuali karyawan tersebut telah ditugaskan sebagai tim pemeriksa atau diperbantukan di SKAI.

SKAI memiliki tugas antara lain:

- Membantu Presiden Direktur dan Dewan Komisaris dalam melakukan tugas pengawasan dengan cara menjabarkan perencanaan, pelaksanaan maupun pemantauan hasil audit.
- Membuat analisis dan penilaian di bidang keuangan, akuntansi, operasional dan kegiatan lainnya melalui pemeriksaan langsung dan pengawasan secara tidak langsung.
- Mengidentifikasi segala kemungkinan untuk memperbaiki dan meningkatkan efisiensi penggunaan sumber daya dan dana.
- Memberikan saran perbaikan dan informasi yang objektif tentang kegiatan yang diperiksa pada semua tingkatan manajemen.
- Menyampaikan laporan audit kepada Presiden Direktur dan Dewan Komisaris melalui Komite Audit dengan tembusan kepada Direktur Kepatuhan.
- Memantau pelaksanaan tindak lanjut yang dilakukan oleh pihak yang diaudit atas usulan langkah perbaikan yang telah disetujui.
- Membuat laporan pelaksanaan kegiatan audit dan pokok-pokok hasil audit, termasuk informasi rahasia dari hasil audit. Laporan tersebut ditandatangani oleh Presiden Direktur dan Komisaris Independen yang menjadi Ketua Komite Audit. Laporan harus dibuat untuk periode yang masing-masing berakhir pada 30 Juni dan 31 Desember, dan disampaikan kepada OJK paling lambat 1 (satu) bulan sejak berakhirnya periode pelaporan.
- Segera membuat laporan khusus atas setiap temuan audit internal yang diperkirakan dapat membahayakan kelangsungan usaha Bank. Laporan tersebut harus ditandatangani oleh Presiden Direktur dan Komisaris Independen yang menjadi Ketua Komite Audit. Laporan harus disampaikan segera ke OJK paling lambat 3 (tiga) hari kerja setelah adanya informasi temuan audit tersebut.

IAD is not authorized to:

- Carry out operational tasks of The Bank.
- Implement, initiate, or approve accounting/operational transactions or other non-operational activities outside the audit that may impair the independency, including if such activity requires the approval of IAD prior to its temporary or permanent execution.
- Direct the activities of The Bank employees who are not employed by the IAD, unless the employee has been assigned as a review team or seconded to IAD.

IAD has the following tasks:

- Assist the President Director and the Board of Commissioners in conducting supervision by outlining the plan, implementation and monitoring of audit results.
- Prepare analysis and assessments in finance, accounting, operations and other activities through direct inspection and indirect supervision.
- Identify all possibilities to remediate and improve the efficient use of resources and funds.
- Provide objective advice for improvements and information on the activities examined at all levels of management.
- Submit an audit report to the President Director and the Board of Commissioners through the Audit Committee with a copy to the Compliance Director.
- Monitor the implementation of follow-up conducted by audited party on the approved remedial steps.
- Prepare a report on the implementation of internal audit activities and key points of internal audit results, including confidential information from the audit results. The report is to be signed by the President Director and Independent Commissioner as the Head of Audit Committee. The report must be made for the periods ending on June 30 and December 31 and to be submitted to OJK no later than 1 (one) month after the end of the reporting period.
- Prepare immediate special report on any internal audit findings that are expected to harm The Bank's business continuity. The report must be signed by the President Director and Independent Commissioner as the Head of Audit Committee. The report should be submitted immediately to OJK no later than 3 (three) working days after the received information of the audit findings.

Tanggung jawab SKAI adalah sebagai berikut:

- Membuat rencana audit yang fleksibel dengan menggunakan metodologi audit berbasis risiko, termasuk seluruh risiko dan masalah pengendalian yang teridentifikasi oleh manajemen dan menyampaikan rencana tersebut kepada Presiden Direktur dan Dewan Komisaris melalui Komite Audit untuk dikaji ulang dan disetujui, demikian pula dengan pengkiniannya secara periodik.
- Memberikan saran kepada Presiden Direktur terkait langkah-langkah perbaikan yang perlu diambil oleh pihak yang diaudit, termasuk mengusulkan langkah korektif dan/atau usul pengenaan sanksi apabila perlu atas pelanggaran/penyimpangan yang dilakukan oleh pihak yang diaudit.
- Memastikan kesesuaian fungsi dan aktivitas SKAI dengan penerapan fungsi audit internal pada bank umum, termasuk Standar Profesional dan Kode Etik Audit Internal yang berlaku.

RUANG LINGKUP PEKERJAAN DEPARTEMEN AUDIT INTERNAL

Ruang lingkup pekerjaan SKAI mencakup pemeriksaan atas seluruh aspek operasional Bank yang secara langsung ataupun tidak langsung dapat membahayakan kepentingan Bank dan masyarakat umum, paling sedikit mengenai:

- Efektivitas, efisiensi, dan kecukupan sistem pengendalian internal, manajemen risiko, dan tata kelola.
- Keandalan, efektivitas, integritas dari proses dan sistem manajemen informasi, termasuk relevansi, akurasi, kelengkapan, ketersediaan, serta kerahasiaan data.
- Kepatuhan terhadap ketentuan peraturan perundang-undangan.
- Kualitas kinerja Bank.

Ruang lingkup SKAI mencakup seluruh area di kantor pusat, kantor cabang, dan teknologi informasi. Prioritas penugasan audit internal dilaksanakan dengan pendekatan audit berbasis risiko. Selain itu, pelaksanaan audit insidental dilaksanakan sesuai kebutuhan Bank.

SKAI memantau tindak lanjut yang dilakukan oleh manajemen dan *auditee* atas temuan hasil audit secara bulanan. Rangkuman kegiatan SKAI dan ringkasan hasil pemeriksaan telah disampaikan kepada OJK pada setiap semester melalui laporan pelaksanaan dan pokok-pokok hasil audit internal.

Responsibilities of IAD are as follows:

- Develop a flexible audit plan using a risk-based audit methodology, including all risks and control issues identified by the management and submit the plan to the President Director and the Board of Commissioners through the Audit Committee for review and approval, as well as its periodic updating.
- Provide advice to the President Director on improvements that need to be taken by the audited parties, including suggesting corrective actions and/or proposed sanctions if necessary, for any violations/irregularities committed by the audited parties.
- Ensure the suitability of functions and activities of the IAD with the implementation of internal audit function for commercial banks, including the applicable Professional Standard and Code of Conduct of Internal Audit.

INTERNAL AUDIT DEPARTMENT SCOPE OF WORK

The scope of IAD's work covers the examination of all aspects of The Bank's operations which may directly or indirectly compromise the interests of The Bank and public, at the very least concerning:

- Effectiveness, efficiency and adequacy of the internal control system, risk management, and governance.
- Reliability, effectiveness, integrity of information management processes and systems, including relevance, accuracy, completeness, availability, and confidentiality of data.
- Compliance with statutory provisions.
- Quality of The Bank's performance.

The scope of IAD covers all areas in the head office, branch offices, and information technology. The priority of internal audit assignments is carried out with a risk-based audit approach. In addition, the implementation of ad-hoc audits is carried out according to the needs of The Bank.

IAD monitors the follow-up actions conducted by the management and the auditee over the audit findings on a monthly basis. A summary of the activities of IAD and summary of inspection results have been submitted to OJK in each semester through the report on the implementation of internal audit activities and key points of internal audit results.

PENGANGKATAN DAN PEMBERHENTIAN KEPALA DEPARTEMEN AUDIT INTERNAL

Kepala SKAI diangkat dan diberhentikan serta bertanggung jawab langsung kepada Presiden Direktur atas persetujuan Dewan Komisaris, dan selanjutnya dilaporkan kepada Otoritas Jasa Keuangan (OJK).

PEJABAT KEPALA DEPARTEMEN AUDIT INTERNAL

Berdasarkan Surat Keputusan Direksi No. 026/KPTS.DIR/ICBC.IND/2018 tanggal 5 November 2018, Bank telah menunjuk I Gde Wiyadnya sebagai Kepala Departemen Audit Internal (SKAI).

APPOINTMENT AND DISMISSAL OF INTERNAL AUDIT DEPARTMENT HEAD

Head of IAD is appointed and dismissed and directly responsible to the President Director upon approval of the Board of Commissioners, and subsequently reported to the Financial Services Authority (OJK).

HEAD OF INTERNAL AUDIT DEPARTMENT

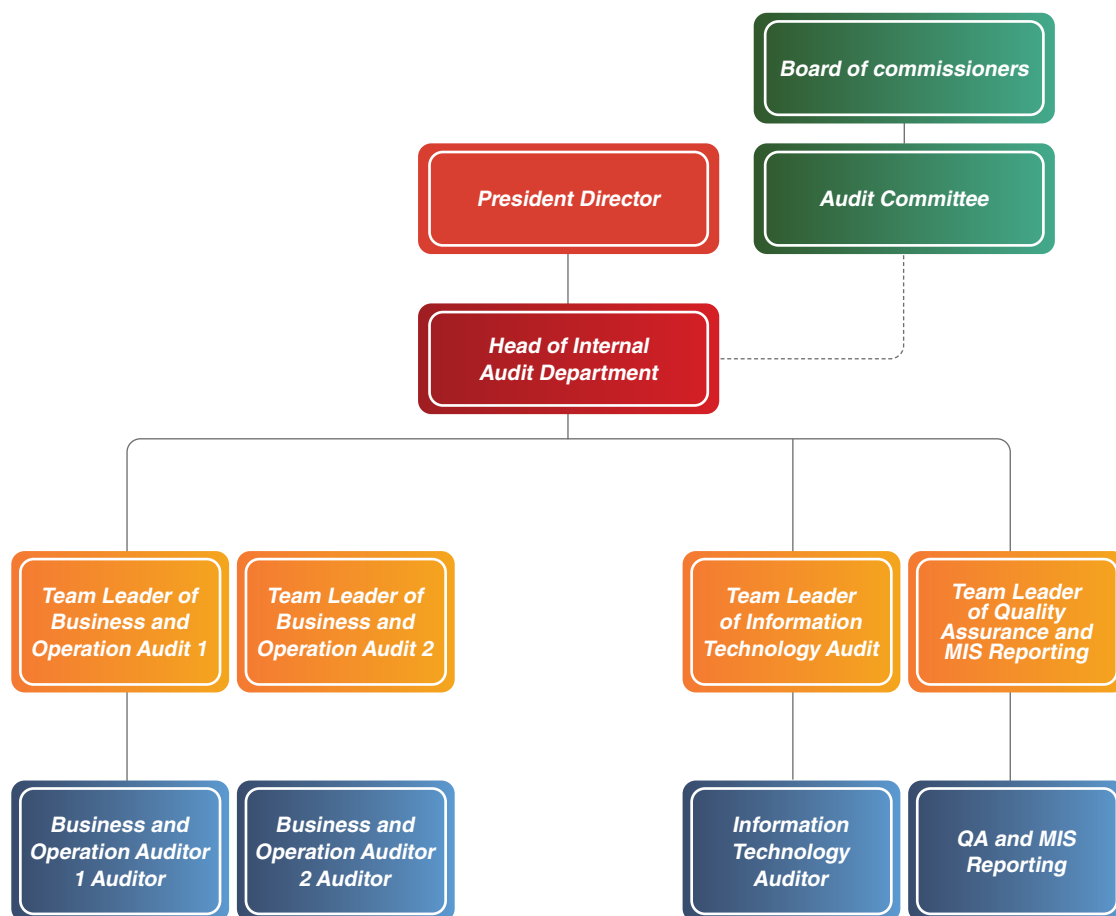
In accordance to Board of Directors Decree No. 026/KPTS.DIR/ICBC.IND/2018 dated November 5, 2018, The Bank has appointed I Gde Wiyadnya as the Head of Internal Audit Department (IAD).

I Gde Wiyadnya

Kepala Departemen Audit Internal (SKAI)
Head of Internal Audit Department (IAD)

Profil I Gde Wiyadnya sebagai Kepala SKAI dipaparkan pada bagian Profil Pejabat Eksekutif dalam Bab “Profil Perusahaan” pada Laporan Tahunan Keberlanjutan 2023 ini.

Profile of I Gde Wiyadnya as the Head of IAD is disclosed in the Executive Officer Profile section in the “Company Profile” of this 2023 Annual Sustainability Report.



Per 31 Desember 2023, jumlah karyawan Departemen Audit Internal sebanyak 13 (tiga belas) orang dengan rincian karyawan sebagai berikut:

As of December 31, 2023, the Internal Audit Department has 13 (thirteen) personnel with the following details:

Jabatan Position	Fungsi Function	Jumlah Orang Total Person(s)
Kepala Departemen Department Head	SKAI IAD	1
Ketua Tim Team Leader	Audit Teknologi Informasi Information Technology Audit	1
	Audit Bisnis & Operational 1 Business & Operational 1 Audit	1
	Audit Bisnis & Operational 2 Business & Operational 2 Audit	1
	Penjamin Kualitas (QA) dan Pelaporan Sistem Informasi Manajemen (SIM) Quality Assurance (QA) and Management Information System (MIS) Reporting	1
Auditor Internal Internal Auditor	Audit Teknologi Informasi Information Technology Audit	2
	Audit Bisnis & Operational 1 Business & Operational 1 Audit	1
	Audit Bisnis & Operational 2 Business & Operational 2 Audit	4
Penjamin Kualitas (QA), dan Pelaporan SIM Quality Assurance (QA) and MIS Reporting	Penjamin Kualitas (QA) dan Pelaporan SIM Quality Assurance (QA) and MIS Reporting	1

KODE ETIK

Dalam menjalankan tugasnya, auditor internal memiliki Kode Etik yang harus dipatuhi, yaitu:

- **Integritas**
Auditor internal harus dapat dipercaya dan senantiasa menyajikan dasar yang terpercaya untuk penilaiannya. Dapat diandalkan, tegas, jujur dan terpercaya menjadi bagian melekat dan integritas auditor internal.
- **Independensi dan Objektivitas**
Auditor internal dalam melakukan aktivitas audit, harus bertanggung jawab dengan cara tidak memihak kepada siapa pun, tidak memiliki potensi benturan kepentingan, dan bebas dari keterlibatan dalam kegiatan operasional maupun non-operasional Bank.

Auditor internal menunjukkan standar yang tinggi terhadap sikap objektif dan profesional dalam mengumpulkan, mengevaluasi, dan mengkomunikasikan informasi tentang aktivitas atau proses yang sedang diperiksa.

CODE OF CONDUCT

In carrying out his/her duties, the internal auditor has a Code of Conduct to comply with, namely:

- **Integrity**
Internal auditor must be trustworthy and always presents a reliable basis for his/her assessment. Reliable, decisive, honest, and trustworthy is an inherent part of the internal auditor's integrity.
- **Independency and Objectivity**
Internal auditor in carrying out audit activities, should have impartial treatment to anyone, have no potential conflict of interest, and be free from involvement over The Bank's operational and non-operational activities.

Internal auditor should demonstrate high standards of objectivity and professional attitude in gathering, evaluating, and communicating information on the activity or process being examined.

- **Kerahasiaan**

Auditor internal menghormati nilai dan kepemilikan informasi yang mereka terima dan tidak mengungkapkan informasi tanpa persetujuan dari pihak yang berwenang kecuali ada kewajiban hukum dan profesi untuk melakukannya.

- **Kompetensi**

Auditor internal menerapkan pengetahuan, keterampilan, dan pengalaman yang dibutuhkan untuk menjalankan jasa audit internal.

- **Confidentiality**

Internal auditor should respect the value and ownership of the information obtained and does not disclose the information without the consent of the authorities, unless there is a legal and professional obligation to do so.

- **Competency**

Internal auditor should apply the knowledge, skills, and experience required to carry out the internal audit services.

LAPORAN PELAKSANAAN TUGAS DEPARTEMEN AUDIT INTERNAL

Hingga 31 Desember 2023, SKAI mencatat pencapaian 113% dari rencana kerja tahunan. Pencapaian ini merupakan hasil dari pelaksanaan serangkaian penugasan terencana, baik untuk pemenuhan persyaratan regulator dan berbasis risiko, dan penugasan audit tambahan bagi SKAI dalam tahun berjalan seiring dengan pertumbuhan bisnis dan profil risiko Bank.

SKAI melakukan penilaian terhadap kecukupan sistem pengendalian internal dan berpartisipasi dalam meningkatkan efektivitas sistem pengendalian internal terkait aktivitas operasional Bank. Proses penilaian dilakukan dengan kerangka acuan yang diterbitkan oleh *Committee of Sponsoring Organizations of the Treadway Commission* (COSO) dan kepatuhan terhadap regulasi yang berlaku. COSO terdiri dari 5 (lima) komponen yaitu lingkungan pengendalian, penilaian risiko, aktivitas pengendalian, informasi dan komunikasi, dan *monitoring*.

Selain itu, SKAI mengembangkan dan mengoptimalkan metodologi serta alat bantu audit sehingga pelaksanaan audit lebih efektif dan efisien secara berkesinambungan, yaitu:

- Mengoptimalkan pemanfaatan *audit management system* untuk memastikan standar kualitas audit dan mendukung proses audit tanpa kertas.
- Mengembangkan analitik data dalam proses audit dengan mengimplementasikan teknik audit berbantuan komputer (*Computer-Assisted Audit Techniques/CAATs*) untuk mengekstrak data, menganalisa data, dan menghasilkan *exception report* atas keseluruhan data, sehingga temuan untuk cakupan audit tertentu dapat mencakup seluruh populasi dan tidak hanya sample audit saja.
- Mengkaji ulang dan memperbarui piagam dan prosedur audit internal dengan tujuan untuk tetap menjaga fungsi audit internal berjalan dengan efektif dan independen, termasuk ketika SKAI juga menjalankan fungsi lain di luar audit internal, melalui beberapa rancangan *safeguardings* yang dikembangkan dan dilakukan oleh audit internal.

REPORT ON THE IMPLEMENTATION OF DUTIES OF INTERNAL AUDIT DEPARTMENT

As of December 31, 2023, IAD accomplished 113% achievement of the annual work plan. This achievement is the implementation result of a series of planned assignment, both for regulatory requirement or risk-based assignment, and additional audit assignment by IAD throughout the year, that is in line with the business growth and risk profile of The Bank.

IAD assesses the adequacy of the internal control system and participates in improving the effectiveness of the internal control system related to The Bank's operational activities. The assessment process is conducted through a framework published by the Committee of Sponsoring Organizations of the Treadway Commission (COSO) and through compliance with applicable regulations. COSO consists of 5 (five) components, namely the control environment, risk assessment, control activities, information and communication, and monitoring.

In addition, IAD develops and optimizes the audit methodology and tools so that the implementation of audits is more effective and efficient on an ongoing basis. This means:

- Optimizing the utilization of an audit management system to ensure audit quality standards and to support paperless auditing process.
- Developing data analytics in audit process through the implementation of Computer-Assisted Audit Techniques (CAATs) to extract data, analyze data, generate exception reports over overall data, hence the audit findings on particular audit scope could cover the whole population instead of audit sampling only.
- Reviewing and updating the internal audit charter and procedures, to ensure the internal audit function is implemented effectively and independently, including when IAD performs functions other than internal audit, through several safeguardings design which is developed and executed by internal audit.

SKAI secara rutin melakukan kajian pengendalian mutu (*quality assurance review*) atas aktivitas audit internal. Tujuan pelaksanaan *quality assurance* adalah:

- Memastikan proses audit telah sesuai dengan Peraturan Otoritas Jasa Keuangan (POJK) No. 1/POJK.03/2019 yang berlaku sejak tanggal 29 Januari 2019 perihal Penerapan Fungsi Audit Internal pada Bank Umum dan metodologi audit yang berlaku.
- Memastikan pelaksanaan audit terdokumentasikan dengan baik dan temuan audit didukung dengan bukti yang cukup.
- Memastikan penggunaan *audit management system* dengan baik.

Selama tahun 2023, aktifitas *quality assurance review* dilakukan baik oleh pihak internal SKAI maupun pihak eksternal yang independen dari fungsi audit intern. Hasil *quality assurance review* dari pihak ekstern, yang dilakukan setiap tiga (3) tahun sekali, adalah SKAI *Generally Conform* atas peraturan yang relevan dengan kegiatan audit intern.

Di tahun 2023, audit internal tidak menggunakan jasa pihak ketiga untuk menjalankan fungsi audit internal atau jasa lainnya.

SERTIFIKASI DAN PELATIHAN

SKAI memberikan pelatihan dan ujian sertifikasi manajemen risiko kepada para auditor internal agar mematuhi regulasi yang berlaku dan untuk pengembangan kompetensi. Untuk mendukung pertumbuhan bisnis, SKAI juga memberikan pelatihan kepada para auditor internal untuk meningkatkan pemahaman terhadap bidang usaha yang menjadi target Bank (seperti infrastruktur, energi, transportasi, dan lain-lain). Selain itu, SKAI juga memberikan pelatihan yang bersifat *soft skill* maupun pelatihan untuk memperoleh sertifikasi profesi bagi para auditor internal.

IAD regularly conducts quality assurance review on internal audit activities. The purposes of implementing quality assurance review are:

- To ensure the audit process is in conformity with Financial Services Authority Regulation (POJK) No. 1/POJK.03/2019, which was effective since January 29, 2019, concerning the Implementation of the Internal Audit Function at Commercial Banks and the applicable audit methodology.
- To ensure the implementation of audits is properly documented and audit findings are supported with enough evidence.
- To ensure the proper use of audit management system.

During 2023, quality assurance review activities were carried out by both internal IAD party and external party independent from audit internal function. The result of quality assurance review from external party, which performed every three (3) year, was IAD Generally Conform to regulations relevant to internal audit activities.

In 2023, internal audit did not use any services from third party to perform internal audit function nor other services.

CERTIFICATION AND TRAINING

IAD provides training and risk management certification examinations to internal auditors in order to comply with prevailing regulations and to develop their competences. To support the business growth, IAD also provides training to internal auditors to improve their understanding of the areas of business targeted by The Bank (such as infrastructure, energy, transportation, etc.). In addition, IAD provides soft skills training and other training for obtaining professional certification to internal auditors.

Berikut merupakan data sertifikasi profesi yang dimiliki oleh para auditor internal Bank:

The following are the professional certifications owned by the internal auditors of The Bank:

Sertifikasi Certification	Nama Name	Jabatan Position
<i>Certified Information System Auditor (CISA)</i>	I Gde Wiyadnya	<i>Head of Internal Audit Department</i>
<i>Chartered Accountant (CA)</i>	I Gde Wiyadnya	<i>Head of Internal Audit Department</i>
	Agnes Maria Widiyanti	<i>Team Leader - QA & MIS Reporting</i>
<i>Certified Bank Internal Auditor – Supervisor Level</i>	I Gde Wiyadnya	<i>Head of Internal Audit Department</i>
	Ardi Nanjaya	<i>Team Leader – Business & Operation 2 Audit</i>
	Agnes Maria Widiyanti	<i>Team Leader – QA & MIS Reporting</i>
	Julius Agung Wibowo	<i>Auditor – Business & Operation 2 Audit</i>
	Kristianto	<i>Auditor – Business & Operation 2 Operations Audit</i>
<i>Certified Bank Internal Auditor – Auditor Level</i>	Nixon Parulian	<i>Auditor – Business & Operation 2 Audit</i>
	Indra Seno Hartono	<i>Auditor – Business & Operation 2 Audit</i>
	Marni Marsirah	<i>Auditor - IT Audit</i>
	Nicholas	<i>QA & MIS Reporting</i>
<i>Cyber Security Foundation Professional Certificate (CSFPC)</i>	I Gde Wiyadnya	<i>Head of Internal Audit Department</i>
<i>Enterprise Risk Management Certified Professional (ERMCP)</i>	Ardi Nanjaya	<i>Team Leader – Business & Operation 2 Audit</i>
<i>ISO 9001 Quality Management System Associate</i>	Dany Hermawan	<i>Team Leader – Business & Operation 1 Audit</i>
	Ardi Nanjaya	<i>Team Leader – Business & Operation 2 Audit</i>
	Agnes Maria Widiyanti	<i>Team Leader - QA & MIS Reporting</i>
	Richie Gradiyanto Molenaar	<i>Auditor Business & Operation 1 Audit</i>
	Nixon Parulian	<i>Auditor – Business & Operation 2 Audit</i>
	Indra Seno Hartono	<i>Auditor – Business & Operation 2 Audit</i>
	Julius Agung Wibowo	<i>Auditor – Business & Operation 2 Audit</i>
	Nicholas	<i>QA & MIS Reporting</i>
<i>ISO/IEC 27001 Information Security Associate</i>	I Gde Wiyadnya	<i>Head of Internal Audit Department</i>
	Hermanto	<i>Team Leader - IT Audit</i>
	Kristianto	<i>Auditor – Business & Operation 2 Audit</i>
	Marni Marsirah	<i>Auditor - IT Audit</i>
	Ketut Sridevi Ayuningsih	<i>Auditor - IT Audit</i>
<i>ISO/IEC 20000 IT Service Management Associate</i>	I Gde Wiyadnya	<i>Head of Internal Audit Department</i>
	Hermanto	<i>Team Leader - IT Audit</i>
	Marni Marsirah	<i>Auditor - IT Audit</i>
	Ketut Sridevi Ayuningsih	<i>Auditor - IT Audit</i>

Akuntan Publik

Public Accountant

Akuntan Publik merupakan organ eksternal Bank untuk memberikan opini terkait kesesuaian penyajian laporan keuangan Bank terhadap Pernyataan Standar Akuntansi Keuangan (PSAK) yang berlaku di Indonesia. Pelaksanaan audit eksternal Bank dilaksanakan oleh auditor eksternal, yaitu Kantor Akuntan Publik yang telah ditunjuk oleh para pemegang saham dalam RUPS berdasarkan usulan Dewan Komisaris dan Komite Audit.

Public Accountant is The Bank's external organ that provides opinions regarding the conformity of the presentation of The Bank's financial statements against applicable Indonesian financial accounting standards (PSAK). The execution of The Bank's external audit is to be conducted by an external auditor, namely a Registered Public Accountant appointed by shareholders in the GMS based on the proposal from the Board of Commissioners and the Audit Committee.

AKUNTAN PUBLIK TAHUN 2023

Berdasarkan FEM No. 017/FEM/FM DEPT/ICBC INA/VI/2023, audit eksternal untuk tahun buku 2023 dilaksanakan oleh Kantor Akuntan Publik Imelda & Rekan (Deloitte).

PUBLIC ACCOUNTANT IN 2023

In accordance to FEM No. 017/FEM/FM DEPT/ICBC INA/VI/2023, the external audit for the fiscal year 2023 was conducted by Imelda & Partners (Deloitte) Registered Public Accountants.

Akuntan Publik Tahun Buku 2023

Public Accountant for the Fiscal Year 2023

Kantor Akuntan Publik Public Accounting Firm	Imelda & Rekan (Deloitte)
Akuntan Accountant	Fonny Alimin
Tahun Audit Year of Audit	Tahun Buku 2023 Fiscal Year 2023
Periode Penugasan Assignment Period	Tahun Buku 2023 Fiscal Year 2023
Jasa Services	Audit Eksternal External Audit
Jasa Lainnya Other Services	-
Biaya Fees	Rp1.361.480.000 (termasuk pajak) Rp1,361,480,000 (tax inclusive)

AKUNTAN PUBLIK DAN BIAYA PERIODE 8 (DELAPAN) TAHUN TERAKHIR

PUBLIC ACCOUNTANT AND FEES FOR THE LAST 8 (DELAPAN) YEARS

Guna kebutuhan transparansi, berikut disampaikan daftar Kantor Akuntan Publik, Akuntan, jasa yang diberikan dan jasa lainnya, serta biaya dalam mengaudit laporan keuangan Bank ICBC Indonesia selama 8 (delapan) tahun terakhir.

In the name of transparency, the following submission is the list of Public Accounting Firms, Accountants, services provided, other services, and fees in auditing the financial statements of The Bank for the last 8 (eight) years.

Daftar Kantor Akuntan Publik 8 (Delapan) Tahun Terakhir (2016-2023)

List of Public Accounting Firms for the Last 8 (Eight) Years (2016-2023)

Tahun Buku Fiscal Year	Kantor Akuntan Publik Public Accounting Firm	Akuntan Accountant	Jasa yang Diberikan Services	Jasa Lainnya Other Services	Biaya Fees
2023	Imelda & Rekan (Deloitte)	Fonny Alimin	Audit Eksternal External Audit	-	Rp1.361.480.000 (termasuk pajak) Rp1,361,480,000 (tax inclusive)
2022	Imelda & Rekan (Deloitte)	Fonny Alimin	Audit Eksternal External Audit	-	Rp1.361.481.000 (termasuk pajak) Rp1,361,481,000 (tax inclusive)
2021	Imelda & Rekan (Deloitte)	Fonny Alimin	Audit Eksternal External Audit	-	Rp1.348.000.000 (termasuk pajak) Rp1,348,000,000 (tax inclusive)
2020	Siddharta Widjaja & Rekan (KPMG)	Handrow Cahyadi, CPA	Audit Eksternal External Audit	-	Rp2.160.000.000 (termasuk pajak) Rp2,160,000,000 (tax inclusive)
2019	Siddharta Widjaja & Rekan (KPMG)	Handrow Cahyadi, CPA	Audit Eksternal External Audit	Pra-transisi implementasi PSAK baru (PSAK 71, 72, dan 73) Pre-transition of new financial accounting standards implementation (PSAK 71, 72, and 73)	Rp2.160.000.000 (termasuk pajak) Rp2,160,000,000 (tax inclusive)
2018	Siddharta Widjaja & Rekan (KPMG)	Kusumaningsih Angkawijaya	Audit Eksternal External Audit	-	Rp1.260.000.000 (termasuk pajak) Rp1,260,000,000 (tax inclusive)
2017	Siddharta Widjaja & Rekan (KPMG)	Susanto Tjie	Audit Eksternal External Audit	-	Rp1.149.120.000 (termasuk pajak) Rp1,149,120,000 (tax inclusive)
2016	Siddharta Widjaja & Rekan (KPMG)	Susanto Tjie	Audit Eksternal External Audit	-	Rp1.149.120.000 (termasuk pajak) Rp1,149,120,000 (tax inclusive)

MEKANISME PELAKSANAAN PEKERJAAN AUDIT

Audit dilaksanakan berdasarkan standar audit yang ditetapkan Ikatan Akuntan Indonesia (IAI) serta memperhatikan semua ketentuan OJK tentang bentuk dan susunan laporan keuangan. Tanggung jawab auditor adalah pada pernyataan pendapat apakah laporan keuangan telah disajikan secara wajar, dalam semua hal yang material, posisi keuangan, hasil usaha serta arus kas.

Agar proses audit sesuai dengan standar profesional akuntan serta perjanjian kerja dan ruang lingkup audit yang telah ditetapkan dan selesai sesuai dengan target waktu yang telah ditetapkan, secara rutin dilakukan pembahasan atas isu-isu yang signifikan.

MECHANISM OF AUDITING IMPLEMENTATION

Auditing is implemented based on the auditing standards set by the Indonesia Accountants Association (IAI) and by taking into account all OJK provisions regarding the form and arrangement of financial statement. The responsibilities of an auditor are with the opinion statement whether the financial statement has been presented in fair value, in all material aspects, financial position, business achievement, and cash flows.

In order the auditing process is on par with the standards of professional accountant as well as working agreement and scope of audit being set and completed within the time frame, discussions on significant issues are routinely conducted.

Berikut disampaikan prosedur dan mekanisme penunjukan Akuntan Publik dan pelaksanaan audit eksternal di lingkup Bank.

- Komite Audit mengusulkan Kantor Akuntan Publik kepada Dewan Komisaris.
- Dewan Komisaris mengusulkan Kantor Akuntan Publik kepada pemegang saham melalui RUPS.
- Pengesahan dan penunjukan Kantor Akuntan Publik oleh RUPS.
- *Kick-off meeting* dengan manajemen, audit internal, dan Komite Audit.
- Menyampaikan jadwal audit sesuai dengan target waktu yang telah disepakati.
- Melaksanakan audit umum untuk interim dan akhir tahun berdasarkan standar audit yang berlaku umum di Indonesia.
- Mengidentifikasi isu yang signifikan dan melakukan pembahasan dengan manajemen.
- Melakukan *exit meeting* dengan manajemen, audit internal, dan Komite Audit.
- Menerbitkan laporan audit.
- Menyampaikan laporan audit.

HUBUNGAN AUDITOR EKSTERNAL DENGAN DEPARTEMEN AUDIT INTERNAL

Dalam mendukung kelancaran tugas-tugas auditor eksternal, Departemen Audit Internal (SKAI) membantu Departemen *Management Information & Accounting* sebagai departemen yang bertanggung jawab untuk mengkoordinasikan kegiatan auditor eksternal agar tercapai hasil audit yang optimal dan komprehensif. SKAI menjaga hubungan kerja yang baik dengan auditor eksternal, dengan tujuan untuk mendukung penerapan audit kepada Bank dan meyakinkan program pemeriksaan antara auditor eksternal dan internal saling melengkapi, sehingga dapat mengoptimalkan cakupan audit. SKAI juga melakukan *monitoring* atas tindak lanjut temuan audit eksternal.

TINDAK LANJUT TEMUAN AUDIT EKSTERNAL

Per 31 Desember 2023, SKAI telah memonitor tindak lanjut atas temuan yang disampaikan oleh auditor eksternal sebagai berikut:

Terkait dengan temuan audit eksternal atas audit laporan keuangan tahun 2022, tindak lanjut atas 4 (empat) temuan telah dilakukan oleh unit kerja terkait, dimana 1 (satu) temuan juga akan berkelanjutan divalidasi ketika proses audit laporan keuangan.

Sedangkan untuk temuan audit eksternal atas audit laporan keuangan tahun 2021, tindak lanjut atas 4 (empat) temuan telah dilakukan oleh unit kerja terkait, dan atas 1 (satu) temuan lainnya, tindak lanjut koreksi telah dilakukan, namun tindak lanjut sebagai kontrol pencegahan ke depannya sedang dalam proses implementasi.

The following are the procedure and mechanism of appointing Public Accountant and the implementation of external audit in The Bank.

- The Audit Committee proposes the Public Accounting Firm to the Board of Commissioners.
- The Board of Commissioners proposes the Public Accounting Firm to shareholders through the GMS.
- Ratification and appointment of Public Accounting Firm by the GMS.
- Kick-off meeting with the management, internal audit, and Audit Committee.
- Deliver the audit schedule in accordance with agreed target timeline.
- Conduct auditing for interim and year-end based on generally accepted auditing standards in Indonesia.
- Identify significant issues and conduct discussions with the management.
- Conduct exit meeting with the management, internal audit, and Audit Committee.
- Publish an audit report.
- Submit an audit report.

EXTERNAL AUDITOR'S RELATIONSHIP WITH INTERNAL AUDIT DEPARTMENT

In supporting the duties of external auditor, the Internal Audit Department (IAD) assists the Management Information & Accounting Department, which is responsible for coordinating the activities of external auditor in order to achieve the optimal and comprehensive audit results. IAD maintains a good working relationship with the external auditor, with the objective to support the application of audit at The Bank and to ensure the audit program of external and internal auditors is complimentary so as to optimize the audit coverage. IAD also monitors the follow-up of external audit findings.

FOLLOW-UP ON EXTERNAL AUDIT FINDINGS

As of December 31, 2023, IAD has monitored the followup of findings raised by external auditor as follows:

With regards to external audit findings on audit of financial statement 2022, follow up action on 4 (four) findings have been carried out by relevant work units, which one (1) finding will be also continuously validated during audit of financial statement.

While regarding external audit findings on audit of financial statement 2021, the follow up action on 4 (four) findings have been carried out by relevant work units, and for another 1 (one) finding, the corrected follow up action was in place, however the follow up action as preventive control in future is still in the process of implementation.

Manajemen Risiko

Risk Management

KERANGKA MANAJEMEN RISIKO

Dalam melaksanakan kegiatan usahanya, Bank selalu berhadapan dengan risiko yang melekat (inheren) pada kegiatan bisnis maupun operasional perbankan. Dalam rangka mengendalikan risiko tersebut, Bank menerapkan manajemen risiko secara terintegrasi untuk mengidentifikasi, mengukur, memantau dan mengendalikan seluruh eksposur risiko yang dihadapi oleh Bank. Kerangka manajemen risiko (*risk management framework*) yang selaras dengan strategi bisnis, struktur organisasi, kebijakan dan pedoman, serta penyempurnaan infrastruktur Bank diimplementasikan untuk mendukung pelaksanaan manajemen risiko yang efektif dan konsisten pada setiap proses aktivitas bisnis maupun operasional untuk senantiasa menjadi bank yang sehat dan tumbuh secara berkesinambungan.

Kerangka manajemen risiko yang diterapkan pada Bank, sesuai dengan Peraturan Otoritas Jasa Keuangan (POJK) No. 18/POJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum, merujuk kepada 4 (empat) pilar manajemen risiko:

1. Pengawasan aktif Dewan Komisaris dan Direksi.
2. Kebijakan dan prosedur manajemen risiko serta penetapan limit risiko.
3. Proses identifikasi, pengukuran, pemantauan, dan pengendalian risiko, serta sistem informasi manajemen risiko.
4. Sistem pengendalian internal yang menyeluruh.

Bank melakukan pengelolaan risiko utama yang terdiri dari risiko kredit, risiko pasar, risiko likuiditas, risiko operasional, risiko hukum, risiko kepatuhan, risiko strategis, dan risiko reputasi.

KEBIJAKAN MANAJEMEN RISIKO

Kebijakan manajemen risiko Bank menjadi acuan dalam pemantauan dan/atau pengendalian internal pada semua tahapan dalam proses manajemen risiko dalam hubungannya dengan visi, misi, dan rencana strategis Bank:

- Sebagai panduan dalam menerapkan prinsip kehati-hatian dan GCG;

RISK MANAGEMENT FRAMEWORK

In carrying out its business activities, The Bank always encounters inherent risks in the banking business and operational activities. In order to control these risks, The Bank implements integrated risk management to identify, measure, monitor and control all risk exposures faced by The Bank. The risk management framework that is aligned with the business strategy, organizational structure, policies and guidelines, as well as the improvement of The Bank's infrastructure are implemented to support effective and consistent risk management implementation in each process of business and operational activities so as to always be a healthy bank that grows sustainably.

The risk management framework applied to The Bank refers to 4 (four) risk management pillars, in compliance with the Financial Services Authority Regulation (POJK) No. 18/POJK.03/2016 concerning the Application of Risk Management for Commercial Banks as follows:

1. Active supervision of the Board of Commissioners and Board of Directors.
2. Policy and procedures of risk management and the establishment of risk limits.
3. The process of identifying, measuring, monitoring, and controlling risk, as well as risk management information system.
4. A comprehensive internal control system.

The Bank manages key risk which consists of credit risk, market risk, liquidity risk, operational risk, legal risk, compliance risk, strategic risk, and reputation risk.

RISK MANAGEMENT POLICY

The Bank's risk management policy serves as a guidance in monitoring and/or internal control at all stages of the risk management process in relation to The Bank's vision, mission and strategic plan. It serves the following purposes:

- As a guidance on applying prudential principles and GCG;

- Sebagai panduan untuk menetapkan dan memperjelas wewenang dan tanggung jawab semua pihak yang terkait dalam manajemen risiko;
- Merupakan alat pengawasan untuk mengendalikan risiko secara keseluruhan;
- Sebagai panduan untuk menjalankan semua aktivitas dalam limit risiko.

TANGGUNG JAWAB DEWAN KOMISARIS DAN DIREKSI TERHADAP MANAJEMEN RISIKO

Dalam rangka memastikan penerapan fungsi manajemen risiko dan pengendalian internal yang baik, Bank telah memiliki struktur organisasi yang memadai dengan tingkat tanggung jawab yang berbeda. Pembagian wewenang dan tanggung jawab dalam organisasi dan fungsi manajemen risiko Bank adalah:

Dewan Komisaris

Wewenang dan tanggung jawab Dewan Komisaris yang berkaitan dengan manajemen risiko meliputi hal-hal sebagai berikut:

- Menyetujui serta mengevaluasi kebijakan manajemen risiko Bank;
- Menyetujui dan mengevaluasi arah kebijakan dan strategi manajemen risiko Bank sekurang-kurangnya 1 (satu) tahun sekali atau sekiranya terjadi perubahan faktor-faktor yang memengaruhi kegiatan usaha Bank secara signifikan;
- Mengevaluasi pertanggungjawaban Direksi dan memberikan arahan perbaikan atas pelaksanaan kebijakan manajemen risiko.

Direksi

Wewenang dan tanggung jawab Direksi Bank yang berkaitan dengan manajemen risiko sekurang-kurangnya meliputi:

- Menyusun kebijakan manajemen risiko Bank berdasarkan rekomendasi dari Komite Manajemen Risiko, dan menyampaikan kebijakan tersebut kepada Dewan Komisaris untuk mendapatkan persetujuan;
- Menyusun strategi manajemen risiko secara komprehensif yang sesuai dengan ketentuan yang berlaku, termasuk penetapan dan persetujuan limit risiko secara keseluruhan maupun per jenis risiko, dengan memperhatikan *risk appetite* dan *risk tolerance* Bank;
- Bertanggung jawab atas pelaksanaan kebijakan manajemen risiko dan eksposur risiko yang diambil oleh Bank secara keseluruhan;
- Mengembangkan budaya manajemen risiko pada seluruh jenjang organisasi, yang meliputi komunikasi yang memadai kepada seluruh jenjang organisasi tentang pentingnya pengendalian internal yang efektif.

- As a guidance on establishing and clarifying the authority and responsibility of all parties involved in risk management;
- As a monitoring tool to control overall risk;
- As a guidance to carry out all activities within risk limits.

RESPONSIBILITIES OF THE BOARD OF COMMISSIONERS AND BOARD OF DIRECTORS ON RISK MANAGEMENT

In order to ensure the proper implementation of risk management and internal control functions, The Bank has in place an adequate organizational structure with different levels of responsibility. The segregation of authorities and responsibilities in the organization and risk management function of The Bank are as follows:

Board of Commissioners

The authorities and responsibilities of the Board of Commissioners in relation to risk management include the following:

- Approve and evaluate The Bank's risk management policy;
- Approve and evaluate the direction of The Bank's risk management policy and strategies at least once a year or in the event of any changes in factors that significantly affect The Bank's business activities;
- Evaluate the accountability of the Board of Directors and provide direction for improvements in the implementation of risk management policy.

Board of Directors

The authorities and responsibilities of the Board of Directors of The Bank in relation to risk management should include, among others:

- Establish the risk management policy of The Bank based on recommendations from the Risk Management Committee, and submit this policy to the Board of Commissioners for approval;
- Formulation of a comprehensive risk management strategy in accordance with prevailing regulations, including the determination and approval of risk limits in overall and on specific types of risks, by taking into account the risk appetite and risk tolerance of The Bank;
- Be responsible for the implementation of overall risk management policy and risk exposure of The Bank;
- Develop a risk management culture at all levels of the organization, including adequate communications to all levels of the organization on the importance of effective internal controls.

Komite Manajemen Risiko

Komite Manajemen Risiko adalah komite yang bersifat non-struktural dalam manajemen risiko, berkedudukan di kantor pusat yang membantu Direksi dalam merumuskan kebijakan, mengawasi pelaksanaan kebijakan, memantau perkembangan dan kondisi profil risiko, dan memberikan saran-saran dan langkah perbaikan yang berkaitan dengan manajemen risiko. Komite Manajemen Risiko diketuai oleh Presiden Direktur, dengan anggota terdiri dari Direksi, Kepala Satuan Kerja Audit Internal (SKAI), Kepala Satuan Kerja Manajemen Risiko (SKMR), Kepala Satuan Kerja Kepatuhan (SKK), dan Kepala Departemen terkait lainnya. Wewenang dan tanggung jawab Komite Manajemen Risiko antara lain:

- Menyusun kebijakan, strategi, dan pedoman pelaksanaan manajemen risiko, termasuk penetapan limit dan *contingency plan* dalam kondisi tidak normal;
- Memperbaiki atau menyempurnakan pelaksanaan manajemen risiko berdasarkan hasil evaluasi pelaksanaan yang dimaksud;
- Memantau, mengevaluasi, dan menilai perkembangan komposisi profil risiko dalam portofolio Bank, penetapan dan pelaksanaan limit, kecukupan permodalan Bank terhadap eksposur risiko sesuai ketentuan yang berlaku, dan memastikan efektivitas pelaksanaan manajemen risiko.

DEPARTEMEN MANAJEMEN RISIKO

Satuan Kerja Manajemen Risiko (SKMR) adalah unit kerja yang memiliki wewenang dan tanggung jawab dalam menjalankan proses manajemen risiko dan independen dari satuan kerja bisnis dan departemen lainnya yang menjalankan fungsi pengendalian internal. Wewenang dan tanggung jawab SKMR antara lain meliputi:

- Memberikan masukan kepada Direksi dalam penyusunan kebijakan, strategi, dan kerangka manajemen risiko;
- Mengembangkan prosedur dan alat untuk mengidentifikasi, mengukur, memantau, dan mengendalikan risiko, serta mendesain dan menerapkan perangkat yang dibutuhkan dalam penerapan manajemen risiko;
- Memantau posisi risiko secara keseluruhan, maupun jenis posisi risiko tertentu serta melakukan *stress testing* untuk mengetahui dampak dari implementasi kebijakan dan strategi manajemen risiko terhadap portofolio atau kinerja Bank secara keseluruhan;
- Melakukan kaji ulang secara berkala untuk memastikan kecukupan kerangka manajemen risiko, keakuratan metodologi penilaian risiko, dan kecukupan sistem informasi manajemen risiko;
- Memberikan rekomendasi kepada satuan kerja bisnis dan/atau Komite Manajemen Risiko terkait penerapan manajemen risiko, antara lain mengenai besaran atau eksposur risiko maksimum yang dapat dipelihara Bank.

Risk Management Committee

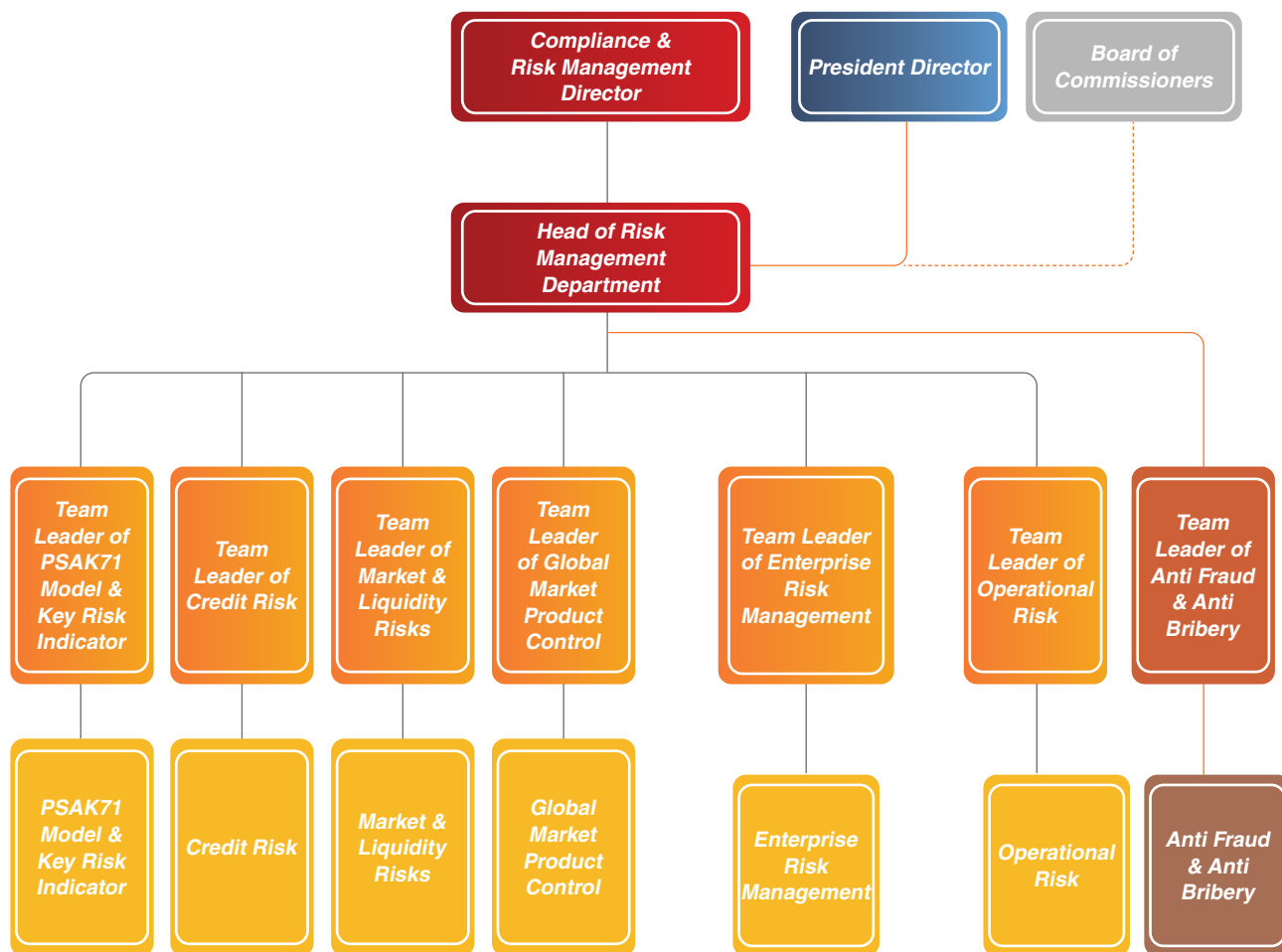
Risk Management Committee is a non-structural committee in risk management, located in the head office. The committee assists the Board of Directors in formulating policy, overseeing the implementation of policy, monitoring the progress and conditions of risk profiles, and providing recommendations and improvement measures related to risk management. Risk Management Committee is chaired by the President Director, with members consisting of the Board of Directors, Head of Internal Audit Department (IAD), Head of Risk Management Department (RMD), Head of Compliance Department, and other relevant Heads of Departments. The authorities and responsibilities of the Risk Management Committee include:

- Establish policies, strategies and guidelines for the implementation of risk management, including the establishment of limits and contingency plans under abnormal conditions;
- Improve or enhance the implementation of risk management based on the evaluation results of intended implementation;
- Monitor, evaluate and assess the development of risk profile compositions in The Bank's portfolio, the establishment and implementation of limits, the adequacy of The Bank's capital against risk exposure in accordance with prevailing regulations, and ensure the effectiveness of risk management implementation.

RISK MANAGEMENT DEPARTMENT

Risk Management Department (RMD) is a unit that has the authorities and responsibilities for carrying out the risk management process and is independent from the business units and departments that perform internal control functions. The authorities and responsibilities of RMD include the following:

- Provide input to the Board of Directors in formulating risk management policy, strategies, and framework;
- Develop procedures and tools for identifying, measuring, monitoring, and controlling risks, as well as designing and implementing the tools required for the implementation of risk management;
- Monitor overall risk positions, as well as specific types of risk positions, and performing stress testing to ascertain the impact of implementation of risk management policy and strategies on the overall portfolios or performances of The Bank;
- Conduct periodic reviews to ensure adequacy of risk management framework, accuracy of risk assessment methodology, and adequacy of risk management information system;
- Provide recommendations to the business unit and/or Risk Management Committee related to the implementation of risk management, among others concerning the amount or maximum risk exposure that can be maintained by The Bank.



KEGIATAN MANAJEMEN RISIKO

Bank telah melaksanakan beberapa program kerja penting dalam mengembangkan manajemen risiko, termasuk antara lain, namun tidak terbatas pada:

1. Bank telah memiliki komite-komite yang secara aktif melakukan pemantauan atas pengelolaan risiko Bank, seperti Komite Manajemen Risiko dan Komite Pemantau Risiko. Komite-komite tersebut telah melakukan evaluasi atas pelaksanaan manajemen risiko secara berkesinambungan. Bank telah menerapkan *enterprise risk management* untuk memperkuat fungsi pengelolaan manajemen risiko. Sejalan dengan itu, Bank membentuk Komite *Liability Recognition* yang berfokus untuk mengkaji kejadian risiko dan merekomendasikan sanksi, juga tindakan perbaikan agar kejadian risiko serupa tidak terulang di masa datang. Bank menunjuk *Leading Department* untuk memastikan proses identifikasi tanggung jawab kejadian risiko dan pengelolaan risiko yang komprehensif.

RISK MANAGEMENT ACTIVITIES

The Bank has implemented several important work programs in developing risk management. This includes, among others, but not limited to the following:

1. The Bank has established committees that actively monitor The Bank's risk management, such as the Risk Management Committee and Risk Monitoring Committee. These committees have evaluated the implementation of risk management on an ongoing basis. The Bank has implemented enterprise risk management to strengthen the risk management function. Along with it, The Bank established Liability Recognition Committee that focuses on reviewing risk events and recommending sanctions, as well as corrective actions so that similar risk events do not recur in the future. The Bank appointed Leading Department to ensure a comprehensive risk event responsibility identification and risk management process.

2. Kebijakan dan prosedur terkait manajemen risiko dan perkreditan antara lain:

- a. Bank telah memiliki kebijakan dan prosedur yang komprehensif yang meliputi seluruh risiko utama yang dikelola Bank. Pada masing-masing area risiko, penyempurnaan kebijakan dan prosedur juga dilakukan agar sejalan dengan kondisi Bank dan peraturan terkini;
- b. Bank juga telah menerapkan asas-asas perkreditan yang sehat sesuai dengan prinsip-prinsip kehati-hatian secara konsisten dan berkesinambungan, di mana secara komprehensif Bank telah memiliki kebijakan dan prosedur mengenai perkreditan dengan Kebijakan Perkreditan Bank sebagai payung kebijakan, yang senantiasa dilakukan penyempurnaan agar sejalan dengan kondisi Bank dan peraturan terkini;
- c. Dalam rangka menjaga kualitas kredit, Bank juga telah meningkatkan pengelolaan dan pemantauan klasifikasi kualitas kredit debitur, baik debitur yang berada dalam *watch list* atau *potential risk* atau yang menunjukkan penurunan kualitas atau kredit bermasalah, serta memantau perkembangannya. Pengelolaan kredit bermasalah bertujuan untuk meminimalkan jumlah kredit bermasalah Bank serta memaksimalkan tingkat pengembalian kredit.

4. *Risk Appetite*

Pelaksanaan manajemen risiko yang efektif harus didukung oleh kerangka kerja manajemen risiko yang komprehensif, di mana salah satunya melalui kerangka kerja *risk appetite*, yang ditetapkan secara jelas sejalan dengan visi, misi, dan strategi bisnis Bank. *Risk Appetite Statement* memuat *target limit* dan *trigger limit* atas indikator, baik kuantitatif maupun kualitatif, yang dipantau dan dikaji kembali secara berkala dan adhoc untuk diselaraskan dengan rencana strategi dan permodalan Bank.

5. Risiko Kredit

Pada area risiko kredit, pelaksanaan kerangka kerja risiko kredit telah diterapkan melalui pengembangan proses manajemen risiko kredit yang antara lain meliputi identifikasi risiko kredit pada produk/aktivitas baru, kecukupan kebijakan dan prosedur terkait proses perkreditan, pemantauan perkembangan portofolio pinjaman baik per debitur, konsentrasi, segmentasi, sektor ekonomi, kualitas aset, Cadangan Kerugian Penurunan Nilai (CKPN), Batas Maksimum Pemberian Kredit (BMPK), penilaian profil risiko kredit, serta pelaksanaan *stress testing* risiko kredit secara berkala.

Pengelolaan risiko kredit pada pemberian kredit secara langsung kepada debitur dijalankan melalui proses pemberian kredit sesuai kebijakan dan memantau pelaksanaannya agar sejalan dengan prinsip kehati-hatian di dalam mengelola risiko kredit yang harus

2. Policies and procedures related to risk management and credit, among others:

- a. The Bank has comprehensive policies and procedures covering all principal risks that managed by the Bank. In each risk area, improvements to the policy and procedures are also conducted in line with The Bank's current conditions and regulations;
- b. The Bank has also adopted sound credit principles according to the prudential principles in a consistent and continuous manner, whereby The Bank has comprehensive policy and procedures on credit, with The Bank Credit Policy serving as an umbrella policy, which is constantly enhanced to be in line with The Bank's conditions and current regulations;
- c. In order to maintain credit quality, The Bank has also improved the management and monitoring of debtor credit quality classification, both for debtors who are in the watch list or potential risk or who show a decline in quality or non-performing loans, and monitor their progress. The management of non-performing loans aims to minimize the number of non-performing loans of The Bank and to maximize the credit repayment rate.

4. *Risk Appetite*

The implementation of effective risk management must be supported by a comprehensive risk management framework. This includes a risk appetite framework that is clearly defined in line with The Bank's vision, mission and business strategy. The Risk Appetite Statement consists of the target limit and trigger limit for both quantitative and qualitative indicators, which are monitored and reviewed on regular and adhoc basis to align with The Bank's strategic plan and capital.

5. Credit Risk

In the area of credit risk, the implementation of a credit risk framework has been implemented through the development of a credit risk management process, which includes the identification of credit risk on new products/activities, the adequacy of policies and procedures related to the credit process, monitoring the growth of loan portfolios by debtor, concentration, segmentation, economic sector, assets quality, impairment, Legal Lending Limit (LLL), credit risk profile assessment, and periodic credit stress testing.

Credit risk management on credit granting directly to debtors is carried out through the process of credit granting according to policy and monitoring its implementation to be in line with the prudential principles in managing credit risk that must be fulfilled. Credit approval is provided

dipenuhi. Persetujuan kredit diberikan dengan syarat bahwa aplikasi memenuhi persyaratan Bank dan tanpa mengorbankan integritas organisasi. Pemantauan pasca pencairan dilakukan dalam rangka menjaga kualitas kredit. Pemantauan kualitas portofolio kredit dilakukan melalui penerapan manajemen risiko kredit yang *prudent*, penerapan *early warning system*, dan langkah-langkah preventif untuk mencegah terjadinya kredit bermasalah.

Pencadangan penurunan nilai secara individual telah dilakukan tepat waktu yang didasarkan atas analisis kemampuan pembayaran dan arus kas debitur. Selain itu, sistem telah diimplementasikan untuk menghitung pencadangan penurunan nilai secara kolektif sesuai dengan ketentuan PSAK 71.

6. Risiko Pasar

Dalam penerapan manajemen risiko pasar, dengan mengacu kepada *best practice*, selain kaji ulang dan pemantauan atas limit-limit yang telah ada, yaitu *stop loss limit*, limit Posisi Devisa Neto (PDN), faktor sensitivitas (PV01), *Management Action Triggers* (MATs), Bank juga melakukan *stress testing* dan faktor risiko (PSE *risk factor*) dalam penentuan limit FX untuk *counterparty*, VaR, serta memastikan bahwa transaksi yang dilakukan Bank sesuai dengan harga pasar (pemantauan *off market*). Selain itu, valuasi terhadap portofolio yang dimiliki Bank didasarkan pada sumber data pasar yang lazim digunakan. Dalam area manajemen risiko *banking book*, pengelolaan risiko suku bunga dilakukan melalui pendekatan faktor sensitivitas (PV01) dan *stress testing* baik dari perspektif pendapatan maupun perspektif nilai ekonomis. Hal ini akan membantu dalam melakukan pengukuran risiko suku bunga di *banking book* dengan lebih tepat.

Saat ini Bank telah mendapatkan persetujuan dari regulator untuk sistem terkait risiko pasar dan penggunaan sistem tersebut dapat membantu Bank untuk meningkatkan metodologi dan akurasi dalam pengukuran risiko pasar.

Selain itu, Bank juga telah menetapkan Prosedur Rencana Darurat untuk kejadian terkait risiko pasar dan risiko suku bunga *banking book* dengan tujuan untuk memperjelas indikator peringatan dini dan proses eskalasi dalam situasi darurat.

7. Risiko Likuiditas

Manajemen risiko likuiditas merupakan salah satu fungsi yang sangat penting di Bank. Pendekatan proaktif yang melibatkan manajemen Bank dan departemen terkait melalui *Asset and Liability Committee* (ALCO)

on condition that the application meets The Bank's requirements and without compromising organizational integrity. Post-disbursement monitoring is carried out in order to maintain credit quality. Monitoring of the quality of loan portfolio is carried out through the implementation of prudent credit risk management, the application of early warning system, and preventive measures to prevent the occurrence of non-performing loans.

Individual impairment has been made on time based on analysis of payment ability and cash flow of the debtors. In addition, the system has been implemented to calculate the collective impairment in accordance with stipulation of PSAK 71.

6. Market Risk

In the implementation of market risk management, with reference to best practices, in addition to reviewing and monitoring existing limits namely stop loss limit, Net Open Position (NOP) limit, sensitivity factor (PV01), Management Action Triggers (MATs), The Bank also conducts stress testing and risk factor (PSE risk factor) in determining FX limits for counterparties, VaR, and ensuring that transactions carried out by The Bank are in accordance with market prices (off market monitoring). In addition, valuations of The Bank's portfolio are based on commonly used market data sources. In the banking book risk management area, interest rate risk management is carried out through a sensitivity factor (PV01) approach and stress testing both from income perspective and economic value perspective. This should help in dimensioning interest rate risk in the banking book with better precision.

Currently The Bank has obtained approval from regulators for system related to market risk and the use of the system will help The Bank to enhance the methodology and accuracy in market risk measurement.

Moreover, The Bank has established Emergency Plan Procedure for market risk and interest rate risk in the banking book events with the aim to have more clarity in early warning indicators and escalation process during emergency situation.

7. Liquidity Risk

Liquidity risk management is one of the most critical functions in The Bank. A proactive approach involving The Bank management and relevant departments through the Asset and Liability Committee (ALCO)

dalam mengoptimalkan dan memperkuat sumber pendanaan serta penggunaan dana bagi Bank akan terus dilakukan. Untuk meningkatkan efektivitas dan produktivitas penggunaan pendanaan, Bank telah melakukan aktivitas tambahan pada tahun ini, yaitu analisis portofolio yang secara berkala disampaikan pada *Asset and Liability Committee* (ALCO). Pemantauan atas rasio likuiditas, antara lain rasio aset likuid, LCR (*Liquidity Coverage Ratio*), NSFR (*Net Stable Funding Ratio*), dan likuiditas jangka pendek senantiasa disesuaikan dengan perkembangan yang ada dan dilakukan penyesuaian asumsi secara berkala.

Stress testing likuiditas dilakukan berdasarkan asumsi yang disetujui untuk memastikan kondisi pendanaan pada periode *stress*. Saat ini, Bank telah menetapkan dan melakukan pemantauan *stress testing* untuk periode di atas 1 (satu) bulan untuk memastikan kemampuan likuiditas Bank dalam menghadapi kondisi *stress* jangka panjang. Selain itu, Rencana Pendanaan Darurat (*Contingency Funding Plan*) senantiasa diperbarui, di mana *trigger*/indikator peringatan dini Rencana Pendanaan Darurat dipantau dan Rencana Pendanaan Darurat diuji coba secara berkala untuk mempersiapkan Bank jika terjadi krisis likuiditas.

8. Risiko Operasional

Risiko operasional tetap menjadi salah satu fokus perhatian Bank karena risiko operasional timbul pada seluruh aktivitas fungsional, produk, proses dan sistem informasi. Sebagai bagian dari upaya Bank untuk meningkatkan pemantauan risiko operasional, Bank senantiasa melakukan penyesuaian dan penyempurnaan alat bantu risiko operasional, antara lain *Risk Control Self-Assessment* (RCSA) pada unit-unit pengambil risiko, pemantauan pencatatan *Risk/Loss Event Database* (RLED), *Key Risk Indicators* (KRI), dan *Operational Risk Officer* dalam mengidentifikasi dan memitigasi terjadinya risiko operasional pada unit-unit pengambil risiko, dan bersama dengan Departemen TI dalam kesiapan *Business Continuity Plan* (BCP) untuk meminimalkan risiko yang berhubungan dengan gangguan bisnis baik karena masalah internal maupun eksternal, yang diuji coba secara berkala paling kurang 1 (satu) tahun sekali. Bank telah menerapkan 3 (*three*) *lines of defense* untuk memastikan pengendalian internal terhadap risiko operasional telah berfungsi sesuai yang diharapkan. Satuan kerja bisnis mencakup seluruh unit bisnis dan cabang/cabang pembantu di Bank merupakan lini pertama pertahanan yang melakukan pencegahan proaktif, melakukan pengendalian dan manajemen sistem yang berkualitas, serta melakukan proses identifikasi, pemantauan, pelaporan, mitigasi, dan pengendalian risiko operasional.

in optimizing and strengthening the funding sources and use of funds for The Bank will continue to be implemented. To enhance the effectiveness and productivity regarding the use of funding, this year The Bank has conducted additional activity namely portfolio analysis that was regularly presented in the Asset and Liability Committee (ALCO). Monitoring of liquidity ratios, including liquid asset ratio, LCR (Liquidity Coverage Ratio), NSFR (Net Stable Funding Ratio), and short-term liquidity are always adjusted to the current developments along with periodic adjustments to assumptions.

Liquidity stress testing is carried out based on agreed assumptions to ensure funding conditions in the stress period. Currently, The Bank has determined and conducted stress testing monitoring for above 1 (one) month period to ensure The Bank liquidity capability when facing long-term stress condition. In addition, the Contingency Funding Plan is continually updated, where triggers/early warning indicators of the Contingency Funding Plan are monitored and the Contingency Funding Plan is periodically tested to prepare The Bank in the event of a liquidity crisis.

8. Operational Risk

Operational risk remains a focus of attention of The Bank due to operational risk arises in all functional activities, products, processes and information systems. As part of The Bank's initiatives to improve operational risk monitoring, The Bank continues to adjust and enhance the operational risk tools, including Risk Control Self-Assessment (RCSA) on risk taking units, monitoring the recording of Risk/Loss Event Database (RLED), Key Risk Indicators (KRI), and Operational Risk Officer in identifying and mitigating the operational risk at risk taking units, and together with the IT Department in the preparation of the Business Continuity Plan (BCP) to minimize risks associated with business disruption due to internal and external incidents, which is periodically tested at least once a year. The Bank has implemented 3 (three) lines of defense to ensure internal control over operational risk has worked as expected. Business work units covering all business units and branches/sub-branches at The Bank are the first line of defense that carry out proactive prevention, quality control and system management, as well as processes for identification, monitoring, reporting, mitigation, and operational risk control.

Departemen Kepatuhan dan Departemen Manajemen Risiko sebagai lini kedua pertahanan menyusun dan menerapkan Kebijakan Manajemen Risiko Operasional, memberikan dukungan terhadap proses manajemen risiko operasional yang dilakukan oleh lini pertahanan pertama dan secara independen memantau, menilai, dan melaporkan profil risiko operasional, membuat langkah untuk mendukung terciptanya budaya kepatuhan dan kesadaran risiko operasional, melakukan kaji ulang dan/atau merekomendasikan pengkinian dan penyempurnaan kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank agar sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan.

Sementara lini pertahanan ketiga adalah Departemen Audit Internal yang melakukan audit kinerja dan efektivitas penerapan manajemen risiko operasional pada lini pertahanan pertama dan kedua dengan mengacu kepada Peraturan Otoritas Jasa Keuangan, kebijakan, prosedur, dan manual yang terkait dengan fungsi audit internal.

9. Risiko Hukum, Risiko Strategik, Risiko Kepatuhan, dan Risiko Reputasi

Kerja sama dengan departemen terkait, yaitu Departemen Hukum, Departemen *Strategy Management and Investor Relation* (SMIR), Departemen Kepatuhan, dan Departemen *Retail Banking* dalam melakukan pengelolaan maupun pengawasan risiko hukum, risiko strategik, risiko kepatuhan, dan risiko reputasi secara komprehensif, baik melalui penilaian profil risiko secara triwulanan, sosialisasi dan pelatihan untuk meningkatkan *awareness* dan pemahaman karyawan, maupun melalui rapat-rapat komite dan rapat-rapat Direksi.

10. Analisis risiko atas usulan aktivitas dan/atau produk baru dilakukan untuk memastikan kemampuan Bank dalam mengelola aktivitas dan/atau produk baru termasuk kecukupan sumber daya manusia, kelengkapan kebijakan/prosedur dan sistem. Terkait dengan inisiatif baru atau perubahan produk, Bank telah memiliki kebijakan dan prosedur yang menjadi acuan seluruh fungsi unit kerja untuk melakukan perencanaan yang matang dengan melakukan kajian terhadap namun tidak terbatas pada:

- Ketertarikan produk dengan strategi Bank.
- Penilaian risiko dan mitigasinya.
- Mekanisme penyelenggaraan produk.
- Kewajiban pengajuan izin kepada regulator.
- Identifikasi kehandalan sistem informasi.

11. Budaya Manajemen Risiko

Dalam hal meningkatkan budaya manajemen risiko, sosialisasi mengenai *awareness* manajemen risiko terus dilakukan, antara lain melalui program CARAL

Compliance Department and Risk Management Department as the second line of defense prepare and implement Operational Risk Management Policy, provide support to the operational risk management process carried out by the first line of defense and independently monitor, assess, and report the operational risk profile, make steps to support the creation of a compliance culture and operational risk awareness, review and/or recommend the enhancement of The Bank's policies, provisions, systems and procedures to comply with the provisions of the Financial Services Authority and the provisions of laws and regulations.

As for the third line of defense is Internal Audit Department which conducts performance audits and effectiveness of operational risk management implementation on the first and second lines of defense by referring to the Financial Services Authority Regulations, policies, procedures, and manuals related to the internal audit function.

9. Legal Risk, Strategic Risk, Compliance Risk, and Reputation Risk

Cooperation with relevant departments, namely Legal Department, Strategy Management and Investor Relation (SMIR) Department, Compliance Department, and Retail Banking Department to manage and supervise legal risk, strategic risk, compliance risk, and reputation risk comprehensively, either through a quarterly risk profile assessment, socialization and training to increase awareness and understanding of employees or through the committees' meetings and the Board of Directors' meetings.

10. Risk analysis of proposed new activities and/or products is undertaken to ensure The Bank's ability in managing new activities and/or products. These include analysis of the adequacy of human resources, the completeness of policies/procedures and systems. In relation to new initiatives or product changes, The Bank already has policies and procedures that serve as a reference for all working unit functions to carry out careful planning by conducting assessment on but not limited to:

- Product linkage with The Bank's strategy.
- Risk assessment and mitigation.
- Product implementation mechanism.
- The obligation to apply for a permit to regulators.
- Identification of the reliability of information system.

11. Risk Management Culture

In order to improve risk management culture, socialization regarding risk management awareness is continually conducted through CARAL (Compliance,

(Compliance, AML, Risk Management, Audit, and Legal), forum diskusi dengan cabang, *awareness* terkait *Business Continuity Plan* (BCP), termasuk mengingatkan kembali pemahaman terhadap kebijakan dan prosedur yang ada dan yang akan diimplementasikan, melalui berbagai saluran komunikasi seperti email blast, media virtual atau tatap muka, dan *e-learning*.

AML, Risk Management, Audit, and Legal) program, discussion forum with branches, *awareness* related to the Business Continuity Plan (BCP), as well as through the refreshment of the understanding of existing policies and procedures and which will be implemented, through various communication channels such as email blasts, virtual or face-to-face media, and e-learning.

PROSES DAN PENILAIAN MANAJEMEN RISIKO

Proses manajemen risiko mencakup identifikasi, pengukuran, pemantauan, dan pengendalian risiko dengan dukungan sistem informasi manajemen yang memadai. Pelaksanaan penilaian profil risiko dilakukan oleh Departemen Manajemen Risiko yang dilaporkan pada setiap triwulan. Penilaian profil risiko dilakukan berdasarkan penilaian risiko inheren dan kualitas penerapan manajemen risiko pada setiap risiko yang akan dinilai. Kualitas penerapan manajemen risiko meliputi tata kelola risiko, kerangka manajemen risiko, proses manajemen risiko, kecukupan sumber daya manusia, kecukupan sistem informasi manajemen, dan kecukupan sistem pengendalian risiko.

Risiko yang dikelola Bank seperti yang tercantum pada Kebijakan Manajemen Risiko mencakup juga risiko suku bunga pada *banking book*, *country risk* dan *transfer risk*, risiko teknologi informasi, dan risiko iklim.

RISIKO KREDIT

Risiko kredit didefinisikan sebagai risiko yang terjadi akibat kegagalan pihak debitur dan/atau pihak lain dalam memenuhi kewajiban kepada Bank. Risiko kredit dapat bersumber dari berbagai aktivitas bisnis Bank. Selain pada aktivitas pemberian kredit, risiko kredit dapat berasal dari berbagai instrumen keuangan seperti efek-efek, akseptasi, transaksi antar-bank, transaksi nilai tukar dan derivatif, transaksi pembiayaan perdagangan, dan liabilitas komitmen dan kontinjensi.

Penerapan manajemen risiko kredit berlandaskan pada kebijakan dan prosedur risiko kredit yang mencakup ketentuan regulator dan juga kebijakan internal. Kebijakan dan prosedur internal dikaji ulang secara berkala agar sejalan dengan perubahan-perubahan ketentuan perbankan, perkembangan usaha Bank, dan kondisi perekonomian.

Pelaksanaan penilaian risiko kredit dilakukan Bank atas penilaian terhadap risiko inheren dan kualitas penerapan manajemen risiko. Parameter yang digunakan sebagai dasar penilaian risiko inheren terdiri dari komposisi

RISK MANAGEMENT PROCESS AND ASSESSMENT

The risk management process includes identification, measurement, monitoring, and risk control with the support of an adequate management information system. Implementation of risk profile assessment conducted by the Risk Management Department is reported on a quarterly basis. Risk profile assessment is based on inherent risk assessment and the quality of risk management implementation at each risk to be assessed. The quality of risk management implementation covers aspects such as risk governance, risk management framework, risk management process, adequacy of human resources, adequacy of management information systems, and adequacy of risk control systems.

Risks that be managed by the Bank as stated in the Risk Management Policy also covers interest rate risk in banking book, country risk and transfer risk, information technology risk, and weather risk.

CREDIT RISK

Credit risk is defined as the risk arising from the default of debtors and/or other parties in fulfilling their obligations to The Bank. Credit risk may arise from various business activities of The Bank. In addition to lending activities, credit risk may arise from various financial instruments such as securities, acceptances, interbank transactions, exchange rate and derivative transactions, trade finance transactions, and commitment and contingent liabilities.

Implementation of credit risk management is governed by the credit risk policy and procedure that incorporate the regulatory provisions as well as internal policies. Internal policies and procedures are reviewed periodically to reflect changes in banking regulations, The Bank's business growth, and economic conditions.

Credit risk assessment is conducted by The Bank in assessing inherent risk and the quality of risk management implementation. The parameters used as the basis for inherent risk assessment consist of the composition of

portofolio aset dan tingkat konsentrasi, kualitas penyediaan dana dan kecukupan pencadangan, strategi penyediaan dana dan sumber timbulnya penyediaan dana, dan faktor eksternal.

Berdasarkan penilaian tersebut, unit-unit pengambil risiko melakukan tindak lanjut, antara lain agar komposisi portofolio tidak terpusat pada sektor ataupun debitur besar tertentu, mempertahankan kualitas penyediaan dana pada tingkat risiko yang dipandang aman, mempertahankan kecukupan pencadangan, memastikan bahwa pemberian kredit dan pengambilan keputusan kredit telah dikelola secara memadai dan sesuai dengan limit yang telah ditetapkan.

Penerapan manajemen risiko yang dilakukan oleh Bank dalam rangka pemantauan dan pengendalian risiko kredit antara lain sebagai berikut:

- Pemberian kredit dan pengambilan keputusan kredit senantiasa mengacu pada pedoman tertulis yang telah dimiliki Bank mengenai kebijakan dan prosedur terkait perkreditan yang mencakup seluruh aspek proses pemberian kredit, termasuk mengenai pendelegasian wewenang dan limit wewenang kredit;
- Melakukan analisis terhadap sektor ekonomi/industri berdasarkan risiko dan penetapan limit sektor ekonomi/industri internal, yang bertujuan selain memberikan acuan dalam melakukan pemberian kredit, juga sebagai upaya untuk melakukan diversifikasi dan meningkatkan hasil proses pengelolaan risiko kredit yang lebih baik;
- Secara berkala, Bank melakukan pemantauan terhadap portofolio kredit, antara lain meliputi pemantauan pertumbuhan kredit, kualitas/kolektibilitas kredit, kecukupan pencadangan, konsentrasi pemberian kredit pada sektor ekonomi, dan debitur/grup debitur terbesar;
- Melakukan pemantauan secara intensif dan penyusunan solusi penyelesaian terhadap setiap kredit bermasalah termasuk kemungkinan dilakukannya restrukturisasi kredit, penjualan kredit, penjualan agunan secara sukarela oleh debitur, lelang agunan;
- Melakukan identifikasi risiko kredit pada setiap produk/aktivitas baru, termasuk mitigasi risiko yang diperlukan.

Risiko Kredit Maksimum

Untuk aset keuangan yang diakui di laporan posisi keuangan, eksposur maksimum terhadap risiko kredit sama dengan nilai tercatat. Untuk garansi bank dan *Standby L/C* yang diterbitkan dan *L/C* serta SKBDN yang masih berjalan dan tidak dapat dibatalkan, eksposur maksimum terhadap risiko kredit adalah nilai maksimum yang harus dibayarkan oleh Bank jika kewajiban atas garansi bank, *Standby L/C*, *L/C*, dan SKBDN tersebut terjadi. Untuk komitmen fasilitas kredit yang diberikan yang belum digunakan, eksposur maksimum terhadap risiko kredit adalah sebesar jumlah komitmen tersebut.

asset portfolio and level of concentration, the quality of funding and the adequacy of provision, funding strategy and source of funding, and external factors.

Based on the assessment, risk taking units conduct follow-up actions to ensure that the portfolio composition is not concentrated on certain sectors or large debtors, to maintain the quality of funding at a safely perceived level of risk, to maintain adequacy of provision, and to ensure that credit lending and credit decision have been adequately managed and within the approved limits.

The implementation of risk management by The Bank in monitoring and controlling credit risk includes, among others:

- Credit lending and credit decision must always refer to the written guidelines held by The Bank concerning credit policy and procedure, which cover all aspects of lending process, including delegation of authority and limit of credit authority;
- Perform analysis to economic/industry sector based on risk and limits setting on the internal economic/industry sector. This aims to provide a reference in lending activity, as well as efforts to diversify and improve the credit risk management process;
- The Bank periodically performs monitoring on loan portfolios, including monitoring on loan growth, credit quality, adequacy of provision, credit concentration by economic sector, and largest debtors/group of debtors;
- Perform intensive monitoring and prepare settlement solutions for any non-performing loans including possibility of credit restructuring, credit sales, voluntary collateral sales by debtors, collateral auctions;
- Perform credit risk identification on any new product/activity, including any risk mitigation required.

Maximum Credit Risk

For financial assets recognized in the statement of financial position, the maximum exposure to credit risk equals their carrying amount. For bank guarantee and *Standby L/C* issued and outstanding irrevocable *L/C* and domestic *L/C*, the maximum exposure to credit risk is the maximum amount that The Bank has to pay if the obligation of bank guarantee, *Standby L/C*, irrevocable *L/C*, and domestic *L/C* are called upon. For unused committed loan facilities, the maximum exposure to credit risk is the committed amount.

Tabel berikut menyajikan eksposur maksimum Bank terhadap risiko kredit untuk instrumen keuangan pada laporan posisi keuangan dan rekening administratif dengan risiko kredit, tanpa memperhitungkan agunan yang dimiliki atau perlindungan kredit lainnya:

The following table presents the maximum exposure of The Bank to credit risk for financial instruments in the statement of financial position and off-balance sheet accounts with credit risk, without taking into account any collateral held or other credit enhancements:

Risiko Kredit Maksimum

Maximum Credit Risk

dalam Rp juta | in Rp million

Uraian	2023	2022	Description
Laporan Posisi Keuangan			Statement of Financial Position
Giro pada Bank Indonesia	2.999.989	2.442.289	Current accounts with Bank Indonesia
Giro pada bank-bank lain	2.517.193	2.384.395	Current accounts with other banks
Penempatan pada Bank Indonesia dan bank-bank lain	2.880.501	7.971.834	Placements with Bank Indonesia and other banks
Aset derivatif	13.466	6.187	Derivative assets
Tagihan akseptasi	61.826	66.245	Acceptance receivables
Efek-efek yang dibeli dengan janji dijual kembali	3.653.431	9.835.773	Securities purchased under agreements to resell
Efek-efek untuk tujuan investasi	7.519.563	6.994.707	Investment securities
Kredit yang diberikan	23.720.505	25.998.130	Loans receivable
Aset lain-lain	462.816	504.740	Other assets
Rekening Administratif dengan Risiko Kredit			Off-Balance Sheet Accounts with Credit Risk
Fasilitas kredit yang diberikan yang belum digunakan - <i>committed</i>	3.562.025	2.198.706	Unused loan facilities - committed
L/C dan SKBDN yang masih berjalan dan tidak dapat dibatalkan	173.490	99.783	Outstanding Irrevocable L/C and Domestic L/C
Garansi bank dan <i>Standby</i> L/C yang diterbitkan	1.287.292	3.208.108	Bank guarantee and Standby L/C issued
Jumlah	48.852.097	61.710.897	Total

Risiko Konsentrasi Kredit

Bank mengelola dan mengendalikan konsentrasi kredit dengan menetapkan batas pemberian kredit untuk pihak terkait, satu debitur, kelompok debitur serta sektor ekonomi tertentu. Salah satu strategi yang dilakukan Bank dalam mengelola risiko konsentrasi kredit adalah dengan memberikan acuan dalam aktivitas kredit berupa penetapan target dalam pemberian kredit seperti target berdasarkan sektor ekonomi, yang dituangkan dalam rencana bisnis Bank, termasuk di dalamnya penetapan target pasar yang bertujuan untuk mengidentifikasi segmen bisnis yang dapat diterima Bank, sehingga Bank dapat memfokuskan upaya pemasaran serta menentukan mitigasi risiko yang diperlukan.

Credit Concentration Risk

The Bank manages and controls credit concentration by setting lending limits to related parties, one debtor, group of debtors and a specific economic sector. One of the strategies undertaken by The Bank in managing credit concentration risk is to provide a reference in credit activities in the form of target market lending, such as targets based on economic sectors that set forth in the business plan of The Bank. This includes target market aims to identify business segments that can be accepted by The Bank, so that The Bank can focus its marketing efforts and determine the necessary risk mitigation.

Bank juga melakukan kaji ulang atas target yang telah ditetapkan dengan mempertimbangkan kondisi ekonomi terkini, serta apabila diperlukan Bank melakukan penyesuaian atas target tersebut.

Agunan dan Perlindungan Kredit Lainnya

Sebagai salah satu kebijakan dalam memitigasi risiko kredit, Bank meminta agunan sebagai jaminan pembayaran atas dana yang diberikan oleh Bank. Bank berprinsip bahwa agunan adalah sumber terakhir dari pelunasan kredit, di mana sumber utama pelunasan kredit adalah dana dari hasil usaha debitur.

Pedoman Bank mengenai agunan antara lain mencakup jenis agunan yang dapat diterima sebagai mitigasi risiko kredit, perhitungan rasio jaminan, serta frekuensi penilaian agunan untuk setiap jenis agunan. Penentuan nilai dan jenis agunan yang diminta juga tergantung pada penilaian risiko kredit dari debitur.

The Bank also reviews its predetermined targets by taking into consideration the current economic condition, and if necessary, The Bank adjusts its targets.

Collateral and Other Credit Enhancements

As one of The Bank's policies in mitigating credit risk, The Bank requires collateral as a guarantee of payment for funds provided by The Bank. The Bank considers the collateral as the last source of loan repayment, whereas the main source of loan repayment is the fund generated from business operations of the debtors.

The Bank's guideline for collateral regulates the acceptability of the types of collateral, collateral ratio calculation, and frequency of appraisal for each collateral type. The determination of value and type of collateral required also depends on the assessment of debtors' credit risk.

RISIKO KREDIT BERDASARKAN RISIKO KONSENTRASI KREDIT

Uraian	Pemerintah (termasuk Bank Indonesia) Government (including Bank Indonesia)		Badan Usaha Milik Negara State Owned Enterprises		Bank Banks		
	2023	2022	2023	2022	2023	2022	
Laporan Posisi Keuangan							
Giro pada Bank Indonesia	2.999.989	2.442.289	-	-	-	-	
Giro pada bank-bank lain		-	38.342	26.646	2.478.851	2.357.749	
Penempatan pada Bank Indonesia dan bank-bank lain	2.880.501	6.972.794	-	-		999.040	
Aset derivatif	-	-	-	-	13.466	6.187	
Tagihan akseptasi	-	-	-	49.129	-	-	
Efek-efek yang dibeli dengan janji dijual kembali	3.653.431	9.835.773	-	-	-	-	
Efek-efek untuk tujuan investasi	7.518.543	6.925.809	-	-	-	-	
Kredit yang diberikan		-	7.040.348	9.429.878	1.535.240	799.099	
Aset lain-lain	78.572	91.726	198.536	119.708	3.185	8.671	
Rekening Administratif dengan Risiko Kredit							
Fasilitas kredit yang diberikan yang belum digunakan – <i>committed</i>	-	-	18	-	-	-	
L/C dan SKBDN yang masih berjalan dan tidak dapat dibatalkan	-	-	3.306	29.754	-	-	
Garansi bank dan <i>Standby</i> L/C yang diterbitkan	-	-	243	41.922	153.970	1.712.425	
Jumlah	17.131.036	26.268.391	7.280.793	9.697.037	4.184.712	5.883.171	
Persentase	35%	43%	15%	16%	8%	10%	

Jenis agunan yang dapat diterima oleh Bank antara lain deposito berjangka/setoran kas, *Standby* L/C, tanah dan bangunan (properti - rumah tinggal, komersial, industri, dan dalam konstruksi), tanah kosong, mesin dan peralatan, piutang dagang, persediaan (termasuk komoditi), truk/bis, alat berat, pesawat (untuk tujuan komersial dan *charter*), kapal laut, mobil, saham, motor, dan jaminan perusahaan atau perorangan. Kondisi, legalitas, peruntukan jaminan (sebagai jaminan pokok, utama, tambahan) serta rasio jaminan telah diatur dalam kebijakan Bank.

The types of collateral that can be accepted by The Bank include time deposits/cash deposits, *Standby* L/C, land and buildings (property - residential, commercial, industrial, and under construction), vacant land, machinery and equipment, accounts receivable, supplies (including commodities), trucks/buses, heavy equipment, aircrafts (for commercial and charter purposes), ships/vessels, automobiles, stocks, motorcycles, and corporate or personal guarantees. The condition, legality, collateral purpose (as prime, main, additional collateral) and collateral ratio are regulated in The Bank's policy.

CREDIT RISK BY CREDIT CONCENTRATION RISK

dalam Rp juta
in Rp million

	Perusahaan Corporate		Ritel Retail		Jumlah Total		Description
	2023	2022	2023	2022	2023	2022	
Statement of Financial Position							
	-	-	-	-	2.999.989	2.442.289	Current accounts with Bank Indonesia
	-	-	-	-	2.517.193	2.384.395	Current accounts with other banks
	-	-	-	-	2.880.501	7.971.834	Placements with Bank Indonesia and other banks
	-	-	-	-	13.466	6.187	Derivative assets
	61.826	17.116	-	-	61.826	66.245	Acceptance receivables
	-	-	-	-	3.653.431	9.835.773	Securities purchased under agreements to resell
	1.020	68.898	-	-	7.519.563	6.994.707	Investment securities
	15.025.163	15.508.920	119.754	260.233	23.720.505	25.998.130	Loans receivable
	181.978	279.253	545	5.382	462.816	504.740	Other assets
Off-Balance Sheet Accounts with Credit Risk							
	3.414.811	2.194.722	147.196	3.984	3.562.025	2.198.706	Unused loan facilities - committed
	170.184	70.029	-	-	173.490	99.783	Outstanding Irrevocable L/C and Domestic L/C
	1.133.079	1.453.761	-	-	1.287.292	3.208.108	Bank gurantee and Standby L/C issued
	19.988.061	19.592.699	267.495	269.599	48.852.097	61.710.897	Total
	41%	32%	1%	0%	100%	100%	Percentage

Untuk kredit atau pembiayaan properti, Bank telah menetapkan rasio *Loan to Value* (LTV), yang merupakan rasio antara nilai kredit yang dapat diberikan oleh Bank terhadap nilai agunan pada saat awal pemberian kredit, sesuai dengan ketentuan oleh regulator yang berlaku saat ini.

Tabel berikut menyajikan komposisi kredit yang diberikan (sebelum penyisihan kerugian penurunan nilai) yang mendapatkan manfaat dari agunan, baik sebagian maupun penuh, sebagai mitigasi dari risiko kredit:

For credit or property financing, The Bank has set the Loan to Value (LTV) ratio, which is defined as the ratio between the credit value that may be granted by The Bank to the value of the collateral at the time when the loan was given, in accordance with the current prevailing provisions by regulators.

The following table presents the composition of loans receivable (before allowance for impairment losses) that benefit from collateral, either partially or in full, as mitigation of credit risk:

Agunan dan Perlindungan Kredit Lainnya

Collateral and Other Credit Enhancements

dalam Rp juta | in Rp million

Uraian Description	Nilai kredit yang diberikan sebelum penyisihan kerugian penurunan nilai Balance of loans receivable before allowance for impairment losses		Jenis Agunan Type of Collateral
	2023	2022	
Dijamin penuh Fully secured	2.506.219	2.065.967	Kas, <i>Standby</i> L/C Cash, <i>Standby</i> L/C
Dijamin sebagian Partially secured	14.037.289	17.288.277	Kas, piutang dagang, tanah dan bangunan, aset bergerak, garansi Cash, accounts receivable, land and buildings, moveable assets, guarantees
Tidak memiliki jaminan Unsecured	8.212.580	7.860.623	-
Jumlah Total	24.756.088	27.214.867	

Kualitas Aset Keuangan

Bank memiliki kebijakan untuk memelihara secara akurat dan konsisten peringkat risiko seluruh portofolio aset keuangan. Hal ini akan memfasilitasi fokus manajemen risiko atas risiko yang ada dan perbandingan eksposur kredit di seluruh lini bisnis, daerah geografis, dan produk. Sistem peringkat ini didukung oleh berbagai analisa keuangan, dikombinasikan dengan informasi pasar yang telah diolah untuk menyediakan masukan utama untuk pengukuran risiko pihak lawan.

Quality of Financial Assets

The Bank has a policy to maintain accurate and consistent risk ratings across the portfolio of financial assets. This will facilitate the focus of risk management on existing risks and comparison of credit exposures across all lines of business, geographic areas, and products. This rating system is supported by a variety of financial analysis, combined with market information that has been processed to provide the main inputs for counterparty risk measurement.

Fungsi Pengendalian Sebelum dan Setelah Pencairan Kredit

Fungsi pengendalian pada proses sebelum pencairan bertujuan untuk memastikan kelengkapan dokumen, pemenuhan syarat dan ketentuan yang telah ditetapkan serta kepatuhan debitur yang merupakan pemeriksaan umum awal sebelum pencairan dilakukan. Tata usaha dokumentasi dan administrasi yang baik akan menempatkan Bank pada posisi yang kuat pada saat terjadi tuntutan hukum yang harus diperhitungkan dengan baik, sehingga tidak ada keraguan dalam legalitas dokumen.

Control Functions Pre- and Post-Credit Disbursement

The control function prior to credit disbursement is conducted to ensure the completeness of documents, the fulfillment of the terms and conditions set, and the compliance of debtors which are the initial general verifications before the disbursement takes place. Proper administration and documentation will place The Bank in a strong position in the event of a lawsuit, so that there is no doubt in the legality of the document.

Tidak hanya pengendalian sebelum pencairan kredit, pemantauan dan pemeriksaan setelah kredit direalisasi juga merupakan hal penting yang harus dilakukan. Oleh sebab itu, Bank mewajibkan adanya kunjungan rutin ke nasabah, melakukan pemeriksaan pasca realisasi kredit berdasarkan pemeriksaan umum dan khusus serta mendokumentasikannya dalam arsip file kredit.

Besides having control function prior to credit disbursement, the monitoring and checking after credit disbursement are also important. Therefore, The Bank requires regular visits to customers, conducts post-disbursement checking based on general and special checking, and documenting them in credit files.

Pemeriksaan umum antara lain meliputi kesesuaian penggunaan fasilitas dengan perjanjian kredit, situasi perkembangan usaha, aset dan kewajiban debitur, aktivitas rekening debitur, dan perkembangan pasar dari debitur.

General verifications include, among others, the conformity between the use of facilities with loan agreements, business development situations, debtor assets and liabilities, debtor account activities, and debtor market conditions.

Evaluasi Penurunan Nilai

Pertimbangan utama evaluasi penurunan nilai kredit yang diberikan antara lain adalah kualitas aset kredit, kondisi keuangan dan prospek usaha debitur. Bank melakukan evaluasi penurunan nilai dalam 2 (dua) pendekatan:

Evaluasi Penurunan Nilai dengan Pendekatan Expected Cash Flow (ECF)

Bank menentukan penyisihan kerugian penurunan nilai dengan pendekatan *Expected Cash Flow* (ECF) untuk setiap kredit yang signifikan secara individual dan memiliki bukti objektif penurunan nilai kredit. Hal-hal yang dipertimbangkan dalam menentukan jumlah penyisihan kerugian penurunan nilai antara lain mencakup keberlanjutan rencana bisnis debitur, kemampuan debitur untuk memperbaiki kinerja saat menghadapi kesulitan keuangan, proyeksi penerimaan dan ekspektasi pengeluaran saat terjadi kepailitan, ketersediaan dukungan keuangan lainnya, nilai agunan yang dapat direalisasikan, dan ekspektasi waktu diperolehnya arus kas. Penyisihan kerugian penurunan nilai dievaluasi setiap tanggal pelaporan kecuali terdapat beberapa kondisi yang mengharuskan adanya perhatian lebih. Penilaian individu dilakukan berdasarkan metode *discounted cash flow*.

Evaluasi Penurunan Nilai dengan Pendekatan Model

Jika Bank menentukan tidak terdapat bukti objektif mengenai penurunan nilai atas aset keuangan yang dinilai secara ECF, terlepas aset keuangan tersebut signifikan atau tidak, maka Bank memasukkan aset tersebut ke dalam kelompok aset keuangan yang memiliki karakteristik risiko kredit yang sejenis dan menilai penurunan nilai kelompok tersebut secara pendekatan model. Penurunan nilai aset keuangan dievaluasi secara model, diestimasi berdasarkan kerugian historis yang pernah dialami atas aset-aset yang memiliki risiko kredit yang serupa dengan karakteristik risiko kredit kelompok tersebut di Bank. Aset yang penurunan nilainya dinilai secara pendekatan ECF dan untuk itu kerugian penurunan nilai diakui atau tetap diakui, tidak termasuk dalam penilaian penurunan nilai secara pendekatan model.

Penyisihan kerugian penurunan nilai secara pendekatan model dihitung dengan menggunakan metode statistik dari data historis berupa *Probability of Default* (PD), *Loss Given Default* (LGD), dan *Exposure at Default* (EAD) di mana termasuk di dalamnya komponen seperti *repayment schedule*, Faktor Konversi Kredit (FKK), dan *Expected Lifetime*. Bank juga menentukan *Forward Looking* (FL) menggunakan metode analisis model statistik untuk penilaian penurunan nilai aset keuangan di masa depan secara pendekatan model.

Proses penentuan kualitas kredit Bank mengacu pada kolektibilitas sesuai peraturan OJK.

Impairment Assessment

The main considerations for the loan impairment assessment are the asset quality of loan, financial condition and business prospect of the debtor. The Bank evaluates impairment in 2 (two) approaches:

Expected Cash Flow (ECF) Approach Impairment Assessment

The Bank determines the allowance for impairment losses with expected cash flow (ECF) approach for each loan that is individually significant and has objective evidence of impairment of the credit score. Matters considered in determining the allowance for impairment losses include the sustainability of the debtor's business plan, the ability of the debtor to improve performance in the face of financial difficulties, the projected revenue and expenditure in the event of bankruptcy, the availability of other financial support, the value of collateral that can be realized, and the expected time of cash flows. Allowance for impairment losses is evaluated on every reporting date, unless there are certain conditions that require more attention. Individual assessment is based on discounted cash flow method.

Model Approach Impairment Assessment

If The Bank determines that there is no objective evidence on impairment of financial assets to be assessed with ECF approach, whether significant or not, The Bank includes the asset in a group of financial assets with similar credit risk characteristics and to be assessed with model approach for impairment. The impairment of financial assets that are assessed with model approach are estimated based on historical loss experience of assets with similar credit risk characteristics of the group in The Bank. Assets that are assessed with ECF approach for impairment and for which an impairment loss is or continues to be recognized are not included in the model approach assessment of impairment.

The allowance for impairment losses which is assessed with model approach is calculated using statistical method of the historical data including the Probability of Default (PD), Loss Given Default (LGD), and Exposure at Default (EAD) in which consists of some components such as repayment schedule, Credit Conversion Factor (CCF), and Expected Lifetime. The Bank also determines the Forward Looking (FL) using statistical model analysis method to assess the impairment of financial assets in the future with model approach.

Process of determining The Bank refers to collectibility in accordance with the OJK regulations.

Segmen Korporasi

Untuk segmen korporasi, kualitas kredit dikelola oleh Bank dengan menggunakan peringkat kredit internal. Bank menentukan peringkat suatu debitur dengan terlebih dahulu menetapkan peringkat keuangan (*financial grade*) dengan menggunakan model peringkat dari aspek keuangan dan data yang diperoleh dari laporan keuangan debitur, termasuk kekayaan bersih dan arus kas. Peringkat keuangan ini kemudian disesuaikan dengan mempertimbangkan kondisi dari posisi keuangan debitur dan faktor kualitatif untuk menentukan peringkat debitur.

Faktor kualitatif terutama mempertimbangkan faktor-faktor seperti informasi kerugian historis, kesesuaian rencana bisnis debitur atau rencana perbaikan operasional, status perkembangan rencana bisnis dan dukungan menyeluruh dari lembaga keuangan.

Selain prosedur peringkat di atas, dalam hal debitur dianggap sebagai anak perusahaan yang dikonsolidasi oleh induk perusahaan di luar negeri, peringkat debitur bisa ditentukan dengan mengadopsi peringkat obligor berdasarkan kualitas kredit induk perusahaan atau peringkat kredit yang diberikan induk perusahaan Bank terhadap induk perusahaan tersebut. Peringkat debitur dan peringkat fasilitas ditelaah paling sedikit setahun sekali, atau bila diperlukan, ketika ada perubahan kredit.

Peringkat internal untuk segmen korporasi digolongkan sebagai berikut:

- *Grading* sAAA+ sampai AA+: debitur memiliki kemampuan membayar kewajiban yang tinggi;
- *Grading* sAA sampai A-: debitur tidak mengalami kesulitan pembayaran kewajiban, namun terdapat faktor bisnis atau ekonomi yang dapat menyebabkan masalah dalam pembayaran kewajiban;
- *Grading* BBB+ sampai BB: debitur memerlukan pemantauan khusus karena bisnis yang lesu/tidak stabil, atau masalah keuangan;
- *Grading* B atau lebih rendah merupakan debitur yang telah memburuk (*default*).

Corporate Segment

For corporate segment, the quality of credit is managed by The Bank using internal credit ratings. The Bank determines the rating of a debtor by first determining the financial grade using a rating model from financial aspects and data obtained from the debtor's financial statements, including net worth and cash flows. This financial grade is then adjusted by considering the conditions of the debtor's financial position and qualitative factors to determine the grade of the debtor.

Qualitative factors mainly consider some factors such as historical loss information, conformity of the debtor's business plan or operational improvement plan, status of developments in the business plan and overall support from financial institutions.

In addition of grading procedure above, in the event that the debtor is considered as a subsidiary that is consolidated by a parent company abroad, the debtor's grading can be determined by adopting an obligor grading based on the quality of the parent loan or credit grading provided by The Bank's parent company. Debtor grading and facility grading are reviewed at least once a year, or if needed, when there are changes in credit.

Internal grading for corporate segment is categorized as follows:

- *Grading* sAAA+ to AA+: debtors have very strong ability to pay their obligations;
- *Grading* sAA to A-: debtors do not experience difficulties to pay their obligations; however, there are business or economic factors that may cause difficulties to pay the obligations;
- *Grading* BBB+ to BB: debtors need special observation as they experience sluggish/unstable business, or financial issues;
- *Grading* B or lower debtors represent debtors which are credit-impaired (*default*).

Pada tanggal 31 Desember 2023 dan 2022, nilai tercatat aset keuangan berdasarkan kualitas kredit adalah sebagai berikut:

As of December 31, 2023 and 2022, the carrying amount of financial assets based on credit quality was as follows:

Uraian	Tahap 1 Stage 1	Tahap 2 Stage 2	Tahap 3 Stage 3	Jumlah Total	Description
GIRO PADA BANK INDONESIA			CURRENT ACCOUNTS WITH BANK INDONESIA		
Tanpa peringkat	2.999.989	-	-	2.999.989	Non-graded
Nilai tercatat bruto	2.999.989	-	-	2.999.989	Gross carrying amount
Dikurangi: cadangan kerugian penurunan nilai		-	-		Less: allowance for impairment losses
NILAI TERCATAT	2.999.989	-	-	2.999.989	CARRYING AMOUNT
GIRO PADA BANK-BANK LAIN			CURRENT ACCOUNTS WITH OTHER BANKS		
Grade AAA sampai AA+	1.610.993	-	-	1.610.993	Grade AAA to AA+
Grade AA- sampai BBB	909.231	-	-	909.231	Grade AA- to BBB
Nilai tercatat bruto	2.520.224	-	-	2.520.224	Gross carrying amount
Dikurangi: cadangan kerugian penurunan nilai	(3.031)	-	-	(3.031)	Less: allowance for impairment losses
NILAI TERCATAT	2.517.193	-	-	2.517.193	CARRYING AMOUNT
PENEMPATAN PADA BANK INDONESIA DAN BANK-BANK LAIN			PLACEMENTS WITH BANK INDONESIA AND OTHER BANKS		
Tanpa peringkat	2.880.501	-	-	2.880.501	Non-graded
Nilai tercatat bruto	2.880.501	-	-	2.880.501	Gross carrying amount
Dikurangi: cadangan kerugian penurunan nilai		-	-		Less: allowance for impairment losses
NILAI TERCATAT	2.880.501	-	-	2.880.501	CARRYING AMOUNT
TAGIHAN AKSEPTASI			ACCEPTANCE RECEIVABLES		
Grade sAA sampai AA+	61.966	-	-	61.966	Grade sAA to AA+
Grade AA sampai BBB		-	-		Grade AA to BBB
Nilai tercatat bruto	61.966	-	-	61.966	Gross carrying amount
Dikurangi: cadangan kerugian penurunan nilai	(140)	-	-	(140)	Less: allowance for impairment losses
NILAI TERCATAT	61.826	-	-	61.826	CARRYING AMOUNT

Uraian	Tahap 1 Stage 1	Tahap 2 Stage 2	Tahap 3 Stage 3	Jumlah Total	Description
EFEK-EFEK YANG DIBELI DENGAN JANJI DIJUAL KEMBALI				SECURITIES PURCHASED UNDER AGREEMENTS TO RESELL	
Tanpa peringkat	3.653.440	-	-	3.653.440	Non-graded
Nilai tercatat bruto	3.653.440	-	-	3.653.440	Gross carrying amount
Dikurangi: cadan- gan kerugian penurunan nilai	(9)	-	-	(9)	Less: allowance for impairment losses
NILAI TERCATAT	3.656.431	-	-	3.656.431	CARRYING AMOUNT
EFEK-EFEK UNTUK TUJUAN INVESTASI				INVESTMENT SECURITIES	
Grade sAA	7.518.543	-	-	7.518.543	Grade sAA
Grade A-	1.020	-	-	1.020	Grade A-
Tanpa peringkat	7.519.563	-	-	7.519.563	Non-graded
Nilai tercatat bruto	7.519.563	-	-	7.519.563	Gross carrying amount
Dikurangi: cadangan kerugian penurunan nilai	-	-	-	-	Less: allowance for impairment losses
NILAI TERCATAT	7.519.563	-	-	7.519.563	CARRYING AMOUNT
KREDIT YANG DIBERIKAN				LOANS RECEIVABLE	
Korporasi				Corporates	
Grade sAA sampai AA+	1.100.202	-	-	1.100.202	Grade sAA to AA+
Grade sAA- sampai A-	19.014.578	1.629.180	-	20.643.758	Grade sAA- to A-
Grade BBB+ sampai BB	265.414	1.733.180	412.099	2.410.603	Grade BBB+ to BB
Grade B	-	301.972	162.285	464.257	Grade B
Nilai tercatat bruto	20.380.194	3.664.332	574.294	24.618.820	Gross carrying amount
Dikurangi: cadangan kerugian penurunan nilai	(96.543)	(607.681)	(329.811)	(1.034.035)	Less: allowance for impairment losses
	20.283.651	3.056.651	244.483	23.584.785	
Non-korporasi				Non-corporates	
Belum jatuh tempo	127.208	2.023	-	129.231	Not yet overdue
Telah jatuh tempo sampai dengan 1-30 hari	2.236	1.256	-	3.492	Past due up to 31 - 90 days
Telah jatuh tempo sampai dengan 31-90 hari	-	3.597	-	3.597	It is due until 31-90 days
Telah jatuh tempo lebih dari 90 hari	-	-	948	948	Past due more than 90 days
Nilai tercatat bruto	129.444	6.172	400	135.720	Gross carrying amount
Dikurangi: cadangan kerugian penurunan nilai	(296)	(704)	(548)	(1.584)	Less: for impairment losses

Uraian	Tahap 1 Stage 1	Tahap 2 Stage 2	Tahap 3 Stage 3	Jumlah Total	Description
NILAI TERCATAT KREDIT YANG DIBERIKAN	20.489.152	2.555.722	675.631	23.720.505	CARRYING AMOUNT OF LOANS RECEIVABLES
ASET LAIN-LAIN					OTHER ASSETS
Tanpa peringkat	462.816	-	-	462.816	Not yet overdue
Nilai tercatat bruto	462.816	-	-	462.816	Gross carrying amount
Dikurangi: cadangan kerugian penurunan nilai		-	-		Less: allowance for impairment losses
NILAI TERCATAT	462.816	-	-	462.816	CARRYING AMOUNT

Risiko Pasar

Risiko pasar adalah risiko terjadinya perubahan harga pasar, seperti tingkat suku bunga dan nilai tukar valuta asing, yang akan memengaruhi pendapatan Bank atau nilai dari instrumen keuangan yang dimilikinya. Tujuan dari manajemen risiko pasar adalah untuk mengelola dan mengendalikan eksposur risiko pasar dalam parameter yang dapat diterima, dan secara bersamaan mengoptimalkan hasil pengembalian atas risiko yang diambil. Penerapan manajemen risiko pasar Bank meliputi risiko suku bunga dan risiko nilai tukar yang timbul baik dari posisi *trading book* maupun posisi *banking book*.

Asset and Liability Committee (ALCO), yang diketuai oleh Presiden Direktur, dengan anggota Direksi terkait, Kepala Departemen terkait, dan Departemen *Global Markets* sebagai sekretaris ALCO, mengadakan rapat secara berkala untuk mengkaji profil bisnis Bank dan dampaknya terhadap pengelolaan aset dan kewajiban. ALCO menentukan strategi pengelolaan aset dan kewajiban dengan mempertimbangkan lingkungan bisnis saat ini dan yang diharapkan. ALCO mengkaji posisi aset, kewajiban, dan suku bunga dan posisi *gap* likuiditas pada *banking book*. ALCO juga menetapkan suku bunga deposito dan suku bunga acuan kredit.

Dalam penerapan manajemen risiko pasar, dengan mengacu kepada *best practice*, selain kaji ulang dan pemantauan atas limit-limit yang ada, yaitu *stop loss limit*, limit Posisi Devisa Neto (PDN), faktor sensitivitas (PV01), dan *Management Action Triggers* (MATs), Bank juga menerapkan *stress testing* dan faktor risiko (PSE *risk factor*) dalam penentuan limit FX untuk *counterparty* serta memastikan bahwa transaksi yang dilakukan Bank sesuai dengan harga pasar (pemantauan *off market*). Selain itu, valuasi terhadap portofolio yang dimiliki Bank didasarkan atas sumber data pasar yang lazim digunakan.

Market Risk

Market risk is the risk of changes in market prices, such as interest rates and foreign exchange rates, which will affect The Bank's income or the value of its financial instruments. The objective of market risk management is to manage and control market risk exposures within acceptable parameters, while simultaneously optimizing the return on risk. Implementation of The Bank's market risk management includes interest rate risk and exchange rate risk arising both from trading book position and banking book position.

The Asset and Liability Committee (ALCO), chaired by President Director, with members comprising related Board of Directors, related Heads of Departments, and Global Markets Department as secretary of ALCO. The ALCO meets periodically to review The Bank's business profile and its impact on asset and liability management. It determines the strategies of asset and liability management by considering the current and expected business environment. It reviews the position of assets, liabilities, and interest rates and liquidity gap position in the banking book. It also determines the term deposit rates and lending rates.

In the implementation of market risk management, with reference to best practices, in addition to reviewing and monitoring existing limits, namely stop loss limit, Net Open Position (NOP) limit, sensitivity factor (PV01), and Management Action Triggers (MATs), The Bank also conducts stress testing and risk factor (PSE risk factor) in determining FX limits for counterparties and ensuring that transactions carried out by The Bank are in accordance with market prices (off market monitoring). Moreover, valuations of The Bank's portfolio are based on commonly used market data sources.

Dalam area manajemen risiko *banking book*, pengelolaan risiko suku bunga dilakukan melalui pendekatan faktor sensitivitas (PV01) dan *stress testing*, baik dari perspektif pendapatan maupun nilai ekonomis, yang telah disesuaikan dengan peraturan terkini dari regulator. Metode-metode ini membantu Bank dalam menentukan perkiraan risiko suku bunga di *banking book* dengan lebih akurat.

Bank juga telah menetapkan Prosedur Rencana Darurat untuk kejadian terkait risiko pasar dan risiko suku bunga *banking book* dengan tujuan untuk memperjelas indikator peringatan dini dan proses eskalasi dalam situasi darurat.

Risiko Suku Bunga

Risiko suku bunga timbul dari adanya kemungkinan bahwa perubahan tingkat suku bunga akan memengaruhi aliran kas di masa depan atau nilai wajar instrumen keuangan. Posisi ini dipantau secara bulanan untuk memastikan bahwa posisi tersebut dapat dikelola oleh Bank. Pengelolaan risiko suku bunga dilakukan dengan pemantauan sensitivitas aset dan liabilitas keuangan Bank atas berbagai skenario suku bunga. Tabel di bawah ini menyajikan aset berbunga dan liabilitas berbunga (bukan untuk tujuan diperdagangkan) Bank pada nilai tercatat, yang dikategorikan menurut mana yang lebih terdahulu antara tanggal *repricing* atau tanggal jatuh tempo kontraktual:

Instrumen dengan Tingkat Suku Bunga Mengambang

In the banking book risk management area, the interest rate risk management is carried out through a sensitivity factor (PV01) approach and stress testing, both from income perspective and economic value perspective, which have been adjusted to the current regulations of regulators. These methods help The Bank in determining the interest rate risk in the banking book more accurately.

The Bank has established Emergency Plan Procedure for market risk and interest rate risk in the banking book events with the aim to have more clarity in early warning indicators and escalation process during emergency situation.

Interest Rate Risk

Interest rate risk arises from the possibility that changes in interest rates will affect future cash flows or the fair values of financial instruments. This position is monitored on a monthly basis to ensure that the position can be managed by The Bank. Interest rate risk management is performed by monitoring the sensitivity of The Bank's assets and liabilities over various interest rate scenarios. The table below presents The Bank's interest-earning assets and interest-bearing liabilities (not for trading purpose) at carrying amounts, categorized by whichever is earlier between the repricing or contractual maturity dates:

Floating Rate Instruments

dalam Rp juta | in Rp million

Uraian	Hingga 3 bulan Up to 3 months		3-12 bulan 3-12 months		Description
	2023	2022	2023	2022	
Giro pada bank-bank lain	-	-	-	-	Current accounts with other banks
Penempatan pada Bank Indonesia dan bank-bank lain		655.536	-	-	Placements with Bank Indonesia and other banks
Efek-efek yang dibeli dengan janji dijual kembali	-	-	-	-	Securities purchased under agreements to resell
Efek-efek untuk tujuan investasi	-	-	-	-	Investment securities
Kredit yang diberikan*	15.379.069	19.659.816	6.897.257	6.484.057	Loans receivable*
	15.379.069	20.315.352	6.897.257	6.484.057	

dalam Rp juta | in Rp million

Uraian	Hingga 3 bulan Up to 3 months		3-12 bulan 3-12 months		Description
	2023	2022	2023	2022	
Simpanan nasabah	(8.291.796)	(10.478.129)	-	(5.862)	Deposits from customers
Simpanan dari bank-bank lain	(1.209.231)	(166)	-	-	Deposits from other banks
Pinjaman yang diterima	(2.001.610)	(5.292.950)	-	-	Borrowings
Liabilitas lain-lain dan beban yang masih harus dibayarkan	-	-	-	-	Other liabilities and accrued expenses
Surat berharga yang dijual dengan janji dibeli kembali	-	-	-	-	Securities sold under agreements to repurchase
Pinjaman subordinasi	-	(934.050)	(1.154.775)	(1.167.563)	Subordinated loans
	(11.502.637)	(16.705.295)	(1.154.775)	(1.173.425)	
Jumlah	3.876.432	3.610.057	5.742.482	5.310.632	Total

* Sebelum dikurangi penyisihan kerugian penurunan nilai
* Before allowance for impairment losses

Instrumen dengan Tingkat Suku Bunga Tetap

Fixed Rate Instruments

dalam Rp juta | in Rp million

Uraian	Hingga 3 bulan Up to 3 months		3-12 bulan 3-12 months		1-2 tahun 1-2 years		> 2 tahun > 2 years		Description
	2023	2022	2023	2022	2023	2022	2023	2022	
Giro pada bank Indonesia	2.999.989	2.442.289	-	-	-	-	-	-	Current accounts with Indonesian banks
Giro pada bank-bank lain	2.520.224	2.385.188	-	-	-	-	-	-	Current accounts with other banks
Penempatan pada Bank Indonesia dan bank-bank lain	2.880.501	6.972.794	-	343.574	-	-	-	-	Placements with Bank Indonesia and other banks
Efek-efek yang dibeli dengan janji dijual kembali	2.198.137	8.268.921	1.455.303	1.566.852	-	-	-	-	Securities purchased under agreements to resell
Efek-efek untuk tujuan investasi	401.711	760.721	2.247.019	1.279.717	2.410.750	1.207.669	2.460.083	3.746.984	Investment securities
Kredit yang diberikan*	1.695	18.804	247.090	67.296	116.555	206.862	2.114.422	778.032	Loans receivable*
	11.002.257	20.848.717	3.949.412	3.257.439	2.527.305	1.414.531	4.574.505	4.526.016	
Simpanan nasabah	(17.472.220)	(23.439.680)	(7.474.684)	(6.962.770)	(1.235)	-	(629)	-	Deposits from customers

dalam Rp juta | in Rp million

Uraian	Hingga 3 bulan Up to 3 months		3-12 bulan 3-12 months		1-2 tahun 1-2 years		> 2 tahun > 2 years		Description
	2023	2022	2023	2022	2023	2022	2023	2022	
Simpanan dari bank-bank lain	(159.750)	(1.226.585)	(4.000)	(238.012)	-	-	-	-	Deposits from other banks
Pinjaman yang diterima	-	-	-	-	-	-	-	-	Borrowings
Liabilitas lain-lain dan beban yang masih harus dibayarkan	-	-	(2.806)	(1.073)	(561)	(78)	(44.829)	(19.745)	Other liabilities and accrued expenses
Surat berharga yang dijual dengan janji dibeli kembali	-	(610.523)	-	-	-	-	-	-	Securities sold under agreements to repurchase
Pinjaman subordinasi	-	-	-	-	-	-	-	-	Subordinated loans
	(17.631.970)	(25.276.788)	(7.481.490)	(7.201.855)	(1.796)	(78)	(45.458)	(19.745)	
Jumlah	(6.629.713)	(4.428.071)	(3.532.078)	(3.944.416)	2.525.509	1.414.453	4.529.047	4.505.271	Total

* Sebelum dikurangi penyisihan kerugian penurunan nilai
* Before allowance for impairment losses

Berdasarkan perjanjian kredit dengan debitur/nasabah, Bank berhak mengubah besaran suku bunga sewaktu-waktu atas dasar pertimbangan Bank, kecuali untuk kredit-kredit tertentu yang sudah ditetapkan jangka waktu *repricing*.

Based on the loan agreement with the debtors/customers, The Bank has the right to change the interest rate at any time based on the consideration of The Bank, except for certain loans with repricing period have been determined

Interest Rate Risk in Banking Book (IRRBB)

Interest Rate Risk in Banking Book (IRRBB) merupakan risiko akibat pergerakan suku bunga di pasar yang berlawanan dengan posisi *banking book*, yang memiliki potensi memberikan dampak terhadap permodalan dan pendapatan Bank baik untuk saat ini atau pada masa mendatang.

Interest Rate Risk in Banking Book (IRRBB)

Interest Rate Risk in Banking Book (IRRBB) is the risk that exists due to the movement of market interest rate that is contrary to the banking book position, which has the potential to impact The Bank's capital and income, either for now or in the future.

Mengacu kepada SEOJK No. 12/SEOJK.03/2018, Bank menggunakan 2 (dua) metode dalam melakukan pengukuran IRRBB sebagai berikut:

- Pengukuran berdasarkan perubahan pada nilai ekonomis dari ekuitas (*economic value of equity*), yang selanjutnya disingkat EVE, adalah suatu metode yang mengukur dampak perubahan suku bunga terhadap nilai ekonomis dari ekuitas Bank; dan
- Pengukuran berdasarkan perubahan pada pendapatan bunga bersih (*net interest income*), yang selanjutnya disingkat NII, adalah suatu metode yang mengukur dampak perubahan suku bunga terhadap pendapatan Bank.

In reference to SEOJK No. 12/SEOJK.03/2018, The Bank uses 2 (two) methods in measuring IRRBB as follows:

- Measurement based on changes in the economic value of equity, hereinafter abbreviated as EVE, is a method that measures the impact of changes in interest rates on the economic value of The Bank's equity; and
- Measurement based on changes in net interest income, hereinafter abbreviated as NII, is a method that measures the impact of changes in interest rates on The Bank's income..

INTEREST RATE RISK IN BANKING BOOK (IRRBB) BANK SECARA INDIVIDU

dalam Rp juta / in Rp million

Uraian Description	ΔEVE		ΔNII	
	2023	2022	2023	2022
Parallel up	(437.376)	(341.988)	(90.714)	10.322
Parallel down	514.809	406.887	90.714	(10.322)
Steeper	(9.143)	(56.164)		
Flattener	(79.298)	(20.593)		
Short rate up	(261.326)	(169.244)		
Short rate down	277.968	183.543		
Nilai maksimum negatif (absolut) Negative maximum value (absolute)	437.376	341.988	90.714	10.322
Modal Tier 1 (untuk ΔEVE) atau projected income (untuk ΔNII) Tier 1 capital (for ΔEVE) or projected income (for ΔNII)	5.770.356	5.532.750	1.282.642	1.425.833
Nilai maksimum dibagi modal Tier 1 (untuk ΔEVE) atau projected income (untuk ΔNII) Maximum value divided by Tier 1 capital (for ΔEVE) or projected income (for ΔNII)	7,58%	6,18%	7,07%	0,72%

Analisa Kualitatif Qualitative Analysis

1. Definisi IRRBB untuk pengukuran dan pengendalian risiko

Risiko suku bunga dalam banking book atau IRRBB adalah risiko akibat pergerakan suku bunga di pasar yang berlawanan dengan posisi banking book, yang berpotensi memberikan dampak terhadap permodalan dan rentabilitas (earnings) Bank baik untuk saat ini maupun pada masa mendatang.

Definisi tersebut di atas merujuk kepada:

1. POJK No. 18/POJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum;
2. SEOJK No. 34/SEOJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum;
3. SEOJK No. 12/SEOJK.03/2018 tentang Penerapan Manajemen Risiko dan Pengukuran Risiko Pendekatan Standar untuk Risiko Suku Bunga dalam Banking Book bagi Bank Umum.

Definition of IRRBB for risk measurement and control

IRRBB is defined as risk due to the adverse movement of interest rate in market which is opposite to the Banking Book, potentially conducting impact to the capital and earnings of The Bank both for present time and future time.

The above definition refers to:

1. POJK No. 18/POJK.03/2016 concerning Application of Risk Management for Commercial Banks;
2. SEOJK No. 34/SEOJK.03/2016 concerning Application of Risk Management for Commercial Banks;
3. SEOJK No. 12/SEOJK.03/2018 concerning Application of Risk Management and Measurements of Standardized Approach for Interest Rate Risk in the Banking Book for Commercial Banks.

Analisa Kualitatif Qualitative Analysis

2. Strategi Manajemen Risiko dan Mitigasi Risiko untuk IRRBB

Dalam mengelola dan memitigasi risiko IRRBB, Bank telah menentukan limit untuk IRRBB (EVE dan NII) sebagai berikut:

1. Sensitivitas pendapatan yang merupakan dampak perubahan suku bunga sebesar 400bps, 200bps dan 250bps untuk 3 (tiga) mata uang utama Bank yaitu IDR, USD dan CNY terhadap pendapatan bunga bersih.
2. Sensitivitas risiko suku bunga yang merupakan dampak perubahan shock suku bunga yang merujuk kepada 6 (enam) skenario shock suku bunga yang merujuk kepada SEOJK No. 12/SEOJK.03/2018 untuk 3 (tiga) mata uang utama Bank yaitu IDR, USD, dan CNY terhadap modal Tier 1.

Selain itu, saat ini secara bertahap Bank melakukan kajian dan negosiasi dengan debitur untuk mengubah suku bunga pinjaman dari suku bunga tetap menjadi suku bunga mengambang. Hal ini karena hampir seluruh liabilitas Bank memiliki repricing suku bunga berjangka pendek (1 – 6 bulan).

Risk Management Strategy and Risk Mitigation for IRRBB

In managing and mitigating IRRBB, The Bank has determined limit for IRRBB (EVE and NII) as follows:

1. Sensitivity of income which is an impact of changing in interest rate for 3 (three) major currencies of The Bank by 400bps, 200bps and 250bps for IDR, USD, and CNY respectively against net interest income.
2. Sensitivity of interest rate risk which an impact of changing in interest rate scenario referring to 6 (six) interest rate shock scenario in SEOJK No. 12/SEOJK.03/2018 for 3 (three) major currencies of The Bank namely IDR, USD, and CNY against Tier 1 capital.

In addition, currently The Bank gradually conducts study and negotiation with debtors to change lending rate from fixed rate to floating rate. This is due to most of The Bank liabilities has short-term interest rate repricing (1 – 6 months).

3. Periodisasi perhitungan IRRBB dan penjelasan mengenai pengukuran spesifik yang digunakan untuk mengukur sensitivitas terhadap IRRBB

Dalam implementasinya Bank melakukan perhitungan IRRBB setiap bulan, dengan menggunakan asumsi pengukuran sebagai berikut:

1. Bank melakukan perhitungan dan analisa produk non-maturity deposit secara berkala untuk menentukan porsi core deposit dan non-core deposit dengan menggunakan data historis yang dimiliki oleh Bank berdasarkan klasifikasi segmen sebagai berikut: Ritel Transaksional, Ritel Non-Transaksional, dan Wholesale.
2. Penempatan arus kas untuk non-core deposit yaitu dalam skala waktu overnight, sedangkan penempatan arus kas untuk core deposit sesuai dengan hasil perhitungan yang dilakukan dengan mempertimbangkan caps terhadap jangka waktu rata-rata dan maksimum proporsi dari core deposit berdasarkan kategori merujuk kepada SEOJK No. 12/SEOJK.03/2018.
3. Asumsi arus kas untuk pinjaman dengan suku bunga mengambang apabila tidak ada informasi lebih detail ditempatkan pada skala waktu 3 (tiga) bulan untuk pinjaman USD dan 1 (satu) bulan untuk pinjaman IDR dan CNY.

Periodization of IRRBB calculation and explanation of specific measurements used to measure sensitivity to IRRBB

In its implementation The Bank carries out an IRRBB calculation every month, using the following measurement assumptions:

1. The Bank performs the calculation and analysis of non-maturity deposit products on a regular basis to determine the portion of core deposits and non-core deposits using historical data owned by The Bank based on the segment classification as follows: Retail Transactional, Retail Non-Transactional, and Wholesale.
2. Placement of cash flows for non-core deposits is on overnight time scale, while the placement of cash flows for core deposits is in accordance with the results of calculations by considering caps against the average period and maximum proportion of core deposits in respective category referring to SEOJK No. 12/SEOJK.03/2018.
3. Assumption of cash flows for loans with floating interest rates if there is no more detailed information is placed on a time scale of 3 (three) months for USD loans and 1 (one) month for IDR and CNY loans.

4. Skenario shock suku bunga dan skenario stress yang digunakan dalam perhitungan IRRBB dengan menggunakan metode EVE dan NII

Bank menggunakan skenario shock suku bunga merujuk kepada SEOJK No. 12/SEOJK.03/2018 tentang Penerapan Manajemen Risiko dan Pengukuran Risiko Pendekatan Standar untuk Risiko Suku Bunga dalam Banking Book bagi Bank Umum, untuk 3 (tiga) mata uang utama Bank yaitu IDR, USD, dan CNY.

The interest rate shock scenario and the stress scenario used in the IRRBB calculation using the EVE and NII methods

The Bank uses an interest rate shock scenario referring to SEOJK No. 12/ SEOJK.03/2018 concerning the Application of Risk Management and Measurements of Standardized Approach for Interest Rate Risk in the Banking Book for Commercial Banks, for 3 (three) major currencies of The Bank namely IDR, USD, and CNY.

Analisa Kualitatif Qualitative Analysis

5. **Asumsi pemodelan yang digunakan secara signifikan dalam IMS yang berbeda dari asumsi pemodelan yang digunakan dalam laporan perhitungan IRRBB dengan pendekatan standar, termasuk dampaknya serta alasan penggunaan asumsi tersebut, jika ada**
Bank tidak menggunakan asumsi pemodelan yang berbeda antara IMS Bank dan laporan perhitungan IRRBB kepada regulator.

The modeling assumptions used significantly in the IMS that are different from the modeling assumptions used in the IRRBB calculation report with a standardized approach, including the impact and the reasons for using these assumptions, if any
The Bank does not use different modeling assumptions between The Bank's IMS and IRRBB calculation reports to the regulator.

6. **Lindung nilai (hedging) terhadap IRRBB (apabila ada) dan perlakuan akuntansi terkait**
Untuk saat ini, tidak terdapat lindung nilai (hedging) terhadap IRRBB yang dilakukan Bank dengan menggunakan instrumen seperti interest rate swap.

Hedging against IRRBB (if any) and related accounting treatment
At present, there is no hedging against IRRBB by The Bank using instruments such as interest rate swap.

7. **Asumsi utama pemodelan dan parametrik yang digunakan dalam menghitung Δ EVE dan Δ NII**
 - a. **Perhitungan margin komersial dan spread components lainnya dalam arus kas dan dalam tingkat suku bunga diskon yang digunakan dalam perhitungan dengan metode EVE;**
Bank tidak memasukkan komponen margin komersial dan spread ke dalam perhitungan IRRBB.
 - b. **Rata-rata jatuh tempo penilaian ulang (repricing maturities) NMD dalam pengungkapan kuantitatif ditentukan (termasuk karakteristik unik produk yang memengaruhi penilaian repricing behaviour);**
Dalam penentuan rata-rata jatuh tempo penilaian ulang (repricing maturities) untuk NMD, Bank menggunakan caps terhadap jangka waktu rata-rata dari core deposit berdasarkan kategori merujuk kepada SEOJK No. 12/SEOJK.03/2018. Sedangkan untuk non-core deposit ditempatkan pada skala waktu overnight.
 - c. **Metodologi yang digunakan untuk mengestimasi prepayment rate dari pinjaman dan/atau early withdrawal rate untuk deposito berjangka dan asumsi signifikan lainnya;**
Bank secara berkala melakukan analisis terhadap prepayment rate untuk loan dan withdrawal rate untuk deposito berjangka dengan menggunakan data historis yang dimiliki Bank. Hasil perhitungan terakhir yang dilakukan menunjukkan bahwa persentase prepayment rate dan withdrawal rate yang dimiliki oleh Bank tidak signifikan sehingga Bank menggunakan asumsi jatuh tempo secara kontraktual untuk produk-produk tersebut.
 - d. **Asumsi lainnya, termasuk instrumen dengan opsi perilaku (behaviour options) yang telah dikeluarkan dari perhitungan, yang memiliki dampak material terhadap Δ EVE dan Δ NII yang diungkapkan dalam laporan perhitungan IRRBB dengan pendekatan standar serta penjelasan mengenai bagaimana hal tersebut berdampak material;**
Dalam perhitungan, Bank mengeluarkan instrumen ekuitas dari IRRBB.
 - e. **Metodologi agregasi antar mata uang dan korelasi suku bunga antar mata uang yang signifikan.**
Metodologi agregasi antar mata uang dengan menggunakan total mata uang tanpa korelasi suku bunga.

The main assumptions of modeling and parametric used in calculating Δ EVE and Δ NII

 - a. **Calculation of commercial margins and other spread components in cash flow and in the discount rate used in the calculation using the EVE method;**
The Bank does not include the commercial margin and spread components in the IRRBB calculation.
 - b. **The average maturity of the re-assessment (repricing maturities) of NMD in quantitative disclosures is determined (including the unique characteristics of the product that affect the assessment of repricing behavior);**
In determining the average maturity (repricing maturities) for NMD, The Bank uses caps on the average time period of the core deposit based on the category referring to SEOJK No. 12/SEOJK.03/2018. Non-core deposits are placed on an overnight time scale.
 - c. **The methodology used to estimate the prepayment rate of loans and/or early withdrawal rate for time deposits and other significant assumptions;**
The Bank periodically analyzes the prepayment rate for loans and withdrawal rates for time deposits using historical data held by The Bank. The results of the latest calculations show that the percentage of the prepayment rate and withdrawal rate owned by The Bank is not significant, therefore The Bank uses the contractual maturity assumption for these products.
 - d. **Other assumptions, including instruments with behavioral options that have been excluded from calculations, which have a material impact on Δ EVE and Δ NII that are disclosed in the IRRBB calculation report with a standardized approach and an explanation of how it impacts materially;**
In the calculation, The Bank exclude equity instruments from the IRRBB.
 - e. **Methodology of aggregation between currencies and significant correlation of interest rates between currencies.**
Methodology of aggregation between currencies using total currencies without interest rate correlation.

Analisa Kualitatif Qualitative Analysis

8. **Informasi lainnya yang perlu diungkapkan terkait interpretasi terhadap signifikansi dan sensitivitas hasil pengukuran IRRBB yang telah diungkapkan dan/atau penjelasan terhadap variasi yang signifikan pada tingkat IRRBB yang dilaporkan dibandingkan dengan pengungkapan sebelumnya (apabila ada).**

Informasi dan asumsi yang digunakan telah dijelaskan pada no. 2 – 7 di atas.

Other information that needs to be disclosed related to the interpretation of the significance and sensitivity of the IRRBB measurement results that have been disclosed and/or explanation of significant variations in the reported IRRBB level compared to the previous disclosures (if any).

The information and assumptions used have been explained in no. 2 - 7 above.

Analisa Kuantitatif Quantitative Analysis

1. **Rata-rata jangka waktu penyesuaian suku bunga (repricing maturity) yang diterapkan untuk NMD**

Arus kas core deposit ditempatkan pada skala waktu berdasarkan caps yang merujuk kepada SEOJK No. 12/SEOJK.03/2018 yaitu 5 (lima) tahun untuk rekening ritel transaksional, 4,5 (empat setengah) tahun untuk rekening ritel non-transaksional dan 4 (empat) tahun untuk rekening wholesale, sedangkan penempatan arus kas untuk non-core deposit ditempatkan pada skala waktu overnight.

Average tenor of repricing maturity to be applied to NMD

Cash flows for core deposit are placed on a time scale based on caps which refer to SEOJK No. 12/SEOJK.03/2018, which 5 (five) years for retail transactional accounts, 4.5 (four and a half) years for retail non-transactional accounts and 4 (four) years for wholesale accounts, while cash flows for non-core deposits are placed on the overnight time scale.

2. **Jangka waktu penyesuaian suku bunga (repricing maturity) terlama yang diterapkan untuk NMD**

Jangka waktu penyesuaian terlama yang diterapkan pada NMD adalah 5 (lima) tahun.

Longest tenor of repricing maturity applied for NMD

Longest repricing applied for NMD is 5 (five) years.

Risiko Nilai Tukar

Risiko nilai tukar merupakan risiko di mana nilai instrumen keuangan akan berfluktuasi karena perubahan kurs nilai tukar. Bank telah menetapkan batasan posisi berdasarkan mata uang yang dipantau secara harian untuk memastikan bahwa posisi tersebut tetap berada dalam batasan yang telah ditetapkan.

Bank memiliki eksposur risiko mata uang melalui transaksi dalam mata uang asing. Bank memonitor konsentrasi risiko yang terkait dengan tiap mata uang individual sehubungan dengan penjabaran transaksi, aset moneter dan liabilitas moneter dalam mata uang asing ke dalam mata uang fungsional Bank, yaitu IDR.

Perhitungan Posisi Devisa Neto (PDN) dilakukan berdasarkan peraturan dari regulator yang berlaku. Bank diwajibkan untuk menjaga PDN secara keseluruhan maksimum 20% dari total modal.

Exchange Rate Risk

Exchange rate risk represents the risk that the value of financial instruments will fluctuate due to changes in the exchange rate. The Bank has set limits on positions by currency that is monitored on a daily basis to ensure that the positions remain within the predetermined limits.

The Bank is exposed to currency risk through transactions denominated in foreign currency. The Bank monitors the concentration of risk associated with each individual currency in respect of the translation of foreign currency transactions and monetary assets and liabilities into The Bank's functional currency, which is IDR.

Calculation of Net Open Position (NOP) is based on prevailing regulations from regulators. The Bank is required to maintain the overall NOP at a maximum of 20% from total capital.

PDN pada tanggal 31 Desember 2023 dan 2022 adalah sebagai berikut:

The NOP as of December 31, 2023 and 2022 is as follows:

Perhitungan Posisi Devisa Neto

Net Open Position Calculation

dalam Rp juta | in Rp million

Mata Uang Currency	Keseluruhan (Laporan Posisi Keuangan dan Rekening Administratif) Aggregate (Statement of Financial Position and Off-Balance Sheet Accounts)					
	Aset Assets		Liabilitas Liabilities		Posisi Devisa Neto (Nilai Absolut) Net Open Position (Absolute Amount)	
	2023	2022	2023	2022	2023	2022
Dolar Amerika Serikat United States Dollar	15.280.108	24.301.838	15.052.396	24.223.397	227.712	78.441
Yuan China Chinese Yuan	4.110.588	3.183.170	3.994.016	3.123.369	116.572	59.801
Euro Eropa European Euro	9.108	10.310	10.011	10.057	903	253
Dolar Singapura Singapore Dollar	43.661	26.016	41.548	25.949	2.113	67
Dolar Australia Australian Dollar	14.936	18.052	11.829	17.861	3.107	191
Dolar Hong Kong Hong Kong Dollar	4.614	4.105	2.127	281	2.487	3.824
Poundsterling Inggris British Poundsterling	6.975	3.531	6.970	4.680	5	1.149
Yen Jepang Japanese Yen	3.114	1.205	3.075	1.357	39	152
Dolar Selandia Baru New Zealand Dollar	1.500	2.153	1.504	1.517	4	636
Jumlah Total						352.942
Jumlah Modal Total Capital						6.239.006
Rasio PDN (Keseluruhan) NOP Ratio (Aggregate)						5,66%

Fungsi manajemen risiko pasar diterapkan secara independen, antara lain, dengan terdapatnya pemisahan yang jelas antara tugas dan tanggung jawab setiap pihak yang terkait risiko pasar. Departemen *Global Markets* (*front office*) sebagai unit bisnis mengelola risiko pasar secara harian, Unit *Settlement Center* (*back office*) melakukan fungsi *settlement*, dan Departemen Manajemen Risiko (*middle office*) sebagai pihak yang independen memastikan pengelolaan risiko pasar sesuai dengan limit yang telah ditetapkan. Limit yang ditetapkan telah dipantau secara berkala dan telah berjalan dengan baik, antara lain pemantauan atas *stop loss limit*, *Management Action Triggers* (MATs), *off-market*, PDN, dan VaR telah dilakukan secara harian. Limit ini dikaji ulang secara berkala.

The market risk management function is applied independently, among others, through clear segregation of duties and responsibilities of each party in relation to market risk. The Global Markets Department (*front office*) serves as a business unit to manage market risk on a daily basis, the Settlement Center Unit (*back office*) performs the settlement function, and the Risk Management Department (*middle office*) serves as an independent party to ensure the market risk management is in accordance with predetermined limits. The predetermined limits have been monitored periodically and have been running well, among others the monitoring of stops loss limit, Management Action Triggers (MATs), off market, NOP, and VaR, have been done on a daily basis. These limits are reviewed regularly.

Risiko suku bunga dengan menggunakan pendekatan *repricing* diukur berdasarkan sensitivitas terhadap pendapatan bunga bersih dan nilai ekonomi permodalan.

Selain itu, *stress testing* dilakukan dengan berbagai skenario untuk mengukur kerugian dan inisiasi langkah-langkah pengendalian.

RISIKO LIKUIDITAS

Risiko likuiditas adalah risiko akibat ketidakmampuan Bank untuk memenuhi liabilitas yang jatuh tempo dari sumber pendanaan arus kas dan/atau dari aset likuid berkualitas tinggi yang dapat diagunkan, tanpa mengganggu aktivitas dan kondisi keuangan Bank.

Risiko likuiditas diukur melalui, antara lain, rasio likuiditas yang terdiri dari rasio aset likuid, *Loan to Funding Ratio* (LFR), rasio deposito besar, *Liquidity Coverage Ratio* (LCR), *Net Stable Funding Ratio* (NSFR), dan maksimum arus kas keluar. Pengendalian risiko likuiditas dilakukan dengan menetapkan limit-limit yang mengacu pada ketentuan regulator maupun internal serta menetapkan indikator peringatan dini.

Bank senantiasa mempertahankan aset likuid pada tingkat yang dipandang aman, memperkecil ketergantungan pada deposito besar, dan memastikan bahwa Bank dapat memperoleh akses sumber pendanaan baik pada kondisi normal maupun krisis, dengan mempertimbangkan *stress testing* yang dilakukan. Sedangkan pengendalian risiko likuiditas dilakukan melalui strategi pendanaan, pengelolaan posisi likuiditas dan risiko likuiditas harian, pengelolaan aset likuid yang berkualitas tinggi, dan rencana pendanaan darurat (*contingency funding plan*).

Manajemen risiko likuiditas merupakan salah satu fungsi yang sangat penting bagi Bank. Pendekatan proaktif yang melibatkan manajemen Bank dan semua departemen terkait dalam mengoptimalkan dan memperkuat sumber pendanaan bagi Bank akan terus dilakukan, salah satunya untuk memperbaiki *mismatch* likuiditas melalui pendanaan jangka panjang yang terutama berasal dari perusahaan induk. Sebagai tambahan, Bank juga melakukan *stress testing* dengan asumsi dasar yang telah disepakati untuk memastikan kebutuhan pendanaan pada periode *stress*, pemantauan atas indikator peringatan dini, rasio aset likuid, LCR, NSFR, dan memastikan likuiditas jangka pendek senantiasa disesuaikan dengan perkembangan yang ada.

The interest rate risk by repricing approach is measured based on its net interest income sensitivity and economic value of equity.

In addition, stress testing is simulated through various scenarios in order to measure losses and initiate control measures.

LIQUIDITY RISK

Liquidity risk is the risk caused by the inability of The Bank to settle liabilities at due date from cash flow funding sources and/or of high-quality liquid assets that could be collateralized, without disrupting the activities and financial condition of The Bank.

Liquidity risk is measured through, among others, the ratio of liquid assets, Loan to Funding Ratio (LFR), the ratio of large depositors, Liquidity Coverage Ratio (LCR), Net Stable Funding Ratio (NSFR), and maximum cash outflow. Liquidity risk control is carried out by setting limits that refer to both regulatory and internal provisions, and by establishing early warning indicators.

The Bank continues to maintain liquid assets at a level that is deemed safe, minimize dependency on large depositors, and ensure that The Bank can obtain access to financing sources in both normal and crisis conditions, by considering stress testing. Liquidity risk control is conducted through funding strategy, liquidity position and daily liquidity risk management, high quality liquid asset management, and contingency funding plan.

Liquidity risk management is one of the most critical functions in The Bank. A proactive approach involving the management of The Bank and all relevant departments in optimizing and strengthening funding sources for The Bank will continue to be carried out, one of which is to improve the liquidity mismatch through long-term funding that mainly comes from the parent company. In addition, The Bank also conducts stress testing with agreed basic assumptions to ensure funding needs in the stress period, monitoring of early warning indicators, liquid assets ratio, LCR, NSFR, and ensures the short-term liquidity is always adjusted to current developments.

Selain itu, Rencana Pendanaan Darurat (*Contingency Funding Plan*) telah disusun untuk mempersiapkan Bank jika terjadi krisis likuiditas, termasuk *standby committed facility* dari bank lokal, di mana pemicu Rencana Pendanaan Darurat dipantau secara berkala dan uji coba Rencana Pendanaan Darurat dilakukan 1 (satu) tahun sekali.

Untuk memantau mitigasi risiko likuiditas, Bank membentuk ALCO yang bertanggung jawab terhadap pengelolaan risiko likuiditas.

Moreover, the Contingency Funding Plan has been prepared to prepare The Bank in the event of a liquidity crisis, including standby committed facility from local banks, where triggers of the Contingency Funding Plan are regularly monitored and trials of the Contingency Funding Plan are conducted once a year.

To monitor liquidity risk mitigation, The Bank forms ALCO which is responsible for liquidity risk management.

Nilai Nominal Bruto Arus Kas Masuk (Keluar) Berdasarkan Sisa Jatuh Tempo Kontraktual Liabilitas Keuangan

Uraian	Nilai tercatat Carrying amount		Nilai nominal bruto arus kas masuk (keluar) Gross nominal cash inflow (outflow)		Kurang dari 3 bulan Less than 3 months		
	2023	2022	2023	2022	2023	2022	
Liabilitas Non-Derivatif							
Liabilitas segera	9.298	2.857	(9.298)	(2.857)	(9.298)	(2.857)	
Simpanan nasabah	33.240.564	40.886.441	(33.599.511)	(41.386.693)	(25.787.695)	(33.951.720)	
Simpanan dari bank-bank lain	1.372.981	1.464.763	(1.373.345)	(1.416.813)	(1.369.247)	(1.173.121)	
Efek-efek yang dijual dengan janji dibeli kembali	-	610.523	-	(618.569)	-	(618.569)	
Liabilitas akseptasi	61.966	66.800	(61.966)	(66.800)	(61.966)	(27.227)	
Pinjaman yang diterima	2.001.610	5.292.950	(2.045.427)	(5.503.199)	(781.958)	(2.344.351)	
Liabilitas lain-lain dan beban yang masih harus dibayar	202.036	178.353	(202.036)	(178.353)	(202.036)	(178.353)	
Pinjaman subordinasi	1.154.775	2.101.613	(1.226.456)	(2.256.557)	-	-	
	38.043.230	50.604.300	(38.518.039)	(51.429.841)	(28.212.200)	(38.296.198)	
Liabilitas Derivatif							
Diperdagangkan:							
Arus kas keluar	12.131	80.179	(1.471.733)	(2.873.540)	(1.471.733)	(2.873.540)	
Arus kas masuk	-	-	1.459.602	2.793.361	1.459.602	2.793.361	
	12.131	80.179	(12.131)	(80.179)	(12.131)	(80.179)	
Jumlah	38.055.361	50.684.479	(38.530.170)	(51.510.020)	(28.224.331)	(38.376.377)	

Sisa Jatuh Tempo Kontraktual dari Liabilitas Keuangan

Pada tanggal 31 Desember 2023, nilai nominal bruto arus kas masuk (keluar) berdasarkan sisa jatuh tempo kontraktual liabilitas keuangan adalah seperti tabel di atas. Nilai nominal arus kas masuk (keluar) yang diungkapkan pada tabel di atas menyajikan arus kas kontraktual yang tidak didiskonkan terkait dengan nilai pokok dan bunga dari liabilitas keuangan. Arus kas atas instrumen keuangan yang diharapkan Bank bervariasi secara signifikan dari analisa ini. Sebagai contoh, simpanan diharapkan memiliki saldo yang stabil atau meningkat.

RISIKO OPERASIONAL

Risiko operasional adalah risiko yang dapat timbul akibat ketidakcukupan dan/atau tidak berfungsinya proses internal, kesalahan manusia, kegagalan sistem, dan/atau adanya kejadian-kejadian eksternal yang memengaruhi operasional Bank. Risiko operasional melekat pada semua aktivitas, kegiatan operasional dan produk Bank. Kegagalan mengelola risiko operasional dapat menyebabkan kerugian finansial, memengaruhi keselamatan karyawan dan reputasi Bank.

Contractual Remaining Maturity of Financial Liabilities

As of December 31, 2023, the gross nominal cash inflow (outflow) based on contractual remaining maturity of financial liabilities is represented in above table. The nominal cash inflow (outflow) disclosed in the above table represents an undiscounted contractual cash flows relating to the principal and interest on the financial liabilities. The Bank's expected cash flows on these financial instruments vary significantly from this analysis. For example, deposits are expected to have stable or increasing balance.

OPERATIONAL RISK

Operational risk is the risk that may arise due to inadequacy and/or a malfunction of internal processes, human errors, system failures, and/or external events affecting The Bank's operations. Operational risk is inherent in all of The Bank's activities, operational activities, and products. Failure to manage operational risk could lead to financial losses, affecting employees' safety and reputation of The Bank.

Gross Nominal Value of Cash Inflow (Out) Based on Remaining Contractual Maturity of Financial Liabilities

	3-12 bulan 3-12 months		1-5 tahun 1-5 years		Lebih dari 5 tahun More than 5 years		Description
	2023	2022	2023	2022	2023	2022	
Non-Derivative Liabilities							
	-	-	-	-	-	-	Liabilities immediately payable
	(7.809.103)	(7.431.893)	(2.713)	(3.080)	-	-	Deposits from customers
	(4.098)	(243.692)	-	-	-	-	Deposits from other banks
	-	-	-	-	-	-	Securities sold under agreements to repurchase
	-	(39.573)	-	-	-	-	Acceptance payables
	(1.263.469)	(984.740)	-	(2.174.108)	-	-	Borrowings
	-	-	-		-	-	Other liabilities and accrued expenses
	(1.226.456)	(949.824)	-	(1.306.733)	-	-	Subordinated loans
	(10.303.126)	(9.649.722)	(2.713)	(3.483.921)	-	-	
Derivative Liabilities							
							Trading:
	-	-	-	-	-	-	Cash outflow
	-	-	-	-	-	-	Cash inflow
	-	-	-	-	-	-	
	(10.303.126)	(9.649.722)	(2.713)	(3.483.921)	-	-	Total

Kerangka kerja manajemen risiko operasional terdiri dari identifikasi dan penilaian risiko dan kontrol, kerangka proses analisa risiko atas produk baru, pengukuran dan pemantauan melalui alat bantu risiko operasional, dan mitigasi melalui peningkatan proses dan kontrol. Bank mengelola risiko operasional secara aktif dan konsisten dengan menerapkan prinsip kehati-hatian pada setiap kegiatan usaha Bank dan seluruh unit bisnis terkait. Pelaksanaan penilaian terhadap risiko operasional dilakukan Bank pada semua aktivitas fungsional secara komprehensif. Penilaian terhadap risiko operasional dilakukan atas penilaian terhadap risiko inheren dan kualitas penerapan manajemen risiko. Parameter yang digunakan sebagai dasar penilaian risiko inheren mencakup karakteristik dan kompleksitas bisnis, sumber daya manusia, teknologi informasi dan infrastruktur pendukung, *fraud* dan kejadian eksternal seperti terorisme, pandemi, dan bencana alam.

Unit-unit pengambil risiko berperan sebagai lini pertahanan lapis pertama dalam pengelolaan risiko operasional sehari-hari. Lini pertahanan lapis kedua meliputi fungsi-fungsi *controlling*, seperti manajemen risiko dan kepatuhan. Masing-masing fungsi ini, bersama dengan unit-unit bisnis, memastikan bahwa risiko di unit bisnis telah diidentifikasi dan dikelola dengan tepat.

The operational risk management framework comprises identification and assessment of risks and controls, new products risk analysis framework, measurement and monitoring through operational risk tools, and mitigation through process and control enhancement. The Bank manages the operational risk actively and consistently by applying prudential principles to every business activity of The Bank and all related business units. The operational risk assessment is conducted by The Bank on all functional activities in a comprehensive manner. The assessment of operational risk is conducted on the assessment of inherent risk and the quality of risk management implementation. Parameters used as the basis for inherent risk assessment include the characteristic and complexity of business, human resources, information technology and supporting infrastructure, fraud and external events such as terrorism, pandemic, and natural disaster.

Risk taking units act as the first line of defense in day-to-day enforcement of operational risk management. The second line of defense includes controlling functions, such as risk management and compliance. Each of these functions, together with the business units, ensures that risks in the business units have been properly identified and managed.

Fungsi-fungsi bisnis pendukung bekerja sama untuk membantu menentukan strategi, menerapkan kebijakan dan prosedur Bank, dan mengumpulkan informasi untuk menyusun risiko Bank secara keseluruhan. Sementara itu, pengawasan independen yang dilakukan oleh Audit Internal sebagai lini pertahanan ketiga secara independen menilai efektivitas pengendalian internal dan pengelolaan risiko yang dilakukan oleh lini pertahanan pertama dan kedua dan memastikan kecukupan proses tersebut. Selain itu, fungsi audit juga secara aktif memberikan rekomendasi perbaikan terhadap proses operasional dan kualitas pelayanan.

Penerapan manajemen risiko operasional dilakukan melalui penyusunan dan penetapan kebijakan dan prosedur tertulis untuk setiap aktivitas operasional Bank, mengembangkan budaya organisasi yang sadar terhadap risiko operasional, memperkuat aspek keamanan dan keandalan operasi teknologi informasi sehingga kesalahan manusia, *fraud*, kesalahan proses, dan potensi kegagalan sistem yang menyebabkan terganggunya kelangsungan usaha dapat ditekan dan dimitigasi lebih dini.

Bank juga mengembangkan pemantauan secara berkala oleh Departemen Manajemen Risiko terhadap hasil penilaian sendiri yang dilakukan unit-unit pengambil risiko atas risiko operasional yang melekat pada areanya masing-masing untuk mendeteksi secara dini dan melakukan pencegahan terhadap timbulnya risiko operasional, serta *Business Continuity Management*, untuk memastikan kemampuan Bank untuk tetap beroperasi jika terjadi bencana.

Sebagai bagian dari upaya Bank untuk meningkatkan pemantauan risiko operasional, Bank senantiasa melakukan penyesuaian cakupan dan peningkatan *Risk Control Self-Assessment* (RCSA) pada unit-unit pengambil risiko serta melakukan pemantauan pencatatan *Risk/Loss Event Database* (RLED), *Key Risk Indicators* (KRI), dan *Operational Risk Officer* dalam mengidentifikasi dan memitigasi terjadinya risiko operasional pada unit-unit pengambil risiko. Selain itu, Bank bersama dengan Departemen TI dalam kesiapan *Business Continuity Plan* (BCP) untuk meminimalkan risiko yang berhubungan dengan gangguan bisnis, baik karena masalah internal maupun eksternal, yang diuji coba secara berkala paling kurang 1 (satu) tahun sekali.

Pelatihan secara berkala juga dilakukan di tingkat internal untuk memperkuat pemahaman terhadap kebijakan dan prosedur yang ada dan yang akan diimplementasikan sekaligus juga untuk meningkatkan risk awareness. Selanjutnya, untuk memitigasi risiko operasional, Bank telah menerapkan kontrol internal yang komprehensif termasuk jejak audit, pemisahan yang tepat dari *front*, *middle*, dan operasional *back office*, proses pemantauan pasca transaksi di bagian belakang untuk memastikan

The supporting business functions work closely to help determining strategies, implementing The Bank policies and procedures, and collecting information to create a bank-wide view of risks. Meanwhile, the independent supervision conducted by the Internal Audit as the third line of defense independently assesses the effectiveness of the internal control and risk management implemented by the first and second lines of defense and ensures the adequacy of these processes. In addition, the audit function also proactively provides recommendations on improvements in operational processes and service quality.

The implementation of operational risk management is conducted through the preparation and stipulation of written policies and procedures for each operational activity of The Bank, developing organizational culture to have awareness of operational risk, strengthening security and reliability aspects of information technology operations so that human error, fraud, process error, and system failure that cause disruption of business continuity could be reduced and early mitigated.

The Bank has also developed periodic monitoring performed by Risk Management Department on self-assessment results conducted by risk taking units for operational risk inherent to their respective areas for early detection and prevention of operational risk, as well as Business Continuity Management, to ensure The Bank's ability to continue to operate in the event of a disaster.

As part of The Bank's initiatives to improve operational risk monitoring, The Bank continues to adjust the scope and increase the Risk Control Self-Assessment (RCSA) on risk taking units, and to monitor the recording of Risk/Loss Event Database (RLED), Key Risk Indicators (KRI), and Operational Risk Officer in identifying and mitigating operational risk at risk taking units. In addition, The Bank together with the IT Department in the preparation of the Business Continuity Plan (BCP) to minimize risks associated with business disruption, both due to internal and external incidents, which is periodically tested at least once a year.

Regular training is also carried out at the internal level to strengthen the understanding of existing policies and procedures that will be implemented as well as to increase risk awareness. Furthermore, to mitigate the operational risk, The Bank has put in place extensive internal controls including audit trails, appropriate segregation of front, middle, and back office operations, post transaction monitoring processes at the back end to ensure independent checks and balances, compliance to The

pemeriksaan secara independen, kepatuhan terhadap pelaksanaan kebijakan dan prosedur Bank dan untuk semua pedoman peraturan yang berlaku, transfer risiko melalui penggunaan asuransi telah diatur oleh Bank di dalam kebijakan dan prosedur, antara lain: Kebijakan Pengelolaan Asuransi Aset Tetap, *Cash in Transit*, dan *Cash in Safe*; Prosedur Pengelolaan Asuransi Aset Tetap; dan Prosedur Operasional Kantor Cabang.

RISIKO HUKUM

Risiko hukum adalah risiko yang timbul akibat tuntutan hukum dan/atau kelemahan aspek yuridis, di antaranya akibat kelemahan perikatan yang dilakukan oleh Bank, ketiadaan dan/atau perubahan peraturan perundang-undangan yang menyebabkan suatu transaksi yang telah dilakukan oleh Bank menjadi tidak sesuai dengan ketentuan yang ada dan proses litigasi baik yang timbul dari gugatan pihak ketiga maupun Bank terhadap pihak ketiga.

Penerapan manajemen risiko hukum dilakukan melalui penerapan kebijakan manajemen risiko hukum dan prosedur terkait yang berfungsi mengidentifikasi, mengukur, memantau dan mengendalikan risiko hukum yang disesuaikan dengan strategi bisnis Bank dan peraturan atau perundangan yang berlaku.

Departemen Hukum melakukan identifikasi dan pengukuran terhadap risiko hukum dengan menganalisis sumber risiko yang melekat pada produk dan transaksi perbankan serta aktivitas fungsional Bank yang telah dan dapat berpotensi menjadi kerugian bagi Bank. Departemen Hukum juga melakukan pencatatan dan pemantauan atas risiko hukum termasuk penyelesaiannya sesuai dengan kebijakan dan prosedur internal Bank yang berlaku. Terutama kejadian risiko hukum yang dapat berpengaruh signifikan terhadap permodalan Bank, kejadian tersebut wajib dilakukan penyelesaiannya dengan segera sehingga tidak menimbulkan risiko lainnya bagi Bank. Kejadian risiko hukum seperti proses litigasi dan potensi kerugian dikelola sebagai sebuah parameter dalam mengukur risiko hukum yang didukung oleh pencatatan dan tata usaha yang memadai

Pengendalian risiko hukum dilakukan oleh Departemen Hukum antara lain dengan melakukan kaji ulang atas perjanjian antara Bank dan pihak ketiga, menyediakan dan melakukan kaji ulang terhadap perjanjian dan formulir yang digunakan oleh Bank sesuai kebutuhan, dan menyediakan opini/advis hukum kepada Bank terhadap risiko hukum atas aktivitas Bank. Departemen Hukum juga dapat meminta pendapat atau saran atau bantuan hukum dari konsultan hukum atau pengacara sehubungan dengan permasalahan hukum yang dihadapi, bilamana diperlukan.

Bank's policies and procedures implementation and to all applicable regulatory guidelines, risk transfer through the use of insurance has been regulated by The Bank in the policies and procedures, including: Fixed Asset, Cash in Transit, and Cash in Safe Insurance Management Policies; Fixed Asset Insurance Management Procedures; and Branch Office Operational Procedures.

LEGAL RISK

Legal risk is the risk arising from lawsuits and/or weakness of juridical aspect, such as due to weakness of legal binding conducted by Bank, the absence and/or change of laws and regulations causing a transaction that has been done by Bank to be inconsistent with existing provisions, and litigation process arising either from any third-party lawsuits or Bank against any third party.

The implementation of legal risk management is conducted through the implementation of legal risk management policies and related procedures that are used to identify, measure, monitor and control legal risk, adjusted with the Banks business strategy and prevailing laws and regulations.

Legal Department identifies and measures legal risk through analyzing sources of inherent risk in the product and banking transaction as well as the functional activity of the Bank that occurs or potentially becomes losses to The Bank. Legal Department also records and monitors the legal risk and its settlement in the Bank according to applicable internal policies and procedures of the Bank. Especially for legal risk events that may have a significant impact on the Banks capital, such event must be done immediately so that the settlement does not expose to other risks. The legal risk events such as litigation process and potential losses are managed as a parameter in measuring legal risk supported by adequate records and administration.

Controlling of legal risk is performed by Legal Department among others through reviewing of agreements between the Bank and third party, providing and reviewing of standard agreements templates and forms used by the Bank according to the needs, and providing legal opinion/advice to the Bank against the legal risk of the Banks activities. Legal Department may also seek legal opinion or advice or assistance from external legal counsels or lawyers in connection with legal issues, if deemed necessary.

Peran serta Departemen Hukum dalam berbagai aktivitas pengendalian di dalam Bank, seperti tinjauan aktivitas/produk baru, tinjauan kebijakan, prosedur dan proses operasional merupakan bagian untuk memastikan kecukupan dari pengendalian risiko hukum.

RISIKO STRATEJIK

Risiko stratejik adalah risiko akibat ketidaktepatan dalam pengambilan dan/atau pelaksanaan suatu keputusan strategis serta kegagalan dalam mengantisipasi perubahan lingkungan bisnis. Risiko stratejik merupakan potensi dari efek samping pada pendapatan (*earning*) yang muncul dari perubahan kondisi kegiatan usaha, seperti keadaan pasar, perilaku nasabah, kemajuan teknologi, serta keputusan strategi yang kurang baik.

Risiko stratejik dapat disebabkan oleh kelemahan dan ketidaktepatan dalam perumusan strategi, sistem informasi manajemen yang kurang memadai, analisis lingkungan internal dan eksternal yang kurang memadai, ketidaktepatan dalam implementasi strategi dan kegagalan mengantisipasi perubahan lingkungan bisnis. Dalam rangka mendukung perumusan strategi Bank, Bank telah mempersiapkan perkembangan teknologi yang dituangkan dalam rencana strategis TI dan terus meningkatkan kemampuan organisasi di bidang sumber daya manusia.

Bank memiliki rencana bisnis tertulis yang mencakup strategi selama 3 (tiga) tahun yang akan dikaji ulang dan diperbarui setiap tahun. Rencana bisnis tersebut disusun sesuai dengan visi dan misi Bank dan dengan mempertimbangkan kondisi internal (kekuatan dan kelemahan Bank), perkembangan faktor-faktor/kondisi-kondisi eksternal yang secara langsung atau tidak langsung dapat memengaruhi strategi usaha Bank, dan strategi yang diambil untuk mencapai tujuan kegiatan usaha Bank.

Laporan rencana bisnis dibandingkan dengan realisasi pencapaian secara berkala dilaporkan kepada Dewan Komisaris dan Direksi dalam rangka mengevaluasi pelaksanaan rencana bisnis, di mana risiko stratejik diidentifikasi dan langkah-langkah perbaikan akan diambil apabila terjadi penyimpangan.

Laporan realisasi berkala kepada regulator setiap triwulan menggambarkan realisasi berbanding dengan rencana bisnis, diikuti dengan penjelasan dari variasi-variasi yang ada. Laporan profil risiko stratejik disiapkan setiap triwulan oleh Departemen *Strategy Management and Investor Relation* (SMIR) bersama dengan Departemen Manajemen Risiko untuk mengidentifikasi dan mengevaluasi perkembangan rencana strategis berdasarkan parameter yang telah ditentukan.

The role of Legal Department in various control activities within Bank, such as new product/activity reviews, policy reviews, operational procedures and processes are part of ensuring the adequacy of legal risk control.

STRATEGIC RISK

Strategic risk is the risk caused by an inaccuracy in the decision making and/or in the execution of strategic decision as well as failure in anticipating changes in the business environment. Strategic risk is the potential of side-effects on earnings arising from changing business conditions, such as market conditions, customer behaviors, technological advances, and unfavorable strategic decisions.

Strategic risk can be caused by weakness and inaccuracy in the formulation of strategies, inadequate management information systems, inadequate internal and external environment analysis, inaccuracy in strategy implementation and failure to anticipate changes in the business environment. To support The Bank's strategy formulation, The Bank has prepared technological developments as outlined in the IT strategic plan and continues to improve its organizational capability in the field of human resources.

The Bank has a written business plan covering strategy for 3 (three) years that will be reviewed and updated annually. The business plan is prepared in accordance with The Bank's vision and mission, and by considering the internal conditions (strengths and weaknesses of The Bank), the development of external factors/conditions that directly or indirectly affect The Bank's business strategy, and the strategy taken to achieve the objectives of The Bank's business activities.

The business plan report compared to the achievement of its realization is periodically reported to the Board of Commissioners and Board of Directors in order to evaluate the implementation of the business plan. Strategic risk is identified and corrective measures will be taken in the event of any deviation.

Realization report to regulators on a quarterly basis illustrates the realization results from the business plan, followed by an explanation of the variations. The strategic risk profile report is prepared on a quarterly basis by the Strategy Management and Investor Relation (SMIR) Department in conjunction with the Risk Management Department to identify and evaluate the progress of strategic plan based on predetermined parameters.

RISIKO KEPATUHAN

Risiko kepatuhan merupakan risiko yang disebabkan oleh karena Bank tidak mematuhi dan/atau tidak melaksanakan peraturan perundang-undangan dan ketentuan yang berlaku. Dalam mengelola risiko kepatuhan, Bank berpedoman pada kebijakan dan prosedur kepatuhan. Untuk menjalankan fungsi kepatuhan secara efektif, Bank telah memiliki Departemen Kepatuhan yang kompeten. Dalam rangka anti pencucian uang dan pencegahan pendanaan terorisme, Departemen Anti Pencucian Uang/Pencegahan Pendanaan Terorisme (APU/PPT) bertanggung jawab atas pelaksanaan kebijakan dan prosedur anti pencucian uang dan pencegahan pendanaan terorisme yang mencakup proses identifikasi, pengukuran, pemantauan, pengendalian, dan pelaporan di Bank.

Dalam hal terjadi pelanggaran, Bank melakukan identifikasi penyebab terjadinya pelanggaran dan mengambil tindakan perbaikan untuk mencegah terjadinya pelanggaran yang sama di masa mendatang. Departemen Kepatuhan juga memastikan kepatuhan terhadap kebijakan, prosedur, sistem dan bisnis yang dimiliki oleh Bank, dan menjaga pelaksanaan komitmen kepada regulator.

Komite yang berada di bawah Direktur Kepatuhan adalah:

1. Komite Kepatuhan dan APU-PPT;
2. Komite Kebijakan dan Produk Non Kredit; dan
3. Komite Liability Recognition.

Keanggotaan Komite Kepatuhan dan APU-PPT terdiri dari Direktur Kepatuhan, Direktur Operasional & Teknologi Informasi, Kepala Departemen APU-PPT, Kepala Departemen Manajemen Operasional, Kepala Departemen Manajemen Risiko, Kepala Departemen Kepatuhan, yang juga berperan sebagai sekretaris komite serta Kepala Departemen Satuan Kerja Audit Internal (SKAI).

Keanggotaan Komite Kebijakan dan Produk (Non Kredit) terdiri dari Direktur Kepatuhan, Direktur-direktur Pemasaran, Direktur Operasional & Teknologi Informasi, Kepala Departemen Strategic Management and Investor Relation, Kepala Departemen Retail Banking, Kepala Departemen Transaction Banking, Kepala Departemen Manajemen Operasional, Kepala Departemen Kepatuhan, Kepala Departemen Teknologi Informasi, dan Kepala Departemen Manajemen Risiko yang juga berperan sebagai sekretaris komite.

Keanggotaan Komite Liability Recognition terdiri dari Direktur Kepatuhan, Direktur Bidang, leading department, dan kepala departemen lain yang relevan sesuai dengan jenis risikonya.

COMPLIANCE RISK

Compliance risk is the risk caused by The Bank's failure to comply with and/or to implement the applicable laws and regulations. In managing compliance risk, The Bank is guided by the compliance policy and procedure. To perform compliance functions effectively, The Bank has a competent Compliance Department. In the framework of anti money laundering and countering financing of terrorism, the Anti Money Laundering/Countering Financing of Terrorism (AML/CFT) Department is responsible in the implementation of anti money laundering and countering financing of terrorism system policy and procedure covering the process of identifying, measuring, monitoring, controlling, and reporting in The Bank.

In the event of a violation, The Bank identifies the cause of the violation and takes corrective action to prevent the occurrence of same violation in the future. The Compliance Department also ensures compliance with The Bank's policies, procedures, systems and businesses, and maintains the implementation of its commitments to regulators.

The committees under Compliance Director are:

1. Compliance and AML-CFT Committee;
2. Policy and Product Committee (non-credit); and
3. Liability Recognition Committee

Membership of the Compliance and AML-CFT Committee consists of Compliance Director, Operations & Information Technology Director, Head of AML-CFT Department, Head of Operations Management Department, Head of Risk Management Department, Head of Compliance Department, who also serves as a committee secretary, and Head of Internal Audit Department (IAD).

Policy and Product Committee (non credit) membership consists of Compliance Director, Marketing Directors, Operations & Information Technology Director, Head of Strategic Management and Investor Relations Department, Head of Retail Banking Department, Head of Transaction Banking Department, Head of Operations Management Department, Head of Compliance Department, Head of Information Technology Department, and Head of Risk Management Department, who also serves as a committee secretary.

Liability Recognition Committee membership consists of Compliance Director, Director in Charge, leading department, and heads of other relevant departments in accordance with the risk type.

RISIKO REPUTASI

Risiko reputasi adalah risiko akibat menurunnya tingkat kepercayaan pemangku kepentingan yang bersumber dari persepsi negatif terhadap Bank. Kunci pengelolaan risiko reputasi di Bank berhubungan dengan kepatuhan terhadap peraturan-peraturan, penanganan yang tepat terhadap keluhan-keluhan nasabah, dan pelaksanaan pengujian kesesuaian nasabah terhadap produk yang ditawarkan.

Dalam mengelola risiko reputasi Bank, kerangka kerja manajemen risiko reputasi telah dibuat untuk memastikan risiko reputasi dalam Bank telah diidentifikasi dengan baik, diukur, dipantau, dikendalikan, dan dilaporkan secara konsisten.

Sebagai bagian dari pengelolaan risiko reputasi, Bank memiliki *call center* yang bertanggung jawab untuk menyediakan informasi komprehensif kepada nasabah dan pemilik kepentingan bank lainnya, serta menangani permintaan dan keluhan nasabah.

Pemantauan terhadap media cetak, jejaring sosial, internet, maupun media lainnya, dilakukan agar dapat segera diambil langkah-langkah yang diperlukan sekiranya terdapat pemberitaan yang memiliki dampak negatif terhadap Bank. Bank telah memiliki kebijakan tentang transparansi kondisi keuangan dan non-keuangan Bank yang dipublikasikan secara berkala untuk memberikan informasi yang komprehensif kepada pemangku kepentingan Bank.

Pengelolaan Permodalan

Sasaran utama atas kebijakan pengelolaan permodalan yang dilakukan oleh Bank adalah untuk mematuhi ketentuan permodalan eksternal yang berlaku dan untuk mempertahankan rasio permodalan yang sehat agar dapat mendukung usaha dan memaksimalkan nilai bagi pemegang saham.

Bank mengelola struktur modal dan melakukan penyesuaian atas struktur tersebut terhadap perubahan kondisi ekonomi dan karakteristik risiko aktivitasnya. Untuk mempertahankan atau menyesuaikan struktur modal tersebut, Bank melakukan antara lain penambahan setoran modal inti dari pemegang saham dan memperoleh pinjaman subordinasi.

Bank telah mematuhi semua persyaratan modal yang ditetapkan sepanjang periode pelaporan. Kewajiban Penyediaan Modal Minimum (KPM) Bank, sesuai dengan peraturan Otoritas Jasa Keuangan (OJK), yang saat ini menggunakan pendekatan standar untuk risiko kredit dan risiko pasar, serta pendekatan indikator dasar untuk risiko operasional, adalah sebagai berikut:

REPUTATION RISK

Reputation risk is the risk arising from the decreasing level of trust of shareholders, pertaining to negative perception towards The Bank. The key of reputation risk management at The Bank relates to the compliance with regulations, proper handling of customer complaints, and the implementation of customer conformity testing on the products offered.

In managing the reputation risk of The Bank, the reputation risk management framework has been established to ensure that reputation risk within The Bank has been properly identified, measured, monitored, controlled, and reported consistently.

As part of reputation risk management, The Bank has a call center responsible for providing comprehensive information to customers and other bank interest owners, as well as handling customer requests and complaints.

Monitoring of print media, social networking, internet, and other media is carried out, so that necessary steps can be taken immediately, if there is any news that has a negative impact on The Bank. The Bank has a policy on transparent financial and non-financial condition of The Bank, which is published periodically to provide comprehensive information to stakeholders of The Bank.

Capital Management

The main objective of The Bank's capital management policy is to ensure that The Bank complies with externally imposed capital requirements and that The Bank maintains healthy capital ratio in order to support its business and to maximize shareholders' value.

The Bank manages its capital structure and makes adjustment to it in the light of changes in economic conditions and risk characteristics of its activities. To maintain or adjust the capital structure, The Bank may, among other things, inject the additional core capital from the shareholders and obtain subordinated loans.

The Bank has complied with all capital requirements set out throughout the reporting period. The Bank's capital adequacy ratio (CAR), in accordance with the Financial Services Authority (OJK) regulation, which currently uses the standardized approach for credit risk and market risk, and the basic indicator approach for operational risk, is as follows:

Kewajiban Penyediaan Modal Minimum Bank

The Bank Capital Adequacy Ratio

dalam Rp juta | in Rp million

Uraian	2023	2022	Description
Modal <i>Tier 1</i>	5.780.060	5.544.461	Tier 1 capital
Modal <i>Tier 2</i>	458.944	831.721	Tier 2 capital
Jumlah modal	6.239.004	6.376.182	Total capital
ATMR untuk risiko kredit setelah memperhitungkan risiko spesifik	18.239.150	24.265.279	RWA for credit risk after considering specific risk
ATMR untuk risiko operasional	2.134.445	2.524.820	RWA for operational risk
ATMR untuk risiko pasar	352.942	144.514	RWA for market risk
Jumlah ATMR untuk risiko kredit, risiko pasar, dan risiko operasional	20.726.537	26.934.613	Total RWA for credit risk, market risk, and operational risk
Rasio CET 1	27,89%	20,58%	CET 1 ratio
Rasio <i>Tier 1</i>	27,89%	20,58%	Tier 1 ratio
Rasio <i>Tier 2</i>	2,21%	3,09%	Tier 2 ratio
Total rasio	30,10%	23,67%	Total ratio
Rasio KPMM yang diwajibkan sebelum modal penyangga	9% - 10%	9% - 10%	Required CAR before buffer
<i>Capital conservation buffer</i>	0%	0%	Capital conservation buffer
<i>Countercyclical buffer</i>	0%	0%	Countercyclical buffer
<i>Capital surcharge</i>	0%	0%	Capital surcharge

Bank telah mematuhi semua persyaratan modal yang ditetapkan pada tanggal 31 Desember 2023 dan 2022
The Bank has complied with all externally imposed capital requirements as of December 31, 2023 and 2022

Proses Perhitungan Kecukupan Modal Internal (ICAAP)

Bank telah melakukan perhitungan kecukupan modal internal (ICAAP) untuk menetapkan kecukupan modal sesuai dengan profil risikonya, dan menetapkan strategi untuk memelihara tingkat permodalan.

Kecukupan modal minimum sesuai profil risiko bertujuan untuk mengantisipasi potensi kerugian yang timbul dari seluruh risiko yang dihadapi Bank, yang kemungkinan memiliki dampak material terhadap bisnis dan posisi keuangan dan kecukupan permodalan untuk menutup risiko-risiko tersebut, antara lain Aset Tertimbang Menurut Risiko (ATMR) yang telah memperhitungkan risiko kredit, risiko pasar, dan risiko operasional. Selain itu, kecukupan modal minimum juga bertujuan mengantisipasi potensi kerugian di masa mendatang dari risiko-risiko yang belum sepenuhnya diperhitungkan dalam ATMR tersebut, antara lain risiko konsentrasi kredit, risiko likuiditas, risiko suku bunga pada *banking book*, risiko hukum, risiko kepatuhan, risiko strategis, dan risiko reputasi serta untuk mengantisipasi dampak penerapan skenario *stress test* terhadap kecukupan modal Bank.

Internal Capital Adequacy Assessment Process (ICAAP)

The Bank has conducted the Internal Capital Adequacy Assessment Process (ICAAP) to determine the adequacy of capital in accordance with its risk profile and to establish strategy to maintain its capital level.

The capital adequacy based on risk profile aims to anticipate potential losses arising from all risks exposed by The Bank, which may have a material adverse impact on its business and financial position and the adequacy of capital to cover these risks, among others, Risk Weighted Assets (RWA) which have taken into account credit risk, market risk, and operational risk. In addition, the capital adequacy also aims to anticipate potential future losses from risks not yet fully accounted for in the RWA, such as credit concentration risk, liquidity risk, interest rate risk in banking book, legal risk, compliance risk, strategic risk, and reputation risk, as well as to anticipate the impact of the implementation of stress test scenario on the capital adequacy of The Bank.

Fungsi Sistem Pengendalian Internal dalam Penerapan Manajemen Risiko

Bank melaksanakan sistem pengendalian internal dalam rangka memastikan kepatuhan terhadap ketentuan dan peraturan perundang-undangan yang berlaku, termasuk ketentuan internal Bank, tersedianya informasi keuangan dan manajemen yang lengkap dan akurat, efektivitas dan efisiensi dalam kegiatan operasional, serta efektivitas budaya risiko (*risk culture*) pada organisasi Bank secara menyeluruh. Penerapan sistem pengendalian internal dilakukan agar kegiatan operasional Bank dapat berjalan secara sehat, aman, dan terkendali.

Dalam mendukung pelaksanaan manajemen risiko, Bank menerapkan sistem pengendalian internal yang di dalamnya terdapat kerangka dan kebijakan pengendalian internal, pengawasan atas pelaksanaan sistem pengendalian internal, baik oleh audit internal maupun audit eksternal, pelaksanaan kaji ulang independen oleh Satuan Kerja Audit Internal (SKAI), serta fungsi yang melakukan kaji ulang independen, baik dari sisi metodologi, frekuensi, maupun pelaporan kepada Dewan Komisaris dan Direksi.

Penerapan fungsi pengendalian internal dalam kegiatan operasional Bank termasuk melalui pemisahan tugas, *dual control*, rekonsiliasi, standar proses kerja, dan pedoman pelaksanaan. Unit-unit pengambil risiko berperan sebagai lini pertahanan lapis pertama dalam pengelolaan risiko sehari-hari. Lini pertahanan lapis kedua meliputi fungsi-fungsi *controlling*, seperti manajemen risiko dan kepatuhan.

Setiap fungsi ini, bersama dengan unit-unit bisnis, memastikan bahwa risiko di unit bisnis telah diidentifikasi dan dikelola dengan tepat. Fungsi-fungsi bisnis pendukung bekerja sama untuk membantu menentukan strategi, menerapkan kebijakan dan prosedur Bank, serta mengumpulkan informasi untuk menyusun risiko Bank secara keseluruhan. Sementara itu, pengawasan independen yang dilakukan oleh Audit Internal sebagai lini pertahanan ketiga secara independen menilai efektivitas pengendalian internal dan pengelolaan risiko yang dilakukan oleh lini pertahanan pertama dan kedua dan memastikan kecukupan proses tersebut.

The Functions of Internal Control System in the Implementation of Risk Management

The Bank implements the internal control system in order to ensure the compliance with applicable laws and regulations, including The Bank's internal provisions, the availability of complete and accurate financial information and management, effectiveness and efficiency in operational activities, and the effectiveness of risk culture in The Bank's overall organization. The implementation of internal control system is carried out so that The Bank's operational activities can run in a healthy, safe, and controlled manner.

In supporting the application of risk management, The Bank implements the internal control system in which there is an internal control framework and policy, supervision of the implementation of internal control system, both by internal audit and external audit, the implementation of independent review by the Internal Audit Department (IAD), as well as the functions that perform independent review, both in terms of methodology, frequency, and reporting to the Board of Commissioners and Board of Directors.

The implementation of internal control function in The Bank's operational activities includes among others, through segregation of duties, dual control, reconciliation, work process standards, and implementation of guidelines. Risk taking units serve as the first line of defense in day-to-day enforcement of risk management. The second line of defense includes controlling functions, such as risk management and compliance.

Each of these functions, together with the business units, ensures that risks in the business units have been properly identified and managed. The supporting business functions work closely to help determining strategies, implementing The Bank policies and procedures, and collecting information to create a bank-wide view of risks. Meanwhile, the independent supervision conducted by the Internal Audit as the third line of defense independently assesses the effectiveness of the internal control and risk management implemented by the first and second lines of defense and ensures the adequacy of these processes.

Atas hasil penilaian terhadap pelaksanaan manajemen risiko berdasarkan kaji ulang oleh pihak independen ini, lini pertahanan pertama dan kedua akan melaksanakan aktivitas tindak lanjut yang akan dipantau sesuai dengan tenggat waktu yang telah ditentukan. Untuk memastikan independensi, Audit Internal bertanggung jawab langsung kepada Presiden Direktur dan memiliki jalur pelaporan kepada Komite Audit dan Dewan Komisaris. Komite Audit sebagai komite yang membantu Dewan Komisaris akan juga meninjau kinerja SKAI dan fungsi kepatuhan mengkaji efektifitas pelaksanaan audit intern, meninjau efektivitas kontrol dan kepatuhan terhadap peraturan yang berlaku, serta memastikan SKAI bekerja secara independen.

Kaji Ulang Terhadap Penerapan Manajemen Risiko

Bank melakukan kaji ulang penerapan manajemen risiko melalui evaluasi secara internal dan eksternal, yang antara lain bertujuan untuk menilai keandalan kerangka manajemen risiko, yang mencakup kebijakan dan prosedur, struktur organisasi, alokasi sumber daya, desain proses manajemen risiko, sistem informasi dan pelaporan risiko.

Kaji ulang penerapan manajemen risiko dilakukan oleh Satuan Kerja Manajemen Risiko (SKMR) yang meliputi menyusun dan melakukan pengkinian kebijakan, prosedur, dan limit risiko secara berkala atau *ad hoc* yang disesuaikan dengan perkembangan internal dan eksternal. Sebagai bagian dari sistem informasi manajemen risiko, SKMR telah menyusun antara lain laporan profil risiko, pemantauan portofolio kredit, pemantauan *risk appetite*, dan laporan terkait lainnya, yang disampaikan kepada Direksi dan Dewan Komisaris secara periodik.

Secara internal, Satuan Kerja Audit Internal (SKAI) secara independen dan periodik dapat melakukan kaji ulang dan audit terhadap penerapan manajemen risiko Bank berdasarkan prinsip audit berbasis risiko dengan tujuan bukan hanya sebagai pengendalian internal namun juga untuk perbaikan penerapan manajemen risiko secara terus menerus. Komite Pemantau Risiko melakukan kajian dan evaluasi atas kebijakan dan pelaksanaan manajemen risiko Bank, serta memberikan masukan dan rekomendasi kepada Dewan Komisaris dalam rangka melaksanakan fungsi pengawasan. Secara eksternal, kaji ulang penerapan manajemen risiko dilakukan oleh auditor eksternal maupun pemeriksaan Otoritas Jasa Keuangan (OJK).

On the assessment results of risk management implementation based on review from independent party, the first and second lines of defense will carry out follow-up activities which will be monitored according to a specified deadline. To ensure independence, the Internal Audit reports directly to the President Director and has a reporting channel to the Audit Committee and Board of Commissioners. The Audit Committee as committee that supporting the Board of Commissioners also also reviews the IAD performance and compliance function review the effectiveness of internal audit implementation, reviews the effectiveness of controls and compliance with applicable regulations, and ensures the IAD works independently.

Risk Management Implementation Review

The Bank reviews the implementation of risk management through internal and external evaluations, which aims at assessing the reliability of the risk management framework, including policies and procedures, organizational structure, allocation of resources, risk management process design, information system and risk reporting.

Reviews of risk management implementation are carried out by the Risk Management Department (RMD) that include compiling and updating the policies, procedures, risk limits on a regular basis or *ad hoc* adjusted to the internal and external developments. As part of the risk management information system, RMD has prepared among others, risk profile report, loan portfolio monitoring, risk appetite monitoring, and other related reports, which are submitted to the Board of Directors and Board of Commissioners periodically.

Internally, the Internal Audit Department (IAD) can independently and periodically review and audit the application of risk management of The Bank based on the principle of risk-based audit with the objective not only as internal control but also for continuous improvement of risk management implementation. The Risk Monitoring Committee reviews and evaluates the policies and risk management implementation of The Bank, and provides inputs and recommendations to the Board of Commissioners in conducting its supervisory function. Externally, reviews of risk management implementation are performed by external auditors as well as by examinations from the Financial Services Authority (OJK).

Sertifikasi Manajemen Risiko

Bank telah melakukan pemantauan atas pelaksanaan kewajiban sertifikasi manajemen risiko pada seluruh unit kerja Bank, sebagai alat untuk meningkatkan kompetensi dan keahlian pengelolaan risiko.

Risk Management Certification

The Bank has conducted monitoring on the implementation of risk management certification obligations in all of The Bank's work units. This was done as a way to improve risk management competency and expertise.

Sertifikasi Manajemen Risiko

Uraian	Level 4	Level 5	Level 6	Level 7	Description
Sasaran	482	46	6	7	Target
Terpenuhi	434	43	4	7	Fulfilled
Tidak terpenuhi	48	3	2	0	Not fulfilled
Pemenuhan	90,04%	93,48%	66,67%	100%	Fulfillment
Rata-rata pemenuhan Average fulfillment					90,20%

Risk Management Certification

EVALUASI ATAS EFEKTIVITAS MANAJEMEN RISIKO

Dalam melaksanakan kegiatan usahanya, Bank selalu berhadapan dengan risiko yang melekat (inheren) pada kegiatan bisnis maupun operasional perbankan. Untuk mengendalikan risiko tersebut, Bank menerapkan manajemen risiko secara terintegrasi untuk mengidentifikasi, mengukur, memantau, dan mengendalikan seluruh eksposur risiko yang dihadapi oleh Bank. Kerangka manajemen risiko (*risk management framework*) yang selaras dengan strategi bisnis, struktur organisasi, kebijakan dan pedoman, serta penyempurnaan infrastruktur Bank diimplementasikan untuk mendukung pelaksanaan manajemen risiko yang efektif dan konsisten pada setiap proses aktivitas bisnis maupun operasional agar senantiasa menjadi bank yang sehat dan tumbuh secara berkesinambungan.

EVALUATION OF THE EFFECTIVENESS OF RISK MANAGEMENT

In carrying out its business activities, The Bank always encounters inherent risks in the banking business and operational activities. To control these risks, The Bank implements integrated risk management to identify, measure, monitor, and control all risk exposures faced by The Bank. The risk management framework that is aligned with the business strategy, organizational structure, policies and guidelines, as well as the improvement of The Bank's infrastructure are implemented to support effective and consistent risk management implementation in each process of business and operational activities so as to always be a healthy bank that grows sustainably.

Garis besar kebijakan manajemen risiko diarahkan kepada hal-hal sebagai berikut:

1. Kerangka *risk appetite* yang ditetapkan secara jelas sejalan dengan visi, misi, dan strategi bisnis Bank. *Risk Appetite Statement* memuat *target limit* dan *trigger limit* atas indikator baik kuantitatif maupun kualitatif yang dipantau secara berkala;
2. Mengimplementasikan prinsip-prinsip kehati-hatian secara konsisten dan berkesinambungan, di mana secara komprehensif Bank telah memiliki kebijakan dan prosedur, baik mengenai perkreditan dengan Kebijakan Perkreditan Bank sebagai payung kebijakan, manajemen risiko dengan Kebijakan Manajemen Risiko sebagai payung kebijakan, maupun kebijakan dan prosedur terkait dengan aktivitas operasional Bank yang senantiasa dilakukan penyempurnaan agar sejalan dengan kondisi Bank, peraturan terkini, dan *best practice*;

The outline of risk management policy is directed to the following matters:

1. The risk appetite framework that is clearly defined in line with The Bank's vision, mission, and business strategy. The Risk Appetite Statement consists of target limit and trigger limit for both quantitative and qualitative indicators that are monitored regularly;
2. Implementing the prudential principles in a consistent and continuous manner, whereby The Bank has comprehensive policy and procedures, both concerning credit with The Bank Credit Policy serving as an umbrella policy, risk management with the Risk Management Policy as an umbrella policy, as well as policies and procedures related to operational activities of The Bank, which are constantly being improved to be in line with The Bank's conditions, current regulations, and best practices;

3. Kualitas portofolio kredit tetap menjadi perhatian Bank yang dilakukan melalui penerapan manajemen risiko kredit yang *prudent* serta penerapan *early warning system* dan langkah-langkah preventif untuk mencegah terjadinya kredit bermasalah;
4. Pengembangan dan penyempurnaan pengukuran risiko pasar baik untuk *trading book* maupun *banking book* senantiasa dilakukan dengan mengacu kepada kondisi Bank, peraturan terkini, dan *best practice*;
5. Dalam pemantauan risiko likuiditas, penyempurnaan pengukuran rasio likuiditas, likuiditas jangka pendek, *stress testing*, dan rencana pendanaan darurat senantiasa dilakukan, disesuaikan dengan perkembangan yang ada;
6. Penyempurnaan dan pengembangan alat bantu pengukuran risiko operasional, kebijakan/prosedur Bank, sistem informasi manajemen, serta kesiapan BCP dan DRC untuk meminimalkan risiko yang berhubungan dengan gangguan bisnis baik karena kejadian internal maupun eksternal senantiasa dilakukan;
7. Bersama dengan berbagai departemen terkait, yaitu Departemen Hukum, Departemen *Strategy Management and Investor Relation* (SMIR), Departemen Kepatuhan, serta Departemen *Retail Banking* secara komprehensif mengelola, memantau, dan mengendalikan risiko hukum, risiko strategik, risiko kepatuhan, dan risiko reputasi;
8. Pengembangan pelatihan untuk memperkuat pemahaman terhadap kebijakan dan prosedur yang ada, yang dimutakhirkan dan yang akan diimplementasikan, serta untuk meningkatkan *risk awareness and culture*;
9. Kaji ulang terhadap parameter Penilaian Tingkat Kesehatan Bank Umum, baik untuk parameter profil risiko, rentabilitas, maupun permodalan senantiasa disesuaikan dengan perkembangan kondisi Bank dan data *peer bank*.
3. The quality of loan portfolio remains a concern of The Bank, which is maintained through the implementation of prudent credit risk management and the application of early warning system and preventive measures to prevent the occurrence of non-performing loans;
4. Development and improvement of market risk measurement both for trading book and banking book are always carried out by referring to The Bank's conditions, current regulations, and best practices;
5. In monitoring liquidity risk, improvement to the measurement of liquidity ratio, short-term liquidity, stress testing, and contingency funding plan are always carried out and adjusted to current developments;
6. Improvement and development of tools for measuring operational risk, The Bank policies/procedures, management information system, as well as BCP and DRC readiness to minimize risks associated with business disruption, both due to internal and external incidents, are always carried out;
7. Together with various relevant departments, namely Legal Department, Strategy Management and Investor Relation (SMIR) Department, Compliance Department, and Retail Banking Department comprehensively manage, monitor, and control legal risk, strategic risk, compliance risk, and reputation risk;
8. Development of training to strengthen the understanding of existing policies and procedures, which are updated and will be implemented, to increase risk awareness and culture;
9. Parameters review for evaluating the soundness rating of commercial banks, both for the risk profile, profitability, and capital parameters, is always adjusted to the development of The Bank's conditions and peer bank data.

PROFIL RISIKO DAN MITIGASI

Penilaian terhadap profil risiko dilakukan setiap triwulan yang dilaporkan kepada Dewan Komisaris, Direksi dan regulator. Penilaian tersebut ditempuh dengan menggabungkan risiko yang melekat (*inherent risk*) dengan kualitas penerapan manajemen risiko.

Berdasarkan penilaian profil risiko per 31 Desember 2023, risiko inheren memiliki peringkat "*Low to Moderate* (2)" dan kualitas penerapan manajemen risiko memiliki peringkat "*Satisfactory* (2)" sehingga risiko komposit Bank adalah "*Low to Moderate* (2)".

RISK PROFILE AND MITIGATION

The assessment of risk profile is performed quarterly and to be reported to the Board of Commissioners, Board of Directors and regulators. The assessment is done by combining inherent risk with the quality of risk management implementation.

Based on risk profile assessments as of December 31, 2023, The Bank's inherent risk has "*Low to Moderate* (2)" rating and the quality of risk management implementation has "*Satisfactory* (2)" rating, thus the risk of The Bank composite is "*Low to Moderate* (2)".

Sistem Pengendalian Internal

Internal Control System



1A.

- Peraturan Perusahaan, Kode Etik, termasuk tindakan disiplin
- Kebijakan, prosedur, petunjuk pelaksanaan
- Opini/nasihat dari *Compliance*
- Pelatihan, sosialisasi, diskusi
- Laporan compliance assurance
- Laporan hasil audit/hal-hal yang menjadi perhatian (*concern*) dari regulator, seperti Bank Indonesia (BI) dan Otoritas Jasa Keuangan (OJK)
- Laporan hasil audit keuangan dan non-keuangan dari pihak eksternal

1A.

- Company Regulations, Code of Conduct, including disciplinary action
- Policy, procedure and guideline
- Compliances opinion/advice
- Training, socialization, discussion
- Compliance assurances report
- Report on audit results/concerns from regulators, such as Bank Indonesia (BI) and Financial Service Authority (OJK)
- Financial and non-financial audit report from external party

1B.

- Laporan *Risk Control Self-Assessment* (RCSA)/IT Risk Management (ITRM), laporan kejadian risiko (RER), laporan risk officer, dan laporan *Key Risk Indicators* (KRI)
- Laporan *speak up/whistleblowing* dan insiden fraud
- Tindak lanjut hasil *audit/concern*, baik internal maupun eksternal

2A.

- Laporan hasil audit internal (termasuk audit investigasi), penilaian terhadap kualitas penerapan manajemen risiko
- Penilaian risiko *fraud*
- Laporan hasil audit dari pihak eksternal (keuangan dan non-keuangan)

2B.

- Laporan *Risk Control Self-Assessment* (RCSA)/IT Risk Management (ITRM), laporan kejadian risiko (RER), dan laporan *risk officer*
- Laporan *speak up/whistleblowing* (termasuk penerusan dari unit bisnis/pendukung)
- Tindak lanjut hasil audit, baik internal/eksternal 3a.
- Laporan hasil audit eksternal
- Ruang lingkup dan strategi audit eksternal

3B.

- Laporan hasil audit internal
- Ruang lingkup dan rencana strategis audit internal

Pada prinsipnya, sistem pengendalian internal melekat dalam seluruh aktivitas dan seluruh unit kerja. Dewan Komisaris dan Direksi bertanggung jawab penuh untuk mengawasi dan melaksanakan kerangka kerja sistem pengendalian internal yang diterapkan di Bank, dan untuk mengusulkan perubahan jika diperlukan. Bank telah membentuk 3 (tiga) lini *assurance* guna memastikan sistem pengendalian internal berjalan sesuai fungsinya.

Unit bisnis/pendukung/operasional, yang memiliki dan mengelola risiko, baik yang ada di cabang dan kantor pusat adalah lini pertama *assurance*. Lini kedua *assurance* adalah fungsi yang memantau dan meyakini bahwa risiko dan pengendalian terkelola dengan baik oleh lini pertama, seperti manajemen risiko, kepatuhan, legal, sumber daya manusia, manajemen keuangan, operasional, dan teknologi informasi.

Lini ketiga *assurance* adalah fungsi audit internal yang secara independen menilai efektivitas proses yang diciptakan di lini pertama dan kedua, serta memberikan *assurance* yang memadai atas seluruh aktivitas dan unit kerja.

1B.

- Risk Control Self-Assessment (RCSA)/IT Risk Management (ITRM) report, Risk Event Reporting (RER), risk officer report, and Key Risk Indicators (KRI) report
- Speak up/whistleblowing and fraud incident report
- Follow-up on audit results/concerns, both internal and external

2A.

- Internal audit report (including investigation assignment), assessment on the quality of risk management implementation
- Fraud risk assessment
- External audit report (financial and non-financial)

2B.

- Risk Control Self-Assessment (RCSA)/IT Risk Management (ITRM) report, Risk Event Reporting (RER), and risk officer report
- Speak up/whistleblowing report (including forwarding from the business/supporting unit)
- Follow-up on internal/external audit results 3a.
- External audit report
- External audit scope and strategy

3B.

- Internal audit report
- Internal audit scope and strategic plan

In principle, the internal control system is attached in all activities and throughout all work units. The Board of Commissioners and Board of Directors are fully responsible for overseeing and implementing the internal control system framework applied at The Bank, and proposing changes when necessary. The Bank has established 3 (three) line of assurance to ensure the internal control system is functioning accordingly.

Business/supporting/operational units who own and manage the risks, both at branches and head office serve as the first line of assurance. The second line of assurance is a function that monitors and ensures the risks and controls are well managed by the first line, such as risk management, compliance, legal, human resources, financial management, operations, and information technology.

The third line of assurance is an internal audit function that independently assesses the effectiveness of processes created in the first and second line and provides adequate assurance of all activities and work units.

SISTEM PENGENDALIAN KEUANGAN DAN OPERASIONAL

Sistem pengendalian internal ditetapkan oleh Direksi dengan persetujuan Dewan Komisaris. Penerapan sistem pengendalian yang efektif dilakukan secara berkesinambungan dengan tujuan sebagai berikut:

- Menjaga dan mengamankan harta kekayaan Bank.
- Menjamin tersedianya laporan yang lebih akurat.
- Meningkatkan kepatuhan terhadap ketentuan yang berlaku.
- Mengurangi dampak keuangan/kerugian, penyimpangan termasuk kecurangan/fraud, dan pelanggaran terhadap prinsip kehati-hatian.
- Meningkatkan efektivitas organisasi dan efisiensi biaya.

PENILAIAN TERHADAP EFEKTIVITAS PENGENDALIAN INTERNAL

Manajemen bertanggung jawab atas terselenggaranya sistem pengendalian internal yang andal dan efektif serta berkewajiban untuk meningkatkan budaya risiko (*risk culture*) yang efektif, dan wajib memastikan bahwa hal tersebut telah melekat di setiap jenjang organisasi. Departemen Audit Internal (SKAI) bertanggung jawab mengevaluasi dan berperan aktif dalam meningkatkan efektivitas sistem pengendalian internal secara berkesinambungan berkaitan dengan pelaksanaan operasional Bank dalam mencapai sasaran yang telah ditetapkan Bank. SKAI melakukan audit secara periodik terhadap aktivitas di unit kerja. Hasil audit disampaikan kepada manajemen untuk ditindaklanjuti dan dimonitor pelaksanaannya. Hal ini dilakukan untuk memastikan sistem pengendalian internal berjalan secara efektif.

Proses penilaian kecukupan pengendalian internal dilakukan terhadap 5 (lima) komponen pengendalian internal yang merujuk ke kerangka acuan yang diterbitkan oleh *Committee of Sponsoring Organizations of the Treadway Commission* (COSO) dan komponen kepatuhan terhadap regulasi (*compliance*).

Penilaian pengendalian internal dengan berdasarkan kepada hasil audit dan revidu lainnya menunjukkan pengendalian internal yang ada telah dirancang untuk memitigasi risiko, namun masih memerlukan perbaikan, serta keefektifan pelaksanaannya masih perlu ditingkatkan.

FINANCIAL AND OPERATIONAL CONTROL SYSTEMS

The internal control system is established by the Board of Directors with the approval of the Board of Commissioners. The implementation of effective internal control system is carried out continuously with the following objectives:

- Maintain and secure The Bank's assets.
- Ensure more accurate reporting.
- Improve compliance to prevailing regulations.
- Reduce financial impacts/losses, irregularities including deceit/fraud, and violation of prudential principles.
- Improve organizational effectiveness and cost efficiency.

ASSESSMENT OF INTERNAL CONTROL EFFECTIVENESS

The management is responsible for the implementation of a reliable and effective internal control system and is obliged to promote an effective risk culture, and to ensure that it is inherent at every level of the organization. The Internal Audit Department (IAD) is responsible for evaluating and taking an active role in improving the effectiveness of internal control system on an ongoing basis in relation to The Bank's operational implementation in achieving the objectives set by The Bank. IAD conducts periodic audits on activities in the work units. Audit results are submitted to the management for follow-up and its implementation is to be monitored. This is carried out to ensure the internal control system runs effectively.

The process of assessing the adequacy of internal control is carried out on 5 (five) components of internal control that refers to a framework issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO) and the component of compliance to regulations.

The assessment of internal control which is based on audit results and other reviews shows that existing internal controls have been designed to mitigate risk. However, the improvement is still required as well as the effectiveness of its implementation still needs to be improved.

FUNGSI KEPATUHAN

Sejalan dengan Peraturan Otoritas Jasa Keuangan (POJK) No. 46/ POJK.03/2017 tentang Pelaksanaan Fungsi Kepatuhan Bank Umum, Bank telah menetapkan serangkaian pedoman kepatuhan yang antara lain berupa:

Piagam Kepatuhan

Piagam Kepatuhan merupakan standar formal yang berisi prinsip-prinsip dasar, kewenangan, tugas dan tanggung jawab fungsi kepatuhan dalam organisasi, dan jalur pelaporan antara Dewan Komisaris, Direksi dan Otoritas Jasa Keuangan (OJK) selaku pengawas Bank. Tujuan utama dari disusunnya Piagam Kepatuhan ini adalah untuk memformulasikan tugas dan tanggung jawab fungsi kepatuhan.

Pernyataan Kepatuhan

Pernyataan Kepatuhan berisi kesanggupan setiap karyawan Bank untuk bertanggung jawab dan patuh pada Kode Etik Perilaku, kebijakan, prosedur dan pedoman internal, serta peraturan dan perundang-undangan yang berlaku sesuai dengan lingkup pekerjaan karyawan yang bersangkutan. Melalui Kode Etik Perilaku ini, diharapkan agar seluruh karyawan Bank dapat selalu bersikap hati-hati, cermat, dan cerdas saat menghadapi hal-hal yang berpotensi menimbulkan risiko yang dapat merugikan Bank (memiliki *risk awareness*).

Kebijakan Kepatuhan

Kebijakan Kepatuhan merupakan ketentuan yang mengatur pelaksanaan fungsi kepatuhan dalam Bank. Kebijakan ini diterbitkan dalam rangka memitigasi risiko pada aktivitas bisnis Bank terutama dalam pengelolaan risiko kepatuhan (*ex-ante*), serta mewujudkan terlaksananya budaya kepatuhan pada semua tingkatan organisasi dan kegiatan usaha Bank.

Kesesuaian dengan COSO

Sistem pengendalian internal Bank disusun secara terintegrasi dan telah sesuai dengan kerangka acuan yang diterbitkan oleh *Committee of Sponsoring Organizations of the Treadway Commission* (COSO) dan kepatuhan terhadap peraturan yang berlaku.

COMPLIANCE FUNCTION

In compliance with the Financial Services Authority Regulation (POJK) No. 46/POJK.03/2017 on the Implementation of Compliance Function for Commercial Banks, The Bank has established a series of compliance guidelines, which include:

Compliance Charter

The Compliance Charter is an official standard that contains the basic principles, authorities, duties and responsibilities of the compliance function within the organization, and the reporting line between the Board of Commissioners, Board of Directors and the Financial Services Authority (OJK) as The Bank's supervisor. The main objective of this Compliance Charter's compilation is to formulate the duties and responsibilities of the compliance function.

Compliance Statement

The Compliance Statement contains the ability of The Bank employees to be responsible and adhere to the Code of Conduct, internal policies, procedures and guidelines, as well as prevailing laws and regulations in accordance with the scope of work of the employees concerned. Through this Code of Conduct, The Bank employees are expected to always be careful, prudent, and smart when dealing with matters that have potential to cause harmful risks for The Bank (have risk awareness).

Compliance Policy

The Compliance Policy is a provision that defines the role of compliance function within The Bank. This policy is published to mitigate the risks within The Bank's business activities particularly to manage the compliance risk (*ex-ante*), and to ensure the implementation of compliance culture at all levels of The Bank's organization and business activities.

Compatibility with COSO

The internal control system of The Bank is developed in an integrated manner and in accordance with a framework published by the Committee of Sponsoring Organizations of the Treadway Commission (COSO) and the compliance of prevailing regulations.

Perkara Penting

Litigation

PERMASALAHAN HUKUM

Perkembangan jumlah permasalahan dan/atau perkara hukum serta litigasi yang dihadapi Bank dalam 3 (tiga) tahun terakhir adalah sebagai berikut:

Permasalahan Hukum Legal Cases	2023		2022		2021	
	Perdata Civil	Pidana Criminal	Perdata Civil	Pidana Criminal	Perdata Civil	Pidana Criminal
Perkara yang sudah selesai (sudah ada putusan yang mempunyai kekuatan hukum tetap) Legally settled (a decision has been issued with valid legal force)	7	-	7	-	3	-
Perkara yang sedang dalam proses penyelesaian In the settlement process	10	-	11	-	10	-
Jumlah Total	17	-	18	-	13	-

Selama tahun 2023, terdapat 17 (tujuh belas) perkara perdata yang dihadapi Bank dan tidak terdapat perkara pidana di pengadilan yang dihadapi oleh Bank.

Perkara perdata yang telah selesai (telah mendapatkan putusan yang mempunyai kekuatan hukum tetap) berjumlah 7 (tujuh) perkara perdata. Sementara, perkara perdata yang sedang dalam proses penyelesaian berjumlah 10 (sepuluh) perkara dengan nominal sebesar Rp1,23 miliar.

Perkara perdata yang dihadapi oleh atau melibatkan Bank antara lain terjadi karena:

1. Gugatan terkait sengketa ahli waris terkait nasabah Bank yang sudah meninggal
2. Gugatan terkait obyek sengketa yang merupakan agunan Bank
3. Gugatan/perlawanan terkait penyelesaian kredit macet dan penyelamatan/eksekusi agunan
4. Gugatan debitur terkait kredit dan atau agunan
5. Gugatan terkait dimasukkannya jaminan pihak ketiga yang merupakan jaminan Bank ke dalam boedel pailit

LEGAL ISSUES

The development of the number of issues and/or legal and litigation issues faced by The Bank in the last 3 (three) years is as follows:

During the year of 2023, there were 17 (seventeen) civil cases faced by the Bank and no criminal case in court faced by the Bank.

Of these, 7 (seven) civil cases that have been settled (obtained decision with valid legal force). Meanwhile, 10 (ten) civil cases in the settlement process, with the total nominal amounting of Rp1.23 billion.

Civil cases faced or involving the Bank occurred due to the followings:

1. Lawsuit related inheritance dispute related the late Bank's customer
2. Lawsuit related dispute object which is the Bank's collateral
3. Lawsuit/rebuttal related the settlement of bad loan and collateral rescue/execution
4. Lawsuit from debtor related credit and or collateral
5. Lawsuit related the inclusion of third party collateral, which is a Bank's collateral to the bankruptcy asset

Perkara perdata yang masih berjalan di tahun 2023 dinilai tidak material atau tidak berpengaruh terhadap kelangsungan usaha Bank.

Penanganan perkara hukum tersebut dilaksanakan melalui proses yang berlaku di Indonesia, dengan penuh kesadaran sebagai bentuk kepatuhan hukum. Bank senantiasa berkomitmen untuk memberikan kerja sama yang baik dalam proses penyelesaian perkara hukum.

PERKARA YANG BERSIFAT SIGNIFIKAN YANG DIHADAPI OLEH ANGGOTA DEWAN KOMISARIS DAN DIREKSI

Sepanjang tahun 2023, semua anggota Dewan Komisaris dan Direksi yang menjabat tidak pernah terlibat atau terdampak di perkara pidana maupun perdata yang bersifat signifikan.

Civil cases that are still ongoing in the year of 2023 is deemed immaterial or does not affect the Bank's business continuity.

Legal proceedings adhere to the applicable processes in Indonesia, conducted conscientiously as a commitment to legal compliance. The Bank is always committed to provide good cooperation in the settlement process of legal cases.

SIGNIFICANT CASES FACED BY MEMBERS OF THE BOARD OF COMMISSIONERS AND MEMBERS OF BOARD OF DIRECTORS

Throughout 2023, all current members of the Board of Commissioners and members of Board of Directors have never been involved in or implicated in any significant criminal or civil cases.

Sanksi Administratif Administrative Sanction

Pada tahun 2023, Bank dikenakan sanksi administratif sebesar Rp17,55 juta, di mana 4 (empat) sanksi administratif berasal dari Bank Indonesia (BI) senilai Rp7,80 juta dan 3 (tiga) sanksi administratif dari Otoritas Jasa Keuangan (OJK) senilai Rp9,75 juta. Seluruh sanksi administratif tersebut telah dibayarkan oleh Bank kepada instansi terkait.

In 2023, The Bank was subjected to administrative sanctions amounting to IDR 17.55 million, in which 4 (four) sanctions came from Bank Indonesia (BI) amounting to IDR7.80 million and 3 (three) sanctions came from the Financial Services Authority (OJK) amounting to IDR9.75 million. All of these administrative sanctions have been paid by The Bank to the respective institutions.

Akses Informasi dan Data Perusahaan

Information Access and Corporate Data

Sesuai dengan Undang-Undang Republik Indonesia No. 14 Tahun 2008 tentang Keterbukaan Informasi Publik yang menyatakan bahwa keterbukaan informasi publik merupakan sarana dalam mengoptimalkan pengawasan publik terhadap penyelenggaraan negara dan badan publik lainnya dan segala sesuatu yang berakibat pada kepentingan publik, maka Bank berkomitmen menerapkan prinsip transparansi kepada segenap pemangku kepentingan Bank dengan menyediakan akses dan sarana perolehan informasi yang memadai kepada seluruh pemangku kepentingan.

Akses informasi dan data Bank kepada publik secara eksternal dapat diakses di situs resmi Bank, media cetak, dan media elektronik lainnya seperti:

Law of the Republic of Indonesia No. 14 of 2008 on Public Information Disclosure states that public information disclosure is a means to optimize public supervision on the administration of the state and other public bodies and everything that affects the public interest. In accordance with this law, The Bank is committed to apply the principle of transparency to all stakeholders of The Bank by providing access and means of obtaining adequate information to all stakeholders.

Access to The Bank information and data for public is externally accessible on The Bank's official website, as well as through print media and the following channels:

 Telepon : (+62 21) 2355 6000 Telephone : (+62 21) 2355 6000	 Call Center : 1-500-198 (i Call ICBC) Call Center : 1-500-198 (i Call ICBC)	 Surel : customer_care@ina. icbc.com.cn Email : customer_care@ina. icbc.com.cn	 Website : www.icbc.co.id Website : www.icbc.co.id	 Instagram : icbc.indonesia Instagram : icbc.indonesia
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KETERBUKAAN DALAM KOMUNIKASI EKSTERNAL

Bank secara berkala menyebarluaskan informasi mengenai aktivitas dan kinerja Bank sebagai bentuk transparansi kepada masyarakat, yakni sebagai berikut:

DISCLOSURE IN EXTERNAL COMMUNICATION

The Bank periodically disseminates material information regarding its activities and performances as a form of transparency towards the public, as follows:

PERKEMBANGAN KETERBUKAAN INFORMASI

DEVELOPMENT OF INFORMATION DISCLOSURE

Bentuk Keterbukaan Forms of Disclosure	2023	2022	2021
Iklan Publikasi Pengumuman Lelang Tender Publication	-	-	-
Laporan Tahunan Annual Report	1	1	1
Laporan Keberlanjutan* Sustainability Report	1	1	1
Paparan Kinerja Bank Bank Performance Presentation	27	30	22
Siaran/Konferensi Pers Press Conference/Release	1	1	-

* Laporan Keberlanjutan merupakan gabungan dari Laporan Tahunan | Sustainability Report was prepared and combined with Annual Report

SITUS WEB

WEBSITE



Informasi mengenai profil dan sejarah perusahaan, manajemen perusahaan, produk dan layanan, kinerja keuangan, serta sejumlah dokumen keterbukaan informasi lainnya disajikan Bank dalam situs web dengan alamat www.icbc.co.id yang dapat diakses oleh pemegang saham dan segenap pemangku kepentingan.

Information regarding the company's profile and history, company management, products and services, financial performance, and other information disclosure documents are presented by The Bank on the website at www.icbc.co.id that is accessible to shareholders and all other stakeholders.

PAPARAN KINERJA

Sepanjang 2023, Bank telah menyampaikan paparan kinerja kepada pemegang saham dan pemangku kepentingan sebagai bentuk keterbukaan informasi. Paparan kinerja dilakukan melalui tayangan iklan media massa nasional sebagai berikut:

Publikasi Laporan Keuangan

Posisi Keuangan Financial Position	Tanggal Publikasi Publication Date	Media
31 Desember 2022 December 31, 2022	31 Maret 2023 March 31, 2023	Situs Web Website
31 Maret 2023 March 31, 2023	21 Mei 2023 May 21, 2023	Situs Web Website
30 Juni 2023 June 30, 2023	14 Agustus 2023 August 14, 2023	Situs Web Website
30 September 2023 September 30, 2023	11 November 2023 November 14, 2023	Situs Web Website
31 Desember 2023 December 31, 2023	31 Maret 2024 March 31, 2024	Situs Web Website

PERFORMANCE EXPOSURE

Throughout 2023, The Bank has submitted performance exposure to shareholders and stakeholders as a form of information disclosure. The performance exposure is done through national mass media advertisement as follows:

Financial Statement Publication

Publikasi Laporan Keuangan ICBC Limited

ICBC Limited Financial Statement Publication

Posisi Keuangan Financial Position	Tanggal Publikasi Publication Date	Media
30 Juni 2023 June 30, 2023	09 September 2023 September 09, 2023	Situs Web Website
31 Desember 2023 December 31, 2023	30 April 2024 April 30, 2024	Situs Web Website

LAPORAN TAHUNAN

Bank menerbitkan laporan tahunan yang merupakan dokumentasi resmi atas pencapaian kinerja Bank di tahun buku. Laporan Tahunan Bank tahun 2023 telah didistribusikan kepada pemegang saham dan segenap pemangku kepentingan lainnya.

ANNUAL REPORT

The Bank publishes an annual report which is the official documentation of The Bank's performance in a fiscal year. The Bank's 2023 Annual Report has been distributed to shareholders and all other stakeholders.

PENGELOLAAN KOMUNIKASI INTERNAL

Dalam rangka menciptakan iklim komunikasi internal yang kondusif untuk mendukung pencapaian kinerja, Bank senantiasa menciptakan komunikasi dua arah melalui berbagai media komunikasi termasuk:

- Surel
- Situs Internal
- Newsboard
- Digital Signage

INTERNAL COMMUNICATION MANAGEMENT

In the event of creating a conducive internal communication climate to support The Bank performance achievements, The Bank continues to create two-way communication channels through various communication media, including:

- Email
- Internal Site
- Newsboard
- Digital Signage

Hubungan dengan Pemangku Kepentingan

Relations with Stakeholders

Pemangku kepentingan adalah pihak-pihak yang memiliki kepentingan dengan Bank baik langsung maupun tidak langsung. Pemangku kepentingan utama Bank adalah ICBC Limited dan PT Intidana Wijaya. Pemangku kepentingan lainnya antara lain karyawan, nasabah, vendor penyedia barang dan jasa, pemerintah, regulator dan masyarakat.

PRINSIP DASAR

Bank menghormati hak setiap pemangku kepentingan yang tercermin dalam kebijakan sebagai berikut:

- Pengelolaan pemangku kepentingan diarahkan pada kepentingan bisnis Bank dengan tetap memperhatikan aturan main dan praktik bisnis yang sehat dan beretika.
- Pengelolaan pemangku kepentingan didasarkan pada prinsip-prinsip GCG, yaitu Transparency, Accountability, Responsibility, Independency, dan Fairness.

POLA HUBUNGAN DENGAN PEMANGKU KEPENTINGAN

Dalam mencapai keseimbangan dalam pengelolaan pemangku kepentingan, Bank wajib memperhatikan hak pemangku kepentingan yang dapat timbul secara hukum karena peraturan perundangan, perjanjian/kontrak, nilai etika/moral, atau tanggung jawab sosial perusahaan yang tidak bertentangan dengan aturan main Bank, dengan demikian:

- Bank mengkomunikasikan hak-hak para pemangku kepentingan secara transparan, akurat, dan tepat waktu melalui Sekretaris Perusahaan atau pejabat yang ditunjuk untuk menjadi penghubung antara Bank dengan pemangku kepentingan.
- Bank mempunyai mekanisme untuk menampung dan menindaklanjuti saran dan keluhan dari pemangku kepentingan.
- Bank mendorong pemangku kepentingan ikut berpartisipasi dalam penciptaan iklim yang kondusif untuk menaati peraturan perundangan yang berlaku.
- Bank memberikan kesempatan kepada masyarakat sekitar untuk bekerja di Bank sepanjang sesuai dengan kebutuhan dan standar mutu yang ditetapkan.

PENGEMBANGAN KOMUNIKASI DENGAN PEMANGKU KEPENTINGAN

Upaya yang dilakukan Bank dalam membangun komunikasi dengan para pemangku kepentingan dilaksanakan dengan menggunakan berbagai media, di antaranya sebagai berikut

Stakeholders are parties who have an interest with The Bank either directly or indirectly. The main stakeholders of The Bank are ICBC Limited and PT Intidana Wijaya. Other stakeholders include employees, customers, vendors of goods and services provider, government, regulators and community.

BASIC PRINCIPLES

The Bank respects the rights of each stakeholder, as reflected in the following policies:

- Stakeholder management is directed to The Bank's business interests with due regard to the sound and ethical business rules and business practices.
- Stakeholder management is based on GCG principles, namely Transparency, Accountability, Responsibility, Independency, and Fairness.

RELATIONSHIP PATTERNS WITH STAKEHOLDERS

In achieving balance in the management of stakeholders, The Bank takes into account the rights of stakeholders that may arise legally due to laws, contracts, moral/ethical values, or corporate social responsibility, not in conflict with The Bank's rules of conduct. This is done in the following ways:

- The Bank communicates the rights of stakeholders in a transparent, accurate and timely manner through the Corporate Secretary or through an appointed official to serve as a liaison between The Bank and the stakeholders.
- The Bank has mechanisms to accommodate and follow-up on stakeholders' suggestions and complaints.
- The Bank encourages stakeholders to participate in the creation of a conducive climate to comply with applicable laws and regulations.
- The Bank provides an opportunity for the surrounding community to work at The Bank as long as it meets the needs and quality standards set.

DEVELOPMENT OF COMMUNICATION WITH STAKEHOLDERS

The efforts made by The Bank in establishing communication with stakeholders are implemented using various media, including as follows:

Pemangku Kepentingan Stakeholders	Pengembangan Sarana Komunikasi How Communication is Developed
Pemegang Saham Shareholders	- Rapat Umum Pemegang Saham General Meeting of Shareholders - Kunjungan Kerja Work Visits - Presentasi Paparan Kinerja Presentations on The Bank's Performance - Laporan Tahunan Annual Report - Laporan Keberlanjutan Sustainability Report
Regulator Regulators	- Situs Website - Kunjungan Kerja Work Visits - Laporan Regulator Regulatory Reports - Laporan Keuangan Financial Statements - Laporan Tahunan Annual Report - Laporan Keberlanjutan Sustainability Report
Pemerintah Government	- Situs Website - Laporan Tahunan Annual Report - Laporan Keberlanjutan Sustainability Report
Masyarakat Community	- Situs Website - Media Jejaring Sosial Bank The Bank's Social Media - Berita Tentang Bank di Media Massa News About The Bank in Mass Media - Tanggung Jawab Sosial Perusahaan Corporate Social Responsibility - Laporan Tahunan Annual Report - Laporan Keberlanjutan Sustainability Report
Nasabah Customers	- Situs Website - Media Jejaring Sosial Bank The Bank's Social Media - Berita Tentang Bank di Media Massa News About The Bank in Mass Media - Petugas Garda Depan Front Guard Officer - Laporan Tahunan Annual Report - Laporan Keberlanjutan Sustainability Report
Lembaga Swadaya Masyarakat Non-Governmental Organizations	- Laporan Tahunan Annual Report - Laporan Keberlanjutan Sustainability Report - Tanggung Jawab Sosial Perusahaan Corporate Social Responsibility
Media Massa Mass Media	- Situs Website - Media Jejaring Sosial Bank The Bank's Social Media - Laporan Tahunan Annual Report - Laporan Keberlanjutan Sustainability Report - Pendistribusian Siaran Pers Distribution of Press Releases - Press Gathering - Wawancara Interviews
Peer Group Usaha Perbankan (Bank Umum, Bank Devisa) Peer Banking Business Groups (Commercial Bank, Foreign Exchange Bank)	- Asosiasi Industri Industry Associations - Studi Banding Comparative Studies - Laporan Tahunan Annual Report - Laporan Keuangan Financial Statements
Komunitas Keuangan Financial Community	- Laporan Tahunan Annual Report - Laporan Keuangan Financial Statements
Pesaing Competitors	- Situs Website - Media Jejaring Sosial Bank The Bank's Social Media - Berita Tentang Bank di Media Massa News About The Bank in Mass Media - Asosiasi Industri Industry Associations - Laporan Tahunan Annual Report - Laporan Keuangan Financial Statements
Pihak Ketiga (Pemasok) Third Party (Suppliers)	Pengarahan Briefing/Aanwijzing
Karyawan Employees	Situs Internal Internal Site Pos Elektronik Electronic Posts

Budaya Perusahaan

Corporate Culture

Bank memiliki nilai-nilai, budaya, dan karakter yang menjadi landasan kerja bagi seluruh insan Bank, yaitu:

The Bank has the following values, culture, and character that serve as the foundation of work for all of The Bank insiders:



INTEGRITAS / Integrity

01

Bertindak sesuai dengan norma dan etika serta bertanggung jawab terhadap tindakan yang dilakukan.

Act according to norms and ethics, and be responsible for actions taken.



PEDULI SOSIAL / Humanity

02

Membangun budaya peduli dan empati, serta menghargai sesama.

Build a culture of care and empathy, and respect for others.



KEHATI-HATIAN / Prudence

03

Menerapkan prinsip kehati-hatian dalam menjalankan usaha.

Implementing the prudential principles in progressing the business.



INOVASI / Innovation

04

Terdepan dalam menciptakan produk dan layanan, dengan berfokus pada pengembangan teknologi.

Leading forward in creating products and services by focusing on the development of technology.



KEUNGGULAN / Excellence

05

Memberikan hasil terbaik agar terciptanya keunggulan dalam segala aspek.

Providing the best results for excellence in all aspects.

Kode Etik

Code of Conduct

LANDASAN PENERAPAN KODE ETIK

Untuk dapat menjalankan fungsinya dengan baik dan memelihara kepercayaan masyarakat umum, termasuk para pemangku kepentingan Bank, setiap karyawan wajib melaksanakan tugasnya dengan kejujuran, integritas, tidak memihak, tanpa perlakuan istimewa dari pihak mana pun, dan bertindak sesuai dengan ketentuan yang berlaku. Oleh karena itu, diperlukan penetapan standar Kode Etik yang baik, agar dapat dipatuhi oleh seluruh karyawan Bank.

KODE ETIK BANK

Bank telah memiliki Kode Etik. Tujuan Kode Etik adalah diharapkan agar seluruh karyawan Bank dapat selalu bersikap hati-hati, cermat dan cerdas saat menghadapi hal-hal yang berpotensi menimbulkan risiko yang dapat merugikan Bank (memiliki *risk awareness*).

Kode Etik Bank berlaku bersama dengan peraturan internal Bank, peraturan pemerintah dan undang-undang yang berlaku, dan sama sekali tidak dimaksud untuk menggantikan regulasi tersebut karena tidak semua hal tercakup di dalam Kode Etik. Karyawan diharapkan selalu dapat bertindak dan berperilaku atas pertimbangan baik dan benar, serta bila diperlukan mendiskusikannya dengan atasan jika timbul keraguan dalam bertindak dan berperilaku.

PLATFORM FOR IMPLEMENTING A CODE OF CONDUCT

To be able to perform its functions well and to maintain the trust of the general public, including stakeholders of The Bank, it is important that each employee performs his/her duties with honesty, integrity, impartiality, no preferential treatment from other parties, and acts in accordance with applicable provisions. As such, it is necessary for The Bank to establish good Code of Conduct standards which can be adhered to by all employees of The Bank.

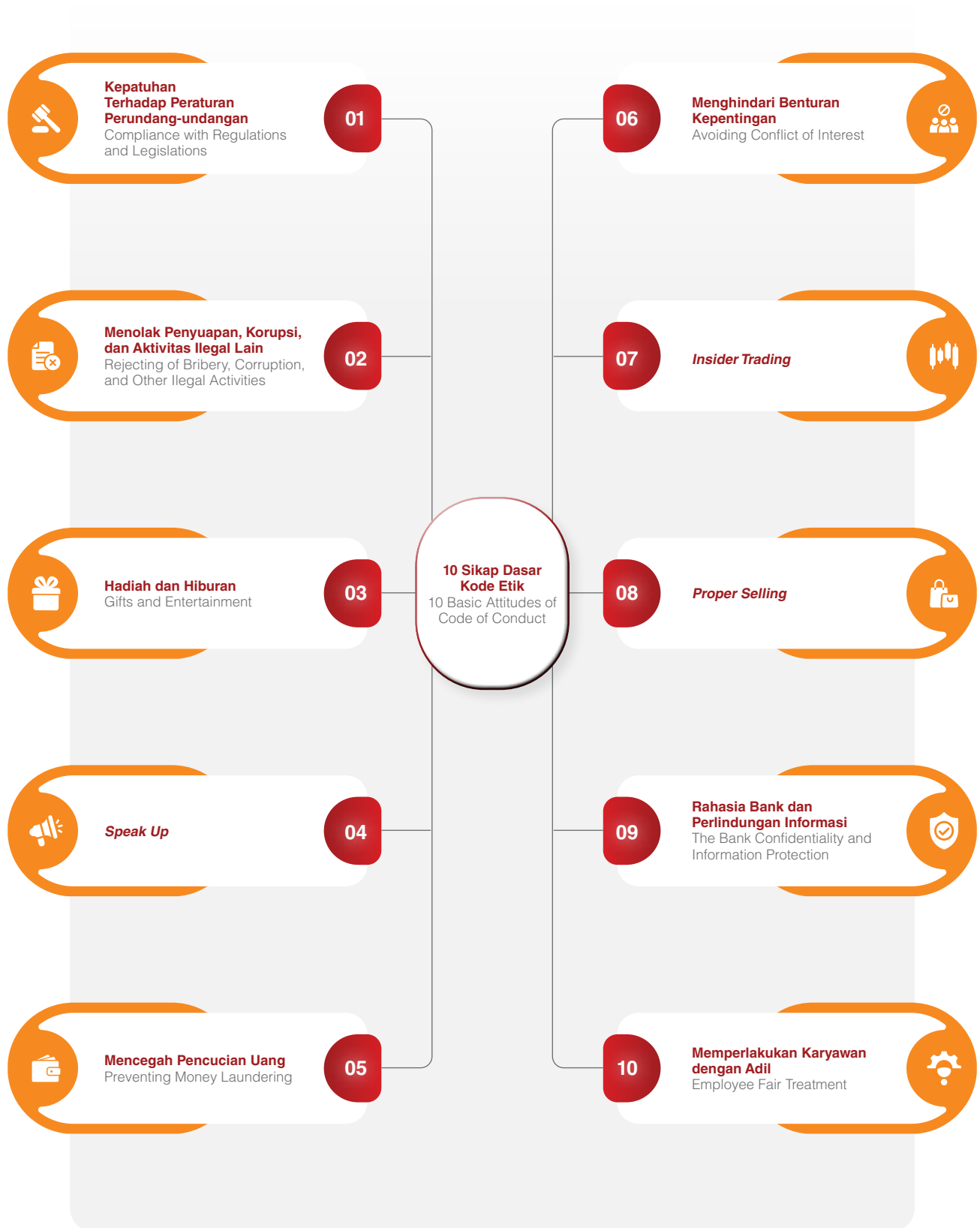
THE BANK'S CODE OF CONDUCT

The Bank already has a Code of Conduct. The objective of the Code of Conduct is so that all of The Bank's employees are always cautious, meticulous and intelligent when facing the potential risks that may harm The Bank (*risk awareness*).

The Bank's Code of Conduct applies in conjunction with The Bank's internal regulations, government regulations and applicable laws, and absolutely not intended to replace those regulations as not all are covered by the Code of Conduct. Employees are expected to always act and behave in good and right manners, and when necessary discuss things with their superiors when there is doubt in acting and behaving.

Kode Etik Bank tertuang dalam 10 (sepuluh) sikap dasar sebagaimana secara ringkas diuraikan di bawah ini:

The Bank's Code of Conduct contains 10 (ten) basic attitudes as summarized below:



Mematuhi Peraturan Internal Bank, Peraturan Regulator dan Peraturan Perundangan Lain yang Berlaku
Compliance with The Bank's Internal Regulations, Regulatory Requirements and Other Applicable Laws

Karyawan mewakili dan menjaga reputasi Bank, sehingga karyawan harus memahami dan mengenal seluruh peraturan dan ketentuan yang berlaku terkait dengan departemennya. Jika terdapat keraguan, karyawan harus berkonsultasi dengan rekan-rekan yang berpengalaman pada Departemen Kepatuhan, Departemen Sumber Daya Manusia, Departemen Hukum, Departemen *Management Information & Accounting*, dan Departemen *Financial Management* sesegera mungkin. Pelanggaran terhadap undang-undang dan peraturan dapat dikenakan sanksi sesuai dengan peraturan yang berlaku.

Employees represent and maintain The Bank's reputation, so they must understand all applicable rules and regulations related to their departments. In case of doubt, employees should consult with experienced colleagues in the Compliance Department, Human Resources Department, Legal Department, Management Information & Accounting Department, and Financial Management Department as soon as possible. Violations of the laws and regulations may be subject to sanctions in accordance with applicable regulations.

Menolak Penyuapan, Korupsi, dan Aktivitas Ilegal Lain
Rejecting of Bribery, Corruption, and Other Illegal Activities

Penyuapan dan korupsi merusak bisnis serta nilai-nilai yang dijunjung. Bank menentang segala bentuk penyuapan dan korupsi. Karyawan dilarang melakukan penyuapan, korupsi, dan kegiatan ilegal apa pun untuk keuntungan material atau sesuatu yang berharga.

Karyawan dilarang keras:

- Menawarkan atau membuat segala jenis pemberian dalam bentuk uang secara tidak resmi kepada pejabat pemerintah atau orang lain yang memiliki kekuasaan untuk mengambil keputusan.
- Menawarkan pembayaran kepada nasabah atau calon nasabah untuk bisnis mereka.
- Menerima segala jenis pembayaran tidak resmi atau tidak lazim.

Bribery and corruption damage business and upheld values. The Bank opposes all forms of bribery and corruption. Employees are prohibited from bribery, corruption, and any illegal activity for material benefits or valuable things.

Employees must not:

- Offer or make any kind of unofficial payment or benefit to government officials or others with decision making power.
- Offer to pay a customer or potential customer for their business.
- Accept any kind of unofficial or unorthodox payment or benefit.

Hadiah dan Hiburan
Gifts and Entertainment

Karyawan dilarang menerima atau meminta hadiah dan/atau hiburan dalam bentuk apa pun dari nasabah, vendor atau pihak mana pun yang dapat berpotensi terhadap benturan kepentingan atau lebih jauh lagi dapat memengaruhi proses pengambilan keputusan.

Hadiah dan/atau hiburan dapat diterima apabila sesuai dengan ketentuan yang berlaku:

- Karyawan yang karena tugasnya harus memberikan atau menerima hadiah berupa barang dengan nilai yang wajar kepada/dari pihak eksternal dalam rangka hari raya keagamaan dan tahun baru, harus melaporkan kepada atasan langsung dan atasan langsung berikutnya untuk dilakukan pencatatan. Adapun nilai yang wajar adalah hadiah yang nilainya tidak melebihi Rp1.000.000. Hadiah berbentuk uang tunai tidak diperkenankan.
- Menawarkan dan menerima jamuan bisnis yang wajar.
- Menerima hadiah yang bernilai tinggi, di mana penolakan akan menimbulkan penghinaan, dan di mana permintaan maaf dan pengembalian tidak dimungkinkan. Jika diterima, hadiah itu harus dilaporkan kepada atasan langsung dan atasan langsung berikutnya untuk dicatat, dan kemudian dilaporkan dan diserahkan ke Departemen Sumber Daya Manusia dan Departemen Kepatuhan serta disimpan oleh Departemen *General Affairs* untuk selanjutnya akan dibagikan kepada karyawan dalam acara-acara perusahaan dan/atau acara amal.

Employees are prohibited from accepting or soliciting gifts of any kind and/or entertainment from customers, vendors or other parties that may potentially cause conflict of interest or may further influence the decision-making process.

The following rewards and/or entertainment may be accepted when permitted under applicable rules:

- An employee, who due to his/her duties must provide/receive a prize of goods of a reasonable value to/ from an external party in the event of religious festivities and new year's celebration, must report to the immediate supervisor and subsequent immediate supervisor for recording. The fair value is a gift which value does not exceed Rp1,000,000. Gifts in cash are not allowed.
- Offer and receive a reasonable business dinner.
- Receive high value prize, where refusal will cause humiliation, and where apologies and returns are not possible. If accepted, the prize must be reported to the immediate supervisor and subsequent immediate supervisor for recording, and then reported and submitted to the Human Resources Department and Compliance Department, and will be kept by General Affairs Department to be subsequently distributed to employees in corporate events and/or charity events.

Speak Up

Speak Up merupakan saluran yang disediakan oleh Bank kepada karyawan dan pihak eksternal untuk melakukan pelaporan pelanggaran dan kecurangan apabila karyawan tidak merasa nyaman untuk melakukan eskalasi melalui jalur formal yang ada yaitu eskalasi.

Semua laporan yang diterima melalui saluran pelaporan *Speak Up* akan dicatat, diidentifikasi, dan ditindaklanjuti apabila memenuhi kriteria dalam penyampaian *Speak Up*. Perlu diingat bahwa kebijakan *Speak Up* bukanlah mekanisme untuk mengungkapkan keluhan umum.

Hal-hal yang dapat dilaporkan melalui prosedur *Speak Up* antara lain:

1. Perilaku yang melanggar peraturan;
2. Pencurian, *fraud*, dan korupsi;
3. Pelanggaran terhadap kerahasiaan data/informasi;
4. Pemberian uang yang tidak semestinya (suap dan hadiah);
5. Ketidaksesuaian finansial;
6. Benturan kepentingan;
7. Perilaku tidak etis;
8. Pelecehan (seksual dan rasis); dan
9. Penyuapan.

Masalah lain yang dapat menimbulkan risiko reputasi bagi Bank dapat dilaporkan.

Bank mendorong aksi *Speak Up* dengan menyediakan saluran pelaporan yang aman dan terjamin kerahasiaannya. *Speak Up* merupakan bagian penting dari nilai-nilai Bank. Tidak ada yang dirugikan dari *Speak Up*, kecuali jika penggunaannya disalahgunakan untuk memberikan informasi yang tidak benar (fitnah).

Speak Up is a channel provided by The Bank for employees and external parties to report any violation and fraud in the condition when an employee is uncomfortable to carry out escalation through formal channel called escalation.

All reports that received through the *Speak Up* channel will be recorded, reviewed and followed up if they meet the criteria for delivering *Speak Up*. Keep in mind that *Speak Up* policies are not a mechanism for expressing public complaints.

Matters that can be reported through *Speak Up* procedures include:

1. Behavior that violates laws and regulations;
2. Theft, fraud, and corruption;
3. Violation of confidentiality of data/information;
4. Inappropriate payments (bribery and reward);
5. Financial irregularities;
6. Conflict of interest;
7. Unethical behaviors;
8. Harassment (sexual and racist); and
9. Bribery.

Any other issues that may pose a reputation risk to The Bank may be reported.

The Bank encourages the action of *Speak Up* procedures by providing secure and confidential reporting channel. *Speak Up* is an important part of The Bank's values. Nothing is harmed from *Speak Up*, unless the use is misused to provide false information.

Mencegah Pencucian Uang Preventing Money Laundering

Pencucian uang merusak integritas dan reputasi Bank dan membawa Bank kepada kemungkinan dikenakan hukuman yang berat. Bank mendukung gerakan internasional dalam memerangi tindakan kriminal sepenuhnya serta berkomitmen mencegah pencucian uang dan penipuan.

Karyawan wajib mematuhi berbagai undang-undang dan peraturan lain yang dikeluarkan oleh pemerintah atau instansi yang berwenang yang dirancang untuk mendeteksi, mencegah, dan melaporkan pencucian uang, pembiayaan teroris dan kriminalitas penggunaan sistem keuangan.

Bank sudah memiliki kebijakan dan prosedur tentang anti pencucian uang dan pencegahan pendanaan terorisme berdasarkan ketentuan regulator dan Pusat Pelaporan dan Analisis Transaksi Keuangan (PPATK) dan peraturan perundangan lainnya yang terkait, maupun *international best practice* yang harus dipatuhi dalam menjalankan semua kegiatan usaha Bank.

Dalam mencegah kegiatan pencucian uang, karyawan wajib untuk:

1. Pelatihan dan sosialisasi: Berpartisipasi dalam semua program pelatihan dan sosialisasi.
2. Mengenal nasabah: Karyawan harus mengenal nasabah dan mempunyai pengetahuan yang memadai mengenai nasabah agar dapat mengidentifikasi transaksi yang tidak sesuai dengan pola transaksi nasabah atau tidak sesuai dengan aktivitasnya.
3. Melaporkan aktivitas yang mencurigakan: Karyawan harus segera melaporkan kepada Departemen Kepatuhan dan Departemen AML/CFT (*Anti Money Laundering/Countering Financing of Terrorism*) atas kecurigaan pencucian uang. AML officer harus diberitahu untuk menentukan perlu atau tidaknya mengajukan laporan transaksi keuangan yang mencurigakan.

Money laundering undermines the integrity and reputation of The Bank and brings The Bank to possible severe penalties. The Bank supports the international movement in combating criminal acts completely and is committed to preventing money laundering and fraud.

Employees are required to comply with various other laws and regulations issued by the government or authorized agencies designed to detect, prevent, and report money laundering, terrorist financing and criminal use of the financial system.

The Bank has a policy and procedure on anti money laundering and countering financing of terrorism based on the provisions of regulators and Financial Transaction Reports and Analysis Center (PPATK) and other relevant legislations, as well as international best practices to be observed in carrying out all business activities of The Bank.

In preventing money laundering activities, employees are required to observe the following:

1. Training and socialization: Participate in all training and socialization programs.
2. Know your customer: Employees must be familiar with customers and have sufficient knowledge of customers to identify transactions that are not in accordance with the pattern of customer transactions or not in accordance with their activities.
3. Reporting suspicious activity: Employees should report to the Compliance Department and AML/CFT (*Anti Money Laundering/Countering Financing of Terrorism*) Department for suspicion of money laundering. The AML officer must be notified to determine whether or not to file a suspicious transaction report.

Menghindari Benturan Kepentingan

Avoiding Conflict of Interest

Benturan kepentingan adalah suatu kondisi di dalam suatu rangkaian aktivitas Bank, di mana kepentingan Bank, dan/ atau nasabahnya, dan/atau karyawan Bank saling berbenturan baik secara langsung maupun tidak langsung. Terdapat 5 (lima) kategori benturan kepentingan:

- Benturan kepentingan dengan nasabah (atau pihak lainnya).
Dalam melakukan kegiatan memasarkan produk dan jasa Bank, karyawan harus senantiasa memperhatikan kepentingan Bank dengan tetap menciptakan dan memelihara hubungan baik dengan calon nasabah atau nasabah.
- Benturan kepentingan antar karyawan (dalam kaitannya dengan aktivitas profesional) dan nasabah.
Karyawan harus selalu bersikap objektif dan tidak dipengaruhi oleh rekanan atau calon rekanan untuk memenuhi kepentingannya yang tidak sesuai dengan ketentuan internal Bank.
- Benturan kepentingan di luar Bank.
 - Karyawan Bank tidak diperkenankan untuk mendapatkan keuntungan pribadi dengan menggunakan informasi yang diperoleh karena jabatannya di Bank, sedangkan informasi tersebut bukan informasi umum.
 - Karyawan Bank tidak diperkenankan memiliki usaha atau bisnis pribadi di luar pekerjaannya sebagai karyawan Bank.
 - Karyawan Bank tidak diperkenankan untuk mengikat hubungan kerja dengan pihak lain. Apabila hal ini terjadi, karyawan dapat dikenakan sanksi yang telah ditentukan oleh Bank. Bank dapat memberi izin kepada karyawan yang memiliki keahlian khusus, misalnya di bidang pendidikan (pengajar) untuk mengabdikan keahliannya kepada masyarakat luas sejauh karyawan tetap mengutamakan dan tidak mengabaikan kewajibannya terhadap Bank. Namun untuk hal ini karyawan harus mendapatkan rekomendasi dari atasannya sekurang-kurangnya pejabat tingkat Kepala Departemen. Namun Bank juga mempunyai hak prerogatif untuk tidak memberikan izin terhadap kepentingan tersebut di atas.
- Benturan kepentingan dengan calon karyawan dan antar karyawan.
Karyawan tidak diperkenankan untuk menerima suatu pemberian apalagi meminta sesuatu dari sesama karyawan maupun calon karyawan, baik berupa uang, tip, komisi, bantuan atau sesuatu apa pun yang dapat menyebabkan "utang budi" kepada karyawan maupun calon karyawan tersebut.
- Benturan kepentingan hubungan keluarga.
Karyawan yang memiliki hubungan keluarga dengan karyawan lain di Bank, harus melaporkan hubungan tersebut kepada Departemen Sumber Daya Manusia di kantor pusat. Hal ini dilakukan agar Departemen Sumber Daya Manusia dapat mengatur posisi masing-masing karyawan tidak saling menimbulkan benturan kepentingan.

A conflict of interest is a condition within a series of The Bank activities, in which the interests of The Bank, and/or its customers, and/or The Bank employees' conflict with each other directly or indirectly. There are 5 (five) categories of conflict of interest:

- Conflict of interest with customers (or other parties).
In conducting activities to market The Bank's products and services, employees must always pay attention to the interests of The Bank while maintaining good relationships with prospective customers or customers.
- Conflict of interest between employees (in connection with professional activities) and customers.
Employees must always be objective and not influenced by partners or potential partners to fulfill their interests that are not in accordance with the internal provisions of The Bank.
- Conflict of interest outside The Bank.
 - The Bank employees are not allowed to gain personal benefit by using information obtained from their position at The Bank, as the information is not for public consumption.
 - The Bank employees are not allowed to own a business or personal business outside of their work as The Bank employees.
 - The Bank employees are not allowed to engage with other parties. If this occurs, the employee may be subject to sanctions determined by The Bank. The Bank may grant licenses to employee with special expertise, for example in the field of education (instructor) to devote his/her expertise to the public, as long as the employee remains concerned and does not neglect his/her obligations to The Bank. But for this, the employee must get recommendation from his/her superiors, at the very least from the Head of Department. However, The Bank also has a prerogative to not grant permission to the above-mentioned interests.
- Conflict of interest with prospective employees and fellow employees.
Employees are not allowed to accept gift or request something from their fellow employees or prospective employees, whether in the form of money, tips, commissions, assistance or anything that can cause "debt" to the employees or prospective employees.
- Conflict of interest of family relations.
Employees who have family relations with other employees at The Bank must report their relationships to the Human Resources Department at the head office. This is done so that the Human Resources Department can set the position of each employee to not conflict with each other interests.

Insider Trading

Dalam melakukan pekerjaan di dalam Bank, karyawan dapat memiliki akses terhadap *inside information*. Karyawan dilarang melakukan *insider trading* apabila memiliki *inside information* yang belum menjadi informasi publik. Bila karyawan melakukan transaksi tersebut karena mengetahui atau mendapatkan *inside information*, maka karyawan dapat dianggap telah membocorkan rahasia Bank dan harus bertanggung jawab atas pelanggaran undang-undang yang berlaku. Ketika memiliki *inside information*, karyawan harus bertindak dengan integritas dan kejujuran, serta menghindari mengambil keuntungan pribadi melalui transaksi yang dilakukan. Memberi petunjuk kepada orang lain atau bertransaksi mewakili keluarga, teman, ataupun pihak ketiga yang lain berdasarkan informasi orang dalam juga dilarang.

In performing their work within The Bank, the employees may have access to inside information. Employees are prohibited to conduct insider trading if they have inside information that has not become public information. If an employee commits such transactions for knowing or obtaining inside information, then the employee may be deemed to have disclosed The Bank secrets and shall be liable for breach of applicable laws. When having inside information, employees must act with integrity and honesty, and avoid taking personal advantage through transactions made. Tipping off to another person or dealing on behalf of relatives, friends, or any other third parties based on insider information are also prohibited.

Proper Selling

Karyawan dilarang, baik sengaja atau secara ceroboh, membuat pernyataan, janji, atau prediksi yang menyesatkan, palsu atau menipu kepada setiap nasabah atau dengan kata lain karyawan wajib untuk menghindari terjadinya *misselling*. *Misselling* dapat menurunkan reputasi Bank dan menimbulkan adanya tuntutan hukum dari nasabah. *Misselling* terjadi dikarenakan kesalahan dalam menyampaikan risiko yang terkait suatu produk perbankan, atau ketika produk perbankan yang ditawarkan tidak sesuai dengan kebutuhan nasabah. Selain itu, karyawan dilarang menyembunyikan fakta apa pun dari nasabah yang dapat menyebabkan nasabah atau pemangku kepentingan membuat keputusan berdasarkan informasi yang tidak benar. Setiap karyawan wajib untuk memberikan atau membuat pernyataan baik lisan ataupun tertulis mengenai fakta yang benar atau dengan kata lain karyawan wajib untuk menghindari terjadinya *misrepresentation*. Dengan demikian, karyawan diharuskan untuk:

- Menghindari menjual produk dan jasa yang tidak sesuai dengan kebutuhan nasabah dan tidak memedulkan kepentingan nasabah.
- Memberikan informasi yang relevan dan lengkap kepada nasabah supaya mereka dapat dihadapkan kepada pilihan yang paling tepat dari produk yang ada.
- Memiliki pengetahuan yang memadai mengenai produk-produk Bank dan tingkat risiko yang diinginkan nasabah, serta tujuan, keuangan, dan kondisi pribadi nasabah agar dapat menilai akibat yang ditimbulkan dan apakah produk tersebut dapat memenuhi kebutuhan nasabah.
- Berusaha agar nasabah mengerti produk beserta risikonya, terutama produk-produk yang rumit dan pembelian produk tersebut harus didasarkan atas persetujuan nasabah.
- Menjelaskan fitur produk dengan jelas baik secara lisan maupun melalui media.

Employees are prohibited, either deliberately or carelessly, from making false or deceptive statements, promises or predictions to customers. In other words, employees are required to avoid the occurrence of misselling. Misselling can undermine The Bank's reputation and cause lawsuits from customers. Misselling occurs due to errors in conveying the risks associated with a banking product, or when the offered banking products are not in accordance with the needs of customers. In addition, employees are prohibited from hiding any facts from customers that may cause customers or stakeholders to make decisions based on information that is not true. Every employee is obliged to give or make a statement both orally and in writing about the true facts. In other words, employees are obliged to avoid the occurrence of misrepresentation. Accordingly, employees are required to:

- Avoid selling products and services that are not in accordance with the needs of customers and not caring about the interests of customers.
- Provide relevant and complete information to customers so that they can be exposed to the most appropriate choice of existing products.
- Have sufficient knowledge of The Bank's products and the level of risk desired by the customers, as well as the clients' personal goals, finances and conditions in order to assess the consequences and whether the product meets the customers' needs.
- Try to get customers to understand the product and its risks, especially for complicated products and the purchases of such products must be based on the customers' approval.
- Describe the product features clearly both orally and through the media.

Rahasia Bank dan Perlindungan Informasi

The Bank Confidentiality and Information Protection

Karyawan Bank wajib sepanjang waktu menghormati prinsip kerahasiaan Bank khususnya sehubungan dengan perlindungan kerahasiaan informasi nasabah. Tugas untuk melindungi kerahasiaan informasi nasabah terus berlanjut bahkan setelah karyawan berhenti bekerja pada Bank. Hal tersebut terkait dan sejalan dengan kebijakan benturan kepentingan, Kode Etik, serta *compliance statement* yang disetujui karyawan pada saat bergabung dengan Bank. Karyawan Bank dapat memperoleh informasi Bank untuk dirahasiakan, dan tidak untuk diungkapkan kepada pihak ketiga. Membocorkan informasi tersebut kepada pihak di luar Bank adalah pelanggaran serius. Karyawan dilarang melakukan hal tersebut kecuali jika karyawan diminta oleh badan/instansi hukum yang berwenang (pengadilan/polisi/BI/OJK, dll.). Dengan demikian, karyawan wajib untuk:

- Mencatat dan melaporkan seluruh data yang berkaitan dengan informasi nasabah dan menyimpan data dan informasi nasabah pada tempat yang aman, tidak dapat diakses oleh orang yang tidak berhak untuk memperoleh informasi tersebut untuk membaca, mengetahui, mencatat dan menggandakan data tersebut.
- Menjaga kerahasiaan informasi nasabah dan tidak mendiskusikannya di tempat-tempat umum serta tidak memberi informasi baik secara lisan maupun tertulis tentang nasabah dan calon nasabah kepada pihak mana pun termasuk teman dekat atau anggota keluarga sendiri yang tidak berwenang untuk mengetahuinya yang dapat merugikan nasabah dan Bank secara langsung maupun tidak langsung.
- Dilarang menyebarkan informasi gaji, pinjaman karyawan, dan informasi lainnya yang bersifat pribadi dan rahasia kepada pihak luar Bank.
- Tidak menggunakan kembali kertas-kertas bekas yang berisikan informasi bersifat rahasia.

The Bank employees are obliged at all time to respect the principle of The Bank secrecy especially in protecting the confidentiality of customer information. The duty of protecting the confidentiality of customer information continues even after the employees stop working at The Bank. It is related and in line with the policy of conflict of interest, Code of Conduct, and compliance statement that employees agree upon joining The Bank. The Bank employees may obtain its information to be kept confidential and not to be disclosed to third parties. Leaking that information to parties outside The Bank is a serious offense. Employees are prohibited from doing so unless they are requested by a legal entity/agency (courts/police/BI/OJK, etc.). Accordingly, employees are required to:

- Record and report all data relating to customer information and store customer data and information in a safe place, not accessible to unauthorized persons who wish to obtain such information to read, know, record and duplicate the data.
- Maintain the confidentiality of customer information and not discussing it in public places, and not providing information both orally and in writing about customers and potential customers to any party including close friends or family members who are not authorized to know and that may harm the customers and The Bank directly or indirectly.
- It is prohibited to disseminate salary information, employee loans, and other personal and confidential information to parties outside The Bank.
- Do not reuse used papers containing confidential information.

Memperlakukan Karyawan dengan Adil

Employee Fair Treatment

Bank berupaya membantu karyawannya untuk mencapai potensi terbaiknya agar dapat berkinerja tinggi dengan selalu berusaha meningkatkan kesejahteraan dan memperlakukan karyawan secara adil dan bertindak sesuai peraturan internal Bank, peraturan Bank Indonesia dan peraturan perundangan lainnya yang berlaku serta melindungi hak-hak karyawan.

Atasan mengemban tugas untuk memperhatikan secara seksama karyawannya. Karyawan harus terus mengembangkan keterampilan dan kemampuan untuk dapat memenuhi komitmen Bank kepada pemangku kepentingan.

Dengan demikian, karyawan diharuskan untuk:

1. Mempertahankan standar kinerja dan perilaku
 - Memenuhi standar kinerja yang diharapkan, perilaku, dan etika.
 - Setiap perilaku diskriminatif, pelecehan, atau pelanggaran perilaku tidak akan ditoleransi dan akan diperlakukan dengan serius.
2. Menjaga kesehatan, keselamatan dan keamanan
 - Bekerja dengan sehat dan aman supaya tindakan atau kelalaian tidak menimbulkan risiko bagi orang lain.
 - Mendorong rekan kerja untuk bekerja secara sehat dan aman.
 - Melaporkan semua kecelakaan dan kejadian.
 - Meminta perhatian manajemen akan semua bahaya yang ada di tempat kerja.
3. Pembelajaran dan kompetensi
 - Karyawan bertanggung jawab atas pembelajaran dan perkembangan yang berkesinambungan.
 - Karyawan harus menjaga keahlian dan pengetahuan yang diperlukan dalam menjalankan pekerjaan dengan baik dan memaksimalkan potensi.
 - Karyawan harus mengidentifikasi kebutuhan pembelajaran setiap tahun dan berpartisipasi dalam aktivitas pengembangan yang relevan dalam membantu mengembangkan keahlian dan kemampuan baru.

The Bank strives to accommodate its employees to reach their best potential and generate great performance by improving their welfare, treating them fairly, and acting in accordance with its internal policies, Bank Indonesia regulations, and other regulatory requirements, as well as protecting the rights of its employees.

Managers owe a duty of care to all their subordinates. Employees must continuously develop their skills and capabilities, so they can deliver The Bank's commitments to the stakeholders.

Thus, the employees are required to:

1. Maintain the standards of performance and conduct
 - Meet the expected standards of performance, behavior, and conduct.
 - Any discriminatory behavior, harassment, or breach of conduct will not be tolerated and will be treated seriously.
2. Maintain healthy, safe and secure work environment
 - Work in a healthy and safe manner, so that the actions or omissions taken do not put others at risk.
 - Encourage others to work in a healthy and safe manner.
 - Report all accidents and incidents.
 - Bring any hazard in the workplace to the attention of management.
3. Learning and competency
 - Employees have responsibility for continuous learning and development.
 - Employees must maintain the skills and knowledge they need to perform their jobs well and to maximize their potential.
 - Employees must identify their learning needs each year and participate in relevant development activities that can help them in developing new skills and capabilities.

PENERAPAN KODE ETIK

Kode Etik Bank berlaku untuk seluruh karyawan Bank pada setiap level organisasi dalam Bank.

SOSIALISASI DAN PENYEBARLUASAN KODE ETIK

Departemen Kepatuhan telah menetapkan aturan internal terkait dengan Kode Etik Perilaku Karyawan. Dalam rangka penyebaran Kode Etik Perilaku maka setiap karyawan wajib untuk menandatangani Surat Pernyataan untuk Tunduk kepada Kode Etik Perilaku. Departemen Sumber Daya Manusia akan membantu dalam proses penandatanganan dan pengadministrasian surat pernyataan tersebut khususnya kepada Karyawan Baru.

IMPLEMENTATION OF CODE OF CONDUCT

The Bank's Code of Conduct applies to all of The Bank employees at each level of the organization in The Bank.

SOCIALIZATION AND DISSEMINATION OF THE CODE OF CONDUCT

Compliance Department has established an internal rules related to the Employee Code of Conduct. In order to disseminate the Code of Conduct, each employee is required to sign a Statement of Adherence to the Code of Conduct. The Human Resources Department assist the process of signing and administering the statement especially for the New Employee.

Selain melalui penandatanganan surat pernyataan, sosialisasi terkait Kode Etik Perilaku juga dicantumkan dalam buku Peraturan Perusahaan, dan disosialisasikan dalam pelatihan CARAL (Compliance, AML, Risk Management, Audit, and Legal) kepada seluruh Karyawan.

PELANGGARAN DAN SANKSI DISIPLIN

Kepatuhan terhadap kebijakan dan peraturan Bank adalah wajib. Karyawan yang berhubungan langsung dengan nasabah atau rekanan wajib menekankan dan mengimplementasikan kondisi pada kebijakan ini dalam hubungan kerja sama bisnis/komersil. Pelanggaran atas kebijakan tersebut dapat berakibat pada tindakan disiplin sesuai dengan peraturan Bank yang berlaku mulai dari surat peringatan sampai dengan pemberhentian, sebagaimana diatur dalam Peraturan Perusahaan dan/atau Kebijakan dalam Penanganan Ketidakpatuhan dan Disipliner

KECURANGAN INTERNAL 2023

Kecurangan internal atau *internal fraud* adalah penyimpangan/kecurangan yang dilakukan oleh pengurus, karyawan tetap dan tidak tetap (termasuk karyawan alih daya) terkait dengan proses kerja dan kegiatan operasional Bank yang memengaruhi kondisi keuangan Bank.

Tidak terdapat kecurangan internal yang teridentifikasi pada tahun 2023.

Apart from signing the statement letter, Code of Conduct was also included in the Company Regulations and socialize in the CARAL Training (Compliance, AML, Risk Management, Audit, and Legal) to all Employee.

VIOLATIONS AND DISCIPLINARY SANCTIONS

Compliance with all policies and regulations of The Bank is a mandatory obligation. Any respective employee with direct interaction with the customers or partners must emphasize and implement conditions in this policy in any business/commercial cooperation. Violation of this policy can result in disciplinary action in accordance with The Bank's applicable regulations, starting from the warning letter to termination, as stipulated in the Company Regulation and/or the Policy for Handling In-Compliant and Disciplinary

INTERNAL FRAUD 2023

Internal fraud is deviation/act of fraud committed by the management, permanent and non-permanent employees (including outsourcing employees) in relation to The Bank's work processes and operational activities that affect The Bank's financial condition.

There was no internal fraud identified in 2023.

Kebijakan Transparansi Dan Benturan Kepentingan

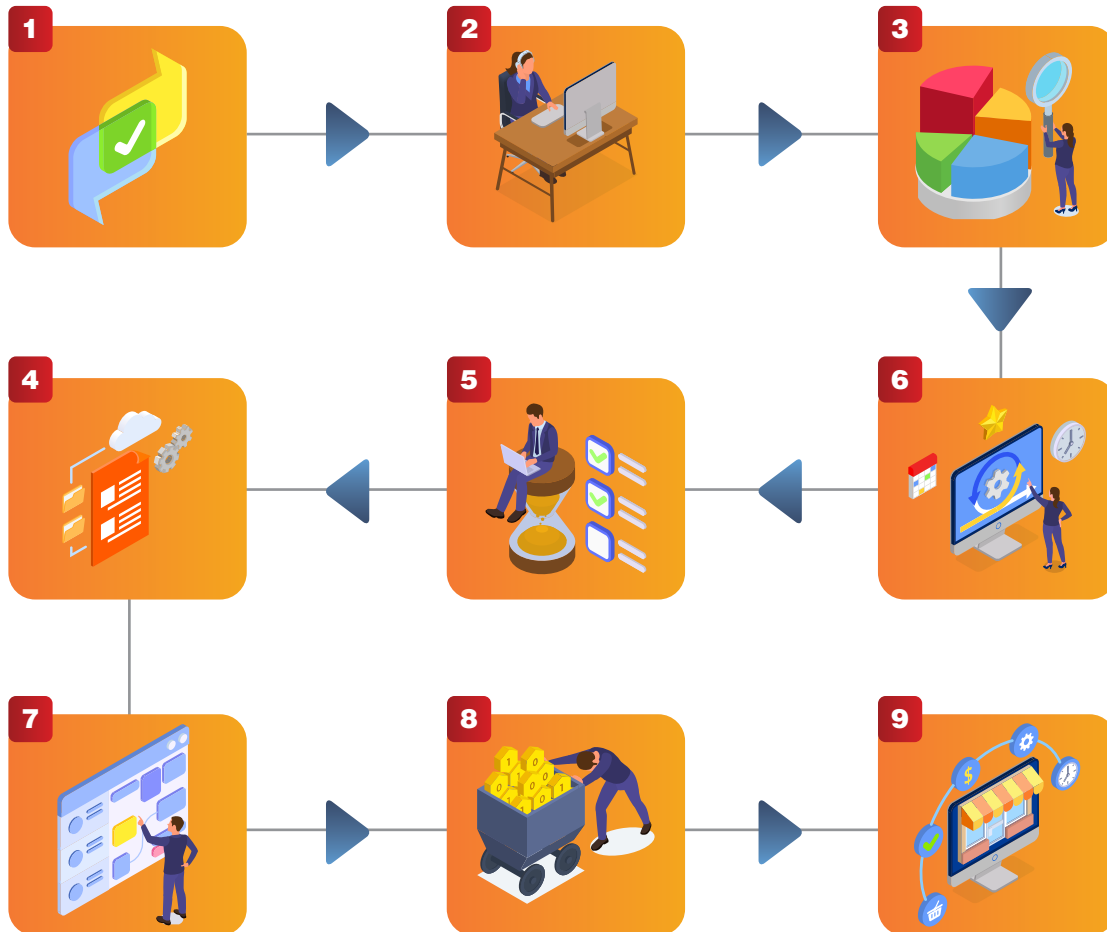
Policy on Transparency and Conflict of Interest

Kode Etik Bank mengatur kebijakan terkait benturan kepentingan, yang tercantum dalam 10 (sepuluh) Sikap Dasar Kode Etik Bank, yang salah satunya adalah "Menghindari Benturan Kepentingan". Dalam Kode Etik Bank tercantum kebijakan secara rinci tentang definisi benturan kepentingan, dan jenis benturan kepentingan yang memungkinkan munculnya kerugian baik bagi Bank sendiri maupun bagi pemangku kepentingan.

The Bank's Code of Conduct regulates policy on conflict of interest, that is listed in 10 (ten) Basic Attitudes of The Bank's Code of Conduct, one of which is "Avoiding Conflict of Interest". The Bank's Code of Conduct includes detailed policy on the definition of conflict of interest, and the types of conflict of interest that may cause harm to both The Bank itself and the stakeholders.

Kebijakan Pengadaan Barang dan Jasa

Procurement Policy



TATA CARA PENGADAAN BARANG DAN JASA

1. Menerima permintaan dari pemohon dan melakukan peninjauan dan diskusi untuk mendapatkan kriteria barang dan jasa yang diminta.
2. Menghubungi vendor-vendor terkait yang dapat menyediakan barang dan jasa yang diminta dan meminta penawaran harga awal.
3. Membuat analisis perbandingan dari penawaran yang diterima dari vendor-vendor.
4. Membuat proposal pengajuan dana pengadaan ke manajemen untuk mendapatkan persetujuan dana serta persetujuan atas hasil seleksi vendor.

PROCEDURES FOR THE PROCUREMENT OF GOODS AND SERVICES

1. Receive requests from applicants and conduct reviews and discussions for obtaining the criteria of goods and services requested.
2. Contact the relevant vendors who can provide the requested goods dan services and asking for initial price quotes from vendors.
3. Make a comparison analysis of the proposals received from vendors.
4. Make a proposal for procurement funding to management for obtaining approval of funding and result of vendor selection.

5. Membuat pemesanan barang dan jasa kepada vendor terpilih.
6. Melakukan pengawasan terhadap penyerahan barang dan jasa yang telah dilaksanakan oleh vendor.
7. Melakukan pendataan dan penyimpanan terhadap barang yang telah dikirim oleh vendor.
8. Melakukan serah terima kepada pemohon.
9. Memproses tagihan vendor ke bagian keuangan.

Sebagai salah satu komitmen Bank untuk melaksanakan proses bisnis yang berkelanjutan, manajemen sangat memperhatikan hubungan yang baik serta profesional dengan para pemasok barang dan jasa secara transparan, akuntabel, bertanggung jawab, independen, dan adil.

Semua pengadaan pendukung operasional dan bisnis Bank wajib melalui departemen penanggung jawab termasuk pengadaan untuk jasa perawatan, penggantian barang atas perbaikan, dan kontrak kerja pembelian atau sewa.

Pengajuan pendanaan atas pengadaan barang dan jasa dengan nominal tertentu dianalisis melalui *Financial Review Committee* (FRC) dan dimintakan persetujuan ke Direktur penanggung jawab FRC dan Presiden Direktur.

Proses seleksi vendor atas barang dan jasa dengan nominal tertentu dikaji oleh *Centralized Purchase Review Team* (CPRT) yang terdiri dari perwakilan kepala atau penanggung jawab dari Departemen *General Affairs*, Departemen *Financial Management* dan departemen-departemen terkait lainnya yang ditunjuk oleh Presiden Direktur.

Tugas dan tanggung jawab dari departemen penanggung jawab dapat diuraikan sebagai berikut:

- Melaksanakan permintaan atas barang dan jasa dari pemohon berdasarkan prosedur yang telah ditetapkan.
- Menyusun detail permintaan atas barang dan jasa sesuai permintaan pemohon.
- Bekerjasama dengan vendor dalam proses pengadaan.
- Melakukan pendataan atas barang yang telah diterima.
- Pengawasan terhadap kualitas barang atau hasil pekerjaan dari vendor.
- Melakukan serah terima barang dan jasa kepada pemohon.

5. Make a purchase order of goods and services to the selected vendor.
6. Conduct oversight of goods and services delivery carried out by the vendor.
7. Collect data and store the goods sent by the vendor.
8. Handover to the applicant.
9. Process billing to finance department.

As part of The Bank's commitment to implementing sustainable business processes, the management takes a serious concern in maintaining the good and professional relationship with the suppliers of goods and services in a transparent, accountable, responsible, independent, and fair manner.

All procurement of The Bank's operational and business support must be done through the department in charge, including the procurement for maintenance services, replacement of goods for repairs, and lease purchase agreement.

Submission of funding for procurement of goods and services in certain amount is analyzed through the Financial Review Committee (FRC) and to be approved by the Director in charge of FRC and the President Director.

The selection process of vendors of goods and services in certain amount is reviewed by the Centralized Purchase Review Team (CPRT) comprising the representatives of head or person in charge of the General Affairs Department, Financial Management Department and other relevant departments appointed by the President Director.

The duties and responsibilities of the department in charge can be described as follows:

- Conducting requests for goods dan services from applicants based on predetermined procedures.
- Prepare details of goods dan services request according to the request from applicants.
- Working closely with vendor in the procurement process.
- Collecting data on goods that have been received.
- Monitoring the quality of goods or services of vendor.
- Hand over goods dan services to the applicants

Whistleblowing System

Whistleblowing System

Dalam menciptakan lingkungan kerja yang sehat, Bank telah memiliki *whistleblowing system* yang merupakan sarana komunikasi bagi semua pihak untuk melaporkan perbuatan/perilaku/kejadian yang berhubungan dengan antara lain: tindakan *fraud*/pelanggaran terhadap hukum, perjanjian kerja sama Bank, Kode Etik, kebijakan internal Bank, dan/atau benturan kepentingan yang dilakukan oleh/atau melibatkan internal Bank.

Dalam hal mekanisme eskalasi tidak dapat dijalankan karena tindakan penyimpangan yang dilaporkan berkaitan dengan atasan langsung pegawai dan/atau atasan lain, pegawai Bank dapat menggunakan media *Speak Up*.

Speak Up merupakan saluran yang disediakan oleh Bank kepada karyawan dan pihak eksternal untuk melakukan pelaporan pelanggaran dan kecurangan apabila karyawan tidak merasa nyaman untuk melakukan eskalasi melalui jalur formal yang ada yaitu eskalasi.

PENERAPAN KEBIJAKAN

Dalam menerapkan budaya manajemen risiko yang mampu mentransformasikan Bank untuk menjadi penyedia jasa keuangan terkemuka, maka prosedur *whistleblowing* diterapkan melalui:

1. Partisipasi aktif dari pegawai Bank

Partisipasi aktif dari pegawai Bank diperlukan untuk mengadopsi nilai-nilai yang mendukung budaya risiko. Partisipasi aktif dari pegawai Bank dapat diwujudkan dalam bentuk tindakan nyata untuk mempertahankan terciptanya lingkungan kerja yang bebas dari pelanggaran. Oleh karena itu, setiap pegawai Bank berhak untuk melaporkan setiap indikasi akan adanya penyelewengan dan wajib untuk mengungkapkan setiap pelanggaran yang dilakukan oleh pegawai lain kepada Departemen Kepatuhan secara langsung ataupun melalui sarana *Speak Up* yang telah disediakan.

In creating a favorable working environment, The Bank has a whistleblowing system as a communication channel for all parties to report any actions/behaviors/events related to: acts of fraud/violations of laws, working agreement with The Bank, Code of Conduct, The Bank's internal policies, and/or conflicts of interest committed by/or involving internal of The Bank.

In the event that escalation mechanism cannot be carried out due to the fact that the incident is associated with their direct supervisor and/or other superiors, The Bank employees can use the *Speak Up* mechanism.

Speak Up is a channel provided by The Bank for employees and external parties to report any violation and fraud in the condition when an employee is uncomfortable to carry out escalation through formal channel called escalation.

IMPLEMENTATION OF POLICY

In implementing a risk management culture that can transform The Bank into a leading financial service provider, the whistleblowing procedure is implemented through:

1. The active participation of The Bank employees

The active participation of The Bank employees is required in order to adopt values that support the risk culture. The active participation of The Bank employees can be implemented in the form of concrete actions to maintain the creation of a work environment free from offense. Therefore, every employee of The Bank is entitled to report any indication of fraud and is obliged to disclose any offense caused by other employees to the Compliance Department directly or through the *Speak Up* channel provided.

2. Komite Disipliner

Setelah melakukan evaluasi dan analisa terkait Laporan *Speak Up* yang memerlukan investigasi lebih lanjut, maka Komite Disipliner akan mengambil tindak lanjut yang mungkin juga melibatkan pihak-pihak terkait, seperti Departemen Kepatuhan, Departemen Audit Internal, Departemen Hukum, Departemen Sumber Daya Manusia, Departemen Manajemen Risiko, dan pihak lain jika dipandang perlu. Jika yang dicurigai melakukan potensi pelanggaran atau pelanggaran adalah anggota Dewan Komisaris atau Direksi, maka laporan ditujukan kepada Ketua Komite Audit (yang diketuai oleh Komisaris Independen).

PRINSIP DASAR SISTEM PELAPORAN PELANGGARAN

Penerapan sistem pelaporan pelanggaran di Bank memiliki prinsip dasar bagi yang memiliki informasi dan ingin melaporkan suatu perbuatan tidak etis maupun pelanggaran yang terjadi di lingkungan Bank. Pelapor tidak perlu khawatir atas terungkapnya identitas diri karena Bank akan merahasiakan identitas diri pelapor sebagai *whistleblower*. Bank menghargai informasi yang dilaporkan dan fokus pada materi informasi yang dilaporkan.

TUJUAN

Pemberlakuan sistem pelaporan pelanggaran di lingkup Bank dilakukan sebagai acuan dalam tata cara pengelolaan penanganan pengaduan/penyingkapan (*whistleblowing system*) bagi Dewan Komisaris, Direksi, karyawan serta pemangku kepentingan, agar setiap laporan yang dikirimkan terjaga kerahasiaannya dan kasus yang dilaporkan dapat dipertanggungjawabkan serta dapat ditindaklanjuti.

RUANG LINGKUP

Kebijakan ini berlaku bagi Dewan Komisaris, Direksi dan organnya, karyawan Bank (baik karyawan tetap, karyawan kontrak maupun karyawan tidak tetap), pihak eksternal yang memiliki hubungan kerja sama dan/atau berkepentingan dengan Bank, seperti nasabah, pihak ketiga (pihak penyedia barang/jasa) dan mantan karyawan. Pelanggaran yang dapat dilaporkan meliputi korupsi, suap, benturan kepentingan, pencurian, kecurangan, dan pelanggaran peraturan/hukum.

2. The Disciplinary Committee

After evaluating and analyzing the *Speak Up* Report that requires further investigation, the Disciplinary Committee will take follow-up actions that may also involve relevant parties, such as Compliance Department, Internal Audit Department, Legal Department, Human Resources Department, Risk Management Department, and others if deemed necessary. If the suspected of potential violation or suspected of violation is a member of the Board of Commissioners or Board of Directors, then the report is addressed to the Chairman of Audit Committee (chaired by an Independent Commissioner).

BASIC PRINCIPLES OF VIOLATION REPORTING SYSTEM

The implementation of violation reporting system at The Bank has a basic principle for those who have information and wish to report an unethical act or violation that occurs within the environment of The Bank. The reporting party does not have to worry about the disclosure of his/her identity as The Bank will keep his/her identity as the whistleblower. The Bank appreciates the reported information and focuses on the reported information material.

PURPOSE

The application of violation reporting system in the scope of The Bank is conducted as a reference point in the management of the whistleblowing system for the Board of Commissioners, Board of Directors, employees and stakeholders, so that each submitted report is kept confidential and the reported case may be accountable and actionable.

SCOPE

This policy applies to the Board of Commissioners, Board of Directors and their organs, The Bank employees (both permanent employees, contract employees, and non-permanent employees), external parties who have business relations and/or have an interest with The Bank, such as customers, third parties (goods/services provider), and former employees. Reportable offenses include corruption, bribery, conflict of interest, theft, fraud, and violation of regulations/laws.

PENANGANAN PELAPORAN PELANGGARAN

Bank memiliki prosedur dalam penanganan pelaporan pelanggaran. Prosedur tersebut dibuat dengan mengacu pada prinsip di bawah ini:

- Laporan *Speak Up* yang bersifat rahasia. Hanya pelapor dan administrator *Speak Up*, serta komite yang telah ditunjuk yang mempunyai kewenangan untuk mengakses laporan tersebut.
- Pihak pelapor berhak untuk mendapat perlindungan dari Bank jika laporannya dapat menyebabkan ancaman yang berasal dari dalam maupun dari luar Bank.
- Pihak pelapor dan terlapor dibebaskan dari segala sanksi apabila laporannya tidak dapat dibuktikan secara sah kebenarannya.
- Bank menjamin bahwa seluruh pihak pelapor dan laporan yang telah disampaikan tidak akan memengaruhi penilaian terhadap kinerja maupun terhadap karier pegawai Bank.
- Berdasarkan kepastian dan jaminan di atas, pihak pelapor wajib untuk bersedia memberikan informasi yang lebih rinci jika diminta oleh pihak manajemen Bank sebagai bagian dari tindak lanjut atas laporan yang telah disampaikan.

Langkah-langkah dari prosedur tersebut adalah:

1. Mendeteksi Indikasi Pelanggaran
2. Penyampaian Laporan
3. Penanganan Laporan *Speak Up*
4. Tindak Lanjut Laporan

PENDETEKSIAN INDIKASI PELANGGARAN

Dalam hal karyawan dan/atau pihak eksternal mengetahui, melihat, dan mendengar tentang kondisi yang diindikasikan sebagai tindakan pelanggaran terhadap Kode Etik perilaku, peraturan, dan praktik umum yang berlaku pada industri perbankan, maka karyawan dapat melaporkan hal tersebut kepada atasannya sesuai dengan mekanisme eskalasi. Namun untuk pihak eksternal dapat melaporkan melalui mekanisme *Speak Up*

PENYAMPAIAN LAPORAN

Karyawan yang mengetahui adanya indikasi pelanggaran atau aktivitas yang mencurigakan diminta untuk menyampaikan laporan dengan menggunakan Formulir Pelaporan *Speak Up* yang dilampiri dengan dokumen pendukung.

HANDLING OF VIOLATION REPORT

The Bank has procedure for handling violation reports. The procedure is made with reference to the following principles:

- *Speak Up* reports are confidential. Only the reporting party, *Speak Up* administrator and designated committee have the authority to access such reports.
- The reporting party is entitled for protection from The Bank if his/her reporting may cause threat from within or outside The Bank.
- The reporting party and the reported party are exempt from any sanction if the report cannot be legally validated.
- The Bank guarantees that all reporting parties and reports submitted will not affect the assessment of performance or career of The Bank employees.
- Based on the above certainty and guarantee, the reporting party is obliged to provide more detailed information if requested by the management of The Bank as part of a follow-up action on the reports that have been submitted.

The steps of the above procedures are:

1. Detecting Indication of Violation
2. Report Submission
3. *Speak Up* Report Handling
4. Follow-up on the Report

DETECTING AN INDICATION OF VIOLATION

In the event that employees and/or external parties know, see, and hear about conditions that are indicated as violations of the Code of Conduct, regulations and general practices applicable to the banking industry, employees can report the matter to their superiors in accordance with the escalation mechanism. However, for external parties can report through the *Speak Up* mechanism

REPORT SUBMISSION

Employee who is aware of the violation indications or suspicious activities is requested to submit a report using the *Speak Up* Reporting Form attached with supporting documents.

Formulir Speak Up yang sudah dilengkapi dikirimkan melalui email kepada: speakup@ina.icbc.com.cn.

Dalam hal terdapat laporan pelanggaran yang diperkirakan berdampak negatif secara signifikan terhadap Bank dan/atau nasabah, termasuk yang berpotensi menjadi perhatian publik, maka Bank harus segera melaporkan hal tersebut kepada OJK paling lambat 3 (tiga) hari kerja setelah Bank mengetahui terjadinya pelanggaran tersebut. Proses pelaporan ini mengacu pada “Kebijakan Strategi Anti Fraud”

PENANGANAN LAPORAN

Setiap laporan yang diterima oleh administrator Speak Up akan ditindaklanjuti sebagai berikut:

1. Mencatat tanda terima Laporan Speak Up.
2. Mengirimkan pemberitahuan balasan kepada pengirim/ pelapor (whistleblower) selambat-lambatnya dalam 5 (lima) hari kerja (melalui email) setelah laporan diterima untuk menyatakan bahwa laporan telah diterima oleh administrator Speak Up dan laporan tersebut akan ditindaklanjuti sesuai dengan ketentuan internal Bank
3. Memastikan kelengkapan informasi pada laporan dan bukti pendukung yang dilampirkan (jika ada). Informasi dapat dikategorikan lengkap apabila pelapor (whistleblower) mencantumkan nama dan nomor telepon atau kontak yang dihubungi.
4. Untuk laporan yang dikategorikan sebagai Laporan Fraud, hasil identifikasi tersebut disampaikan kepada Kepala Departemen Audit Internal selambat-lambatnya 1 (satu) hari setelah Laporan Fraud diterima oleh administrator Speak Up.
5. Sedangkan laporan yang dikategorikan sebagai Laporan Keluhan, disampaikan kepada Kepala Departemen Sumber Daya Manusia paling lambat 2 (dua) hari kerja setelah laporan diterima oleh administrator Speak Up.
6. Administrator Speak Up melaporkan kejadian fraud yang memiliki dampak negatif secara signifikan dengan perkiraan kerugian finansial $\geq$ Rp500 juta terhadap Bank dan/atau nasabah kepada Unit Anti Fraud (UAF).
7. Menyampaikan laporan kepada Komite Disipliner terkait Laporan Speak Up yang memerlukan investigasi lebih lanjut untuk proses lebih lanjut. Hal tersebut dilakukan paling lambat 3 (tiga) bulan sejak diterimanya dokumen Speak Up secara lengkap.

The fulfilled Speak Up form needs to be submitted via email to: speakup@ina.icbc.com.cn.

For any violation incidents which are estimated to have a significant negative impacts to The Bank and/or customers, including those which may potentially become public concern, The Bank should immediately report the issue to OJK no later than 3 (three) working days after The Bank is aware of the violation. The reporting process refers to the “Anti Fraud Strategy Policy”

REPORT HANDLING

Any report received by Speak Up administrator will be followed up as follows:

1. Record the received date of the Speak Up Report.
2. Send a reply email to the report sender/whistleblower no later than 5 (five) working days after the report is received by Speak Up administrator as a notification that the report has been received and will be followed up in accordance with The Bank’s internal provision.
3. Ensure the fulfillment of information in the report and supporting evidence (if any). Information can be categorized as complete if the reporter (whistleblower) discloses his/her name and phone number.
4. For reports categorized as Fraud Report, the results of the identification are submitted to the Head of Internal Audit Department no later than 1 (one) day after the Fraud Report is received by the Speak Up administrator.
5. Meanwhile, the reports categorized as Grievance Report are submitted to the Head of Human Resources Department no later than 2 (two) working days after the report is received by the Speak Up administrator.
6. Speak Up administrator reports the fraud incidents, which have a significant negative impacts with an estimated financial loss of $\geq$ Rp500 million against The Bank and/or customers to the Anti Fraud Unit (UAF).
7. Submit the report to the Disciplinary Committee regarding the Speak Up Report that requires further investigation for next proceedings. This must be conducted at the latest in 3 (three) months since the received Speak Up report date.

8. Administrator Speak Up menyampaikan rekapitulasi pengaduan fraud, ancaman, dan kerentanan di Bank yang dapat memberikan paparan risiko fraud ke Bank yang diterima melalui saluran Speak Up secara kuartalan kepada Unit Anti Fraud. Laporan disampaikan 10 (sepuluh) hari kerja setelah kuartal berakhir.
 9. Matrix penindaklanjutan laporan kejadian/indikasi/dugaan fraud di setiap kategori pihak terlapornya mengacu kepada Kebijakan Strategi Anti Fraud.
 10. Dokumen dan laporan terkait Laporan Speak Up hanya dapat diakses oleh administrator Speak Up. Administrator Speak Up wajib menjaga kerahasiaan data yang diperoleh dari whistleblower. Saluran Speak Up hanya akan diakses oleh administrator Speak Up pada saat jam operasional Bank.
8. Speak Up administrator submits a recapitulation of complaints of fraud, threats, and vulnerabilities in The Bank that can provide exposure of fraud risk to The Bank received through Speak Up channel on a quarterly basis to the Anti Fraud Unit. The report is submitted within 10 (ten) working days after the end of each quarter.
 9. Matrix of fraud incident/indication report handling in each category of reported parties refer to the Anti Fraud Strategy Policy.
 10. The documents and reports related to Speak Up Report can only be accessed by Speak Up administrator. Speak Up administrator must keep the data confidentiality of the whistleblower. Speak Up channel can only be accessed by Speak Up administrator during The Bank's operational hours

TINDAK LANJUT LAPORAN

Komite Disipliner berwenang untuk mengkategorikan laporan berdasarkan urgensi dan dampak, untuk menentukan laporan yang perlu ditindaklanjuti dengan segera. Jika laporan telah ditindaklanjuti dan dilakukan tindakan pencegahan pelanggaran, Komite Disipliner dapat memutuskan untuk memberikan penghargaan kepada pihak pelapor (*whistleblower*).

Jika laporan tidak dapat ditindaklanjuti dengan alasan apapun, Komite Disipliner akan menyampaikan alasan laporan tidak dapat ditindaklanjuti kepada administrator *Speak Up* untuk diteruskan kepada pihak pelapor.

PERLINDUNGAN BAGI PELAPOR

Hanya pihak pelapor, administrator *Speak Up*, dan Komite Disipliner yang memiliki kewenangan untuk mengakses laporan. Pegawai yang melapor berhak mendapatkan perlindungan dari Bank dalam hal keselamatannya terancam. Selain itu, pegawai yang melapor juga bebas dari segala bentuk sanksi, bahkan jika laporan mereka tidak terbukti benar. Bank juga memberikan jaminan kepada seluruh pihak yang melapor bahwa laporan mereka tidak akan berdampak pada evaluasi kinerja dan/atau karier mereka di Bank.

FOLLOW-UP REPORT

Disciplinary Committee carries full authority to categorize reports based on their level of urgency and impact, to determine which reports need to be followed up immediately. Once the follow-up actions are completed and actions are taken to prevent any violation, Disciplinary Committee may decide to give reward to the whistleblower.

If the report cannot be followed up for any reason, the Disciplinary Committee will convey the reasons why the report cannot be followed up to the Speak Up administrator to be delivered to whistleblower.

WHISTLEBLOWER PROTECTION

Only the reporting party, Speak Up administrator, and the Disciplinary Committee have the authority to access the reports. The reporting employees are entitled to have protection from The Bank in the event of their safety being threatened. In addition, the reporting employees are also free from any form of sanction, even if their reports are not proven to be true. The Bank also provides assurance to all reporting parties that their reports will not affect the evaluation of their performance and/or career at The Bank.

PELANGGARAN WHISTLEBLOWING 2023

Sepanjang tahun 2023, tidak terdapat laporan yang masuk melalui mekanisme *Speak Up system*.

PIHAK YANG MENGELOLA PENGADUAN YANG MEMERLUKAN INVESTIGASI LEBIH LANJUT

Pengaduan tersebut dikelola oleh Komite Disipliner. Komite Disipliner akan melakukan evaluasi dan analisa terkait Laporan *Speak Up* yang memerlukan investigasi lebih lanjut, untuk kemudian mengambil tindak lanjut yang mungkin juga melibatkan pihak-pihak terkait dan pihak lain jika dipandang perlu. Jika yang dicurigai melakukan potensi pelanggaran atau pelanggaran adalah anggota Dewan Komisaris atau Direksi, maka laporan ditujukan kepada Ketua Komite Audit yang diketuai oleh Komisaris Independen.

SANKSI BAGI TERLAPOR YANG TERBUKTI

Bentuk sanksi kepada terlapor yang terbukti bersalah diberikan sesuai dengan ketentuan yang berlaku di Bank. Berdasarkan Peraturan Perusahaan Bank, tindakan disiplin kepada pekerja dapat berupa teguran lisan, surat peringatan, pencabutan fasilitas, penundaan kenaikan golongan upah, penurunan golongan upah, pemindahan (mutasi dan demosi), pembayaran ganti rugi, atau pemutusan hubungan kerja sesuai dengan tingkatan kesalahan yang diperbuat.

SOSIALISASI WHISTLEBLOWING SYSTEM

Untuk mensosialisasikan kepada seluruh insan Bank, Departemen Kepatuhan melakukan sosialisasi melalui pelatihan CARAL (*Compliance, AML, Risk Management, Audit, and Legal*) kepada seluruh insan Bank.

WHISTLEBLOWING VIOLATION 2023

Throughout 2023, there was no report received through the *Speak Up* receipt system mechanism.

PARTIES IN CHARGE OF MANAGING COMPLAINT THAT REQUIRES FURTHER INVESTIGATION

Complaints are administered by the Disciplinary Committee. The Disciplinary Committee will evaluate and analyze the *Speak Up* Report that requires further investigation, and then take follow-up action that may also involve relevant parties and others if deemed necessary. If the suspected of potential violation or suspected of violation is a member of the Board of Commissioners or Board of Directors, then the report is addressed to the Chairman of Audit Committee, chaired by an Independent Commissioner

SANCTION FOR PROVEN REPORTED PARTY

The form of sanction to the reported party that is proven guilty is given in accordance with the prevailing provisions in The Bank. Based on The Bank's Company Regulation, disciplinary actions to employees may include oral warning, warning letter, facility retention, postponement of salary increment, salary reduction, transfer (rotation and demotion), payment of losses incurred, or termination of employment in accordance with the level of offenses made.

WHISTLEBLOWING SYSTEM SOCIALIZATION

To socialize information to all of The Bank employees, Compliance Department conducted socialization through CARAL (*Compliance, AML, Risk Management, Audit, and Legal*) training to all of The Bank's personnel.

Transparansi Praktik *Bad Governance*

Transparency of Bad Governance Practices

Pada tahun 2023, tidak adanya pihak mana pun yang melaporkan aktivitas Bank yang dapat mencemari lingkungan; baik aktivitas langsung maupun aktivitas perbankan seperti pemberian kredit kepada nasabah yang memiliki pelanggaran terhadap pencemaran lingkungan.

In 2023, there were no parties reporting the activities of The Bank that can pollute the environment; whether it be direct activities or banking activities such as lending to customers with violation in environmental pollution.

PENGUNGKAPAN PEMENUHAN KEWAJIBAN PERPAJAKAN

Bank telah berkontribusi dalam pembayaran pajak sebesar Rp168,54 miliar selama tahun 2023.

DISCLOSURE OF TAX OBLIGATION FULFILLMENT

The Bank has contributed commitment related to taxation payment amounting to Rp168.54 billion during 2023.

KESESUAIAN PENYAJIAN LAPORAN TAHUNAN DAN LAPORAN KEUANGAN DENGAN PERATURAN YANG BERLAKU DAN PERNYATAAN STANDAR AKUNTANSI KEUANGAN (PSAK)

Laporan Tahunan Bank tahun buku 2023 disusun melalui acuan laporan keuangan Bank yang berakhir pada 31 Desember 2023. Laporan keuangan Bank tahun buku 2023 telah diaudit oleh Kantor Akuntan Publik (KAP) Imelda & Rekan (Deloitte) yang telah disusun sesuai dengan PSAK yang berlaku di Indonesia.

CONFORMITY OF THE PRESENTATION OF ANNUAL REPORT AND FINANCIAL STATEMENTS WITH APPLICABLE REGULATIONS AND FINANCIAL ACCOUNTING STANDARDS (PSAK)

The Bank's Annual Report for the fiscal year 2023 is prepared based on The Bank's financial statements ended on December 31, 2023. The Bank's financial statements for the fiscal year 2023 have been audited by Imelda & Partners (Deloitte) Registered Public Accountants. These statements have been prepared in accordance with the applicable financial accounting standards (PSAK) in Indonesia.

KASUS TERKAIT BURUH DAN KARYAWAN

Bank tidak menemukan adanya kasus terkait buruh dan karyawan sepanjang tahun 2023.

CASES RELATED TO LABOR AND EMPLOYEE

The Bank did not find any cases related to labor and employee throughout 2023.

KESESUAIAN BUKU LAPORAN TAHUNAN DAN LAPORAN TAHUNAN DIGITAL

Laporan Tahunan digital Bank baik yang disampaikan kepada pemegang saham, pemangku kepentingan, maupun yang telah diunggah pada situs web Bank telah sesuai dengan Laporan Tahunan yang dicetak dan diterbitkan oleh Bank.

COMPATIBILITY OF ANNUAL REPORT BOOK AND DIGITAL ANNUAL REPORT

The Bank's digital Annual Report submitted to shareholders, stakeholders or uploaded on The Bank's official website is in conformity with the Annual Report printed and published by The Bank.

Hubungan dengan Pemangku Kepentingan

Relations with Stakeholders

Pemangku kepentingan adalah pihak-pihak yang memiliki kepentingan dengan Bank baik langsung maupun tidak langsung. Pemangku kepentingan utama Bank adalah ICBC Limited dan PT Intidana Wijaya. Pemangku kepentingan lainnya antara lain karyawan, nasabah, vendor penyedia barang dan jasa, pemerintah, regulator dan masyarakat.

PRINSIP DASAR

Bank menghormati hak setiap pemangku kepentingan yang tercermin dalam kebijakan sebagai berikut:

- Pengelolaan pemangku kepentingan diarahkan pada kepentingan bisnis Bank dengan tetap memperhatikan aturan main dan praktik bisnis yang sehat dan beretika.
- Pengelolaan pemangku kepentingan didasarkan pada prinsip-prinsip GCG, yaitu Transparency, Accountability, Responsibility, Independency, dan Fairness.

POLA HUBUNGAN DENGAN PEMANGKU KEPENTINGAN

Dalam mencapai keseimbangan dalam pengelolaan pemangku kepentingan, Bank wajib memperhatikan hak pemangku kepentingan yang dapat timbul secara hukum karena peraturan perundangan, perjanjian/kontrak, nilai etika/moral, atau tanggung jawab sosial perusahaan yang tidak bertentangan dengan aturan main Bank, dengan demikian:

- Bank mengkomunikasikan hak-hak para pemangku kepentingan secara transparan, akurat, dan tepat waktu melalui Sekretaris Perusahaan atau pejabat yang ditunjuk untuk menjadi penghubung antara Bank dengan pemangku kepentingan.
- Bank mempunyai mekanisme untuk menampung dan menindaklanjuti saran dan keluhan dari pemangku kepentingan.
- Bank mendorong pemangku kepentingan ikut berpartisipasi dalam penciptaan iklim yang kondusif untuk menaati peraturan perundangan yang berlaku.
- Bank memberikan kesempatan kepada masyarakat sekitar untuk bekerja di Bank sepanjang sesuai dengan kebutuhan dan standar mutu yang ditetapkan.

PENGEMBANGAN KOMUNIKASI DENGAN PEMANGKU KEPENTINGAN

Upaya yang dilakukan Bank dalam membangun komunikasi dengan para pemangku kepentingan dilaksanakan dengan menggunakan berbagai media, di antaranya sebagai berikut

Stakeholders are parties who have an interest with The Bank either directly or indirectly. The main stakeholders of The Bank are ICBC Limited and PT Intidana Wijaya. Other stakeholders include employees, customers, vendors of goods and services provider, government, regulators and community.

BASIC PRINCIPLES

The Bank respects the rights of each stakeholder, as reflected in the following policies:

- Stakeholder management is directed to The Bank's business interests with due regard to the sound and ethical business rules and business practices.
- Stakeholder management is based on GCG principles, namely Transparency, Accountability, Responsibility, Independency, and Fairness.

RELATIONSHIP PATTERNS WITH STAKEHOLDERS

In achieving balance in the management of stakeholders, The Bank takes into account the rights of stakeholders that may arise legally due to laws, contracts, moral/ethical values, or corporate social responsibility, not in conflict with The Bank's rules of conduct. This is done in the following ways:

- The Bank communicates the rights of stakeholders in a transparent, accurate and timely manner through the Corporate Secretary or through an appointed official to serve as a liaison between The Bank and the stakeholders.
- The Bank has mechanisms to accommodate and follow-up on stakeholders' suggestions and complaints.
- The Bank encourages stakeholders to participate in the creation of a conducive climate to comply with applicable laws and regulations.
- The Bank provides an opportunity for the surrounding community to work at The Bank as long as it meets the needs and quality standards set.

DEVELOPMENT OF COMMUNICATION WITH STAKEHOLDERS

The efforts made by The Bank in establishing communication with stakeholders are implemented using various media, including as follows: