

LAPORAN PENERAPAN MANAJEMEN RISIKO UNTUK RISIKO OPERASIONAL
RISK MANAGEMENT IMPLEMENTATION REPORT FOR OPERATIONAL RISK

Nama Bank : PT Bank ICBC Indonesia

Bank Name : PT. Bank ICBC Indonesia

Laporan Tahun : 2023 / Belum diaudit

Report of Year : 2023 / Un-audited

Analisis Kualitatif

Qualitative Analysis

1. Peraturan, Kebijakan dan/atau Pedoman terkait Manajemen Risiko untuk Risiko Operasional:

1. *Regulations, Policies and/or Guidelines related to Risk Management for Operational Risk:*

- Peraturan Otoritas Jasa Keuangan No.18/POJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank.
- Surat Edaran Otoritas Jasa Keuangan No.34/SEOJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum.
- Peraturan Otoritas Jasa Keuangan No.27 tahun 2022 tentang Perubahan Kedua atas POJK No.11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum Bank Umum.
- Peraturan Otoritas Jasa Keuangan No.11/POJK.03/2022 tentang Penyelenggaraan Teknologi Informasi oleh Bank Umum.
- Surat Edaran Otoritas Jasa Keuangan No.6/SEOJK.03/2020 tentang Perhitungan Aset Tertimbang Menurut Risiko Untuk Risiko Operasional Dengan Menggunakan Pendekatan Standar Bagi Bank Umum.
- Peraturan Otoritas Jasa Keuangan No.13/POJK.03/2021 tentang Penyelenggaraan Produk Bank Umum.
- Kebijakan Manajemen Risiko No. 2022-RMD-001-L1.
- Kebijakan Manajemen Risiko Operasional No.2023-RMD-018-L2.
- Kebijakan Tindakan Administratif Penilaian dan Identifikasi Tanggung Jawab Kejadian

- *Financial Services Authority Regulation No. 18/POJK.03/2016 concerning Risk Management for Commercial Banks.*
- *Financial Services Authority Circular Letter No.34/SEOJK.03/2016 concerning Application of Risk Management for Commercial Banks.*
- *Financial Services Authority Regulation No.27 of 2022 concerning Second Amendment to POJK No.11/POJK.03/2016 concerning Minimum Capital Adequacy Requirement for Commercial Banks.*
- *Financial Services Authority Regulation No.11/POJK.03/2022 concerning The Implementation of Information Technology by Commercial Banks*
- *Financial Services Authority Circular Letter No.34/SEOJK.03/2016 concerning Calculation of Risk Weighted Assets for Operational Risk Using the Standard Approach for Commercial Banks.*
- *Financial Services Authority Regulation No.13/POJK.03/2021 concerning the Implementation of Commercial Bank Products*
- *Risk Management Policy No. 2022-RMD-001-L1.*
- *Operational Risk Management Policy No.2023-RMD-018-L2.*
- *Administrative Measures for the Responsibility Assessment and*

Risiko Operasional No.2022-RMD-010-L3.

- Kebijakan Rencana Kontinuitas Bisnis untuk COVID-19 No.2023-RMD-003-L3.
- Kebijakan Manajemen Kontinuitas Bisnis No.2022-RMD-024-L2.
- Kebijakan Rencana Manajemen Krisis No.2023-RMD-016-L3.
- Kebijakan Penerapan Produk PT Bank ICBC Indonesia No.2023-RMD-023-L2.
- Prosedur Alat Bantu (*Tools*) Manajemen Risiko Operasional No.2023-RMD-019-L4.
- Prosedur Staff Representatif Manjamen Risiko No.2023-RMD-001-L4.
- Prosedur Rencana Kontinuitas Bisnis No.2023-RMD-033-L4.
- Prosedur Penerapan Produk PT Bank ICBC Indonesia No.2023-RMD-024-L4.

2. Dewan Komisaris dan Direksi melakukan pengawasan secara aktif terhadap manajemen risiko operasional melalui berbagai komite seperti Komite Pemantau Risiko, Komite Manajemen Risiko, Komite *Liability Recognition*, dan Komite *Policy and Product (Non-Credit)* yang dilakukan secara berkala untuk membahas risiko operasional beserta pelaksanaan, kewenangan dan tanggung jawabnya.

Bank telah menerapkan *three line 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.

Identification of Operational Risk Events Policy No.2022-RMD-010-L3.

- *Business Continuity Plan for COVID 19 Policy No.2023-RMD-003-L3.*
- *Business Continuity Management Policy No.2022-RMD-024-L2.*
- *Crisis Management Plan Policy No.2023-RMD-016-L3.*
- *PT Bank ICBC Indonesia Product Implementation Policy No.2023-RMD-023-L2.*
- *Operational Risk Management Tools Procedure No.2023-RMD-019-L4.*
- *Risk Management Representative Staff Procedure No.2023-RMD-001-L4.*
- *Business Continuity Plan Procedure No.2023-RMD-033-L4.*
- *PT Bank ICBC Indonesia Product Implementation Procedure No.2023-RMD-024-L4.*

2. *The Board of Commissioners and the Board of Directors carry out active supervision of operational risk management through various committees such as the Risk Monitoring Committee, Risk Management Committee, Liability Recognition Committee, and Policy & Product (Non-Credit) Committee which are carried out periodically according to discuss operational risks and their implementation, authorities and responsibilities.*

Bank has implemented 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 carries 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 perundangan-undangan.

Dan lini pertahanan ketiga adalah Departemen Internal Audit 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.

3. Dalam hal melakukan perhitungan Modal Minimum Risiko Operasional, Bank telah menggunakan perhitungan sesuai dengan standar akuntansi yang berlaku untuk melakukan perhitungan komponen Indikator Bisnis yang tercatat didalam *core banking system*, pencatatan / perhitungan yang digunakan telah berdasarkan hasil audit yang diterima oleh Bank.

Bank juga telah memiliki dokumentasi prosedur dan proses terkait dengan data kerugian yang muncul dari kejadian Risiko Operasional didalam internal Bank. Pelaporan data kerugian dilakukan oleh semua fungsi unit kerja Bank yang mencakup informasi mengenai tanggal kejadian, tanggal penemuan, tanggal akuntansi, nilai pemulihan (jika ada), dan penjelasan deskriptif tentang penyebab kejadian.

Compliance Department and Risk Management Department as the second line of defense prepares and implements Operational Risk Management Policies, provides support to the Operational Risk management process carried out by the first line of defense and independently monitors, assesses, and reports on the Operational Risk profile, makes steps to support the creation of a compliance culture and operational risk awareness, review and/or recommend updating and improving 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.

And 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.

3. *In terms of calculating the Minimum Capital for Operational Risk, Bank has used calculations in accordance with applicable accounting standards to calculate the components of Business Indicators recorded in Bank's core banking, records / calculations used have been based on audit results received by the Bank.*

Bank also has documentation of procedures and processes related to loss data arising from Operational Risk events within the Bank's internal. Reporting of loss data is carried out by all Business or Operational functions of the Bank which includes information regarding the date of occurrence, date of discovery, date of accounting, recovery value (if any), and a descriptive explanation of the cause of the incident.

4. Ruang lingkup dan cakupan utama dari kerangka laporan untuk Risiko Operasional Bank dimulai dari Pengawasan aktif yang dilakukan oleh Direksi dengan melakukan persetujuan dan evaluasi Kebijakan Manajemen Risiko Operasional secara berkala. Direksi juga membarikan arahan berdasarkan laporan Profil Risiko Operasional yang disampaikan oleh Departemen Manajemen Risiko setiap triwulanan.

Guna memastikan kecukupan Kebijakan dan Prosedur yang digunakan oleh Bank untuk melakukan proses manajemen Risiko Operasional termasuk didalam kewajiban pelaporan yang perlu dipatuhi oleh seluruh fungsi unit kerja didalam Bank, Departemen Manajemen Risiko telah menerbitkan:

- Kebijakan Manajemen Risiko Operasional.
- Kebijakan Manajemen Kontinuitas Bisnis.
- Kebijakan Rencana Kontinuitas Bisnis untuk COVID-19.
- Kebijakan Implementasi Produk PT Bank ICBC Indonesia.
- Kebijakan Rencana Manajemen Krisis.
- Kebijakan Tindakan Administratif untuk Penilaian Tanggung Jawab dan Identifikasi Kejadian Risiko Operasional.
- Prosedur Staf Representatif Manajemen Risiko.
- Prosedur Rencana Kelangsungan Usaha.
- Prosedur Implementasi Produk PT Bank ICBC Indonesia.
- Prosedur Alat Bantu Manajemen Risiko Operasional.

Berbagai alat bantu Risiko Operasional telah dimiliki oleh Bank, antara lain: *Key Risk Indicator*, *Risk Control Self-Assessment*, *Risk Event Reporting*, dan *database* kerugian finansial yang disebabkan oleh Risiko Operasional, guna membantu Bank untuk melakukan identifikasi, mengukur, memantau, mengendalikan dan melaporkan Risiko Operasional. Bersama dengan *Operational Risk Officer* dalam mengidentifikasi dan memitigasi terjadinya risiko operasional pada

4. *The main scope of reporting framework for Bank's Operational Risk begins with active supervision carried out by Board of Directors by approving and evaluating Operational Risk Management Policy on a regular basis. Board of Directors also provides direction based on Operational Risk Profile report submitted by the Risk Management Department on a quarterly basis.*

In order to ensure the adequacy of the Policies and Procedures used by the Bank to carry out the Operational Risk management process including the reporting obligations that need to be complied with by all work unit functions within the Bank, the Risk Management Department has issued:

- *Operational Risk Management Policy.*
- *Business Continuity Management Policy.*
- *Business Continuity Plan Policy for COVID-19.*
- *Product Implementation Policy of PT Bank ICBC Indonesia.*
- *Crisis Management Plan Policy.*
- *Administrative Measures for the Responsibility Assessment and Identification of Operational Risk Events Policy.*
- *Risk Management Representative Staff Procedures.*
- *Business Continuity Plan Procedures.*
- *Product Implementation Procedures of PT Bank ICBC Indonesia.*
- *Operational Risk Management Tool Procedures.*

Various Operational Risk tools have been owned by the Bank, including: Key Risk Indicator, Risk Control Self-Assessment, Risk Event Reporting, and a database of financial losses caused by Operational Risk, to assist Bank to identify, measure, monitor, control and Reporting Operational Risk. Together with the Operational Risk Officer in identifying and mitigating the occurrence of operational risk in risk taking units, and

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.

Secara berkala Departemen Manajemen Risiko akan menyampaikan hasil pelaksanaan alat bantu Risiko Operasional dan hasil pelatihan BCP kepada Direksi.

5. Proses mitigasi risiko operasional dilakukan atas seluruh aktivitas/proses, produk, sistem dan organisasi. Selain dilakukan terhadap inisiatif baru Bank, pengkajian risiko juga dilakukan terhadap pengembangan ataupun perubahan. Proses mitigasi risiko operasional juga dilengkapi dengan penerbitan Kebijakan dan Prosedur yang mencakup budaya risiko, risiko yang dapat diterima, dan alih daya.

Dalam hal penerbitan Kebijakan dan Prosedur, Bank telah memiliki panduan dan standarisasi yang komprehensif yang menggambarkan peran dan tanggung jawab semua fungsi unit kerja didalam melakukan proses pembuatan, revisi, pencabutan, administrasi, dan pengawasan ketentuan internal.

Secara internal hirarki Kebijakan dan Prosedur Bank dibagi menjadi sebagai berikut:

- a) Level 1 - Kebijakan Manajemen Risiko.
- b) Level 2 - Kebijakan Utama.
- c) Level 3 - Kebijakan Pendukung.
- d) Level 4 - Prosedur.
- e) Level 5 - Manual.

Penerbitan Kebijakan dan Prosedur oleh unit kerja akan mendapatkan kaji ulang yang dilakukan oleh *functional specialist* yaitu unit kerja yang diminta oleh pemilik Kebijakan atau Prosedur untuk melakukan kajian atas sebuah ketentuan internal berdasarkan spesialisasi dan

together with the IT Department in preparing the Business Continuity Plan (BCP) to minimize risks associated with business interruptions either due to internal and external problems, which are periodically tested at least once a year.

Periodically the Risk Management Department will convey the results of the implementation of Operational Risk tools and the results of BCP training to the Board of Directors.

5. *The operational risk mitigation process is carried out on all activities/processes, products, systems and organizations. In addition to being carried out on new Bank initiatives, risk assessments are also carried out on developments or changes. The operational risk mitigation process is also complemented by the issuance of policies and procedures covering risk culture, acceptable risk and outsourcing.*

In terms of Policies and Procedures issuance, Bank has comprehensive guidelines and standardizations that describe roles and responsibilities of all working unit functions in carrying out the process of making, revising, revoking, administering, and supervising internal regulations.

Internally, the hierarchy of Bank Policies and Procedures is divided into the following:

- a) *Level 1 - Risk Management Policy.*
- b) *Level 2 - Main Policy.*
- c) *Level 3 - Supporting Policies.*
- d) *Level 4 - Procedure.*
- e) *Level 5 - Manual.*

Issuance of Policies and Procedures by working unit will receive a review carried out by a functional specialist, namely a working unit requested by the owner of the Policy or Procedure to conduct a review of an internal provision based on their specialization and

keahlian mereka. Mekanisme ini dirancang agar secara komprehensif setiap kebijakan dan proses teridentifikasi risiko dan diatur mitigasinya.

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:

- a) Keterkaitan produk dengan strategi Bank.
- b) Penilaian risiko dan mitigasinya.
- c) Mekanisme penyelenggaraan produk.
- d) Kewajiban pengajuan izin kepada Regulator.
- e) Identifikasi kehandalan sistem informasi.

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 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 didalam 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.

expertise. This mechanism is designed so that every policy and process is comprehensively identified risks and their mitigation is regulated.

In relation to new initiatives or product changes, 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:

- a) Product linkage with the Bank's strategy.*
- b) Risk assessment and mitigation.*
- c) Product management mechanism.*
- d) The obligation to apply for a permit to the Regulator.*
- e) Identification of the reliability of the information system.*

Furthermore, to mitigate the operational risk, 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 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 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.