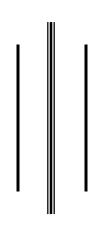
# REPORT ON IMPLEMENTATION OF CORPORATE GOVERNANCE 2023





PT BANK BUMI ARTA Tbk

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#### INTRODUCTION

PT Bank Bumi Arta Tbk (Bank Bumi Arta) as a banking institution is committed to implementing prudential banking and consistently prioritizing ethics and integrity in managing the Bank with the aim of improving performance, guaranteeing the fulfillment of the rights of the stakeholders, and increasing compliance with general laws and regulations in the banking industry and the Capital Market. Bank Bumi Arta in the context of developing Corporate Governance that is aligned with the best practices, continuously improves control and risk management systems that can ensure accountability that is commensurate with the business risks faced. In addition the development of Corporate Governance also aims to provide adequate protection and fair treatment to all shareholders and other stakeholders, by maximizing shareholder value.

The implementation of Corporate Governance in Bank Bumi Arta is based on 5 basic principles namely transparency, accountability, responsibility, independency and fairness.

The implementation of Corporate Governance in Bank Bumi Arta also based on the Regulation of Financial Services Authority No 17 of 2023 dated 14 September 2023 and Financial Services Authority Circular Letter No. 13/SEOJK.03/2017 of March 17, 2017 on Implementation of Corporate Governance for Commercial Banks and Regulation of Financial Services Authority No. 45/POJK.03/2015 of December 23, 2015 and Financial Services Authority Circular Letter No. 40/SEOJK.03/2016 of September 26, 2016 on the Application of Governance in Granting Remuneration for Commercial Bank.

Bank Bumi Arta commits to practice and implement the principles of Good Corporate Governance in every business activity at all organization levels and stages.

The Report on Implementation of Corporate Governance of Bank Bumi Arta of 2023 consists of 2 (two) sections as follows:

### REPORT ON IMPLEMENTATION OF CORPORATE GOVERNANCE 2023

- I. Transparency of Implementation of Corporate Governance.
- II. Report of Self Assessment on Implementation of Corporate Governance.

Jakarta, April 29<sup>th</sup> 2024
PT BANK BUMPARTA TOK

PUSAT

Wikan Aryono S.

Presiden Direktur

Direktur

I. Transparency of Implementation of Corporate Governance

#### A. Disclosures of Corporate Governance Practices

## Fulfillment of Duties and Responsibilities of the Board of Directors and the Board of Commissioners

The role of the Board of Directors and the Board of Commissioners in public company management is highly important. Assignment of duties and responsibilities of the Board of Directors and the Board of Commissioners is basically set forth in the Law on Limited Liability Company, the Articles of Association and the Regulation of Financial Services Authority concerning Corporate Governance and the internal policy of Bank Bumi Arta in general serves as a guidance for the Board of Directors and the Board of Commissioners in performing their duties and responsibilities with regard to the management of Bank Bumi Arta.

a. The Number, Composition, Criteria and Independence of members of the Board of Directors and the Board of Commissioners

The Board of Directors in Bank Bumi Arta consists of 5 (five) people as follows:

- 1) Wikan Aryono S as the President Director
- Hendrik Atmaja as the Credit and Marketing Director
- 3) John David Nehemia Engelen as the Compliance Director
- 4) Edwin Suryahusada as the Director of Business Development and Finance
- 5) Aditya Putra Utama as the Director of Digital Banking

Meanwhile, the Board of Commissioners in Bank Bumi Arta consists of 4 (four) people as follows:

- 1) Ir. Rachmat M.S., MBA, as the President Commissioner
- 2) Daniel Budi Dharma as an Independent Vice President Commissioner
- 3) R.M. Sjariffudin as an Independent Commissioner
- 4) I Gst Agung Rai Wirajaya as a Commissioner

The President Director, Compliance Director and Director of Digital Banking of Bank Bumi Arta originate from Parties Independent from the controlling Shareholders.

All members of the Board of Directors and the Board of Commissioners have obtained approval from Financial Services Authority.

All members of the Board of Directors and the Board of Commissioners reside in Indonesia.

Replacement and/or appointment of members of the Board of Directors are carried out in accordance with the recommendation from the Nomination and Remuneration Committee.

The majority of members of the Board of Directors has no less than 5 (five) years of experience in the operational field as Bank's Executive Officer.

Members of the Board of Directors do not give general authority to other party that may lead to transfer of duties and function of the Board of Directors.

All members of the board of directors of Bank Bumi Arta do not hold concurrent positions in Bank Bumi Arta, other banks, non-bank financial institutions, and other companies located within or outside the country.

The majority of the members of the Board of Commissioners of Bank Bumi Arta do not hold concurrent positions in Bank Bumi Arta, Other Banks, Non-Bank Financial Institutions, and other companies located domestically or internationally, except for Ir. Rachmat M.S., MBA who currently serves as a Commissioner at PT Surya Husada Investment and I Gst Agung Rai Wirajaya who also currently serves as a Director at PT Puri Kuta Beach and as a member of Commission XI of the People's Representative Council of Indonesia (DPR RI).

No Independent Commissioner needs to run a cooling-off period and the last appointment of 2 (two) Independent Commissioners was during the Annual General Meeting of Shareholders ("GMS") in June 2019 with a term of office up to 2024.

Independent Commissioners who are reappointed after serving for 2 (two) years in the term of office it has been determined in a board of Commissioner's meeting that the person concerned can still act independently, and the Commissioner has stated regarding his independence in Annual General Meeting of Shareholders ("GMS").

- Duties, Responsibilities, and Authorities of the Board of Directors and the Board of Commissioners
  - 1) Duties, Responsibilities, and Authorities of the Board of Directors

Pursuant to the provisions in the Articles of Association of Bank Bumi Arta the Board of Directors is held responsible for performing its duties for the interest of Bank Bumi Arta. In achieving its goal and objective the Board of Directors represents Bank Bumi Arta lawfully and directly both inside and outside the Justice Court for all matters and in all events, binds Bank Bumi Arta with other party and other party with Bank Bumi Arta as well as performs any action related to the management or ownership, but with certain limitation.

Bank Bumi Arta internal policies governing the practice of good Corporate Governance for the duties, responsibilities, and authorities of the Board of Directors are as follows:

- a) Duties and Responsibilities of the Board of Directors
  - (1) The Board of Directors is in charge of running and is fully responsible for the implementation of the Bank management for the benefit of the Bank in accordance with the policies deemed appropriate, and in accordance with the purposes and objectives set out in the Deed of Establishment of the Bank.
  - (2) The Board of Directors must manage the Bank according to its authorities and responsibilities as set forth in the Articles of Association and the applicable laws and regulations.
  - (3) The Board of Directors must prepare short and medium term and long term work plans budgets.

- (4) In carrying out the duties and responsibilities of the management of the Bank, the Board of Directors shall convene the Annual General Meeting of Shareholders as stipulated in the laws and regulations and the Deed of Establishment.
- (5) Each member of the Board of Directors shall perform the duties and responsibilities of the Bank's management in good faith, responsibly, and prudence.
- (6) The Board of Directors must implement the principles of Good Corporate Governance in every business managed by the Bank at all organizational levels and stages.
- (7) The Board of Directors shall follow up the audit findings and recommendations from the Internal Audit Work Unit of the Bank, external auditors, Financial Services Authority, and/or other supervisory authorities.
- (8) The Board of Directors must follow up the advice/memorandum from the Board of Commissioners on the Result of Meeting of the Board of Commissioners for issues under the concern of the Board of Commissioners.
- (9) The Board of Directors shall make a written report supplemented with the supporting data regarding the follow-up of the Board of Directors on the call/memorandum from the Board of Commissioners.
- (10) The Board of Directors shall be accountable for the implementation of its duties to shareholders through the General Meeting of Shareholders.
- (11) The Board of Directors shall disclose to the employees of the Bank of the strategic policies in the field of employment.
- (12) In order to implement the principles of Good Corporate Governance, the Board of Directors shall establish at least :

- (a) An Internal Audit Work Unit;
- (b) A Risk Management Work Unit and a Risk Management Committee;
- (c) A Compliance Work Unit;
- (13) In order to support the effective implementation of their duties and responsibilities, the Board of Directors may establish committees, and the Board of Directors shall evaluate the performance of each committee of the end of fiscal year.
- (14) The Board of Directors is obliged to provide accurate, relevant, data and information to the Board of Commissioners in a timely manner.
- (15) Each member of the Board of Directors is responsible jointly and severally for the losses of the Bank caused by fault or negligence of the members of the Board of Directors in carrying out their duties.
- (16) Member of the Board of Directors cannot be held liable for any losses of the Bank as referred to point 1) item a) number(15), when it can be proven that :
  - (a) the loss is not due to fault or negligence;
  - (b) have performed the management in good faith, responsibly, and with prudence for the interests and in accordance with the purposes and objectives of the Bank;
  - (c) have no conflict of interest, either directly or indirectly for any management actions that resulted in losses; and
  - (d) have taken actions to prevent such losses arising or continuing.

- (17) The Board of Directors will make an evaluation/assessment of performance of Directors is held once every year by way of self assessment to then be reviewed by the Board of Commissioners.
- (18) Members of the Board of Directors shall submit information to the Bank no later than 3 (three) working days after the ownership or any change of ownership of the Bank's shares and shall be disclosed in the annual report or Bank website.
- (19) Responsible towards the implementation of the Sustainable Finance Action plan and Sustainable Finance Principles.
- b) Authorities of the Board of Directors:
  - (1) The Board of Directors has the authority to represent the Bank in and outside of court.
  - (2) Members of the Board of Directors are not authorized to represent the Bank, if:
    - (a) there is a litigation between the Bank and the relevant member(s) of the Board of Directors; and
    - (b) members of the Board of Directors concerned have interests that conflict with the interests of the Bank.
  - (3) In the event of a situation as referred point 1) item b) number 2 (two) above, the Bank is entitled to represent :
    - (a) other members of the Board of Directors who do not have a conflict of interest with the Bank;
    - (b) The Board of Commissioners in the event that all members of the Board of Directors have a conflict of interest with the Bank; or
    - (c) other parties appointed by the GMS in the event that all members of the Board of Directors or Board of Commissioners have conflict of interest with the Bank.

Duties, Responsibilities, and Authorities of the Board of Commissioners

In accordance with provisions of the Deed of Establishment of Bank Bumi Arta, the Board of Commissioners is in charge of performing supervision and responsible for the oversight of the policy of the Board of Directors' general course of management, both on Bank Bumi Arta as well as the activities of Bank Bumi Arta and provide advises to the Board of Directors as well as perform other matters as specified in the Deed of Establishment or as specified from time to time by the General Meeting of Shareholders.

The internal policies of Bank Bumi Arta which govern the practice of good Corporate Governance for the duties, responsibilities, and authorities of the Board of Directors are as follows:

- a) The duties and responsibilities of the Board of Commissioners
  - (1) The Board Commissioners shall ensure the implementation of Good Corporate Governance (include Sustainable Governance) in every business managed by the Bank at all organization levels and stages
  - (2) The Board of Commissioners supervises and is responsible for the oversight of management policies, the course of management in general, both concerning the Bank and the Bank's business, and provide advice to the Board of Directors, including the monitoring on the implementation of duties and responsibilities of the Board of Directors among others by directing, monitoring, and evaluating the implementation of the strategic policies of the Bank.

- (3) In certain circumstances, the Board of Commissioners shall hold the Annual Meeting of Shareholders and other General Meeting of Shareholders in accordance with their authority as stipulated in the laws and regulations and the articles of association.
- (4) In order to support the effective implementation of their duties and responsibilities, the Board of Commissioners is required to establish at least:
  - (a) An Audit Committee;
  - (b) A Risk Monitoring Committee;
  - (c) A Nomination and Remuneration Committee;
- (5) The appointment of committee members as referred to in point 2) item a) number 4 (four) above is carried out by the Board of Directors based on the decision of the Board of Commissioners.
- (6) The Board of Commissioners shall ensure that the Committees which have been formed run their duties effectively and shall evaluate the performance of the Committees which assist the implementation of the duties and responsibilities as referred to in point 2) item a) number 4 (four) at each financial year end.
- (7) The Board of Commissioners shall evaluate the implementation of the compliance function of the Bank for at least 2 (two) times in 1 (one) year and provide suggestions that may be required to improve the quality of functions compliance performance.
- (8) Each member of the Board of Commissioners shall jointly and severally be responsible for loss of the Bank caused by fault or negligence of the members of the Board of Commissioners in carrying out their duties.

- (9) Members of the Board of Commissioners may not be held liable for any losses of the Bank as referred to in point 2) item a) number 8 (eight) when they can prove:
  - (a) the loss is not due to fault or negligence;
  - (b) have performed the management in good faith, responsibly, and with prudence for the interests and in accordance with the purposes and objectives of the Bank;
  - (c) have no conflict of interest either directly or indirectly for any management actions that resulted in losses; and
  - (d) have taken actions to prevent such losses arising or continuing.
- (10) The Board of Commissioners shall ensure that the Board of Directors has followed up the findings of the audit and recommendations of the internal audit work unit of the Bank, extern auditors, request of the Board of Commissioners to the Board of Directors, the supervisory result of Financial Services Authority and/or results from other supervisory authorities.
- (11) The Board of Commissioners shall inform Bank Indonesia within 7 (seven) working days since the discovery of :
  - (a) violation of the laws and regulations in the field of finance and banking; and/or.
  - (b) the condition or estimated condition that may endanger the Bank.

- (12) The Board of Commissioners will conduct an evaluation/assessment of the performance of the Board of Directors are held once every year by way of self assessment taking into account the recommendations of the Nomination and Remuneration Committee.
- (13) The Board of Commissioners will conduct evaluation/appraisal The Board of Commissioners held once every year by way of self assessment.
- (14) The Board of Commissioners Evaluating and Approving the Sustainable Finance Action Plan prepared by the Board of Directors.
- (15) The Board of Commissioners Supervise the implementation of the sustainable finance action plan and provide suggestions/ideas to develop support for sustainable development, as well as reduce environmental, social and environmental risks.
- (16) The Board of Commissioners is required to hold a General Meeting of Shareholders (GMS) in the event of a request for a GMS from shareholders as stipulated in the prevailing laws and regulations and the Bank Articles of Association.

- b) Authorities of the Board of Commissioners
  - (1) The Board of Commissioners is authorized to temporarily suspend the members of the Board of Director by stating the reasons.
  - (2) The Board of Commissioners may take actions of managing the Bank under certain circumstances for a certain period of time. Such circumstances include cases in which the entire Board of Directors has a conflict of interest with the Bank, or in the case of all the members of the Board of Directors is absent or temporarily suspended.
  - (3) The authority as referred to point 2) item b) number 2 (two) above shall be determined based on the deed of establishment or the decision of the GMS.
  - (4) In conducting supervision as referred to in point 2) item a) number 2 (two) regarding duties and responsibilities, the Board of Commissioners are prohibited to be engaged in the decision-making of the Bank operations unless it is in regards to:
    - (a) provision of funds to related parties as stipulated in the provisions regarding the Maximum Limit of Commercial Bank lending; and
    - (b) other matters stipulated in the Bank's Articles of Association or laws and regulations.
  - (5) Decisions made by the Board of Commissioners as referred to points 2) item b) number 4 (four) is part of the supervisory duties by the Board of Commissioners, in such a way that does not negate the responsibility of the Board of Directors on the implementation of the management of the Bank.

- (6) Request the Board of Directors to prepare a work plan and short-term and medium-term (business plan) budgets or long term budget (corporate plan).
- (7) Monitor and review/evaluate the performance of the Board of Directors in realizing the Business Plan of the Bank each semester enclosed with supporting data for review/evaluation.
- (8) Propose to the GMS based on the decision of the Board of Commissioners Meeting to appoint a Public Accountant by considering the recommendation of the Audit Committee.
- (9) Evaluate the policies compiled by the Board of Directors in accordance with the provisions of Bank Indonesia.

#### c. Recommendation from the Board of Commissioners

The Board of Directors must take into account the recommendation from the Board of Commissioners according to the result of the General Meeting of Shareholders and the Meeting of the Board of Commissioners.

The Board of Commissioners provides recommendation on the implementation of the duties of the Board of Directors in accordance with the result of the meeting with the Board of Commissioners which discusses the result of the Audit Committee, Risk Monitoring Committee, and Nomination and Remuneration Committee.

d. Declaration of Independence of Independent Commissioners

All members of the Board of Independent Commissioners who are currently serving have met the requirements of Independent Commissioners and each Independent Commissioner has signed the declaration of independence made and updated regularly.

At the Annual General Meeting of the Company in 2019 there was a

reappointment of Independent Commissioners who had served for 2 (two) terms of service and to fulfill the provisions of Article 25 paragraph (1) of the Financial Services Authority No. 33/POJK.04/2014 concerning Directors and Board of Commissioners of Issuers or Public Companies, each reappointed Independent Commissioner has declared his independence to the GMS, as follows: "That if it is believed to be reappointed as Vice President Commissioner/ Member of Commissioner concurrently an Independent Commissioner, hereby declares that he will remain independent in carrying out the positions entrusted to him."

Declaration of Independence of each member of the Commissioners has been submitted to the Financial Services Authority, with the following Declaration:



#### SURAT PERNYATAAN INDEPENDEN PT. BANK BUMI ARTA Tbk.

Saya yang bertanda tangan dibawah ini

: Mohammad Sjariffudin

Tempat/tanggal lahir : Palembang, 03 Maret 1947
Alamat domisili (fotokopi KTP/SIM terlampir) : Villa Cibubur Indah Blok U 2/3, RT. 006, RW. 011,

Kel. Cibubur, Kec. Ciracas, Jakarta Timur : (021) 87755436

Nomor telepon rumah Nama perusahaan : PT. Bank Bumi Arta Tbk. Nomor telepon perusahaan : (021) 2300893

Sehubungan dengan pencalonan saya kembali sebagai Komisaris Independen PT. Bank Bumi Arta Tbk. ("Perseroan") yang sudah menjabat sebagai Komisaris Independen Perseroan selama lebih dari 2 (dua) periode masa jabatan, maka guna memenuhi ketentuan Pasal 25 ayat (1) Peraturan Otoritas Jasa Keuangan Nomor 33/POJK.04/2014 tentang Direksi dan Dewan Komisaris Emiten atau Perusahaan Publik, dengan ini saya menyatakan bahwa saya:

- 1. Tidak mempunyai saham baik langsung maupun tidak langsung dalam Perseroan;
- 2. Tidak mempunyai hubungan afiliasi dengan Perseroan, anggota Dewan Komisaris, anggota Direksi
- atau pemegang saham utama Perseroan.

  3. Tidak mempunyai hubungan usaha baik langsung maupun tidak langsung yang berkaitan dengan kegiatan usaha Perseroan.

Demikian Surat Pernyataan Independensi ini saya buat dengan sebenar-benarnya.

Jakarta, 19 Juni 2019

Wikan Aryono S

Mengetahui:

Mohammad Sjariffudin

#### 2. Completeness and Fulfillment of Duties of the Committees

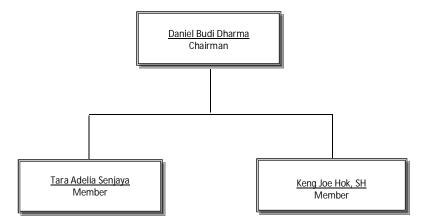
To support the effectiveness of implementation of duties and responsibilities of the Board of Commissioners, the Board of Commissioners has established the Audit Committee, Risk Monitoring Committee and Nomination and Remuneration Committee.

Throughout the year 2023, the Board of Commissioners considered that these committees had carried out their duties properly and optimally. This assessment is based on the periodic reports submitted, input and recommendations on matters that fall within the scope of duties of the Board of Commissioners and the implementation of the Committee's duties.

#### a. Audit Committee

1) The Structure, membership, skills and independence of members of the Committee

The Audit Committee was established on June 30, 2006 and commenced effective on July 1, 2006. The structure of the Audit Committee has changed and as from August 1, 2020, the structure of the Audit Committee is as follows:



The structure of the Audit Committee consists of:

- a) Daniel Budi Dharma as the Chairman and Vice President Commissioner as Independent Commissioner, who has expertise in banking field.
- b) Tara Adelia Senjaya as Member and Independent Party, who has expertise in finance, accounting and risk management field.
- c) Keng Joe Hok, SH as Member and Independent Party, who has expertise in legal field.

Expertise of the Audit Committee members based on the curriculum vitae of the Committee members from the education and work experience of each committee members.

#### 2) Duties and Responsibilities of the Committee

Audit Committee has the following duties and responsibilities:

- a) Performing analysis on financial information to be published by Bank for public and/or the authorities, such as financial statement, projection, and other reports related to financial information of the Bank.
- Performing analysis on legal compliance with regard to Bank's activities.
- c) Providing independent opinion in the event of dissenting opinions between the management board and the Accountant on the provided service.
- d) Provide recommendations to the Board of Commissioners to be submitted to the General Meeting of Shareholders (GMS) regarding the appointment of Public Accountants and Public Accounting Firm based on:
  - (1) independence of Public Accountant, Public Accountant Firm and insiders of Public Accountant Firm.

- (2) the scope of the audit.
- (3) audit Service Fees.
- (4) expertise and experience of Public Accountant, Public Accountant Firm and Audit Team from Public Accountant Firm.
- (5) methodology, techniques, and audit facilities used by Public Accountant and Public Accountant Firm.
- (6) benefits of fresh eye perspectives that will be obtained through replacement of Public Accountant, Public Accountant Firm and Audit Team from Public Accountant Firm.
- (7) potential risks for the use of audit services by the same Public Accounting Firm in a row for a long period of time (not later than 3 (three) consecutive reporting years).
- (8) The results of the evaluation of the implementation of the provision of audit services on annual historical financial information by the Public Accountant and Public Accountant Office in the previous period, if any.
- e) To evaluate the conduct of audit services for annual financial information by Public Accountant and/or Public Accountant Firm. Evaluation of the implementation of audit services shall contain at least the following:
  - (1) compliance with the conduct of the Audit by the Public Accountant and/or Public Accountant Firm with the applicable Audit Standards.
  - (2) adequacy of fieldwork time.
  - (3) assessment of the scope of services provided and the adequacy of the quotation test.
  - (4) recommendations for improvements provided by Public Accountant and/or Public Accountant Firm
- f) Investigate complaints related to the process of accounting and Bank financial reports.

- g) Performing analysis and providing advices to the Board of Commissioners with regard to conflict of interests potentials in the Bank.
- h) Performing analysis on implementation of audit by internal auditor and monitoring the implementation of follow-ups by the Board of Directors with regard to the findings collected by the internal auditor.
- i) Conducting monitoring and evaluation on audit planning and implementation and monitoring of follow up to audit result in order to assess internal control adequacy including financial reporting adequacy.
- j) In order to carry out the duties referred to in points 2) item i), the Audit Committee must conduct monitoring and evakuation at least of:
  - (1) performance of duties of the Internal Audit Task Force.
  - (2) compliance of the Audit performed by the Public Accounting Firm with the applicable Auditing Standard.
  - (3) compliance of financial statement with the applicable auditing standard.
  - (4) implementation of follow up by the Board of Directors with regard to the findings collected by the Internal Audit Task Force, Public Accountant, result of monitoring by Bank Indonesia and/or Financial Services Authority.

to provide recommendations to the Board of Commissioners.

k) Keeping the confidentiality of bank documents, data and information.

#### 3) Authorities of the Committee

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

- Access Bank documents, data, and information on the employees, funds, assets, and Bank resources required.
- b) Communicate directly with the employees, including the Board of Directors and parties running the functions of internal audit, risk management, and accounting in relation to the duties and responsibilities of the Audit Committee.
- c) Involve independent parties outside the members of the Audit Committee required to assist the implementation of duties (if required).
- d) Perform other authorities granted by the Board of Commissioners.

#### 4) Frequency of meeting of the Committee

In fulfilling its duties and responsibilities, the Audit Committee shall carry out conferences/meetings with a minimum of 1 (one) time in 3 (three) months and may hold meetings outside the stipulated schedule when deemed necessary.

- 5) Committee Work Plan and Realization
  Throughout the year 2023, the Audit Committee has:
  - a) Held 9 (nine) meetings attended by the entirety of the Audit Committee.

Attendance of members of Audit Committee in 2023

Audit Comittee	Q1	Q2	
(Date)	17/02/23	17/02/23	23/05/23
Daniel Budi Dharma, Chairman	٧	٧	٧
Keng Joe Hok, SH, Member	٧	٧	٧
Tara Adelia Senjaya, Member	٧	٧	٧

Audit Comittee	Q3			Q4		
(Date)	28/08/23	29/09/23	26/10/23	21/11/23	18/12/23	18/12/23
Daniel Budi Dharma, Ketua	٧	٧	٧	٧	٧	٧
Keng Joe Hok, SH, Anggota	٧	٧	٧	٧	٧	٧
Tara Adelia Senjaya, Anggota	٧	٧	٧	٧	٧	٧

Decisions taken in the meeting of the Audit Committee are done based on consensus or if no consensus was reached, they are based on the majority vote. Results of the Audit Committee meetings are stated in the Minutes of the Meeting and have been well documented. The Audit Committee has submitted a memorandum to the Board of Commissioners regarding matters that are of concern to the Audit Committee, based on the results of the Audit Committee meeting.

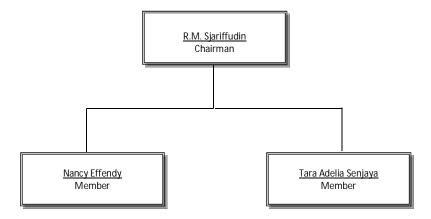
- b) Carry out activities, among others:
  - (1) To discuss the results of SKAI inspection at the Head Office, Branch Offices, Information Technology, SPBI and KPDHN as well as the SCV-LPS System;
  - (2) Conduct discussions regarding the Board of Director's followup actions regarding the findings of SKAI, Public Accountant and OJK audits;
  - (3) Conduct discussions regarding SKAI's 2023 and 2024 Work Plan;
  - (4) Conduct meetings with the Public Accounting Firm of Tanudiredja, Wibisana, Rintis and Partners, Member Firms of PwC global network to discuss PT Bank Bumi Arta Tbk. Audited Financial Report for the financial year ending on 31st December 2022 and others in connection with the result of the KAP audit examination.
  - (5) Discuss and evaluate the implementation of the audit services on the annual historical financial information for the 2022 financial year by the Public Accounting Firm of Tanudiredja, Wibisana, Rintis and Partners, Member Firms of PwC global network;
  - (6) Discussing the proposal to appoint the Public Accounting Firm Tanudiredja, Wibisana, Rintis and Partners as well as Mr. Jimmy Pangestu as the Public Accounting Firm and Bank Bumi Arta's Public Accountant who will carry out the audit of the Financial Statements of PT Bank Bumi Arta Tbk. for the financial year ending December 31, 2023;

- (7) Conduct meetings with the Public Accounting Firm of Tanudiredja, Wibisana, Rintis and Partners, Member Firms of PwC global network as the Public Accounting Firm which carries out the audit of the Financial Report of PT Bank Bumi Arta Tbk. for the financial year ending December 31, 2023;
- (8) Conduct meetings with the Public Accounting Firm of Tanudiredja, Wibisana, Rintis and Partners, Member Firms of PwC global network as a Public Accounting Firm to discuss PT Bank Bumi Arta Tbk's Interim Update for the year ending 2023.

#### b. Risk Monitoring Committee

 Structure, membership, skills, and independence of members of the Committee

Risk Monitoring Committee was established on April 16, 2007, and commenced effective on June 01, 2007. The structure of Risk Monitoring Committee has changed and as from August 1, 2020, the structure of the Committee is as follows:



The structure of Risk Monitoring Committee consists of:

- a) R.M. Sjariffudin as the Chairman and Independent Party, the Commissioner as Independent Commissioner, who has expertise in banking field.
- b) Nancy Effendy as Member and Independent Party, who has expertise in banking and risk management field.
- c) Tara Adelia Senjaya as Member and Independent Party, who has expertise in finance, accounting, and risk management field.

Expertise of the Risk Monitoring Committee members based on the curriculum vitae of the Committee members from the education and work experience of each Committee members.

- 2) Duties and responsibilities of the Committee
  Duties and responsibilities of Risk Monitoring Committee are as follows:
  - a) Providing:
    - evaluation on conformity of risk management policy to the implementation of the policy.
    - (2) monitoring and evaluation on the fulfillment of duties of Risk Management Committee and Risk Management Task Force.

to provide recommendations to the Boards of Commissioners.

- b) Performing evaluation (assessment) based on the risk condition on field, among others by considering:
  - (1) Lending Approval Authority Limit ("BWMK");
  - (2) Competence and Integrity aspect of Human Resource;
  - (3) Adequacy of office facility and infrastructure;
  - (4) Information from other party related to the operational activities that are exposed to risk;

c) Keeping the confidentiality of Bank's document, data, and information.

#### 3) Authorities of the Committee

In performing its duties, Risk Monitoring Committee has the following authorities:

- a) Acces Bank documents, data, and information concerning Bank employees, funds, assets, and resources required;
- b) Communicate directly with employees, including the Board of Directors and others related to the duties and responsibilities of the Risk Monitoring Committee;
- c) Perform other authorities granted by the Board of Commissioners.
- 4) Frequency of meeting of the Committee

In fulfilling its duties and responsibilities, Risk Monitoring Committee shall conduct meetings at least 1 (once) in 3 (three) months and may hold meetings outside the stipulated schedule when deemed necessary.

#### 5) Committee Work Plan and Realization

During 2023, Risk Monitoring Committee has:

 a) Held 6 (six) meetings that are attended by all members of Risk Monitoring Committee both physically and teleconference.
 Attendance of members of Risk Monitoring Committee in 2023.

Risk Monitoring Committee	Q1	Q2	Q3
(Date)	21/02/23	17/05/23	28/08/23
R.M. Sjariffudin, Chairman	٧	٧	٧
Nancy Effendy, Member	٧	٧	٧
Tara Adelia Senjaya, Member	٧	٧	٧

Risk Monitoring Committee	Q4					
(Date)	26/10/23	21/11/23	21/12/23			
R.M. Sjariffudin, Chairman	٧	٧	٧			
Nancy Effendy, Member	٧	٧	٧			
Tara Adelia Senjaya, Member	٧*	٧	٧*			

<sup>\*</sup> telekonferensi

#### b) Conducted activities such as:

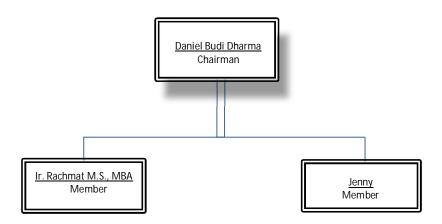
- (1) Discuss the Risk Profile report for December 31 2022, March 31 2023, June 30 2023, September 30 2023, October 31 2023 and November 30 2023.
- (2) Evaluate the suitability of risk management policies with the implementation of these policies.
- (3) Monitor and evaluate the implementation of the duties of the Risk Management Committee and Risk Management Work Unit.
- (4) Conduct a study (assessment) based on risk conditions in the field, including by considering the Limits of Authority to Approve Credit, Human Resources, adequacy of office facilities and infrastructure, information from other parties related to operational activities that are exposed to management risk.
- (5) Discussing the implementation of Financial Services Authority Regulation No. 17 of 2023 dated 14 September 2023 regarding the Implementation of Governance for Commercial Banks.

#### c. Nomination and Remuneration Committee

 Structure, membership, skills, and independence of members of the Nomination and Remuneration Committee

The Committee Remuneration and Nomination Committee was established on April 16, 2007 and commenced effective as from June 1, 2007.

All members of the Committee Remuneration and Nomination Committee have been reappointed based on the Decision of the Board of Directors No. DIR/274/VII/2019 dated July 01, 2019 for 5 (five) subsequent period, as from July 01, 2019, the structure of the Committee is as follows:



The structure of Nomination and Remuneration Committee consists of:

- a) Daniel Budi Dharma as the chairman and Vice President Commissioner cum Independent Commissioner, who has expertise in banking field.
- b) Ir. Rachmat M.S., MBA, as Member and President Commissioner, who has expertise in banking field.

 Jenny as Member and HRD Division Head, who has expertise in human resource field.

Expertise of the Nomination and Remuneration Committee members based on the curriculum vitae of the committee members from the education and work experience of each committee members.

2) Duties and Responsibilities of the Nomination and Remuneration Committee

The Nomination and Remuneration Committee has duties and responsibilities as follows :

- a) Mandatory to act independently in performing their duties, and responsible to the Board of Commisioners.
- b) Related to the Nomination Function
  - (1) Provide recommendations to the Board of Commissioners regarding:
    - (a) the position composition of the members of the Board of Directors and/or members of the Board of Commissioners;
    - (b) policies and criteria required in the process of nomination;
    - (c) policy on performance evaluation for members of the Board of Directors and/or members of the Board of Commissioners;
  - (2) Assist the Board of Commissioners assesses the performance of members of the Board of Directors and/or members of the Board of Commissioners based on the benchmarks that have been developed as evaluation material;

- (3) Provide recommendations to the Board of Commissioners regarding the development programs on the performances of members of the Board of Directors and/or members of the Board of Commissioners:
- (4) Propose candidates who qualify as members of the Board of Directors and/or members of the Board of Commissioners to the Board of Commissioners to be submitted to the GMS;
- (5) Preparing and providing recommendation on the system and procedures for appointment and/or replacement of the Board of Commissioners and the Board of Directors for the Board of Commissioners, to be presented before the General Meeting of Shareholders.
- (6) Provide recommendations to the Independent Party candidates who are to become members of the Committee to the Board of Commissioners.
- c) Related to the Remuneration Function
  - (1) Evaluating remuneration policies based on performance, risk, fairness with peer group, target, and long term strategy of Bank, fulfillment of reserves as regulated in legislation and potential revenue of Bank in the future.
  - (2) Submit evaluation results and recommendation to the Board of Commissioners:
    - (a) remuneration structure, which can be:
      - i. Salary;
      - ii. Honorarium;
      - iii. Incentives: and/or
      - iv. Allowances which are fixed and/or variable.
    - (b) the policy on Remuneration;

- for members of the Board of Commissioners and/or members of the Board of Directors to be submitted to the GMS;
- ii. for Executive Officers and employees as a whole to be submitted to the Board of Directors.
- (c) the amount of Remuneration;
- (3) Assist the Board of Commissioners assesses the performance to the suitability of Remuneration received by each member of the Board of Directors and/or members of the Board of Commissioners;
- (4) Ensure that the remuneration policy is in accordance with the provisions;
- (5) Conduct periodic evaluations of the implementation of Remuneration policies;
- (6) The Nomination and Remuneration Committee shall maintain the confidentiality of documents, data, and Information of the Bank;
- (7) Each member of the Nomination and Remuneration Committee may not take personal advantage, either directly or indirectly from its activities other than their legitimate income;
- (8) Members of the Board of Commissioners who became chairman or member of the Nomination and Remuneration Committee is not provided additional income other than the income as a member of the Board of Commissioners.

#### 3) Authorities of the Committee

In performing its duties, Nomination and Remuneration Committee has the following authorities :

- a) Acces Bank documents, data, and information concerning Bank employees, funds, assets and resources required;
- b) Communicate directly with employees, including the Board of Directors and others related to the duties and responsibilities of Nomination and Remuneration Committee;
- c) Perform other authorities granted by the Board of Commissioners.

#### 4) Frequency of meeting of the Committee

In fulfilling its duties and responsibilities, the Nomination and Remuneration Committee holds no less than 1 (one) meeting in 4 (four) months and, when necessary, may hold meetings outside the stipulated schedule when deemed necessary.

# 5) Committee Work Plan and Realization During 2023, the Nomination and Remuneration Committee:

a) Has held 5 (five) meetings that are attended by all members of the Nomination and Remuneration Committee, whether attended physically or via teleconference.

Attendance of members of the Nomination and Remuneration Committee in 2023

Nomination Commitee and Remuneration	Q1	Q2	Q3		Q4
(Date)	18/01/23	14/04/23	12/07/23	07/08/23	04/12/23
Daniel Budi Dharma, Ketua	٧	٧	٧	٧	٧
Ir. Rachmat M.S., MBA, Anggota	٧*	٧*	٧*	٧*	√*
Jenny, Anggota	٧	٧	٧	٧	٧

<sup>\*</sup>telekonferensi

#### b) Carry out activities, including:

- (1) To evaluate the structure, policies and the amount of remuneration.
- (2) Provide remuneration recommendations for members of the Board of Commissioners and Directors to be submitted by the Board of Commissioners to obtain approval at the Annual General Meeting of Shareholders (AGMS) of PT Bank Bumi Arta Tbk. on June 26, 2023.
- (3) Evaluate the performance of the Board of Directors and Board of Commissioners.
- (4) Provide recommendations for the preparation of training programs/training of members of the Board of Commissioners and Board of Directors.

#### 3. Implementation of Compliance, Internal Audit and External Audit Function

#### a. Compliance Function

Compliance Function in Bank Bumi Arta is under the responsibility of the Compliance Director and implemented by Compliance Task Force that is independent from the other task forces. Appointment of Compliance Director is the commitment of Bank Bumi Arta to always complying with the laws and regulations, both the regulation issued by Financial Services Authority, Bank Indonesia or other laws and regulations.

The general duty of the Compliance Director is to advise all organizational levels, from the highest level to the operating personnel to comply with the principles of prudential banking. This general duty can be fulfilled in several ways, such as by issuing the circulars, providing advice in several summits and work meetings.

The Director in charge of the Compliance Function must prevent the Board of Directors of the Bank from making policy and/or decision that violates Financial Services Authority, Bank Indonesia Regulation and other applicable laws and regulation, which may harm the continuity of Bank's business.

Bank's Compliance Function includes measures, for:

- Realizing the development of Compliance Culture at all organizational levels and Bank's business activities;
- Managing Compliance Risk faced by the Bank;
- Ensuring that the policy, provision, system and procedures, as well as business activities carried out by the Bank, have complied with Financial Services Authority, and the applicable laws and regulations; and
- 4) Ensuring Bank's compliance with the commitment made between the Bank and Financial Services Authority and/or other supervisory authorities.

In managing Compliance Risk that the Bank may face, the Compliance Task Force performs identification, measurement, monitoring and controlling of Compliance Risk based on the reports received from related units, which include functional activities related to lending, treasury and investment, operational and service, trade financing, funding and debt instruments, Information System Technology and Management Information System, as well as Human Resource Management.

The Director in charge of the Compliance Function gives approval for Report on Compliance Risk made by the Compliance Task Force. Report on Compliance Risk will be submitted to the Risk Management Task Force to prepare Report on Risk Profile in Bank Bumi Arta.

In order to ensure that the Bank has complied with Financial Services Authority, Bank Indonesia Regulation and other applicable laws and regulations, The Director in charge of the Compliance Function-together with the Compliance Task Force- coordinate with the relevant work units / Compliance and Risk Management Division to ensure the availability and conformity of the guidelines, system and procedures in each work unit to Financial Services Authority, Bank Indonesia Regulation and the applicable laws and regulations for the Principles of Prudential Banking.

In order to monitor and maintain Bank's compliance with all agreements and commitments made between the Bank and Financial Services Authority or other supervisory authorities, The Director in charge of the Compliance Function performs monitoring of implementation of agreement, fulfillment of commitment, Bank's commitment to obey the command and prohibition from Financial Services Authority or other supervisory authorities.

The Bank has ensured the Bank's compliance with the commitments made by the Bank to the Financial Services Authority and/or other competent supervisory authorities in accordance with the predetermined target date.

The Compliance Director has the following duties and responsibilities:

 Formulating the strategy to encourage the development of Bank's Compliance Culture

The general duty of Compliance Director is to advise all organizational levels, from the highest level to the operating personnel to comply with the principles of prudential banking for the development of Bank's Compliance Culture.

This general duty can be fulfilled in several ways, such as by issuing the circulars, providing advices in several summits and work meetings.

Proposing the compliance policy or compliance principles to be stipulated by the Board of Directors.

The Compliance Director issues Decree of the Board of Directors on Compliance Analysis for monitoring of all provisions of fund in the form of lending (exposure group > 5 billion) and gives approval for Compliance Analysis made by the Compliance Task Force.

3) Specifying compliance system and procedures (Compliance Guidelines).

Compliance Director specifies the Compliance Guidelines that is a guidelines for the implementation of Compliance Function to perform properly. This guidelines is specified according to the duties and responsibilities of Compliance Director pursuant to Financial Services Authority Regulation No. 46/POJK.03/2017 of July 12, 2017 on Implementation of Compliance Function for Commercial Banks.

4) Ensuring that the policy, provision, system and procedures, as well as business activities carried out by the Bank, have complied with Financial Services Authority regulation and the provisions of the laws and regulations.

In order to ensure that the Bank has complied with Financial Services Authority, Bank Indonesia Regulation and other applicable laws and regulations for Principles of Prudential Banking, Compliance Director together with the Compliance Task Force-coordinate with the relevant work units/Compliance and Risk Management Division to ensure the availability and conformity of the guidelines, system and procedures in each work unit to Financial Services Authority, Bank Indonesia Regulation and the applicable laws and regulations for the Principles of Prudential Banking.

5) Minimizing Bank's Compliance Risk.

In order to minimize Bank's Compliance Risk, the Compliance Director gives approval for Report on Compliance Risk made by the Compliance Task Force and provides advices for the management board, both verbally and in written by sending an Internal Memo, in the event that some improvements are necessary.

6) Taking preventive measures to avoid the policy and/or decision made by the Board of Directors of the Bank violating Financial Services Authority regulation and the applicable laws and regulations. The Compliance Director must prevent the Board of Directors of the Bank from making policy and/or decision that violates Financial Services Authority, Bank Indonesia Regulation and other applicable laws and regulations, which may harm the continuity of Bank's business.

7) Performing other duties related to Compliance Function.

The Compliance Director in order to monitor and maintain Bank's compliance with all agreements and commitments made between the Bank and Financial Services Authority or other supervisory authorities, Compliance Director performs monitoring of implementation of agreement, fulfillment of commitment, Bank's commitment to obey the command and prohibition from Financial Services Authority or other supervisory authorities.

The Director in charge of the Compliance Function to fulfill of their duties and responsibilities, supervises Compliance Task Force that is independent from the operational task force.

Duties and responsibilities of the Compliance Task Force are as follows:

- Coordinate, direct, develop, supervise and socialize risk culture, and implement an environmentally friendly culture in the Bank's operational activities.
- Follow, study, understand and implement all internal regulations/regulations and procedures that have been outlined by internal management, the Financial Services Authority, Bank Indonesia or other agencies.
- 3) Take steps to support the creation of a Compliance Culture in all Bank business activities at every level of the organization.

- 4) Identify, measure, monitor and control Compliance Risk by referring to the Financial Services Authority regulations regarding the Implementation of Risk Management for Commercial Banks.
- 5) Assess and evaluate the effectiveness, adequacy and conformity of the Bank's policies, provisions, systems and procedures with applicable laws and regulations.
- 6) Review and/or recommend updating and improving policies, provisions, systems and procedures owned by the Bank so that they comply with the provisions of the Financial Services Authority, Bank Indonesia and applicable laws and regulations.
- 7) Make efforts to ensure that the Bank's policies, provisions, systems and procedures, as well as business activities are in accordance with the provisions of the Financial Services Authority, Bank Indonesia, and applicable laws and regulations.
- 8) Check and be responsible for the truth and accuracy of submitting internal and external reports.
- 9) Assist in the implementation of the duties of the Head of the Compliance and Risk Management Division in the context of monitoring and maintaining the Bank's compliance with all agreements and commitments made by the Bank to the Financial Services Authority/other authorities, including monitoring the followup to the results of supervision/examination by the Financial Services Authority/ other authorities by coordinating with other work units.
- 10) Prepare and submit Bank Compliance Risk Report to the Risk Management Work Unit in order to develop the Bank's risk profile.
- 11) Following up on findings and recommendations from the Internal Audit Division/SKAI, external auditors, results of supervision by the Financial Services Authority and Bank Indonesia as well as results of supervision by other authorities to refine and improve the Compliance Work Unit.

- 12) Conduct Compliance Reviews in order to monitor all funds provided in the form of credit, including credit products related to sustainable finance.
- 13) Contribute effectively in improving and developing the Compliance Function, including attending and providing input at meetings held by related parties.
- 14) Examine warning memos to relevant departments for late submission of reports or violations which result in the Bank being subject to fines by external parties.
- 15) Implement the principles of good governance in every Bank business activity at all levels or levels of the organization.
- 16) Implementing an Anti-Fraud Strategy and reporting or not hiding known fraud incidents, providing direction and raising awareness for controlling fraud risks to staff.
- 17) Carry out other tasks assigned by the Head of the Compliance and Risk Management Division as long as they are within the scope of duties and functions as Head of the Compliance Work Unit.

Result of monitoring of the existing procedures or policy in 2023 indicates that the Bank has complied with the principles of prudential banking as required by Financial Services Authority, Bank Indonesia, the applicable laws and regulations, and by taking into account Bank's business activities, Bank's exposure to loss and Compliance Risk is considered Low.

Bank's Compliance Track Record is proven good and the principles of prudential banking in carrying out its business activities have been the fundamental attitude of Bank Bumi Arta. This fundamental attitude is realized by putting its best efforts to comply with the principles of prudential banking specified by Financial Services Authority, Bank Indonesia regulation and the applicable laws and regulations. There are

minor violations to the regulation that can be improved by the Bank, and the Bank has implemented almost all applicable financial standards and codes of ethics, which in the implementation have not been carried out optimally.

#### b. Internal Audit Function

The Internal Audit function at Bank Bumi Arta is carried out by the Internal Audit Work Unit (SKAI). SKAI is an independent institution from the operational task force that is responsible to the President Director and Communicates Directly to the Board of Commissioners and the Audit Committee. The Chairman of SKAI is Lauw Janto, who is appointed the Chairman of SKAI by Decree of the Board of Directors No. 009/KEP/IV/99/Dir tanggal 13 April 1999, and most recently by the Decree of the Board of Directors No. DK/Pers/069/XII/2021/Dir tanggal 30 Desember 2021, having his Degree from Tarumanegara University, in Accounting Department, Faculty of Economics and has acquired Risk Management Certification Level 3 ("BSMR"), and International Certificate in Banking Risk and Regulation (GARP), *Qualified Internal Auditor* (QIA) in the year of 2017 and *Certifies Anti Fraud Manager* (CAFM).

The Chairman of SKAI is appointed and dismissed by the President Director upon approval from the Board of Commissioners.

Internal Audit by Internal Audit Working Unit refers to the Financial Services Authority Regulation No. 1/POJK.03/2019 dated January 28, 2019 concerning the Implementation of the Bank Internal Audit Function in Commercial Banks, Professional Internal Audit Standards as stipulated by the association of the internal audit profession, guidelines for internal

audit of PT Bank Bumi Arta Tbk., 2023 work plan of PT Bank Bumi Arta Tbk. and the 2023 work plan of SKAI PT Bank Bumi Arta Tbk.

In general, the scope of duties of SKAI includes any independent auditing activity and assessment on adequacy and effectiveness of the Internal Control System, Risk Management, Good Corporate Governance, Information Technology and all business activities by the Bank, as well as the quality of performance of the management board in fulfilling its duties and responsibilities.

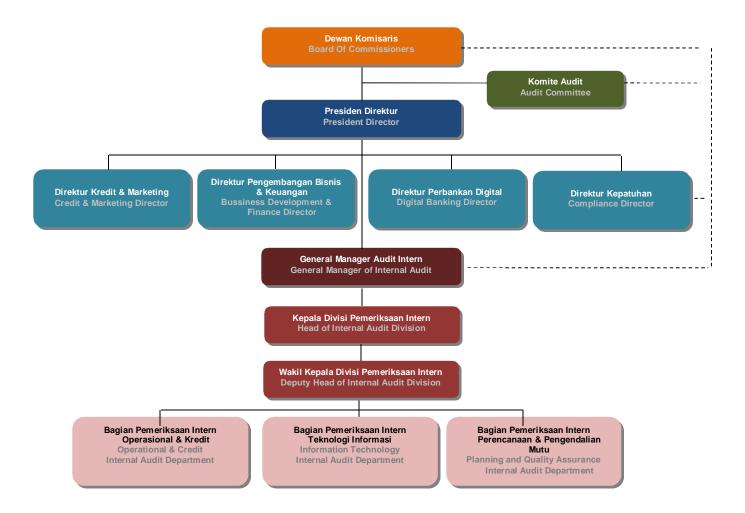
In 2023, in accordance with the work plan, SKAI will carry out annual audits of work units at the Head Office, 9 (nine) Branch Offices, 14 (fourteen) Sub-Branch Offices, 9 (nine) Functional Offices. Apart from that, SKAI has also carried out examinations required by Bank Indonesia (BI), namely examinations of SKN-BI, BI-RTGS, BI-SSSS, BI-ETP, KPDHN, carrying out annual Information Technology examinations and examinations required by the Deposit Insurance Corporation. (LPS), namely examination of the Single Customer View System (SCV) both internally and by independent parties (external).

The results of the SKAI inspection findings and comments are reported to the President Director, Board of Commissioners, Audit Committee, Compliance Director and Auditee for follow-up improvement. Follow-up improvements made by the Auditee are monitored by the Operational Risk Section at the Head Office and Branch Offices. SKAI has also reported the Implementation and Main Results of the Internal Audit to the Financial Services Authority.

To develop the knowledge of internal auditors, improve the skills of internal auditors and to anticipate any new developments in the banking world, SKAI continuously provides training and education to internal auditors, both internally and externally. In 2023 SKAI members have participated in 50 (fifty) training in the form of on-the-job training, inhouse training, outreach, workshops, and seminars.

The effectiveness of the internal audit has been running quite well, among others: internal audit can assist the implementation and improvement of governance, risk management, and internal control systems through improvements to the organization's core business processes, which include General Management, Plan Management Work, Credit Management, Deposit Management, Banking Services Management, Other Operational Management, Accounting, Reporting and General Administration, AML, CFT, and CPF; internal audit has carried out its function in assisting management to achieve company goals by providing information needed by management and being able to detect audit findings which then provide recommendations for the process of improving organizational performance; and internal audit consistently develops knowledge and improves the expertise of internal auditors, so that internal auditors can have adequate understanding and knowledge in carrying out internal audits.

#### **ORGANIZATION STRUCTURE OF SKAI**



#### c. External Audit Function

The External Audit Function in Bank Bumi Arta implemented by the Public Accounting Firm (PAF) Tanudiredja, Wibisana, Rintis and Partners, Member Firms of PwC global network and Public Accounting Jimmy Pangestu, which is registered in Financial Services Authority.

The duties of the Public Accounting Firm (PAF) are to carry out the audit according to the auditing standard specified by the Institute of Indonesian Chartered Accountants (the "generally-accepted auditing standard").

The objective of the audit is to express the opinion on the fairness of the financial statement for the year ending on December 31, 2023, in all material aspects according to the generally-accepted accounting principles in Indonesia.

The external audit implementation and the Bank's compliance with the provisions regarding the relationship between the Bank, public accountants and the Financial Services Authority have gone well.

The implementation of Public Accounting Firm audit shall also refer to:

- 1) Bank Indonesia Regulation No. 3/22/PBI/2001 dated December 13,2001 on Transparency of Bank Financial Condition.
- Financial Services Authority Regulation No. 37/POJK.03/2019 dated
   December 2019 concerning Transparency and Publication of Bank Reports.
- 3) Financial Services Authority Regulation no. 9 of 2023 dated 11 July 2023 concerning the Use of Public Accounting Services and Public Accounting Firms in Financial Services Activities.

- 4) Financial Services Authority Circular No. 9/SEOJK.03/2020 dated 30 June 2020 concerning Transparency and Publication of Conventional Commercial Bank Reports.
- 5) Financial Services Authority Circular No.18/SEOJK.03/2023 dated 06 November 2023 concerning Procedures for Using the Services of Public Accountants and Public Accounting Firms in Financial Services Activities.

The External Audit Function is implemented through the implementation of the Bank's Financial Statements Audit by the Public Accounting Firm and Public Accountant, in order to ensure and believe that the Bank's Financial Statements have been prepared and presented in a quality manner, free from material misstatements, whether caused by error or fraud, forming and express an opinion on the fairness of the Bank's Financial Statements and test the effectiveness of the Bank's internal controls.

In general, the scope of external audit consists of:

- Consideration of the internal control for financial reporting, as the basis for determining audit procedures according to the existing condition but is not intended to provide opinion on the effectiveness of Company's internal control for its financial reporting.
- 2) Examination on a test basis, evidences that support the number and disclosure in the financial statement.
- Discussion with Company's management board and the audit committee to find out fraud or suspected fraud that affects the company.
- 4) Assessment of the implemented accounting principles and significant estimation made by the management board.
- 5) Assessment of presentation of the overall financial statement.

#### 4. Implementation of Risk Management and Internal Control System

In accordance with the framework of good corporate governance, Bank Bumi Arta has implemented the integrated Risk Management Structure, which is a means in determining the strategy, organization, policy and guidelines to ensure that all risks faced by the Bank are identified, measured, monitored, and controlled properly.

In 2023 Bank Bumi Arta keeps on improving its Good Corporate Governance, policy, procedures and risk management process, as well as keeps on improving the competence of its human resource.

Risk Management Process that is implemented by Bank Bumi Arta refers to Regulation of the Financial Services Authority No. 18/POJK.03/2016 dated March 16, 2016 and Financial Services Authority Circular Letter No. 34/SEOJK.03/2016 dated September 1, 2016, on the Implementation of Risk Management for Commercial Banks.

One of the implementations of risk management is the arrangement of Bank's risk profile that is submitted to Financial Services Authority on quarterly basis. Such report on risk profile indicates the inherent risk in Bank's business activities, including the Quality of Implementation of Risk Management for each risk type.

Assessment of risk profile in Bank Bumi Arta is made on 8 (eight) types of risks, i.e. Credit Risk, Market Risk, Liquidity Risk, Operational Risk, Legal Risk, Reputational Risk, Strategic Risk, and Compliance Risk.

The result of composite risk in Bank Bumi Arta per December 31, 2023 is Low to Moderate, which is a combination of the Low to Moderate Aggregate Inherent Risk Low to Moderate and the Fair Quality of Implementation of Satisfactory Risk Management.

#### a. Credit Risk

 Active Supervision by the Board of Directors and the Board of Commissioners.

The Board of Directors and the Board of Commissioners elaborate and evaluate Credit Risk policy and strategy, as well as perform monitoring of work plan of the related unit.

The Bank has established the Credit Committee in each Branch Office and Credit Committee in the Head Office. Credit Committee is a work team that consists of credit officers. The main duties of this committee are to assess a credit proposal and to make credit decision.

2) Adequacy of Policy, Risk Management Procedures and Risk Limitation The Bank has the policy and procedures for Credit Risk control, such as Credit Policy of Bank Bumi Arta ("KPBBA"), Guide Book of Credit and Prosedure (BPKP) Guide Book of Risk Management ("BPMR") and related Circulars.

Limitation is available, such as limit of assets portfolio composition and concentration level, limit of credit quality provision and adequacy of reserve, Mortgage of Deed of Grant ("APHT") and limit of financial ratio that are always adjusted to the business growth and credit expansion plan.

3) Adequacy of Identification, Measurement, Monitoring and Risk Management, as well as Risk Management Information System The Bank makes analysis on business capital requirement, financial condition of the prospective borrowers, cash flow projection, etc. Appraisal has been carried out by Credit Administration Department/ Appraisal Department.

The Bank has a credit scoring system for the outstanding debt with a certain credit limit.

Independent loan review function has been fulfilled by the Review Department in the Head Office according to the Lending Approval Authority Limit ("BWMK").

The Bank has a Remedial Department in the Head Office that regularly monitors arrears and overdraft debtors and finds a solution for potentially non-performing debtors or non-performing debtors. Remedial Department in the Head Office also make analysis and provides recommendation/opinion for settlement of non-performing loans and Foreclosed Collateral ("AYDA") for the Board of Directors, as well as performing follow up for settlement of non-performing loans and the Foreclosed Collateral. The Bank has appointed a staff member of the pension credit administration that will carry out remedial functions.

The Bank begins to identify country risk, transfer risk and climaterelated risks to the Bank's exposure which have an impact on Credit Risk. Report on credit progress, including Credit Risk reporting, is submitted regularly to the Board of Commissioners and the Board of Directors.

### 4) Internal Control System

Credit Risk Control is carried out by establishing an organizational structure that clearly describes the limits of authority and responsibility of each work unit as well as inspections by the Operational Risk Section and regular monitoring of the SKAI.

#### b. Market Risk

 Active Supervision by the Board of Directors and the Board of Commissioners

The Board of Directors and the Board of Commissioners have made agreement on Market Risk policy and strategy and performed an evaluation on Market Risk management policy in the meeting of Asset & Liability Management Committee (ALCO), at least once in a month.

2) Adequacy of Policy, Risk Management Procedures and Risk Limitation The Bank has the policy and strategy for Market Risk control, such as Guide Book of Risk Management (BPMR) and Circulars on Market Risk, which determine the provision for determination of interest rate for Third Party Loans.

Limitation is available, such as volume limit and limit of portfolio composition, limit of potential interest loss risk in banking book, limit of sensitivity to market risk, NOP limit, intraday limit, cut loss limit, dealer limit, etc.

3) Adequacy of Identification, Measurement, Monitoring, and Risk Management, as well as Risk Management Information System Identification, measurement, and Market Risk measurement are carried out using market interest growth and foreign exchange rate as well as performing monitoring using repricing gap to identify Risk Sensitivity Asset (RSA) position to Risk Sensitivity Liabilities (RSL) on a periodical basis.

Every month the Bank performs measurements Interest Rate Risk in the Banking Book by using the Net Interest Income Gap, where the mapping positions of assets, liabilities and off-balance sheet prepared on the assumption repricing time that has been determined by the Bank.

The Bank begins to identify climate-related risks to the Bank's exposure which have an impact on Market Risk.

The report related with Market Risk is reported in ALCO meeting and to Board of Directors at least once in a month.

# 4) Internal Control System

Market Risk Control is carried out by establishing an organizational structure that clearly describes the limits of authority and responsibility of each work unit as well as regular inspections by SKAI.

#### c. Liquidity Risk

 Active Supervision by the Board Directors and the Board of Commissioners

The Board of Directors and the Board of Commissioners have made agreement and performed evaluation on the policy and strategy for Liquidity Risk in the meeting of Assets & Liabilities Management Committee (ALCO) at least once in a month.

The Bank has established the Treasury Credit Committee that is in charge and responsible for determining the market, instrument and transaction with the eligible counterparty.

2) Adequacy of Policy, Risk Management Procedures and Risk Limitation The Bank has proper policy and procedures for management of Liquidity Risk as set forth in Guide Book of Risk Management (BPMR) and the provision set forth in the Circular for Guidelines to Liquidity in Bank Bumi Arta.

Limitation is available, such as limit of composition and asset, liabilities, and administrative account transaction, limit of concentration and asset and liabilities, limit of sensitivity to funding needs, and limit of other liquidity ratio.

3) Adequacy of Identification, Measurement, Monitoring and Risk Management, as well as Risk Management Information System Identification, measurement and monitoring of Liquidity Risk are carried out through analysis on the maturity profile, cash flow, growth of Third Party Loans and assets and Liquidity ratio. The Bank makes regular analysis on Third Party Loans. Measurement of Liquidity Risk has been adjusted to the external and internal condition.

The Bank begins to identify climate-related risks to the Bank's exposure which have an impact on Liquidity Risk.

Report that is related to liquidity comprehensively is submitted to the Board of Directors on a daily basis and in ALCO meeting.

#### 4) Internal Control System

Liquidity Risk Control is carried out by establishing an organizational structure that clearly describes the limits of authority and responsibility of each work unit as well as regular inspections by SKAI.

#### d. Operational Risk

 Active Supervision by the Board of Directors and the Board of Commissioners

The Board of Directors and the Board of Commissioners have made agreement and performed regular evaluation on the policy and strategy for Operational Risk.

The Board of Directors has approved the policy and strategy for Operational Risk management. The operational policy and strategy have been made in consideration with Bank's internal and external condition.

The Bank has formed an information technology steering committee that is authorized and responsible for providing recommendations to directors regarding information technology strategic plans that are in line with the strategic plans of bank business activities and suitability of their implementation.

The Bank's plan in digital transformation that increases the utilization of Information Technology has potential to increase operational risks caused by cyber threats and incidents. The implementation risk caused by cyber threats and incidents. The implementation of risk

management related to cyber security is adjusted to the characteristics and complexity of the Bank's business and the overall implementation of Information Technology by the Bank.

2) Adequacy of Policy, Risk Management Procedures and Risk Limitation The Bank has the policy and procedures for Operational Risk management, such as Manual Use of Technology Information System ("BPPTSI"), Guidelines to Implementation of Risk Management in Utilization of Information Technology ("PPMRPTI"), Guide Book of Risk Management ("BPMR"), Guidelines to application Anti Money Laundering, Counter-Terrorist Financing, and Counter-Proliferation Financing of Mass Destruction (AML, CFT, and CPF) and the relevant Circulars.

Limitation is available, such as fraud limit, transaction limit, currency limit, SWIFT limit, etc.

3) Adequacy of Identification, Measurement, Monitoring, and Risk Management, as well as Risk Management Information System Identification, measurement and monitoring of Operational Risk are carried out through analysis on operational events data, OEOI ratio, Bank's compliance with Anti Money Laundering, Counter-Terrorist Financing, and Counter-Proliferation Financing of Mass Destruction (AML, CFT, and CPF) and so forth.

The Bank has identified cyber security and begun to identify climaterelated risks in the Bank's exposure that impact Operational Risk.

Report that is related to the Operational Risk is submitted to the Board of Directors no less than once in a month.

4) Internal Control System

Operational Risk Control is carried out by establishing an organizational structure that clearly describes the boundaries of authority and responsibility of each work unit as well as inspections by the Operational Risk Section and regular monitoring of the SKAI.

#### e. Legal Risk

 Active Supervision by the Board of Directors and the Board of Commissioners

The Board of Directors has made the policy and procedures that cover the Legal Risk. Bank's Policy and Strategy have taken into account the external and internal factors. The Board of Commissioners and the Board of Directors have made agreement and regular evaluation on the policy and procedures that cover the Legal Risk.

2) Adequacy of Policy, Risk Management Procedures and Risk Limitation The Bank has the policy and procedures for Legal Risk management as set forth in Credit Policy of Bank Bumi Arta ("KPBBA"), Guidelines to Implementation of Risk Management in Utilization of Information Technology ("PPMRPTI"), Guide Book of Risk Management ("BPMR"), Circulars and Decrees, as well as Company Regulation.

Limitation is available, such as limit of legal litigation/case faced by the Bank, limit of absence/amendment of laws and regulations and weakness of agreement.

3) Adequacy of Identification, Measurement, Monitoring and Risk Management, as well as Risk Management Information System Identification, measurement and monitoring of Legal Risk are carried out through, among others, analysis on legal case faced by the Bank, factors of weakness of agreement, absence/amendment of laws and regulations. Legal Risk of the Bank has been regularly monitored.

Branch Offices prepare monthly report on the presence/absence of claims or lawsuits against the Branch Office and send it to the Corporate Legal Division. Report that is related to the Legal Risk is submitted to the Board of Directors no less than once in a month.

## 4) Internal Control System

Legal Risk Control is carried out by establishing an organizational structure that clearly describes the limits of authority and responsibility of each work unit as well as regular inspections by SKAI.

Bank has had Corporate Legal Division and Credit Legal Department at the Headquarters. The role of the Corporate Legal Divison among others are reviewing and analyzing every credit agreement and guarantees, reviewing contracts and agreements between the Bank and other parties/clients under the regulations in force, and analysis of legal cases faced by the Bank. While the role of Credit Legal Department, among others, reviewing and analyzing each binding of credit and guarantees.

#### f. Reputational Risk

 Active Supervision by the Board of Directors and the Board of Commissioners

The Board of Directors and the Board of Commissioners actively give approval and make regular evaluation on the policy and procedures for Reputational Risk. The policy and strategy for Reputational Risk are adjusted to the applicable laws and regulations for consumer's protection.

Bank has established a special function of handling and settlement of customer complaints and appointed Corporate Secretary in charge of providing necessary information/explanation for the customer and other external parties.

2) Adequacy of Policy, Risk Management Procedures and Risk Limitation The Bank has the policy and procedures for Reputational Risk management as set forth in Buku Pedoman Manajemen Risiko (Guide Book of Risk Management - "BPMR"), policy and procedures for transparency of Bank's product information and the use of customers' personal data, as well as handling of customer complaints to minimize the Reputational Risk arising from adverse publication of the Bank as set forth in the Circular.

Limitation is available, such as limitation of losses due to customer complaints and limitation of loss due to adverse publication, influence from reputation of Bank owner and related companies, breach of business ethics and so forth.

3) Adequacy of Identification, Measurement, Monitoring and Risk Management, as well as Risk Management Information System Identification, measurement and monitoring of Reputational Risk are carried out through analysis on the frequency and impact of customer complaints and adverse publication of the Bank.

The Bank has begun to identify climate-related risks in the Bank's exposure that have an impact on Reputation Risk.

Report that is related to Reputational Risk is submitted to the Board of Directors once in a month.

# 4) Comprehensive Internal Control System

Reputation Risk Control is carried out by establishing an organizational structure that clearly describes the limits of authority and responsibility of each work unit as well as regular inspections by SKAI.

#### g. Strategic Risk

 Active Supervision by the Board of Directors and the Board of Commissioners

The Board of Directors and the Board of Commissioners give approval and evaluate the policy and procedures related to Strategic Risk. The operational policy and strategy have been made in consideration with Bank's internal (weaknesses and strengths of the Bank) and external condition. The strategic plan and business plan include new products or activities to be launched.

The Bank has established a Team of Budget Compiler and Bank Business Plan Coordinator of the Bank (*PPA* and *RBB* Team) in order to assist the Board of Directors in the preparation of the Budget and Business Plan of the Bank, including the plan to improve business performance, as well as strategies to realize the plan in accordance with the target and the time set, with regards to the provision fulfillment of prudence and the application of Risk Management.

2) Adequacy of Policy, Risk Management Procedures and Risk Limitation The Bank has the policy and procedures for Strategic Risk management as set forth in Guide Book of Risk Management ("BPMR"), guidelines to budgeting as set forth in written in the Circular and Inter-Branch Memo for drafting of Corporate Plan/Business Plan.

Limitation is available, such as limitation on violation to Bank's Business Plan, conformity of the strategy to business environment, and Bank's business position.

3) Adequacy of Identification, Measurement, Monitoring and Risk Management, as well as Risk Management Information System Identification, measurement and monitoring of Strategic Risk are carried out through analysis on the performance of strategic plan (corporate plan) and business plan.

The Bank has established a Monitoring Team of Budget and Business Realization and Bank Business Plan (*PPA* and *RBB* Team) in order to assist the Board of Directors in the preparation of the Budget and Business Plan of the Bank.

Report on Strategic Risk has been arranged and submitted to the Board of Directors once in a month. Report on Realization of Business Plan has been made and submitted to the Board of Directors once in a month and has been submitted to Financial Services Authority on a quarterly basis.

4) Comprehensive Internal Control System Strategic Risk Control is carried out by establishing an organizational structure that clearly describes the limits of authority and responsibility of each work unit as well as regular inspections by SKAI.

#### h. Compliance Risk

 Active Supervision by the Board of Directors and the Board of Commissioners

The Board of Directors and the Board of Commissioners are aware of the Compliance Risk, in which regular evaluation is performed on Bank's compliance with laws and regulations and other applicable provisions for the principles of prudential banking. The policy and procedures for Compliance Risk control have been approved by the Board of Directors.

Bank has established the Compliance Task Force for monitoring and evaluation on the implementation of the strategy. The Board of Directors obliges all task forces to refer to the applicable regulations, both the internal and external regulations, in performing their operational activities.

2) Adequacy of Policy, Risk Management Procedures and Risk Limitation The Bank has the policy and procedures for management of Compliance Risk as set forth in Guidelines to Compliance, Guidelines to application Anti Money Laundering, Counter-Terrorist Financing, and Counter-Proliferation Financing of Mass Destruction (AML, CFT, and CPF) Guide Book of Risk Management ("BPMR") and the Circulars.

Limitation of Compliance Risk is intended for the implementation of principles of prudential banking and compliance with Bank Indonesia regulation, such as Minimum Capital Adequacy ("KPPM"), Legal Lending Limit ("BMPK"), sound lending according to the Guidelines to Arrangement of Bank Credit Policy ("PPK-PB"), limitation on the Earning Assets Quality ("KAP"), Minimum Statutory Reserves ("GWM") and limitation related to Foreign Currency transaction that includes Net Open Position ("PDN") and so forth.

3) Adequacy of Identification, Measurement, Monitoring and Risk Management, as well as Risk Management Information System Identification, measurement and monitoring of Compliance Risk are carried out through analysis on Bank's compliance with Bank Indonesia, Financial Services Authority regulation and regulation of other authorities.

The Bank has regularly monitored Compliance Risk based on the identification of violation and noncompliance with the applicable laws and regulations.

Compliance Risk Control is performed, among others, by regular evaluation on Bank's compliance with the applicable laws and regulations.

Report that is related to the Compliance Risk is submitted to the Board of Directors once in a month. Report on fulfillment of duties and responsibilities of the Compliance Director are submitted to the President Director with a copy for the Board of Commissioners on a quarterly basis. Compliance Report is submitted to Financial Services Authority with a copy for the President Director and the Board of Commissioners on a biannually basis.

4) Comprehensive Internal Control System Compliance Risk Control is carried out by establishing an organizational structure that clearly describes the limits of authority and responsibility of each work unit as well as inspections by the Operational Risk Section and regular monitoring of the SKAI.

# 5. Lending to Related Party and Large Exposure

Total debit balance for lending to related party and debtors/core group per December 2023 is as follows:

	Lending	Amount	
No.		Debtor	Nominal
			(in million Rupiah)
1	To Related Party	11	91.554
2	To Core Debtors		
	a. Individual	5	436.994
	b. Group	10	843.298
	Total	15	1.280.292

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<sup>\*</sup>The provision of credit to Related Parties in the amount of IDR 91,554 million is guaranted by cash collateral of IDR 61,978 million so that the provision of funds calculated as the Maxium Limit Lending ("BMPK") to Related Parties is 29,576 million.

## 6. Bank's Strategic Plan

Bank Bumi Arta's strategic plan is prepared in the form of a Corporate Plan and Business Plan in accordance with the Bank's vision and mission. The preparation of Corporate Plans is guided by Financial Services Authority Regulation No. 17 of 2023, Financial Services Authority Circular No. 13/SEOJK.03/2017 concerning Implementation of Governance for Commercial Banks and Financial Services Authority Regulation no. 12/POJK.03/2021 concerning Commercial Banks, as well as Business Plans guided by Financial Services Authority Regulation no. 5/POJK.03/2016 dated 26 January 2016 concerning Bank Business Plans and provisions of Financial Services Authority Circular Letter No. 12/SEOJK.03/2021 dated 31 March 2021 concerning Commercial Bank Business Plans.

Corporate Plan and Business Plan of Bank Bumi Arta is arranged to be realistic, comprehensive and achievable by taking into account the composite risk level of Risk Control System (RCS) — Strategic Risk; principles of prudential banking and responsive to internal and external changes that may affect the continuity of Bank's business.

Arrangement of Business Plan of Bank Bumi Arta is based on an analysis of the external environment such as macroeconomics, banking business developments, as well as IT developments and analysis of the internal environment such as credit developments and developments in third party funds, network and services, organization, human resources, and information technology.

Arrangement of Business Plan of Bank Bumi Arta is based on the policy and strategy of Bank Bumi Arta, such as management policy, risk management and compliance policy, business development strategy, strategy for anticipation of external change, human resource development strategy and remuneration policy, and it is supported by SWOT Analysis, macro and micro analysis, and consideration of the external and internal condition as well as national banking condition.

The Board of Directors have communicated the Bank's business plan to the controlling shareholders and to all levels of the organization in the Bank and has implemented all plans and targets set effectively.

To ensure the realization of the arranged plan, achievement of midterm and short-term target in Corporate Plan and Bank's Business Plan, the Board of Directors regularly monitor the achievement. Result of monitoring of Bank's Business Plan is reported to Financial Services Authority in the form of Quarterly Report on Realization of Business Plan.

The Board of Commissioners also perform supervision on the implementation of Bank's Business Plan through the report on Bank's Business Plan, which is submitted by the management board and Meeting of the Board of Commissioners, to evaluate and provide direction for the Board of Directors. Result of supervision of Bank's Business Plan by the Board of Commissioners is reported to Financial Services Authority in the form of Biannually Report on Supervision of Business Plan.

Achieving the Bank's strategic plan as set out in the Bank's Business Plan is directed at achieving 4 (four) main targets/focus of business activities, namely increasing credit growth, reducing the NPL level, increasing third party funds and developing digital services.

To increase credit growth, the Bank will continue to explore opportunities in sectors that have positive prospects with measurable levels of risk and focus on releasing credit to borrowers with promising business prospects and have proven resilience in facing various economic cycles. In addition, the Bank will also continue to develop the commercial segment financing through a value chain financing approach, both distributor financing and supplier financing, as well as focusing on companies in developing industrial sectors.

In order to reduce the level of Non-Performing Loans (NPL), the Bank will carry out preventive steps, including the Bank will better monitor the use of debtor credit and the development of the debtor's business. If there is a decline in the debtor's business which causes difficulties in paying obligations, the Bank will coordinate with the debtor to resolve the problems that occur.

Apart from that, the Bank will also develop digital banking services to collect third party funds, especially from retail customers, on a larger scale and can cover all regions in Indonesia.

In 2023, Bank Bumi Arta's credit will reach IDR 3,919,454 million, an increase of IDR 73,829 million or 1.92%, compared to 2022 of IDR 3,845,625 million.

Meanwhile, credit quality was maintained with a non-performing loan (NPL) ratio of 4.43% (gross) and 3.03% (net).

Bank Bumi Arta's deposits at the end of 2023 were recorded at IDR 4,696,762 million, a decrease of IDR 275,605 or (5.54%) compared to 2022 which amounted to IDR 4,972,367 million. The decrease in savings came from Current Accounts amounting to IDR 123,101 million or (16.33%), Savings amounting to IDR 71,386 million or (16.33%) and Deposits amounting to IDR 81,118 million or (2.13%).

# 7. Transparency of Financial and Non Financial Condition Undisclosed in Other Reports

Bank Bumi Arta has presented all financial and non-financial condition transparently in all reports submitted to the external parties.

## 8. Other Information Related to Corporate Governance of the Bank

During 2023, there is no intervention of the owner, there is no internal disputes, and there is no problems arising from the remuneration policy in Bank Bumi Arta that may interfere with bank business and performance.

# B. Share Ownership by Members of the Board of Directors and Members of the Board of Commissioners of 5% (Five Percent) or More of the Paid-Up Capital

Share ownership by members of the Board of Directors and the Board of Commissioners of 5% (five percent) or more and paid-in capital at Bank Bumi Arta, other Banks, Non-Bank Financial Institution and other Companies are as follows:

- 1. Ir. Rachmat M.S., MBA, as the President Commissioner owns as much as 20.07% of common stock in P.T. Dana Graha Agung.\*)
- 2. I Gst Agung Rai Wirajaya, as Commissioner, owns as much as 10,00% of common stock in PT Midaz Digital Ventura, as much as 10,00% stock in PT Puri Kuta Beach and as much as 7,00% stock in PT BPR Santi Pala.
- 3. Hendrik Atmaja, as Credit and Marketing Director, owns as much as 21.11%

<sup>\*)</sup> PT Dana Graha Agung is a shareholder in PT Bank Bumi Arta Tbk amounting to 17.72%.

<sup>\*\*)</sup> PT Surya Husada Investment is a shareholder in PT Bank Bumi Arta Tbk amounting to 29.53%.

common stock in  $\,\,$  P.T. Surya Husada Investment $^{2^{**}}$  and 10.00% of common stock in P.T. Arta Tritunggal Jaya.

**C. Financial Relations and Family Relations of Members of the Board of Directors** and Members of the Board of Commissioners with Other Members of the **Boards and/or With the Majority Shareholders** 

Name	Position	Financial Relationship/Family Relationship
Ir. Rachmat M.S., MBA	President	Has a Family Relationship with Hendrik Atmaja, the
	Commissioner	Credit and Marketing Director, and Edwin Suryahusada
		as Director of Business Development and Finance, does
		not have Financial Relationship with other members of
		the Board of Commissioners, other members of the
		Board of Directors and/ or the Majority.
Daniel Budi Dharma	Vice President	Does not have Financial Relationship and Family
	Commissioner	Relationship with other members of the Board of
		Commissioners, other members of the Board of
		Directors and/or the Majority Shareholders of the
		Bank.
R.M. Sjariffudin	Commissioner	Does not have Financial Relationship and Family
		Relationship with other members of the Board of
		Commissioners, other members of the Board of
		Directors and/or the Majority Shareholders of the
		Bank.
I Gst Agung Rai Wirajaya	Commissioner	Does not have Financial Relationship and Family
		Relationship with other members of the Board of
		Commissioners, other members of the Board of
		Directors, other members of the Board of Directors
		and/or the Majority Shareholders of the Bank.
Wikan Aryono	President	Does not have Financial Relationship and Family
	Director	Relationship with other members of the Board of
		Commissioners, other members of the Board of
		Directors and/or the Majority Shareholders of the
		Bank.

# REPORT ON IMPLEMENTATION OF CORPORATE GOVERNANCE 2023

Name	Position	Financial Relationship/Family Relationship
Hendrik Atmaja	Credit and	Has Family Relationship with Ir. Rachmat M.S., MBA,
	Marketing	the President Commissioners and Edwin Suryahusada
	Director	as Director of Business Development and Finance, does
		not have Financial Relationship with other members of
		the Board of Commissioners, other members of the
		Board of Directors and/or the Majority.
Edwin Suryahusada	Director of	Has a Family Relationship with Ir. Rachmat M.S., MBA,
	Business	President Commissioner, and Hendrik Atmaja, the
	Development	Credit and Marketing Director and does not have
	and Digitalization	Financial Relationship with other members of the
		Board of Commissioners, other members of the Board
		of Directors and/ or the Majority.
Aditya Putra Utama	Director of Digital	Does not have Financial Relationship and Family
	Banking	Relationship with other members of the Board of
		Commissioners, other members of the Board of
		Directors and/or the Majority Shareholders of the
		Bank.
John David Nehemia	Director of	Does not have Financial Relationship and Family
Engelen	Compliance	Relationship with other members of the Board of
		Commissioners, other members of the Board of
		Directors and/or the Majority Shareholders of the
		Bank.

#### D. Remuneration Policy

#### 1. Nomination and Remuneration Committee

- a. The board of commissioners has formed a Remuneration committee which is merged into one with the nomination committee as the nomination and Remuneration Committee, the structure of the committee is as follows:
  - Daniel Budi Dharma as the chairman and Vice President Commissioner cum Independent Commissioner, who has expertise in banking field.
  - 2) Ir. Rachmat Mulia Suryahusada, MBA, as Member and President Commissioner, who has expertise in banking field.
  - 3) Jenny as Member and HRD Division Head, who has expertise in human resource field.
- b. The duties and responsibilities of the Nomination and Remuneration Committee:
  - 1) Evaluating remuneration policies based on performance, risk, fairness with peer group, long term goals and strategies of the bank, fullfillment of reserves as stipulated in legislation and potential future bank revenue:
  - 2) Submit evaluation results and recommendations to the board of commissioners about:
    - a) Remuneration policy for the Board of Directors and the Board of Commissioner to be submitted to the General meeting of share holders
    - b) Remuneration policy for employees as a whole to be submitted to the Board of Directors
    - 3) Ensure that the remuneration policy complies with the regulations;
  - 4) Periodically evaluate the implementation of the Remuneration policy

- c. Throughout the period of 2023 the Nomination and Remuneration Committee held 5 (five) meetings attended by all members of the Nomination and Remuneration Committee either physically or via teleconference.
- d. Remuneration paid to members of the Nomination and Remuneration Committee during 2023.

Remuneration paid to members of the Nomination and Remuneration Committee during 2023 is Rp 3.851 million. The Remuneration includes salary/honorarium and allowances provided in relation to the position of each member of Nomination and Remuneration Committee.

#### 2. Remuneration Policy Creation Process

#### a. Background

In accordance with Financial Services Authority Regulation No. 45/POJK.03/2015 and Financial Services Authority Circular Letter No. 40/SEOJK.03/2016 concerning the Implementation of Governance in Providing Remuneration for Commercial Banks, Bank Bumi Arta already has and applies a Remuneration Policy that includes remuneration for the Board of Commissioners, the Board of Directors and Employees. The remuneration policy was prepared with various considerations which include the creation of effective risk management, financial stability of the Bank, adequacy and strengthening of Bank capital, short-term and long-term liquidity needs, and future revenue potential.

#### b. Purpose Committees

- 1) Improve the quality of human resources.
- 2) Maintain and keeping human resources who have good quality work and are productive.
- Creating positive competition in order to motivate employees to continue to develop themselves.
- 4) Improve the welfare of human resources.
- 5) Creating good corporate governance.

#### c. Review of Remuneration Policy

The Bank periodically reviews remuneration policies based on performance, risk, fairness with peer groups, targets and long-term strategies of the Bank, fulfillment of reserves as stipulated in the legislation and potential future revenue of the Bank.

#### d. Mechanism Remuneration Policy

To ensure the independence of Remuneration for all employees including employees in the control unit, the Bank ensures the performance evaluation and determination of Remuneration is carried out through supervision and review to the Nomination and Remuneration Committee.

## 3. Scope of Remuneration and Implementation Policies per business unit, the Region and in Subsidiary Companies of Branch Offices Located Overseas

The bank does not have overseas branch offices.

#### 4. Remuneration Related to Risk

The main types of risk in the remuneration policy are adjusted with a review of the Bank's risk profile which is determined annually by looking at market conditions, industry developments, performance and financial capability of the Bank. The Bank's main risk is Credit Risk.

The determination of the main types of risk will have an impact on the determination of KPIs and have an impact on Remuneration that is variable. There has not been any change in the determination of the main risk types compared to the determination of the main risk types last year.

#### 5. Performance Measurement Related to Remuneration

The Bank determines performance appraisal using the Key Performance Indicators (KPI) and Performance Appraisal approaches. KPI to measure and assess employee performance achievement in meeting agreed targets and goals, while Performance Appraisal is to evaluate or assess employee work performance based on the competency aspects that have been set.

#### 6. Adjusment Remuneration is Associated with Performance and Risk

Remuneration is given in the form of:

- a) Cash; and
- b) Shares or instrument based on shares issued by the Bank, which apply to the Board of Directors, the Board of Commissioners and Material Risk Takers.

Variable Remuneration in the form of shares or stock based instruments for independent Commissioners to be converted and give in cash.

In the event that the bank suffers a loss, the bank may not share or share a relatively small value.

The provision of Remuneration in the form of bank shares is calculated from a certain percentage of gratuities that is given as much as 10%.

Some of the Variable Remuneration given to Material Risk Taker both cash and shares must be suspended for 3 years, the disbursement is divided equally according to the time period. The amount of the Variable Remuneration deferred is 10% for cash Remuneration and 10% for Remuneration in the case of shares. The suspension period applies equally to all Material Risk Taker.

#### 7. External Consultant Related to Remuneration Policy

The Bank has not used an external consultant related to Remuneration policies.

# 8. Remuneration Package and Facilities Received The Board of Directors and The Board of Commissioners

Remuneration packages and facilities received by Directors and Board of Commissioners covering the Remuneration structure and details of the amount are as follows:

		The Receive	d Amount in	2023	
Type of Remuneration and Other Facilities		Board of ectors		Board of issioners	
T donities	People	Million Rupiah	People	Million Rupiah	
Remuneration (salary, bonus, regular allowance, tantiem and other fringe benefits)	5	11.385	4	3.972	
Other fringe benefits (housing, transportation, health insurance and so forth) that are:     a. Acquirable     b. Non-Acquirable	- 5	- 734	1	- 88	
Total	5	12.119	4	4.060	
		The Receive	d Amount in	2022	
Type of Remuneration and Other Facilities		Board of ectors	The Board of Commissioners		
	People	Million Rupiah	People	Million Rupiah	
Remuneration (salary, bonus, regular allowance, tantiem and other fringe benefits)	7	10.462	4	3.318	
Other fringe benefits (housing, transportation, health insurance and so forth) that are:					
a. Acquirable b. Non-Acquirable	-	-	-	-	
Total	7	10.462	4	3.318	

#### Remuneration Package which is Grouped in the level of Income received by Directors and of the Board of Commissioners

Remuneration packages and facilities received by the Board of Directors and the Board of Commissioners covering the Remuneration structure and details of the amount are as follows:

The Amount of Remuneration	:	2023	2022		
per person in 1 (one) year	Number The Board of Directors	Number The Board of Commissioners	Number The Board of Directors	Number The Board of Commissioners	
Above Rp 2 billion	3	-	1	-	
Above Rp 1 billion s.d. Rp 2					
billion	2	1	3	1	
Above Rp 500 million s.d. Rp 1					
billion	-	3	1	1	
Rp 500 million and below	-	-	2	2	

<sup>\*)</sup>Received in cash.

#### 10. Variable Remuneration

Variable Remuneration is Remuneration that is associated with performance and Risk, including bonuses or other forms that are equivalent. Variable Remuneration is given in the form of :

- a. Cash; and
- b. Shares or instrument based on shares issued by the Bank, which apply to the Board of Directors, the Board of Commissioners and Material Risk Takers.

There is no difference in Variable Remuneration between the Board of Directors, the Board of Commissioners and Material Risk Taker.

# 11. The Board of Directors, the Board Of Commissioners and Employees receiving Variable Remuneration

Number the Board of Directors, the Board Of Commissioners and Employees receiving Variable Remuneration is as follows:

	Total Amount Received in 2023						
Variable Remuneration		oard of ctors	The Board of Commissioners		Employees		
	Person	Million Rp	Person	Million Rp	Person	Million Rp	
Amount	3	1.457	3	750	587	10.544	

	Total Amount Received in 2022						
Variable Remuneration	The Board of Directors			oard of ssioners	Employees		
	Person	Million Rp	Person	Million Rp	Person	Million Rp	
Amount	4	1.750	3	750	608	11.483	

#### 12. Position and Number of Parties that become a Material Risk Takers

Position and number of parties that are considered Material Risk Takers include:

- a. Non-Independent Commissioners
- b. The Board of Directors
- c. General Manager
- d. Head of Credit Division
- e. Chief of Branch

The total number of Material Risk Takers are 23 people.

#### 13. Shares Option

Shares Option is the option to buy Bank's shares by members of the Board of Directors, the Board of Commissioners and Bank's Executive Officers that are provided through stock offering or share option offering in for provision of compensation for members of the Board of Commissioners, the Board of Directors and Bank's Executive Officers as decided in the General Meeting of Shareholders and/or Articles of Association of the Company's.

Bank Bumi Arta does not offer Shares Option in 2023, and therefore:

- a. Bank Bumi Arta does not have the policy for provision of Share Option.
- b. No Shares Options are given.
- c. No Shares Options are executed until the end of the reporting period.
- d. No Shares Options are given.
- e. There is no validity period for Shares Option.

#### 14. Highest to Lowest Salary Ratio

Salary is the right of the employee that is received and expressed in the form of cash as the reward from the Company's or the employer to the employees, which is specified and paid according to an employment contract, agreement or laws and regulation, including allowance for employees and their family for a work and/or service provided.

The following information explains salary ratio in Company's, in which the compared salaries are the salary ratio below is the monthly salary received by the board of directors, commissioners and permanent employees of the company as follows:

Information	2023 Salary Ratio	2022 Salary Ratio
The highest and lowest employee's salary	52,37	57,06
The highest and lowest salary of the Board of Directors	1,37	1,55
The highest and lowest salary of the Board of Commissioners	2,71	2,70
The highest salary of the Board of Directors and the highest employee's	1,25	1,12

15. The Number of recipients and the total number of Variable Remuneration guaranteed without conditions will be provided by the Bank to prospective Directors, the Board of Commissioners, and /or prospective Employees for the first year

There is no Variable Remuneration guaranteed without conditions to the candidates for Directors, Board of Commissioners, and /or prospective Employees for the first year.

## 16. Employees Affected by Termination of Employment and Nominal Severance Paid

Number of Employees whose employment terminated and the total nominal severance paid :

Nominal Amount of Severance paid	Number of employees			
per person	2023	2022		
Over Rp 1 billion	-	1		
Over Rp 500 million – Rp 1 billion	4	1		
Under Rp 500 million	19	29		

#### 17. Total Deferred Variable Remuneration

Total deferred Variable Remuneration, which consists of cash and/or stock-based instruments issued by the Bank-:

In Million Rp

Deferred Variable	The amount paid for 1 (one) years					
Remuneration Type	2023	2022				
Cash	221	245				
Shares	221	245				

#### 18. Total deferred variable remuneration Implemented Payments

Total deferred variable remuneration implemented as 2023 payments, as follows:

- 1. In cash Rp 221 millions.
- 2. In shares Rp 221 millions.

#### 19. Total Remuneration given

Detail of the amount of Remuneration given :

- a. Fixed Remuneration and Variable Remuneration;
- b. Deferred and Non-Deferred Remuneration;
- c. Form of Remuneration given in cash and/or shares or share-based instruments issued by Bank

A.Fixed Remuneration*)							
	2023	2022					
Cash	22.452	18.973					
Shares/Instruments							
based on shares	-	-					
issued by Bank							

#### B. Variable Remuneration \*)

	202	3	2022		
	Not Suspended	Suspended	Not Suspended	Suspended	
Cash	882	221	978	245	
Shares/Instruments based on shares issued by Bank	882	221	978	245	

<sup>\*)</sup> Only for MRT and expressed in million rupiah

#### 20. Quantitative Information

Quantitative Information regarding:

- a. total remaining Remuneration that is still suspended whether exposed to implicit or explicit adjustment;
- b. total reduction in Remuneration caused by explicit adjusments during the reporning period;
- c. total reduction in Remuneration caused by implicit adjustment.

	Total Deduction During Report Perio					t Period		
Variable Remuneration	<b>Deffered</b>		Due to Explicit  Adjustments		Due to Implicit  Adjustments		Total	
	2023	2022	2023	2022	2023	2022	2023	2022
Cash	436	485	-	-	-	-	-	-
Shares/Instruments based on shares issued by Bank (in shares and nominal of million rupiah which is the conversion of said shares)	436	485	-	-	-	-	-	-

<sup>\*)</sup> Only for MRT and expressed in million rupiah

#### E. Frequency of Meeting of the Board of Commissioners

To fulfill its duties and responsibilities more optimally, the Board of Commissioners regularly holds meeting at least 1 (one) time in 2 (two) months that is physically attended by all members of the Board of Commissioners twice (2) in a year. Non-Independent Commissioners who cannot attend meetings physically, can attend meetings of the Board of Commissioners face-to-face by utilizing information technology (including via teleconference).

Throughout the year 2023, the Board of Commissioners have held 17 (seventeen) meetings as detailed below:

The Board of		<b>Q1</b>					Q2		
Commissioners (Date)	25/01/23	03/02/23	09/02/23	23/02/23	16/03/23	12/04/23	15/06/23	20/06/23	
Ir. Rachmat M.S., MBA	٧*	٧*	-	-	-	-	-	-	
Daniel Budi Dharma	٧	٧	٧	٧	٧	٧	٧	٧	
R.M. Sjariffudin	٧	٧	٧	٧	٧	٧	٧	٧	
I Gst Agung Rai Wirajaya	٧*	٧	٧	٧	٧	٧	٧	٧	

Dewan Komisaris	O	13	Q4		
(Tanggal)	21/07/23	30/08/23	20/09/23	05/12/23	
Ir. Rachmat M.S., MBA	√√*	√√*	-	-	
Daniel Budi Dharma	۷۷	۷۷	٧٧	<b>VVV</b>	
R.M. Sjariffudin	√√	√√	√√	√√√	
I Gst Agung Rai Wirajaya	√√	√√	√√	۷√√	

<sup>\*</sup>telekonferensi

#### F. The Number of Deviations (Internal Fraud)

In 2023 there is no internal fraud related to work processes and operations of the Bank, therefore :

- 1. There is no internal frauds which has been completed.
- 2. There is no internal frauds being settled in Bank's internal affairs.
- 3. There is no internal frauds that has not been sought for settlement.
- 4. There is no internal frauds that has been followed up by legal proceedings.

(unit)

	Number of Cases Committed by					
Internal Fraud in 1 year	Member of of Direct the Bo Commis	ors and Permanent E		Employee	Non - Permanent Employee and Outsourching	
	Previous Year	Current Year	Previous Year	Current Year	Previous Year	Current Year
Total Fraud	-	-	-	-	-	-
Settled Fraud	-	-	-	-	-	-
Being Settled in Bank's Internal Affairs	-	-	-	-	-	-
Has Not Been Sought for	-	-	-	-	-	-
Has Been Followed Up by Legal	-	-	-	-	-	-

#### G. Legal Issues

Throughout the year 2023, there have been 13 (thirteen) civil law issues and 2 (two) criminal law issues, in which 6 (six) civil law issues and 1 (one) criminal law issue have resulted in a legally binding decision, and cases still in the process of finishing include 7 (seven) civil law issues and 1 (one) criminal law issue, but neither disrupt the business continuity and performance of the Bank.

(unit)

Legal Cases	Number		
	Civil	Criminal	
Closed (with final and legally binding decision)	6	1	
In proceedings	7	1	
Total	13	2	

#### **H. Transaction Bearing Conflict of Interests**

As specified in the Articles of Association of Bank Bumi Arta, transaction that bears conflict of interests between personal interests of members of the Board of Directors, the Board of Commissioners or Shareholders and the economic interests of the Bank shall obtain approval from the General Meeting of Shareholders (GMS). During 2023, Bank Bumi Arta does not commit transaction that bears conflict of interests that requires approval from the General Meeting of Shareholders (GMS).

No.	Name and Position of the Party Having Conflict of Interests	Name and Position of the Party Making the Decision	Type of Transaction	Amount of Transaction (In Million Rupiah)	Note *)
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-

<sup>\*)</sup> Noncompliant with the applicable system and procedures.

#### Shares Buyback and/or Bonds Buy Back

In 2023, Bank Bumi Arta does not issue any Bond and does not execute Shares Buyback or repurchase shares issued by the Bank, and therefore:

- 1. Bank Bumi Arta does not have the policy for shares buyback and/or bonds buyback.
- 2. There is no repurchased share and/or bond.
- 3. There is no repurchase of share and/or bond unit.
- 4. There is no increase in earnings per share and/or bond unit.

#### J. Donations for Corporate Social Responsibility and Political Activities

As a form of concern towards social and community responsibility as well as environment and nature conservation, throughout the year 2023 Bank Bumi Arta has:

- 1. Conducted a blood donation event that involves the participation of the Banks employees in Jakarta, with an expenditure of IDR 15.162.500,-.
- 2. Participated in the Tree Planting and Maintenance Project by planting 500 (five hundred) mangrove tree seeds (Rhizphora sp Mangrove Seeds) in the Pantai Indah Kapuk (PIK) Mangrove Forest Ecotourism, Kapuk Muara, Penjaringan, North Jakarta at a cost of IDR 92,000. 000,-.

Bank Bumi Arta does not give funds towards Political Activities

#### II. Report on Self-Assessment on Implementation of Corporate Governance

Result of self-assessment on the implementation of Corporate Governance of Bank Bumi Arta in 2023 is as follows:

SELF ASSE	SESSMENT RESULT ON CORPORATE GOVERNANCE IMPLEMENTATION			
Rank	Definition of Rank			
2	The management of Bank Bumi Arta has conducted a generally good			
	implementation of Corporate Governance. This is reflected in the			
	adequate fulfillment of Corporate Governance principles. If there is a			
	weakness in the implementation of Corporate Governance			
	principles, the weaknesses are generally less significant and can be			
	resolved by the Bank Management.			

According to the analysis on all criteria/indicators for assessment of Corporate Governance, it is concluded that :

#### A. Governance Structure

- 1. Positive factors in Bank governance structure aspect:
  - a. Fulfillment of Duties and Responsibilities of the Board of Directors
    - Number, composition, integrity and competence of members of the Board of Directors are in accordance with the size and complexity of Bank business and have complied with the applicable regulation.
    - The Board of Directors has a work guidelines and code of conducts that have included arrangements for work etics, working time, and meetings, wich are refined from time to time according to needs.

#### b. Fulfillment of Duties and Responsibilities of the Board of Commissioners

- Number, composition, integrity and competence of member of the Board of Commissioners is in accordance with the size and complexity of Bank business and have complied with the applicable regulation.
- The Board of Commissioners has a work guidelines and code of conducts.

#### c. Completeness and Fulfillment of Duties of the Committee

- Number, composition, integrity and competence of members of the Committees are in accordance with the size and complexity of Bank business and have complied with the applicable regulation.
- Any Independent Party member of the Committee does not have any financial, managerial, share ownership and/or family relationship with the Board of Commissioners, the Board of Directors and/or the Majority Shareholders or relationship with the Bank, which may affect his capability to act independently.

#### d. Handling of Conflict of Interests

The Bank has the policy, system and procedures of settlement of conflict of interests set forth in company's regulation, BBA Credit Policy (KPBBA) and Bank Circular.

#### e. Implementation of Bank's Compliance Function

- Compliance Task Force is independent from the operational task force
- Appointment of Director in charge of Compliance Function is in accordance with Financial Services Authority Regulation.

- f. Implementation of Internal Audit Function
  - The Bank has an Internal Audit Charter, an Internal Audit Work Unit (SKAI) and an Internal Audit Guidebook (BP2I).
  - The Bank SKAI is a work unit that is independent of operational work units.
- g. Implementation of External Audit Function
   Appointment of auditing work to the Public Accountant and Public Accounting Firm has met the specified aspects.
- h. Implementation of Risk Management and Internal Control System
  - The Bank has a proper organizational structure to perform Risk Management and internal control, such as the SKAI, Risk Management Task Force ("SKMR") and Risk Management Committee, as well as Compliance Task Force.
  - The Bank has proper policy, procedures and risk limit as set forth in the Guidelines to Risk Management ("BPMR").
- The provision of fund to the Related Parties and the provision of Large Funds (Large Exposure)
  - The Bank has sufficient policies, systems, and procedures for the provision of funds to related parties and large exposure, as stated in the Policy of Legal Lending Limit (*BMPK*) and Financing Authority Limit (BWMK).
- j. Transparence of Bank's Financial and Non-Financial Condition, Report on Implementation of Good Corporate Governance and Internal Reporting
  - The Bank has the policy and procedures for implementation of transparence of financial and non-financial condition.

- The Bank has made the Report on Implementation of Corporate Governance at the end of each financial year with a scope that is in accordance with the applicable provisions.
- Availability of proper internal reporting and accurate and timely information.
- There is a reliable information system and adequate IT security system.

#### k. The Bank's Strategic Plan

- The Bank's strategic plan has been set forth in the form of a Corporate Plan and Business Plan in accordance with vision and mission of the Bank.
- The Bank's strategic plan is fully supported by the owner, as reflected in owner's commitment and efforts in strengthening Bank's capital.

#### **B.** Governance Process

- 1. Positive factors in Bank's governance process are:
  - a. Fulfillment of Duties and Responsibilities of the Board of Directors
    - The Board of Directors manages the Bank in accordance with its authority and responsibilities as specified in the Articles of Association and the applicable laws and regulations.
    - The Board of Directors has followed up audit findings and recommendation from the SKAI, external auditor and result of supervision by Financial Services Authority and/or result of supervision by other authorities.
    - There is no intervention of the owner in the fulfillment of duties of the Board of Directors that may interfere with Bank's operational activities.

#### b. Fulfillment of Duties and Responsibilities of the Board of Commissioners

- Fulfillment of duties and responsibilities of the Board of Commissioners has satisfied the principles of Good Corporate Governance and has been performed effectively.
- There is no intervention of the owner in the fulfillment of duties of the Board of Commissioners that may interfere with Bank's operational activities.

#### c. Completeness and Fulfillment of Duties of the Committee

- The implementation of the duties of committees has been effective.
- Result of committee meeting on issues under Committee's concern has been presented in a memorandum for the Board of Commissioners.
- There is no intervention of the owner in the fulfillment of duties of the Committee.

#### d. Handling of Conflict of Interests

There is no conflict of interests that disadvantages or decreases Bank's profit.

#### e. Implementation of Bank's Compliance Function

- Director in charge of Compliance Function and Compliance Task Force has fulfilled his duties according to the applicable provisions.
- The Board of Directors has approved Bank's compliance policy and communicated all policies, guidelines, systems, and procedures to the relevant organization level.
- The Bank has followed up the findings of the Financial Services

  Authority in accordance with the target time.

#### f. Implementation of Internal Audit Function

- The Bank has implemented internal audit function effectively on all aspects.
- The Bank performs regular review on the effectiveness of fulfillment of duties of SKAI and its compliance with SPFAIB by external parties once every 3 (three) years.
- The Bank's SKAI audit plan in 2023 has all been realized.
- SKAI has carried out audit functions independently with adequate scope of duties and in accordance with the plan, implementation and monitoring of audit results.

#### g. Implementation of External Audit Function

- Appointment of Public Accountant and Public Accounting Firm is carried out by the Board of Directors with the authority granted by the General Meeting of Shareholders on recommendation from the Audit Committee through the Board of Commissioners.
- Public Accountant has fulfilled the audit independently and professionally.
- Public Accountant has reported audit result and Management Letter to Financial Services Authority.

#### h. Implementation of Risk Management and Internal Control System

- The Board of Directors has arranged and evaluated Risk Management policy as set forth in the Guidelines to Risk Management ("BPMR"), ensured the implementation of improvement measures of issues or violation found by the SKAI, as well as developed a Risk Management culture at all organizational levels.
- The Board of Commissioners has approved and evaluated Risk Management policy and evaluated the accountability of the Board of Directors and provided guidance for improvement of implementation

of Risk Management as set forth in the Appeal/Memorandum of the Board of Commissioners to the Board of Directors.

- i. Lending to Related Party and Large Exposure Lending
  - The Bank has ensured that lending to related party and large exposure lending has been in accordance with the principles of prudential banking.
  - The making of decision on lending has been made independently by the Board of Management without any intervention of related party and/or other parties.
- j. Transparence of Bank's Financial and Non-Financial Condition, Report on Implementation of Good Corporate Governance and Internal Reporting
  - The Bank has transparently presented its financial and non-financial condition to the stakeholders, including by publishing its quarterly Condensed Financial Statement, and has reported it to Financial Services Authority or the stakeholders in accordance with the applicable provisions.
  - The Bank has transparently provided information on Bank's product in accordance with Bank Indonesia and Financial Services Authority regulations on transparence of Bank Product Information and the Use of Customer.
  - The Bank has transparently informed the procedures for customer complaint and settlement of dispute to the customers according to Bank Indonesia and Financial Services Authority regulations on Customer Complaints and Banking Mediation.
  - The Bank has drawn the Report on Implementation of Corporate Governance with a scope that is in accordance with the applicable provisions and has presented data and information in accordance with the findings of audit by Financial Services Authority.

#### k. Bank's Strategic Plan

- Bank's Strategic Plan has been approved by the Board of Commissioners.
- The Board of Directors has communicated Bank's Business Plan to all shareholders and to all organizational levels in the Bank.
- The arrangement and submission of Bank's Business Plan have followed the guidance set forth in Bank Indonesia regulation on Bank's Business Plan and have considered the external and internal factors that may affect the performance of Bank's business, principles of prudential banking, implementation of Risk Management and sound banking principles.
- The Board of Commissioners has performed supervision of implementation of Bank's Business Plan.

#### 2. Negative factors of the aspect of Bank governance process are :

 Implementation of Risk Management including an Internal Control System The Bank has implemented an adequate internal control system, although its implementation still needs improvement. In this case, the maker, checker and approval functions still need to be optimized in their implementation.

#### C. Governance Outcome

- 1. Positive factors in Bank's governance outcome aspect are:
  - a. Fulfillment of Duties and Responsibilities of the Board of Directors
    - The Board of Directors has reported its accountability in fulfilling its duties to the shareholders in the General Meeting of Shareholders ("RUPS").

- The Bank has improved its payroll system and procedure.
- Result of meeting of the Board of Directors has been presented in the minutes of meeting and documented properly.
- The Board of Directors has disclosed share ownership, financial and familiy relationship, remuneration and other facilities as well as the owned shares option in the Report on Implementation of Corporate Governance.
- There is no intervention of the owner on the composition and/or fulfillment of duties of the Board of Commissioners that may interfere with Bank's operational activities.
- b. Fulfillment of Duties and Responsibilities of the Board of Commissioners
  - Result of meeting of the Board of Commissioners has been provided in a minutes of meeting and has been documented properly.
  - The Board of Commissioners has disclosed share ownership, financial and familiy relationship, remuneration and other facilities as well as the owned shares option in the Report on Implementation of Corporate Governance.
  - There is no intervention of the owner on the composition and/or fulfillment of duties of the Board of Commissioners that may interfere with Bank's operational activities.
- c. Completeness and Fulfillment of Duties of the Committee
  - Summary of Committee meeting has been documented properly and has been supplied with opinions of the participants of meeting.
  - The existing Committees have provided recommendation for the Board of Commissioners.

#### d. Handling of Conflict of Interests

Bank's operational activities are free of intervention of the owner/related party/other parties that may cause conflict of interests that may disadvantage or decrease Bank's profit.

#### e. Implementation of Bank's Compliance Function

- The Bank has delivered the implementation principal report of the duties of the Compliance Director to the Financial Services Authority and related parties.
- The Bank has followed up the findings of the Financial Services

  Authority in accordance with the target time.

#### f. Implementation of Internal Audit Function

- The Board of Directors has submitted activity report on implementation of Bank's internal audit to the GMS ("RUPS").
- SKAI has act objectively in performing the audit.
- Internal audit function has been performed properly.

#### g. Implementation of External Audit Function

- Audit result and Management Letter have indicated problems faced by the Bank and been submitted to Financial Services Authority in a timely manner.
- Auditor acts objectively in performing the audit.

#### h. Implementation of Risk Management and Internal Control System

 The Bank has implemented Risk Management effectively in accordance with the objective, business policy, size and complexity as well as with Bank capacity.

- The Board of Directors and the Board of Commissioners have performed active supervision on implementation of Risk Management policy and strategy.
- The Bank has not undertaken business activities that are beyond the ability of the capital to absorb the risk of losses.
- i. Lending to Related Party and Large Exposure Lending
  - There is no violation to Legal Lending Limit ("BMPK") and there is no Legal Lending Over Limit ("BMPK").
  - Diversification of lending is spread evenly or the comparison between the amount of large exposure lending/major debtor and the total lending is not significant.
  - The Bank has submitted periodical report on lending by the Bank to related party and/or large exposure lending to Financial Services Authority in a timely manner.
- j. Transparence of Bank's Financial and Non-Financial Condition, Report on Implementation of Good Corporate Governance and Internal Reporting
  - The Bank has submitted the Annual Report and Report on Implementation of Good Corporate Governance to the specified parties completely and in a timely manner.
  - The Bank has presented the Annual Report, Quarterly Condensed Financial Report and Report on Implementation of Good Corporate Governance on the homepage in a timely manner.
  - Mediation for settlement of complaints by customers of the Bank has been performed properly.

#### k. Bank's Strategic Plan

- Corporate Plan and Business Plan is arranged by the Board of Directors and have been approved by the Board of Commissioners.
- Bank's strategic plan is arranged in accordance with the comprehensive analysis by taking into account business opportunities and strength of the Bank, as well as identifying the weaknesses and threats (*Strength*, *Weakness*, *Opportunities*, *Threats*/SWOT *Analysis*)-
- The Bank has amended the Strategic Plan of Information Technology (RSTI) which is part of the Business Plan of the Bank with regards to the suitability of the Bank's strategic plan.
- There is no intervention of the owner to the sharing of Bank's profit.

#### 2. Negative factors in Bank's governance outcome aspect are:

#### a. Implementation of Internal Audit Function

Findings collected by SKAI have been followed up by the Board of Directors and the Auditee. There are some findings that are similar to previous findings but has been followed up and corrected by the Auditee.

#### b. Bank's Strategic Plan

The realization of the Bank's Business Plan related Gross Profit has exceeded the target and has reached 699.78%, while for Assets it has reached 96.16%, Credit has reached 94.37% and Third Party Funds has reached 92.89%.

The Bank's Business Plan related to Credit which has not been achieved is 5.63% mainly due to very tight competition for credit distribution, while Third Party Funds which have not been achieved is 7.11% mainly due to a decrease in Third Party Funds used for customer business activities and there are new products that cannot be launched in 2023.

#### WORKSHEET FOR SELF- ASSESSMENT ON CORPORATE GOVERNANCE

## ASSESSMENT FACTOR: FULFILLMENT OF DUTIES AND RESPONSIBILITIES OF THE BOARD OF DIRECTORS

#### A. FULFILLMENT OF DUTIES AND RESPONSIBILITIES OF THE BOARD OF DIRECTORS 1. Governance Structure Criteria/Indicator **Analysis** The number of members of the Board of Directors is 5 (five) a. The number of members of the Board of Directors is no less than 3. (three) people. people. b. All members of the Board of Directors reside in Indonesia. All members of the Board of Directors reside in Indonesia. c. The majority of members of the Board of Directors has no less than 5 The majority of members of the Board of Directors has no less than (five) years of experience in the operational field as Bank's Executive 5 (five) years of experience in the operational field as Bank's Officer. Executive Officer. d. The Board of Directors does not hold concurrent position as the The Board of Directors does not hold concurrent position as the Board of Directors, the Board of Commissioners or Executive Officer Board of Directors, the Board of Commissioners or the Executive in other Bank, company and/or institution except for matters Officer in other Bank, company and/or institution. specified in Financial Services Authority Regulation on the Implementation of Corporate Governance for Commercial Banks, i.e. holding concurrent position as the Board of Commissioners for fulfillment of supervisory function for investment at non-bank subsidiary under the control of the Bank. e. Members of the Board of Directors, both individually and collectively, Members of the Board of Directors, both individually and do not own more than 25% (twenty five percent) of share and paid-in collectively, do not own more than 25% (twenty five percent) of capital in another company. share and paid-in capital in another Bank and/or company.

#### A. FULFILLMENT OF DUTIES AND RESPONSIBILITIES OF THE BOARD OF DIRECTORS

f. The majority of the members of the Board of Directors do not have family relationship to the second degree with the other members of the Board of Directors and/or the Board of Commissioners.

The majority of the members of the Board of Directors do not have family relationship to the second degree with the other members of the Board of Directors and/or the Board of Commissioners.

g. Replacement and/or appointment of members of the Board of Directors are carried out in accordance with the recommendation from the Nomination Committee or the Nomination and Remuneration Committee.

Replacement and/or appointment of members of the Board of Directors are carried out in accordance with the recommendation from the Nomination and Remuneration Committee.

h. The Board of Directors has a work guidelines and code of conducts that includes guidelines to work ethics, working hours, and meeting.

The Board of Directors has had a work guidelines and code of conducts that includes guidelines to work ethics, working hours and meeting, arrangement that are refined from time to time as needed.

i. The Board of Directors does not hire an individual advisor and/or professional service provider as a consultant except for special project under a definite contract that specifies the scope of work, responsibilities, time of completion and costs, and the consultant is an Independent Party having qualification to perform work for special project. The Board of Directors does not hire an individual advisor and/or professional service provider as a consultant.

j. All members of the Board of Directors have proper integrity, competence and financial reputation.

All members of the Board of Directors have proper integrity, competence and financial reputation.

k. The President Director or the Managing Director are the party independent from the Majority Shareholders, i.e. does not have financial, managerial, share ownership and family relationship.

The President Director or the Managing Director are the party independent from the Majority Shareholders, i.e. does not have financial, managerial, share ownership and family relationship.

#### A. FULFILLMENT OF DUTIES AND RESPONSIBILITIES OF THE BOARD OF DIRECTORS

- I. All members of the Board of directors have passed the Fit and Proper Test and secured the approval from Financial Services Authority.
- All members of the Board of directors have passed the Fit and Proper Test and secured the approval from Financial Services Authority.
- m. Members of the Board of Directors have sufficient and relevant competence to their positions to fulfill their duties and responsibilities and are capable of implementing their competencies in fulfillment of duties and responsibilities.
- Members of the Board of Directors have sufficient and relevant competence to their positions to fulfill their duties and responsibilities and are capable of implementing their competencies in fulfillment of duties and responsibilities.
- n. Members of the Board of Directors have the willingness and capacity to carry out continuous learning in order to develop their knowledge on banking field and the latest improvement on financial or other fields, which supports the fulfillment of their duties and responsibilities.
- Members of the Board of Directors have the willingness and capacity to carry out continuous learning in order to develop their knowledge on banking field and the latest improvement on financial or other fields, which supports the fulfillment of their duties and responsibilities, such as by participating in refreshment of risk management, and seminars.
- o. Members of the Board of Directors develop a continuous learning in order to develop their knowledge on banking field and the latest improvement on financial/other fields, which supports the fulfillment of their duties and responsibilities at all organizational levels.
- Members of the Board of Directors develop a continuous learning in order to develop their knowledge on banking field and the latest improvement on financial or other fields, which supports the fulfillment of their duties and responsibilities at all organizational levels, such as by holding internal or external training on various fields of expertise and by engaging the employees in seminars/training/workshops and risk management certification/refreshment.
- p. Composition of the Board of Directors does not meet the requirement due to intervention of the owner.
- Composition of the Board of Directors has met the requirement.

A	A. FULFILLMENT OF DUTIES AND RESPONSIBILITIES OF THE BOARD OF DIRECTORS					
2.	2. Governance Process					
	Criteria/Indicator	Analysis				
a	The Board of Directors has assigned Committee members according to the result of meeting of the Board of Commissioners.	The Board of Directors has assigned Committee members according to the result of meeting of the Board of Commissioners.				
b	. Members of the Board of Directors do not give general authority to other party that may lead to transfer of duties and function of the Board of Directors.	Members of the Board of Directors do not give general authority to other party that may lead to transfer of duties and function of the Board of Directors.				
C.	The Board of Directors is fully responsible for the implementation of management of the Bank.	The Board of Directors is fully responsible for the implementation of management of the Bank.				
d	. The Board of Directors manages the Bank according to its authority and responsibilities as specified in the Articles of Association and the applicable laws and regulations.	The Board of Directors manages the Bank according to its authority and responsibilities as specified in the Articles of Association and the applicable laws and regulations.				
e.	The Board of Directors has fulfilled its duties and responsibilities independently to the shareholders.	The Board of Directors has fulfilled its duties and responsibilities independently to the shareholders.				
f.	The Board of Directors has implemented the principles of Corporate Governance in every business activities of the Bank at all organizational levels.	The Board of Directors has implemented the principles of Corporate Governance in every business activities of the Bank at all organizational.				
g.	The Board of Directors has followed up audit findings and recommendation from the Internal Audit Work Unit (SKAI), external auditor, and result of supervision by Financial Services Authority and/or result of supervision by other authorities.	The Board of Directors has followed up audit findings and recommendation from the Internal Audit Work Unit (SKAI), external auditor, appeals/memorandum from the Board of Commissioners, and result of supervision by Financial Services Authority and/or result of supervision by other authorities.				

#### A. FULFILLMENT OF DUTIES AND RESPONSIBILITIES OF THE BOARD OF DIRECTORS

- h. The Board of Directors has provided data and information that is complete, accurate, updated and timely to the Board of Commissioners.
- i. Decision in the meeting of the Board of Directors has been made through a deliberation, or based on the majority vote in the event that deliberation is not made.
- j. Every decision of the meeting made by the Board of Directors can be implemented and is in accordance with the policy, work guidelines and code of conduct.
- k. The Board of Directors has set the strategic policy and decision through a meeting of the Board of Directors.
- I. The Board of Directors does not make use of the Bank for its own interest, for their family and/or other party interests that may harm or decrease Bank's profit.
- m. The Board of Directors does not take and/or receive personal advantage from the Bank other than from the remuneration and other facilities as specified in the General Meeting of Shareholders ("RUPS").
- n. The owner intervenes with the performance of duties of the Board of Directors that affects Bank's operational activities, which results in the decrease of Bank's profit and/or disadvantages the Bank.

The Board of Directors provides data and information that is complete, accurate, updated and timely to the Board of Commissioners, such as the Financial Statement, Risk Profile, Business Plan, Compliance Director Report, etc.

Decision in the meeting of the Board of Directors has been made through a deliberation, or based on the majority vote in the event that deliberation is not made.

Every decision of the meeting made by the Board of Directors can be implemented and is in accordance with the policy, work guidelines and code of conduct.

The Board of Directors has set the strategic policy and decision through a meeting of the Board of Directors.

The Board of Directors does not make use of the Bank for their own interest, or for their family and/or other party interests that may harm or decrease Bank's profit.

The Board of Directors does not take and/or receive personal advantage from the Bank other than from the remuneration and other facilities as specified in the General Meeting of Shareholders ("RUPS").

There is no intervention of the owner in the performance of duties of the Board of Directors that affects Bank's operational activities, which results in the decrease of Bank's profit and/or disadvantages the Bank.

A	A. FULFILLMENT OF DUTIES AND RESPONSIBILITIES OF THE BOARD OF DIRECTORS					
3.	Governance Outcome					
	Criteria/Indicator	Analysis				
a.	The Board of Directors has submitted the accountability report on the implementation of its duties to the shareholders in "RUPS".	The Board of Directors has submitted the accountability report on the implementation of its duties to the shareholders in "RUPS".				
b.	Accountability of the Board of Directors for the fulfillment of its duties and responsibilities is obtained received by the shareholders through "RUPS".	Accountability of the Board of Directors for the fulfillment of its duties and responsibilities is obtained received by the shareholders through "RUPS".				
C.	The Board of Directors has disclosed Bank's strategic policy in employment to its employee through a media that is easily accessible.	The Board of Directors has disclosed Bank's strategic policy in employment to its employee through a media that is easily accessible, such as Guidelines to Company Regulation and Circular of the Management Board.				
		The Bank has improved its payroll system and procedure.				
d.	The Board of Directors has communicated to its employee the direction of Bank's business in order to achieve the mission and vision of the Bank.	The Board of Directors has communicated to its employee the direction of Bank's business in order to achieve the mission and vision of the Bank in the Meeting of the Board of Directors and Executive Meeting.				
e.	Result of the meeting of the Board of Directors has been presented in the summary of report and documented properly, including the disclosure of dissenting opinions arising in the meeting of the Board of Directors.	Result of meeting of the Board of Directors has been presented in the minutes of meeting and documented properly.				

### A. FULFILLMENT OF DUTIES AND RESPONSIBILITIES OF THE BOARD OF DIRECTORS

- f. In the report on implementation of Corporate Governance, members of the Board of Directors have disclosed:
  - 1) share ownership of 5% (five percent) or more in the Bank or in other domestic and overseas Bank and company;
  - 2) financial relationship and family relationship with other members of the Board of Directors, members of the Board of Commissioners and/or Majority Shareholders of the Bank;
  - 3) remuneration and other facilities:
  - 4) shares option owned by the Board of Directors.
- g. Improvement of knowledge, skills, and capacity of Members of the Board of Directors in supervising the Bank is indicated by the increase in Bank's performance, settlement of issues faced by the Bank, and achievement result that satisfies the expectation of the stakeholders.
- h. Improvement of knowledge, skills and capacity of all employees in the Bank is indicated by the increase in individual according to their duties and responsibilities.

- In the report on implementation of Corporate Governance 2023, members of the Board of Directors have disclosed:
- 1) share ownership in the Bank or in other domestic and overseas Bank and company;
- 2) financial relationship and family relationship with other members of the Board of Commissioners, members of the Board of Directors and/or Majority Shareholders of the Bank;
- 3) remuneration and other facilities;
- 4) shares option owned by the Board of Directors.

Improvement of knowledge, skills and capacity of Members of the Board of Directors in managing the Bank obtained through seminar/training/workshop and certification can improve bank performance, settlement of issues faced by the Bank, and achievement result that satisfies the expectation of the stakeholders.

Improvement of knowledge, skills and capacity of all employees at all levels and stage of organization obtained through seminars/training/workshops and certification can improve individual performance according to their duties and responsibilities.

### A. FULFILLMENT OF DUTIES AND RESPONSIBILITIES OF THE BOARD OF DIRECTORS

- i. Development of sustainable learning culture for improvement of knowledge on banking field and the latest improvement on financial or other fields, which supports the fulfillment of duties and responsibilities at all organizational levels, which is indicated in the increasing participation of Bank's employees in banking certification and/or education or training for individual quality improvement.
- j. Bank's operational activities are affected and/or providing unfair advantage to the owner, which results in decrease of Bank's profit and/or disadvantage for the Bank due to intervention of the owner to the composition and/or fulfillment of duties of the Board of Directors.

Development of sustainable learning culture for improvement of knowledge on banking field and the latest improvement on financial/other fields, which supports the fulfillment of duties and responsibilities at all organizational levels, which is indicated in the increasing participation of Bank's employees in banking certification and/or education/training for individual quality improvement.

There is no intervention of the owner to the composition and/or fulfillment of duties of the Board of Directors that may affect Bank's operational activities and/or provide unfair advantage to the owner, which may result in the decrease of Bank's profit and/or disadvantage for the Bank.

В.	3. FULFILLMENT OF DUTIES AND RESPONSIBILITIES OF THE BOARD OF COMMISSIONERS		
1.	Governance Structure		
	Criteria/Indicator	Analysis	
a.	The number of members of the Board of Commissioners shall not be less than 3 (three) people and shall not exceed the number of members of the Board of Directors.	The amount of members in the Board of Commissioners is at least 4 (four) members and the Board of Directors is 5 (five) members.	
b.	No less than 1 (one) member of the Board of Commissioners shall reside in Indonesia.	All members of the Board of Commissioners reside in Indonesia.	
C.	No less than 50% (fifty percent) of the number of members of the Board of Commissioners shall be Independent Commissioner.	2 (two) of the 4 (four) members of the Board of Commissioners are Independent Commissioners.	
d.	<ul> <li>The Board of Commissioners do not hold concurrent positions except otherwise specified in Financial Services Authority Regulation on Implementation of Corporate Governance for Commercial Banks, i.e.:</li> <li>concurrent post as member of the Board of Commissioners, the Board of Directors or Executive Officer In 1 (one) non-financial institution/company; located within or outside the country or</li> <li>concurrent post as member of the Board of Commissioners, the Board of Directors or Executive Officer In 1 (one) non-bank subsidiary controlled by the Bank;</li> <li>The Non-Independent Commissioner carries out the functional duties of the Bank's shareholders in the from of legal entities in the Bank's business group; and/or</li> <li>Members of the Board of Commissioners hold positions in organizations or non-profit institutions.</li> </ul>	The majority of the members of the Board of Commissioners of Bank Bumi Arta do not hold concurrent positions in Bank Bumi Arta, other banks, non-bank financial institutions, and other companies located domestically or internationally, except for Ir. Rachmat M.S., MBA who currently serves as a commissioner at PT Surya Husada Investment and I Gst Agung Rai Wirajaya who also currently serves as a director at PT Puri Kuta Beach and as a member of Commission XI of the People's Representative Council of Indonesia (DPR RI).	

### B. FULFILLMENT OF DUTIES AND RESPONSIBILITIES OF THE BOARD OF COMMISSIONERS

- e. Independent Commissioner may hold concurrent positions as the Chairman of Committee in a maximum of 2 (two) Committees in a same Bank.
- Concurrent positions held by the Independent Commissioner is at a maximum of 2 (two) positions as the Chairman of Committee in a same Bank, namely the Audit Committee and the Nomination and Remuneration Committee.
- f. The majority of the members of the Board of Commissioners do not have family relationship to the second degree with the other members of the Board of Directors and/or the Board of Commissioners.
- 3 (three) of the 4 (four) members of the Board of Commissioners do not have family relationship to the second degree with the other members of the Board of Directors and/or the Board of Commissioners.
- g. The Board of Commissioners has a work guidelines and code of conduct, including regulation on work ethics, working hour and meeting.
- The Board of Commissioners has a work guidelines and code of conduct that contain regulation on work ethics, working hour and meeting.
- h. All members of the Board of Commissioners have proper integrity, competence and financial reputation.
- All members of the Board of Commissioners have proper integrity, competence and financial reputation.
- i. Independent Commissioners who are the former members of the Board of Directors or Bank's Executive Officers or parties related to the Bank, which may affect their capacity to act independently and do not perform supervisory function and are from the Bank itself, have been in the cooling-off period of no less than 1 (one) year

No Independent Commissioner needs to run a cooling-off period.

j. An Independent Commissioner from a non Independent Commissioner after being eligible as an Independent Commissioner has served a minimum period of 6 (six) months and has obtained approval from the Financial Services Authority.

There has been no Independent Commissioner from non Independent Commissioner.

### B. FULFILLMENT OF DUTIES AND RESPONSIBILITIES OF THE BOARD OF COMMISSIONERS

k. An Independent Commissioner reappointed after taking office for 2 (two) consecutive periods of tems has been stipulated in a Board of Commissioners meeting that the person concerned may remain independent and the Independent Commissioner concerned has declared independence in the General Meeting of Shareholders ("RUPS").

The last appointment of 2 (two) Independent Commissioners was at the time of Annual General Meeting of Shareholders ("GMS") in June 2019 with a term of office up to 2024.

Independent commissioners who are reappointed after serving for 2 (two) years in the term of office it has been determined in a Board of Commissioner's meeting that the person concerned can still act independently, and the relevant Independent commissioner has stated regarding his independence in Annual General Meeting of Shareholders ("GMS").

- All Independent Commissioners do not have financial, managerial, ownership and family relationship with other members of the Board of Commissioners, the Board of Directors and/or the Majority Shareholders, or relationship with the Bank, which may affect their capacity to act independently.
- All Independent Commissioners do not have financial, managerial, ownership and family relationship with other members of the Board of Commissioners, the Board of Directors and/or the Majority Shareholders, or relationship with the Bank, which may affect their capacity to act independently.
- m. All members of the Board of Commissioners have passed the Fit and Proper Test and secured the approval from Financial Services Authority.
- All members of the Board of Commissioners have passed the Fit and Proper Test and secured the approval from Financial Services Authority.
- n. Members of the Board of Commissioners have sufficient and relevant competence to their positions to fulfill their duties and responsibilities, as well as in order to be able to implement their competences in the fulfillment of duties and responsibilities

Members of the Board of Commissioners have sufficient and relevant competence to their positions to fulfill their duties and responsibilities, as well as in order to be able to implement their competences in the fulfillment of duties and responsibilities, by participating the risk management refreshment.

### B. FULFILLMENT OF DUTIES AND RESPONSIBILITIES OF THE BOARD OF COMMISSIONERS

- o. Members of the Board of Commissioners have the willingness and capacity to carry out continuous learning in order to develop their knowledge on banking field and the latest improvement on financial/other fields, which supports the fulfillment of their duties and responsibilities.
- p. Composition of the Board of Commissioners does not meet the requirement due to intervention of the owner.

Criteria/Indicator

Members of the Board of Commissioners have the willingness and capacity to carry out continuous learning in order to develop their knowledge on banking field and the latest improvement on financial/other fields, which supports the fulfillment of their duties and responsibilities.

Composition of the Board of Commissioners has met the requirement.

**Analysis** 

### 2. Governance Process

a. Replacement and/or appointment of Commissioners are carried out in accordance with the recommendation from the Nomination Committee or the Remuneration and Nomination Committee and have been approved by the General Meeting of Shareholders ("RUPS").

- b. The Board of Commissioners has fulfilled its duties to ensure the implementation of principles of Corporate Governance in every business activity of the Bank at all organizational levels.
- c. The Board of Commissioners has performed supervision on the fulfillment of duties and responsibilities of the Board of Directors on a regular basis or at any time necessary, as well as it has provided advices for the Board of Directors.

Replacement and/or appointment of Commissioners have been carried out in accordance with the recommendation from the Nomination Committee or the Nomination and Remuneration

Shareholders ("RUPS").

The Board of Commissioners has fulfilled its duties to ensure the implementation of principles of Corporate Governance in every business activity of the Bank at all organizational levels.

Committee and have been approved by the General Meeting of

The Board of Commissioners has performed supervision on the fulfillment of duties and responsibilities of the Board of Directors on a regular basis or at any time necessary, as well as it has provided advices for the Board of Directors.

### B. FULFILLMENT OF DUTIES AND RESPONSIBILITIES OF THE BOARD OF COMMISSIONERS

d. In order to perform the supervisory duty, the Commissioners have directed, monitored and evaluated the implementation of Bank's strategic policies.

The Board of Commissioners has directed, monitored and evaluated the implementation of Bank's strategic policies.

e. The Board of Commissioners is not involved in the making of decision for Bank's operational activities, except for lending to related party and other matters set forth in the Articles of Association of the Bank and/or the applicable law and regulation in order to perform the supervisory function.

The Board of Commissioners is not involved in the making of decision for Bank's operational activities, except in the context of carrying out supervisory functions, which as set forth in the Articles of Association of the Bank.

f. The Board of Commissioners has ensured that the Board of Directors has followed up audit findings and the recommendation from the Internal Audit Task Force ("SKAI"), external auditor, result of monitoring Financial Services Authority and/or result of monitoring by other authorities.

The Board of Commissioners has ensured that the Board of Directors has followed up audit findings and the recommendation from the Internal Audit Task Force ("SKAI"), external auditor, result of monitoring by Financial Services Authority and/or result of monitoring by other authorities.

g. The Board of Commissioners shall inform to Financial Services Authority no later than 7 (seven) business days as of the finding of violation to laws and regulation on financial and banking matters, and condition or predicted condition that may harm the continuity of Bank's business. Throughout the year 2023, there is no violation to the law and regulation on financial and banking matters, condition or prediction that may harm the continuity of Bank's business.

h. The Board of Commissioners has fulfilled its duties and responsibilities independently.

The Board of Commissioners has fulfilled its duties and responsibilities independently.

 The Board of Commissioners has established the Audit Committee, Risk Monitoring Committee, and Nomination and Remuneration Committee The Board of Commissioners has established the Audit Committee, Risk Monitoring Committee, and Nomination and Remuneration Committee.

### B. FULFILLMENT OF DUTIES AND RESPONSIBILITIES OF THE BOARD OF COMMISSIONERS

- j. Appointment of Committee members is carried out by the Board of Directors in accordance with the result of meeting of the Board of Commissioners.
- Appointment of Committee members is carried out by the Board of Directors in accordance with the result of meeting of the Board of Commissioners.
- k. The Board of Commissioners has ensured that these Committees have fulfilled their duties effectively.
- The Board of Commissioners has ensured that these Committees have fulfilled their duties effectively.
- I. The Board of Commissioners has provided sufficient time to fulfill its duties and responsibilities optimally.
- The Board of Commissioners has provided sufficient time to fulfill its duties and responsibilities optimally.
- m. Meeting of the Board of Commissioners discusses issues that are specified in the agenda and is held periodically, no less than 4 (four) times in a year, and shall be physically attended by no less than 2 (twice) in a year, or is held through a teleconference in the event that the Non Independent of Commissioners cannot physically attend the meeting.
- During 2023, 17 (seventeen) Board of Commissioners meetings were held, of which 6 (six) meetings were attended physically and teleconferenced by the entire Board of Commissioners and 11 (eleven) meetings were attended physically without the presence of the President Commissioner.
- n. Decision in the meeting of the Board of Commissioners shall be made through a deliberation, or based on the majority vote in the event that deliberation is not made.
- The Board of Commissioners meeting was attended by the majority of members of the Board of Commissioners

- o. Members of the Board of Commissioners shall not make use of the Bank for their own interest, or for their family and/or other party interests that may harm or decrease Bank's profit.
- Decision in the meeting of the Board of Commissioners period of 2023 is made through a deliberation.

Members of the Board of Commissioners do not make use of the Bank for their own interest, or for their family and/or other party interests that may harm or decrease Bank's profit.

### B. FULFILLMENT OF DUTIES AND RESPONSIBILITIES OF THE BOARD OF COMMISSIONERS

- p. Members of the Board of Commissioners shall not take and/or receive personal advantage from the Bank other than from the remuneration and other facilities as specified in the General Meeting of Shareholders ("RUPS")
- q. The owner intervenes with the performance of duties of the Board of Commissioners that affects Bank's operational activities, which results in the decrease of Bank's profit and/or disadvantages the Bank.

Members of the Board of Commissioners do not take and/or receive personal advantage from the Bank other than from the remuneration and other facilities as specified in the General Meeting of Shareholders ("RUPS")

There is no intervention of the owner in the performance of duties of the Board of Commissioners that affects Bank's operational activities, which results in the decrease of Bank's profit and/or disadvantages the Bank.

#### 3. Governance Outcome

a.	Result of the meeting of the Board of Commissioners has been		
	presented in the summary of report and documented properly,		
	including the disclosure of dissenting opinions arising in the meeting		
	obviously.		

Criteria/Indicator

Result of meeting of the Board of Commissioners has been presented in the minutes of meeting and documented properly.

**Analysis** 

- b. Result of meeting of the Board of Commissioners has been distributed to all members of the Board of Commissioners and related party.
- c. Result of meeting of the Board of Commissioners is a recommendation and/or a direction to be implemented by the General Meeting of Shareholders ("RUPS") and/or the Board of Directors.

Result of meeting of the Board of Commissioners has been distributed to all members of the Board of Commissioners and related party.

Result of meeting of the Board of Commissioners is a recommendation and/or a direction to be implemented by the General Meeting of Shareholders ("RUPS") and/or the Board of Directors as set forth in the memorandum.

### B. FULFILLMENT OF DUTIES AND RESPONSIBILITIES OF THE BOARD OF COMMISSIONERS

- d. In the report on implementation of Corporate Governance, members of the Board of Commissioners have disclosed :
  - 1) share ownership of 5% (five percent) or more in the Bank or in other domestic and overseas Bank and company;
  - financial relationship and family relationship with other members of the Board of Commissioners, members of the Board of Directors and/or Majority Shareholders of the Bank;
  - 3) remuneration and other facilities;
  - 4) shares option owned by the Board of Commissioners.
- e. Improvement of knowledge, skills and capacity of Members of the Board of Commissioners in supervising the Bank is indicated by the increase in Bank's performance, settlement of issues faced by the Bank, and achievement result that satisfies the expectation of the stakeholders.
  - Development of sustainable learning culture for improvement of knowledge on banking field and the latest improvement on financial/other fields, which supports the fulfillment of duties and responsibilities of the Board of Commissioners.
- f. Bank's operational activities are affected and/or providing unfair advantage to the owner, which results in decrease of Bank's profit and/or disadvantage for the Bank due to intervention of the owner to the composition and/or fulfillment of duties of the Board of Commissioners.

- In the report on implementation of Corporate Governance, members of the Board of Commissioners have disclosed :
- 1) share ownership in the Bank or in other domestic and overseas Bank and company;
- 2) financial relationship and family relationship with other members of the Board of Commissioners, members of the Board of Directors and/or Shareholders of the Bank:
- 3) remuneration and other facilities;
- 4) shares option owned by the Board of Commissioners.

Improvement of knowledge, skills and capacity of Members of the Board of Commissioners in supervising the Bank is indicated by the increase in Bank's performance, settlement of issues faced by the Bank, and achievement result that satisfies the expectation of the stakeholders.

Development of sustainable learning culture for improvement of knowledge on banking field and the latest improvement on financial/other fields, which supports the fulfillment of duties and responsibilities of the Board of Commissioners.

There is no intervention of the owner to the composition and/or fulfillment of duties of the Board of Commissioners that may affect Bank's operational activities and/or provide unfair advantage to the owner, which may result in the decrease of Bank's profit and/or disadvantage for the Bank.

COMPLETENESS AND FULFILLMENT OF DUTIES OF THE COMMITTEE		
1. Governance Structure		
Criteria/Indicator	Analysis	
a. Audit Committee	Audit Committee	
<ol> <li>Members of the Audit Committee shall at least consist of an Independent Commissioner, an Independent Party having expertise in financial or accounting field, and an Independent Party having expertise in legal field or bank field.</li> </ol>	<ol> <li>Members of the Audit Committee consist of an Independent Commissioner, an Independent Party having expertise in financial, accounting, and risk management field, and an Independent Party having expertise in legal field.</li> </ol>	
2) Audit Committee is led by the Independent Commissioner	2) Audit Committee is led by the Independent Commissioner.	
<ol> <li>No less than 51% (fifty one percent) of members of the Audit Committee is the Independent Commissioner and Independent Party.</li> </ol>	3) Members of the Audit Committee consist of the Independent Commissioner and the Independent Party.	
4) Members of the Audit Committee have proper integrity, characters and morals.  Output  Description:	4) Members of the Audit Committee have proper integrity, characters and morals.	

### C. COMPLETENESS AND FULFILLMENT OF DUTIES OF THE COMMITTEE

### b. Risk Monitoring Committee

- 1) Members of the Risk Monitoring Committee shall at least consist of an Independent Commissioner, an Independent Party having expertise in financial or accounting field, and an Independent Party having expertise in legal or risk management field.
- 2) Risk Monitoring Committee is led by the Independent Commissioner.
- 3) No less than 51% (fifty percent) of the number of members of the Risk Monitoring Committee is the Independent Commissioner and the Independent Party.
- 4) Members of the Risk Monitoring Committee have proper integrity, characters and morals.

#### c. Nomination and Remuneration Committee

- 1) Members of the Nomination and Remuneration Committee shall at least consist of an Independent Commissioner, a Non Independent Commissioner and an Executive Officer in charge of human resource affair or an employee representative.
- 2) The Executive Officer or employee representative shall have the necessary knowledge and understand the provisions for nomination and/or remuneration system and Bank's Succession Plan.

### **Risk Monitoring Committee**

- Members of the Risk Monitoring Committee shall at least consist of an Independent Commissioner, an Independent Party having expertise in financial, accounting and Risk Management field, and an Independent Party having expertise in banking and risk management field.
- 2) Risk Monitoring Committee is led by the Independent Commissioner.
- 3) Members of the Risk Monitoring Committee consist of the Independent Commissioner and the Independent Party.
- 4) Members of the Risk Monitoring Committee have proper integrity, characters and morals.

#### **Nomination and Remuneration Committee**

- 1) The members of the Nomination and Remuneration Committee consist of an Independent Commissioner, a Non Independent Commissioner and an Executive Officer in charge of human resource affair.
- 2) The Executive Officer has the necessary knowledge and understands the provisions for nomination and/or remuneration system and Bank's Succession Plan.

### C. COMPLETENESS AND FULFILLMENT OF DUTIES OF THE COMMITTEE

- 3) Nomination and Remuneration Committee is led by an Independent Commissioner.
- 4) In the event that the member of the Nomination and Remuneration Committee is specified to be more than 3 (three) people, the members of the Independent Commissioner shall be no less than 2 (two) people
- 5) In the event that the Bank established the Committee separately:
  - a) The Executive Officer or employee representative in the members of the Remuneration Committee shall have the knowledge on Bank's remuneration system; and
  - b) The Executive Officer in the member of the Nomination Committee shall have the knowledge on Bank's nomination system and succession plan.
- d. Members of the Audit Committee and Risk Monitoring Committee shall not be appointed from the Board of Directors of the same Bank or the other Bank.
- e. Concurrent Position as the Independent Party in the same Bank, other Bank and/or other company has been taken in consideration of the competence, independence criteria, confidentiality, ethic codes and fulfillment of duties and responsibilities.

- 3) Nomination and Remuneration Committee is led by an Independent Commissioner.
- 4) 1 (one) of the 3 (three) members of the Nomination and Remuneration Committee is an Independent Commissioner.
- 5) The Bank does not establish the Nomination and Remuneration Committee separately.

Members of the Audit Committee and Risk Monitoring Committee are not appointed from the Board of Directors of the same Bank or the other Bank.

Concurrent Position of the Independent Party in the same Bank, other Bank and/or other company has been taken in consideration of the competence, independence criteria, confidentiality, ethic codes and fulfillment of duties and responsibilities.

#### C. COMPLETENESS AND FULFILLMENT OF DUTIES OF THE COMMITTEE

- f. No Independent Parties in the members of the Committee has financial, managerial, share ownership and/or family relationship with the Board of Directors, the Board of Commissioners and/or the Majority Shareholders or relationship with the Bank, which may affect their capacity to act independently
- g. All Independent Parties who are the former members of the Board of Directors or Bank's Executive Officers from the same Bank and do not perform supervisory function or other parties related to the Bank, which may affect their capacity to act independently, have been in the cooling-off period of 6 (six) months.
- h. Meeting of the Audit Committee and Risk Monitoring Committee shall be attended by no less than 51% (fifty one percent) of the members, including the Independent Commissioner and the Independent Party.

No Independent Parties in the members of the Committee has financial, managerial, share ownership and/or family relationship with the Board of Directors, the Board of Commissioners and/or the Majority Shareholders or relationship with the Bank, which may affect their capacity to act independently.

All Independent Parties are not the former Members of the Board of Directors of Bank Bumi Arta. Whereas, the Independent Party who are the Executive Officer of Bank Bumi Arta perform the supervisory function, and therefore does not have to undergo the cooling-off period of 6 (six) months.

Meeting of the Audit Committee is attended by at least 51% (fifty one percent) of the total members, including the Independent Commissioner and the Independent Party. In addition, the meeting is also attended by SKAI who presents an explanation of the executed audit work plan, including audit result and internal control evaluation.

Meeting of the Risk Monitoring Committee is attended by all members, including the Independent Commissioner and the Independent Party. In addition, the meeting is also attended by SKMR who presents an explanation of Bank's risk profile.

### C. COMPLETENESS AND FULFILLMENT OF DUTIES OF THE COMMITTEE

- Meeting of the Nomination and Remuneration Committee shall be attended by no less than 51% (fifty one percent) of the members, including an Independent Commissioner and an Executive Officer or employee representative.
- j. Composition of the Committee does not comply with the requirement due to intervention of the owner.

Meeting of the Nomination and Remuneration Committee is attended by all members, including an Independent Commissioner and an Executive Officer.

Composition of the Committee has met the requirement.

### 2. Governance Process

Criteria/Indicator Analysis

#### a. Audit Committee

To provide recommendation for the Board of Commissioners :

- The Audit Committee has monitored and evaluated the audit planning and implementation, as well as monitored the follow up of audit result in order to assess the adequacy of the internal control, including the adequacy of the financial reporting process.
- 2) The Audit Committee has reviewed:
  - a) the implementation of duties of the IATF;
  - b) the conformity of audit by the Public Accounting Firm to the applicable audit standard;
  - c) the conformity of financial statement to the applicable accounting standard; and

#### **Audit Committee**

To provide recommendation for the Board of Commissioners :

- The Audit Committee has monitored and evaluated the audit planning and implementation, as well as monitored the follow up of audit result in order to assess the adequacy of the internal control, including the adequacy of the financial reporting process.
- 2) The Audit Committee has reviewed:
  - a) the implementation of duties of the SKAI;
  - b) the conformity of audit by the Public Accounting Firm to the applicable audit standard;
  - c) the conformity of financial statement to the applicable accounting standard; and

### C. COMPLETENESS AND FULFILLMENT OF DUTIES OF THE COMMITTEE

d) implementation of the follow-up by Board of Directors on the findings from IATF, Public Accountant and supervision result of Financial Services Authority

- 3) Audit Committee has provided recommendation of the appointment of Public Accountant and Public Accounting Firm in accordance with the applicable provisions under General Meeting of Shareholders ("RUPS") through Board of Commissioners.
- b. Risk Monitoring Committee

To provide the recommendation for the Board of Commissioners:

- 1) the Risk Monitoring Committee evaluates risk management policy and implementation;
- the Risk Monitoring Committee monitors and evaluates the implementation of duties of the Risk Management Committee and Risk Management Task Force.

d) Implementation of the follow-up by Board of Directors on the findings from SKAI, Public Accountant and supervision result of Financial Services Authority.

Audit Committee has made evaluation report for the follow-up by Board of Directors on the findings from SKAI, Public Accountant, and supervision result of Financial Services Authority.

 Audit Committee has provided recommendation of the appointment of Public Accountant and Public Accounting Firm in accordance with the applicable provisions under General Meeting of Shareholders ("RUPS") through Board of Commissioners.

### **Risk Monitoring Committee**

To provide the recommendation for the Board of Commissioners :

- 1) the Risk Monitoring Committee evaluates risk management policy and implementation;
- 2) the Risk Monitoring Committee monitors and evaluates the implementation of duties of the Risk Management Committee and Risk Management Task Force through the result of assessment of Bank's risk profile and other related information exposed to the risk, such as Human Resource issues, completeness of the operational facility and infrastructure in Office.

### C. COMPLETENESS AND FULFILLMENT OF DUTIES OF THE COMMITTEE

#### c. Nomination and Remuneration Committee

To provide recommendation for the Board of Commissioners :

- 1) The Remuneration Committee has evaluated the remuneration policy for :
  - a) The Board of Directors and the Board of Commissioners, which has been presented before the GMS; and
  - b) The Executive Officer and the employees, which has been presented before the Board of Directors.
- 2) With regard to the nomination policy, the Committee has set the system and procedures for the appointment and/or replacement of members of the Board of Directors and the Board of Commissioners to be presented before the GMS.
- 3) The Nomination Committee has provided recommendation on candidates of members of the Board of Directors and/or the Board of Commissioners to be presented before the GMS.
- 4) The Nomination Committee has provided recommendation on candidates of members of the Committee to the Board of Commissioners.

#### **Nomination and Remuneration Committee**

To provide recommendation for the Board of Commissioners :

- 1) The Nomination and Remuneration Committee has evaluated the remuneration policy for :
  - a) The Board of Directors and the Board of Commissioners, which has been presented before the GMS; and
  - b) The Executive Officer and the employees, which has been presented before the Board of Directors.

The Nomination and Remuneration Committee has conducted the remuneration evaluation.

- 2) With regard to the nomination policy, the Committee and remuneration has set the system and procedures for the appointment and/or replacement of members of the Board of Directors and the Board of Commissioners to be presented before the GMS.
- 3) The Nomination and Remuneration Committee has provided recommendation on candidates of members of Independent Commissioner.
- 4) The Nomination and Remuneration Committee has provided recommendation on candidates of members of the Committee to the Board of Commissioners.

C.	COMPLETENESS AND FULFILLMENT OF DUTIES OF THE COMMITTEE	
d.	Meeting of the Committee is held in accordance with the need of the Bank.	Throughout 2023, conducted: - Audit Committee meetings 9 (nine) times, - Risk Monitoring Committee meetings 6 (six) times, and - Nomination and Remuneration Committee meetings 5 (five) times.
е	Decision of meeting is made upon deliberation or the majority vote, in the event that deliberation cannot be made.	Decision of meeting is made upon deliberation.
f.	Result of meeting of the Committee is a recommendation to be used optimally by the Board of Commissioners.	Result of meeting of the Committee regarding issues under the concern of the Board of Commissioners is presented in a memorandum for the Board of Commissioners.
g.	The owner intervenes with the fulfillment of duties of the Committee, such as by providing unfair remuneration for the related party, recommendation on nominees for the Board of Directors or the Board of Commissioners that does not comply with the specified procedures for appointment and/or replacement.	The owner does not intervense with fulfillment of duties of the Committee.

C. COMPLETENESS AND FULFILLMENT OF DUTIES OF THE COMMITTEE  3. Governance Outcome		
Criteria/Indicator	Analysis	
Result of minutes of meeting shall be made, including the disclosure of dissenting opinions and must be documented properly.	Minutes of meeting has been documented properly.	
b. Each Committee has performed its function according to the applicable regulation, such as provision of recommendation for the Board of Commissioners.	Each Committee has performed its function according to the applicable regulation, such as provision of recommendation for the Board of Commissioners.	

# ASSESSMENT FACTOR: HANDLING OF CONFLICT OF INTEREST

D. HANDLING OF CONFLICT OF INTEREST		
1. Governance Structure		
Criteria/Indicator	Analysis	
The Bank has the policy, system and procedures for settlement of :  a. conflict of interests that binds all members of the management board and employees of the Bank;	The Bank has the policy, system and procedures for settlement of conflict of interests as set forth in company regulation, Credit Policy of BBA "KPBBA" and Circular of the Bank.	
b. administration, documentation and disclosure of conflict of interests as referred to in the Minutes of meeting.		
2. Governance Process		
Criteria/Indicator	Analysis	
In the event of conflict of interests, members of the Board of Directors, members of the Board of Commissioners and the Executive Officer shall not take any measure that may harm or decrease Bank's profit.	There is no conflict of interests	
3. Governance Outcome		
Criteria/Indicator	Analysis	
a. Conflict of Interests that may harm the Bank or decrease Bank's profit has been disclosed in each decision and has been documented properly.	There is no conflict of interests	
b. Bank's operational activities are free of intervention of the owner/other related parties that may lead to conflict of interests, which may harm the Bank or decrease Bank's profit.	Bank's operational activities are free of intervention of the owner/other related parties that may lead to conflict of interests, which may harm the Bank or decrease Bank's profit.	
c. The Bank has succeeded in settling the arising conflict of interests.	There is no conflict of interests.	

E. IMPLEMENTATION OF BANK'S COMPLIANCE FUNCTION		
. Governance Structure		
Criteria/Indicator	Analysis	
a. The compliance task force is independent from the operational task force.	The compliance task force is independent from the operational task force.	
b. Appointment, dismissal and/or resignation of the Director in charge of the Compliance Function shall be made in accordance with Financial Services Authority regulation.	Appointment, dismissal and/or resignation of the Director in charge of the Compliance Function shall be made in accordance with Financial Services Authority regulation.	
c. The Bank has provided quality human resource for the Compliance Task Force to perform its duties effectively.	The Bank has provided quality human resource for the Compliance Task Force to perform its duties effectively.	
2. Governance Process		
Criteria/Indicator	Analysis	
a. Compliance Director is responsible for :  1) ensuring Bank's compliance to Bank Indonesia regulation and the applicable laws and regulations by :	With reference to Financial Services Authority Regulation No. 46/POJK.03/2017 of July 12, 2017 on the Fulfillment of Compliance Function for Commercial Banks, the duties and responsibilities of the Compliance Director are:  1) ensures Bank's compliance with the regulation of the Financial Services Authority ("OJK") regulation and the applicable laws and regulations by:	

### E. IMPLEMENTATION OF BANK'S COMPLIANCE FUNCTION a) determining the necessary measures to take in consideration a) determining the necessary measures to take in consideration of the principles of prudential banking; of the principles of prudential banking; Circular of the Management Board no. 108, July 25, 2017 on Compliance Culture has been issued, in which it is stated "The Board of Directors shall develop and implement the Compliance Culture at all organizational levels and Bank's business activities. All staffs and employees shall be aware that in fulfillment of their duties and responsibilities shall be carried out in compliance with Financial Services Authority regulation and the applicable Laws and Regulation, and shall avoid making policy and/or decision that violates Financial Services Authority regulation and the applicable Laws and Regulation. b) monitoring and maintaining Bank's business activities to avoid b) monitoring and maintaining Bank's business activities to avoid violation of the provisions; violation of the provisions; In order to monitor and maintain Bank's business avoiding violation of the regulation, the Director in charge of the Compliance Function, together with the Compliance Task Force, issues the Internal Memo, Inter-Branch Memo to the relevant work units and System and Procedure department, as well as provide analysis on compliance in all provision of fund in the form of credit (exposure group > 5 billion Rupiah).

### E. IMPLEMENTATION OF BANK'S COMPLIANCE FUNCTION

- c) monitoring and maintaining Bank's compliance with all agreements and commitments made between the Bank and Financial Services Authority and other authorities.
- monitoring and maintaining Bank's compliance with all agreements and commitments made between the Financial Services Authority and other authorities.

The Director in charge of the Compliance Function monitors the implementation of agreement, performance of commitment, Bank's commitment to obey the command and prohibition from the Financial Services Authority and/or from other supervisory authorities.

The Bank has followed up on the findings of the Financial Services Authority based on the General Audit Results Report (LHP) of PT Bank Bumi Arta. Tbk Head Office Position 31 January 2022 and position 31 January 2023, as well as PT Bank Bumi Arta Tbk Audit Results Report (LHP). Bandung Branch Office and Denpasar Branch Office Position 31 January 2023, in accordance with the set target time.

- 2) submitting the report on fulfillment of duties and responsibilities on a periodical basis to the President Director with a copy to the Board of Commissioners or other authorities according to the organizational structure of the Bank.
- 3) formulate the strategy to encourage the development of Bank's Compliance Culture.
- 2) the Compliance Director has submitted the quarterly report on fulfillment of duties and responsibilities to the President Director, supplied with a copy to the Board of Commissioners.
- 3) formulate the strategy to encourage the development of Bank's Compliance Culture.

The general duty of Compliance Director is to advise all organizational levels from the highest level to

E. IMPLEMENTATION OF BANK'S COMPLIANCE FUNCTION		
		inciple of prudential banking, in order to develop Bank's Compliance Culture.
		Therefore, Circular of the Management Board No. 108 on July 25, 2017 Compliance Culture has been issued.
proposing the compliance policy or compliance principles to be stipulated by the Board of Directors.	4)	proposing the compliance policy or compliance principles to be stipulated by the Board of Directors.
		Compliance Director has proposed compliance policies and principles that contained in the Compliance Cultures, Guidelines, and Assessments.
5) set the compliance system and procedures for arrangement of Bank's internal regulation and guidelines;	5)	specifying compliance system and procedures (Compliance Guidelines).
		Compliance Director determines the Compliance Guidelines as a guidelines that is necessary for the Compliance Function to be implemented properly.
		This guidelines is arranged according to the duties and responsibilities of the Compliance Director pursuant to Bank Indonesia Regulation No. 46/POJK.03/2017 of July 12, 2017 on Implementation of Compliance Function for Commercial Banks.
<li>6) ensure that all policies, provisions, system and procedures, as well as Bank's business activities have complied with Financial Services Authority regulation and the applicable laws and regulations;</li>	6)	ensure that all policies, provisions, system and procedures, as well as Bank's business activities have complied with Financial Services Authority regulation and the applicable laws and regulations.

E. IMPLEMENTATION OF BANK'S COMPLIANCE FUNCTION	
7) minimizing Bank's Compliance Risk	The Compliance Director together with the Compliance Task Force, coordinate with the relevant work units to ensure the availability and conformity of the guidelines, system and procedures in each work unit with the regulation from the Financial Services Authority regulation and the applicable laws and regulations for the principles of prudential banking.  7) minimizing Bank's Compliance Risk. In order to minimize Bank's Compliance Risk, the Compliance Director gives approval for Report on Compliance Risk made by the Compliance Task Force and provides advices for the management board, both verbally and in written by sending an Internal Memo, in the event that some improvements are necessary.
8) take preventive measures to keep the policy and/or decision made by the Board of Directors or Branch Office management of the Bank avoiding violation of Financial Services Authority regulation and the applicable laws and regulations.	8) take preventive measures to keep the policy and/or decision made by the Board of Directors of the Bank avoiding violation of Financial Services Authority regulation and the applicable laws and regulations. The Compliance Director shall have the Board of Directors of the Bank make policy and/or decision that does not violate the regulation from the Financial Services Authority regulation and other applicable laws and regulations by giving advice in every summit and meeting and providing Compliance Analysis.

### E. IMPLEMENTATION OF BANK'S COMPLIANCE FUNCTION

9) performing other duties related to the Compliance Function.

- b. Appointment of the Compliance Director conforms to the applicable laws and regulations.
- c. The Board of Director has:
  - 1) approved Bank's compliance policy in the form of a formal document of the effective compliance function.
  - 2) been held responsible for establishing an effective and permanent compliance function as a part of Bank's overall compliance policy.
  - 3) responsible for creating an effective and permanent compliance function as part of the overall Bank's compliance policies.

9) performing other duties related to the Compliance Function.

In order to monitor and maintain Bank's compliance with all agreements and commitments made between the Bank and Financial Services Authority and/or other supervisory authorities, Compliance Director performs monitoring of implementation of agreement, fulfillment of commitment, Bank's commitment to obey the command and prohibition from Financial Services Authority and/or other supervisory authorities.

Appointment of the Compliance Director conforms to the applicable laws and regulations.

### The Board of Director has:

- 1) approved Bank's compliance policy in the form of a formal document of the effective compliance function.
- 2) been held responsible for establishing an effective and permanent compliance function as a part of Bank's overall compliance policy.
- 3) responsible for creating an effective and permanent compliance function as part of the overall Bank's compliance policies.

### E. IMPLEMENTATION OF BANK'S COMPLIANCE FUNCTION

- d. Compliance Task Force holds the duties and responsibilities to:
  - 1) take necessary measures to develop Compliance Culture in all Bank's business activities at all organizational levels;

 carry out identification, measurement, monitoring and control of Compliance Risk with reference to Financial Services Authority regulation on Implementation of Risk Management for Commercial Banks; Compliance Task Force holds the duties and responsibilities to:

- 1) in order to support the development of Compliance Culture in all Bank's business activities at all organizational levels. Compliance Task Force has disseminated the information on regulation of the Financial Services Authority regulation and the applicable laws and regulations, both verbally or in written as in the Internal Memo, Inter-Branch Memo, training, etc.;
- 2) Compliance Task Force has carried out identification, measurement, monitoring and control of Compliance Risk based on the reports from the relevant work units, which include credit, treasury and investment functions, operational and service, trade financing, funding and debt instruments, Information System Technology and Management Information System, as well as Human Resource Management.

In the event of violation to the applicable regulation or other issues that need improvement, the Compliance Task Force shall coordinate with the relevant work units both verbally or in written trough the internal memo.

Risk Management Task Force receives the report on Compliance Risk that is made by the Compliance Task Force to arrange report on risk profile/composition with reference to Financial Services Authority regulation on Implementation of Risk Management for Commercial Banks.

### E. IMPLEMENTATION OF BANK'S COMPLIANCE FUNCTION

- assess and evaluate the effectiveness, adequacy and conformity of Bank's policy, provision, system and procedures with the applicable laws and regulations;
- 4) carry out review and/or recommend update and improvement of Bank's policy, system and procedures for compliance with Financial Services Authority regulation and the applicable laws and regulations;

5) put efforts to ensure that Bank's policy, provision, system and procedures, as well as business activities have complied with Financial Services Authority regulation and other applicable laws and regulations;

- 3) Compliance Task Force has assessed and evaluated the effectiveness, adequacy and conformity of Bank's policy, provision, system and procedures with the regulation of the Financial Services Authority regulation and other applicable laws and regulations in order to implement the principles of Prudential Banking;
- 4) Compliance Task Force has reviewed and/or recommended update and improvement of Bank's policy, system and procedures for compliance with the regulation of Financial Services Authority regulation and the applicable laws and regulations, buy sending Internal Memo to the System and Procedures Department or to the relevant Work Unit with regard to the arrangement/review/update/ improvement of the said policy, provision, system or procedures;
- 5) Compliance Task Force has carried out coordination and monitoring of arrangement/ review/update/improvement of the said policy, provision, system or procedures to ensure that Bank's policy, provision, system and procedures, as well as business activities have complied with the regulation of Financial Services Authority regulation and other applicable laws and regulations;

E. IMPLEMENTATION OF BANK'S COMPLIANCE FUNCTION	
6) perform other duties related to the Compliance Function.	<ul> <li>6) perform other duties related to the Compliance Function, such as:</li> <li>a) Monitoring of provision of fund in the form of credit (exposure group &gt; 5 billion Rupiah) for Compliance Analysis.</li> <li>b) The Compliance Task Force helps carry out the duties of the head of the compliance and risk management division in monitoring and maintaining bank compliance with all agreements and commitments made by the bank to authorization of financial services including monitoring the follow up of the results of supervision or inspection of the financial services authority or another authority other authorities by coordinating with other works units.</li> </ul>
3. Governance Outcome	
Criteria/Indicator	Analysis
a. The Bank has submitted the report on fulfillment of duties of the Director in charge of Compliance Function and special report to	The Bank has submitted the report on fulfillment of duties of the Compliance Director and special report to Financial Services
Financial Services Authority and related party.	Authority and related party.
<ul><li>Financial Services Authority and related party.</li><li>b. Scope of the report on fulfillment of duties of the Director in charge of Compliance Function conforms to the applicable Financial Services Authority regulation.</li></ul>	· · · · · · · · · · · · · · · · · · ·

### E. IMPLEMENTATION OF BANK'S COMPLIANCE FUNCTION

The Bank has succeeded in reducing violation of the applicable regulation;

c. The Bank has succeeded in developing compliance culture in decision-making and its operational activities.

The Bank has succeeded in reducing the level of violations against the provisions, as seen from the decreasing number of fines.

The Bank has succeeded in developing compliance culture in decision-making and its operational activities, although the implementation is still not running optimally.

The Bank has followed up on the findings of the Financial Services Authority based on the General Audit Result Report (LHP) of PT Bank Bumi Arta Tbk. Head Office Position 31 January 2022 and position 31 January 2023, as well as PT Bank Bumi Arta Tbk Audit Results Report (LHP). Bandung Branch Office and Denpasar Branch Office Position 31 January 2023, in accordance with the set target time.

F. IMPLEMENTATION OF INTERNAL AUDIT FUNCTION		
1. Governance Structure		
Criteria/Indicator	Analysis	
a. The organizational structure of Bank's IATF is in accordance with the applicable provision.	The organizational structure of Bank's SKAI is in accordance with the applicable provision.	
<ul> <li>b. Satisfying the Internal Audit Function Standard for Commercial Banks ("SPFAIB"), by:</li> <li>1) Arranging the Internal Audit Charter;</li> <li>2) Establishing the Internal Audit Task Force ("SKAI")</li> <li>3) Arranging the guidelines to internal audit.</li> <li>c. The IATF is independent from the operational task force.</li> </ul>	Satisfying the Internal Audit Function Standard for Commercial Banks ("SPFAIB") by:  1) Arranging the Internal Audit Charter; 2) Establishing the Internal Audit Task Force (SKAI) 3) Internal Examination Manual (BP21)  SKAI Bank is a work unit that is independent of operational work units.	
d. Providing quality human resource for effective fulfillment of duties.	The Bank has provided resources in accordance with the qualifications required by SKAI.	
2. Governance Process		
Criteria/Indicator	Analysis	
<ul> <li>a. The Board of Directors is responsible for: <ol> <li>establishment of internal control system, and ensuring the implementation of Bank's internal audit function at all managerial levels;</li> <li>follow-up for findings of Bank's internal audit under the policy and direction from the Board of Commissioners.</li> </ol> </li> </ul>	<ul> <li>The Board of Directors is responsible for:</li> <li>1) establishment of internal control system, and ensuring the implementation of Bank's internal audit function at all managerial levels;</li> <li>2) follow-up for findings of Bank's internal audit under the policy and direction from the Board of Commissioners.</li> </ul>	

### F. IMPLEMENTATION OF INTERNAL AUDIT FUNCTION

- b. The Bank implements internal audit function effectively in all aspects and elements of its activities that may directly be considered affecting the interests of the Bank and the community.
- c. The Bank carries out periodical analysis by an external party on the effectiveness of performance of SKAI and its compliance with the SPFAIB every 3 (three) years.
- d. Proper audit plan by Bank SKAI, adequacy of scope of audit and the depth of audit.
- e. There is no violation in the realization of audit plan by Bank SKAI.
- f. Bank was planning and realizing quality improvement of human resource skills on a regular and sustainable basis.
- g. The SKAI has Performed the supervisory function independently with proper scope of duties and in accordance with the plan, implementation or monitoring of audit result.
- h. SKAI has Fulfilled the duties that at least include the following assessments on :
  - 1) the adequacy of Bank's Internal Control System
  - 2) the effectiveness of Bank's Internal Control System
  - 3) performance quality
- i. SKAI reporting all findings of examination according to the applicable provisions.

The Bank implements internal audit function effectively in all aspects and elements of its activities that may directly be considered affecting the interests of the Bank and the community.

The Bank carries out periodical analysis by an external party on the effectiveness of performance of SKAI and its compliance with the SPFAIB every 3 (three) years.

SKAI Bank has prepared an Audit Plan with adequate audit scope and audit depth.

Bank SKAI audit plans in 2023 have all been realized.

SKAI Bank's human resources have participated in regular and continuous training.

The SKAI has Performed the supervisory function independently with proper scope of duties and in accordance with the plan, implementation or monitoring of audit result.

SKAI has Fulfilled the duties that at least include the following assessments on :

- 1) the adequacy of Bank's Internal Control System
- 2) the effectiveness of Bank's Internal Control System
- 3) performance quality

SKAI has reported all audit findings in accordance with applicable regulations.

F.	IMPLEMENTATION OF INTERNAL AUDIT FUNCTION	
j.	SKAI monitoring, analyzing and reporting the progress of improvement follow up carried out by the audited.	SKAI has monitored, analyzed and reported the progress of follow-up improvements carried out by the audit object (auditee).
k.	SKAI has compiled and updated the guidelines as well as systems and procedures for implementing the duties for internal auditors on a regular basis according to applicable laws and regulations.	SKAI has updated the Internal Audit Guidebook related to changes in the SKAI Organizational Structure at the Bank.
3.	Governance Outcome	
	Criteria/Indicator	Analysis
a.	The Board of Directors is responsible for the availability of report on implementation of Bank's internal audit to the General Meeting of Shareholders.	The Board of Directors has submitted the report on implementation of Bank's internal audit to the General Meeting of Shareholders.
b.	Findings of audit by the IATF have been followed-up and there is no recurrent finding	Findings of audit by the SKAI have been followed-up by the Board of Directors and the Auditee. There are some findings that are similar to previous findings but has been followed up and corrected by the Auditee.
C.	SKAI act objectively in performing the audit.	SKAI has acted objectively in performing the audit.

### F. IMPLEMENTATION OF INTERNAL AUDIT FUNCTION

- d. Internal Audit function has been carried out properly while taking into account the followings:
  - 1) Audit program includes all work units on which the implementation considers risk level in each work unit.
  - 2) Audit program and scope of audit are properly in accordance with the principles of SPFAIB, among others by the fulfillment of independence, objectivity, no limitation of scope and extent of internal audit.
  - 3) Fulfillment of the number and quality of internal auditor.

Internal Audit function has been carried out properly while taking into account the followings :

- 1) Audit program includes all work units on which the implementation considers risk level in each work unit.
- Audit program and scope of audit are properly in accordance with the principles of SPFAIB, among others by the fulfillment of independence, objectivity, no limitation of scope and extent of internal audit.
- 3) Fulfillment of the number and quality of internal auditor.

G. IMPLEMENTATION OF EXTERNAL AUDIT FUNCTION  1. Governance Structure		
Criteria/Indicator	Analysis	
Assignment of audit to the Public Accountant and Public Accounting Firm shall at least meet the following aspects:  a. Capacity of the appointed PAF  b. Legality of contract agreement  c. Scope of audit  d. Professional standard of public accountant; and  e. Communication between Bank Indonesia and the said PAF.	Assignment of audit to the Public Accountant and Public Accounting Firm shall have met the specified aspects.	
2. Governance Process		
Criteria/Indicator	Analysis	
a. In the audit of Bank's financial statement, the Bank appointed a Public Accountant and PAF registered in Financial Services Authority.	In carrying out the audit of the Bank's financial statements for the 2023 financial year, the Bank has appointed Public Accounting Firm Tanudiredja, Wibisana, Rintis & Partners, Member Firms of PwC global network and Public Accountant Jimmy Pangestu S.E who is registered with the Financial Services Authority.	
b. Appointment of the same Public Accountant and Public Accountant Firm has complied with the applicable laws and regulations.	Appointment of the same Public Accountant and Public Accountant Firm has complied with the applicable laws and regulations.	
c. Appointment of Public Accountant and Public Accountant Firm is made upon approval from the the General Meeting of Shareholders based on the recommendation from the Audit Committee through the Board of Commissioners.	Appointment of Public Accountant and Public Accountant Firm is made upon approval from the General Meeting of Shareholders based on the recommendation from the Audit Committee through the Board of Commissioners.	

G.	G. IMPLEMENTATION OF EXTERNAL AUDIT FUNCTION		
d.	The appointed Public Accountant and Public Accountant Firm are capable of performing independently, satisfying the professional standard of public accountant and contract agreement, as well as the specified scope of audit.	The appointed Public Accountant and Public Accountant Firm are capable of performing independently, satisfying the professional standard of public accountant and contract agreement, as well as the specified scope of audit.	
e.	Public Accountant has communicated with Financial Services Authority with regard to the condition of the audited Bank for the preparation and execution of the audit.	Public Accountant has communicated with Financial Services Authority with regard to the condition of the audited Bank for the preparation and execution of the audit.	
f.	Public Accountant has performed the audit independently and professionally.	Public Accountant has performed the audit independently and professionally.	
g.	Public Accountant has reported the result of audit and the Management Letter to Financial Services Authority.	Public Accountant has reported the result of audit and the Management Letter to Financial Services Authority.	
3.	3. Governance Outcome		
	Criteria/Indicator	Analysis	
a.	Result of audit and Management Letter indicates significant problems in the Bank and has been submitted in a timely manner to Financial Services Authority by the appointed Public Accountant Firm.	Result of audit and Management Letter indicates significant problems in the Bank and has been submitted in a timely manner to the Financial Services Authority.	
b.	Scope of audit result shall at least conform to the scope of audit set forth in the applicable provision.	Scope of audit result shall at least conform to the scope of audit set forth in the applicable provision.	
C.	The auditor acts independently in the audit.	The auditor acts independently in the audit.	

Н.	H. IMPLEMENTATION OF RISK MANAGEMENT AND INTERNAL CONTROL SYSTEM	
1.	Governance Structure	
	Criteria/Indicator	Analysis
a.	The Bank has a proper organizational structure to support the implementation of Risk Management and Internal Control System, such as the SKAI, Risk Management Task Force ("SKMR") and Risk Management Committee, as well as the Compliance Task Force.	The Bank has a proper organizational structure to support the implementation of Risk Management and Internal Control System, such as the SKAI, Risk Management Task Force ("SKMR"), and Risk Management Committee, as well as the Compliance Task Force.
b.	The Bank has proper policy, procedures and determination of risk limit.	The Bank has proper policy, procedures and determination of risk limit as set forth in the Guidelines to Risk Management ("BPMR").
2.	Governance Process	
	Criteria/Indicator	Analysis
a.	The Board of Directors has definite duties and responsibilities, among others:  1) making Risk Management policy, including Risk Management strategy and frame work in written and comprehensively, including the overall risk limit and limit for each risk type, in accordance with risk appetite and risk tolerance to capital adequacy. Upon approval from the Board of Commissioners, the Board of Directors shall set the said Risk Management policy, strategy and frame work;	The Board of Directors has definite duties and responsibilities, among others:  1) making Risk Management policy, including Risk Management strategy and frame work in written and comprehensively, including the overall risk limit and limit for each risk type, in accordance with risk appetite and risk tolerance to capital adequacy as set forth in the Guidelines to Risk Management. Upon approval from the Board of Commissioners, the Board of Directors shall set the said Risk Management policy, strategy and frame work;
	<ol> <li>arranging, specifying and updating the procedures and instruments for identifying, measuring, monitoring and controlling the risk;</li> </ol>	arranging, specifying and updating the procedures and instruments for identifying, measuring, monitoring and controlling the risk;

#### H. IMPLEMENTATION OF RISK MANAGEMENT AND INTERNAL CONTROL SYSTEM

- 3) arranging and specifying the mechanism of transaction approval, including for the over limit transaction and the authority of each position level;
- 4) evaluating and/or updating the policy, strategy and frame work of Risk Management no less than once in a year or more, in the event that there is change of factors that significantly affect Bank's business, risk exposure, and/or risk profile.

- 5) determining the organizational structure, including the definite authority and responsibility with regard to the implementation of Risk Management;
- 6) being responsible for the implementation of Risk Management policy, strategy and frame work approved by the Board of Commissioners and evaluating and providing direction based on the reports submitted by the Risk Management Task Force, including the report on risk profile;
- 7) ensuring that all material risks and impacts arising from the said risk have been followed-up and that accountability report has been submitted regularly to the Board of Commissioners. The said report includes –among others- progress report and issues related to material risks, supplied with improvement measures that have been taken, being taken and will be taken;

- arranging and specifying the mechanism of transaction approval, including for the over limit transaction and the authority of each position level;
- 4) evaluating and/or updating the policy, strategy and frame work of Risk Management as set forth in the Guidelines to Risk Management ("BPMR").
  - BPMR is being adjusted to Financial Services Authority Regulation Number 17 of 2023 dated 14 September 2023 concerning Implementation of Governance for Commercial Banks.
- 5) determining the organizational structure, including the definite authority and responsibility with regard to the implementation of Risk Management;
- 6) being responsible for the implementation of Risk Management policy, strategy and frame work approved by the Board of Commissioners and evaluating and providing direction based on the reports submitted by the Risk Management Task Force, including the report on risk profile;
- 7) ensuring that all material risks and impacts arising from the said risk have been followed-up and that accountability report has been submitted regularly to the Board of Commissioners;

#### H. IMPLEMENTATION OF RISK MANAGEMENT AND INTERNAL CONTROL SYSTEM

- 8) ensuring that the implementation of improvement measures for issues or violation in Bank's business is identified by the SKAI;
- 9) developing Risk Management culture, including risk awareness, at all organizational levels, including proper communication among all organizational levels on the importance of effective internal control:
- 10) ensuring the adequacy of financial capacity and infrastructure to 10) ensuring the adequacy of financial capacity and infrastructure to manage and control the risk;
- independently, as reflected in the separation of function between the Risk Management Task Force that performs risk identification, measurement, monitoring and control- and task force that execute and finalize the transaction.

- 8) ensuring that the implementation of improvement measures for issues or violation in Bank's business is identified by the SKAI;
- 9) developing Risk Management culture, including risk awareness, at all organizational levels, including proper communication among all organizational levels on the importance of effective internal control;
- manage and control the risk;
- 11) ensuring that Risk Management function has been implemented 11) ensuring that Risk Management function has been implemented independently, as reflected in the separation of function between the Risk Management Task Force that performs risk identification, measurement, monitoring and control- and task force that execute and finalize the transaction.

#### H. IMPLEMENTATION OF RISK MANAGEMENT AND INTERNAL CONTROL SYSTEM

- b. The Board of Commissioners has definite duties and responsibilities, among others:
  - 1) giving approval for Risk Management policy, including Risk Management strategy and work frame that are specified in accordance with the risk appetite and risk tolerance;
  - 2) evaluating Risk Management policy and Risk Management | 2) evaluating Risk Management policy and Risk Management Strategy no less than once in a year or more, in the event that there is change of factors that significantly affect Bank's business;
  - 3) evaluating the accountability report of the Board of Directors and periodically providing direction for improvement of implementation of Risk Management policy. Evaluation is made in order to ensure that the Board of Directors manages Bank's activities and risks effectively.
- c. The Bank has implemented comprehensive and reliable internal control system.

The Board of Commissioners has definite duties and responsibilities, among others:

- 1) giving approval for Risk Management policy, including Risk Management strategy and work frame that are specified in accordance with the risk appetite and risk tolerance as set forth in the Guidelines to Risk Management ("BPMR").
- Strategy.
- 3) evaluating the accountability report of the Board of Directors and periodically providing direction for improvement of implementation of Risk Management policy, which stipulated in appeal/Memorandum of the Board of Commisioners to the Board of Directors. Evaluation is made in order to ensure that the Board of Directors manages Bank's activities and risks effectively.

The Bank has implemented proper control system. Improvement is necessary on the implementation.

In this case, the maker, checker and approval functions still need to be optimized in their implementation.

	H. IMPLEMENTATION OF RISK MANAGEMENT AND INTERNAL CONTROL SYSTEM		
,	Governance Outcome		
	Criteria/Indicator	Analysis	
í	The Bank has implemented effective Risk Management, which is adjusted to the objective, business policy, size and complexity of Bank's business and capacity.	The Bank has implemented effective Risk Management, which is adjusted to the objective, business policy, size and complexity of Bank's business and capacity.	
	o. The Board of Directors and the Board of Commissioners (Management Board) are capable of performing active supervision of the implementation of Risk Management policy and strategy.	The Board of Directors and the Board of Commissioners (Management Board) are capable of performing active supervision of the implementation of Risk Management policy and strategy.	
(	The Bank does not commit business activities exceeding its capital capacity to absorb loss risk.	The Bank does not commit business activities exceeding its capital capacity to absorb loss risk.	

# ASSESSMENT FACTOR: LENDING TO RELATED PARTY AND LARGE EXPOSURE

I. LENDING TO RELATED PARTY AND LARGE EXPOSURE		
1. Governance Structure		
Criteria/Indicator	Analysis	
The Bank has had the written and definite policies, sys procedures for the provision of lending to related party exposure lending, monitoring and settlement of the problem.	ty and large procedures for the provision of lending to related party and lar	rge
2. Governance Process		
Criteria/Indicator	Analysis	
a. The Bank has regularly evaluates and update policies, sy procedures referred to in order to comply with the provision applicable legislation.	sions and the procedures referred to in order to comply with the provisions a the applicable legislation.	ind
<ul> <li>There is a proper process to ensure lending to related party exposure lending in accordance with the principles of banking.</li> </ul>		
c. Decision-making in the lending is made independent Management Board without any intervention of the relation and/or other parties.		

## ASSESSMENT FACTOR: LENDING TO RELATED PARTY AND LARGE EXPOSURE

1.	LENDING TO RELATED PARTY AND LARGE EXPOSURE	
3	Governance Outcome	
	Criteria/Indicator	Analysis
а	<ul> <li>Implementation of lending to related party and/or large exposure lending by the Bank have:</li> <li>1) Complied with Legal Lending Limit regulation and taking into account the principles of prudential banking and the applicable laws and regulations;</li> </ul>	Implementation of lending to related party and/or large exposure lending by the Bank have:  1) Complied with Legal Lending Limit's regulation and taking into account the principles of prudential banking and the applicable laws and regulations;
	2) Considering capital capacity and distribution/diversification of lending portfolio.	2) Considering capital capacity and distribution/diversification of lending portfolio.
b	. Lending to related party report has been submitted regularly to the Financial Services Authority in a timely manner.	The Bank has delivered the report of fund provision by the Bank to related parties regularly to the Financial Services Authority in a timely manner.

# TRANSPARANCY OF FINANCIAL AND NON FINANCIAL CONDITION, REPORT ON IMPLEMENTATION OF CORPORATE GOVERNANCE AND INTERNAL REPORTING

# J. TRANSPARENCY OF FINANCIAL AND NON FINANCIAL CONDITION, REPORT ON IMPLEMENTATION OF CORPORATE GOVERNANCE AND INTERNAL REPORTING

1. Governance Structure	
Criteria/Indicator	Analysis
a. The Bank has the policy and procedures for methods of implementation fo transparance fo financial and non-financial condition.	The Bank has the policy and procedures for methods of implementation fo transparance fo financial and non-financial condition.
b. The Bank must submit the Report on Implementation of Corporate Governance at every end of financial year, with a scope that is in accordance with the applicable provision.	The Bank must submit the Report on Implementation of Corporate Governance at every end of financial year, with a scope that is in accordance with the applicable provision.
c. Availability of complete, accurate and timely internal reporting that is supported by proper Management Information System.	Availability of complete, accurate and timely internal reporting that is supported by proper Management Information System.
d. Availability of reliable information system that is supported by competent human resource and proper Information Technology security system.	There is a reliable information system and an adequate IT security system.
	The need for HR competencies is always changing, due to the rapid development of digitalization so it is necessary to increase HR competencies to create reliable security.

# TRANSPARANCY OF FINANCIAL AND NON FINANCIAL CONDITION, REPORT ON IMPLEMENTATION OF CORPORATE GOVERNANCE AND INTERNAL REPORTING

# J. TRANSPARENCY OF FINANCIAL AND NON FINANCIAL CONDITION, REPORT ON IMPLEMENTATION OF CORPORATE GOVERNANCE AND INTERNAL REPORTING

2. Governance Process	
Criteria/Indicator	Analysis
a. The Bank has transparently presented its financial and non-financial conditions to the stakeholders, including the quarterly Condensed Financial Statements, and has reported to Financial Services Authority or stakeholders pursuant to the applicable regulations.	The Bank has transparently presented its financial and non-financial conditions to the stakeholders, including the quarterly Condensed Financial Statements, and has reported to Financial Services Authority or stakeholders pursuant to the applicable regulations.
b. The Bank has made the products information become transparent in accordance regulations on the Transparency of Bank's Products Information and the Use of Customer Personal Data, such as:	The Bank has made the products information become transparent in accordance regulations on the Transparency of Bank's Products Information and the Use of Customer Personal Data.
<ol> <li>Written information on Bank's product that meets the specified minimum requirements;</li> </ol>	
<ol> <li>Bank Officers (the Customer Service and Marketing Officer) have explained product information to the customers;</li> </ol>	
3) Product information is disclosed according to its true condition;	
<ol> <li>The Bank has disclosed to the customers whenever there are changes of product information;</li> </ol>	
5) Product information can be read and understood easily;	
6) The Bank has product information service that is easily accessible for public;	

## TRANSPARANCY OF FINANCIAL AND NON FINANCIAL CONDITION, REPORT ON IMPLEMENTATION OF CORPORATE GOVERNANCE AND INTERNAL REPORTING

## J. TRANSPARENCY OF FINANCIAL AND NON FINANCIAL CONDITION, REPORT ON IMPLEMENTATION OF CORPORATE GOVERNANCE AND INTERNAL REPORTING

- 7) The Bank has explained to the customers the objective and consequence of distribution of personal data.
- 8) The customers whose personal data are distributed have given their approval for disclosure of personal data.
- c. The Bank has made transparent the procedures for customer complaints and settlement of disputes to the customer in accordance regulation on Customer Complaints and Banking Mediation.
- d. The Bank has prepared and presented a report with the procedure, type and scope specified in Financial Services Authority regulation on Transparency of Bank's Financial Condition.
- e. The bank has prepared a report on the implementation of Corporate Governance with the contents and scope that are in accordance with the applicable provisions.
- f. In the event that the Report on Implementation of Corporate Governance does not conform to the real condition, the Bank shall immediately submit the revision completely to Financial Services Authority, and any Bank that has its homepage shall publish it on the homepage.

The Bank has made transparent the procedures for customer complaints and settlement of disputes to the customer in accordance regulation on Customer Complaints and Banking Mediation.

The Bank has prepared and presented a report with the procedure, type and scope specified in Financial Services Authority regulation on Transparency of Bank's Financial Condition.

The bank has prepared the report on the implementation of Corporate Governance in accordance with the applicable regulations, by providing the data and information according to the findings of examination by Financial Services Authority.

Report on Implementation of Corporate Governance conforms to the real condition.

## TRANSPARANCY OF FINANCIAL AND NON FINANCIAL CONDITION, REPORT ON IMPLEMENTATION OF CORPORATE GOVERNANCE AND INTERNAL REPORTING

## J. TRANSPARENCY OF FINANCIAL AND NON FINANCIAL CONDITION, REPORT ON IMPLEMENTATION OF CORPORATE GOVERNANCE AND INTERNAL REPORTING

g. In the event that there is difference in the Rank of Corporate Governance Factor from the self assessment in Bank's Report on Implementation of Corporate Governance and assessment result of implementation of Corporate Governance by Financial Services Authority, the Bank:

There is no difference in the Rank of Corporate Governance Factor from the self-assessment in Bank's Report on Implementation of Corporate Governance and assessment result of implementation of Corporate Governance by the Financial Services Authority.

- Shall at least make a revision of the Rank of Corporate Governance Factor and Definition of Rank from the said self assessment to the public in a Condensed Financial Statement for the nearest period;
- 2) Shall immediately submit the complete revision of self-assessment on Bank's Corporate Governance to Financial Services Authority, and any Bank that has its homepage shall publish it on the homepage.

### 3. Governance Outcome

Criteria/Indicator Analysis

a. Annual Report has been submitted completely and in a timely manner to the Financial Services Authority and the shareholders.

Bank has submitted Annual Report completely and in a timely manner to the Financial Services Authority and the shareholders.

# TRANSPARANCY OF FINANCIAL AND NON FINANCIAL CONDITION, REPORT ON IMPLEMENTATION OF CORPORATE GOVERNANCE AND INTERNAL REPORTING

# J. TRANSPARENCY OF FINANCIAL AND NON FINANCIAL CONDITION, REPORT ON IMPLEMENTATION OF CORPORATE GOVERNANCE AND INTERNAL REPORTING

- b. Transparency of reports has been made on reporting media and deadlines in accordance with the provisions of the Financial Services Authority on Transparency and Publication of Bank Statements, including:
  - 1) Quarterly Condensed Financial Statements
  - 2) Annual Report
- c. Corporate Governance implementation report has reflected the actual condition of the Bank or the condition according to the result of Bank's self-assessment and has been supplied with the result of Bank' self-assessment to:
  - 1) Scope of Corporate Governance as referred to in Financial Services Authority regulation on Corporate Governance and the result of self-assessment on the implementation of Corporate Governance;
  - Share ownership by members of the Board of Directors and financial relationship and family relationship between members of the Board of Directors and other members of the Board of Commissioners, and/or Bank's share holders;
  - 3) Share ownership by members of the Board of Commissioners and financial relationship and family relationship between members of the Board of Directors and other members of the Board of Commissioners, members of the Board of Directors and/or Bank's share holders:

Transparency of reports has been made on reporting media and deadlines in accordance with the provisions of the Financial Services Authority on Transparency and Publication of Bank Statements, including:

- 1) Quarterly Condensed Financial Statements
- 2) Annual Report

Corporate Governance implementation report has reflected the actual condition of the Bank or the condition according to the result of Bank's self-assessment and has been supplied with the result of Bank' self-assessment.

## TRANSPARANCY OF FINANCIAL AND NON FINANCIAL CONDITION, REPORT ON IMPLEMENTATION OF CORPORATE GOVERNANCE AND INTERNAL REPORTING

## J. TRANSPARENCY OF FINANCIAL AND NON FINANCIAL CONDITION, REPORT ON IMPLEMENTATION OF CORPORATE GOVERNANCE AND INTERNAL REPORTING

- 4) Frequency of meeting of the Board of Commissioners meets the requirements;
- 5) The number of internal fraud and settlement efforts by the Bank;
- 6) Transaction with conflict of interests;
- 7) Share buy-back and/or Bank's bond buy-back;
- 8) Provision of fund for social program and political activities, both in cash or non-cash;
- d. Report on Implementation of Corporate Governance has been submitted completely and in a timely manner to the Financial Services Authority and the shareholders.
- e. Report on Implementation of Corporate Governance has been published on the homepage in a timely manner.
- f. Mediation for settlement of customer complaint has been carried out properly.
- g. The Bank implements transparence of information on product and the use of customer's data.

Bank has submitted the Report on Implementation of Corporate Governance completely and in a timely manner to the Financial Services Authority and the shareholders.

The Bank has published the Report on Implementation of Corporate Governance on the homepage in a timely manner.

Mediation for settlement of customer complaint has been carried out properly.

The Bank has implemented transparence of information on product and the use of customer's data.

K.	C. BANK'S STRATEGIC PLAN	
1.	. Governance Structure	
	Criteria/Indicator	Analysis
a.	Bank's strategic plan has been arranged in the form of a Corporate Plan and Business Plan according to the vision and mission of the Bank.	Bank's strategic plan has been arranged in the form of a Corporate Plan and Business Plan according to the vision and mission of the Bank.
		The Bank has submitted the Corporate Plan in accordance with the recommendation of the Financial Services Authority.
b.	Bank's strategic plan is fully supported by the owner, as indicated by the commitment and efforts of the owner to strengthen Bank's capital.	Bank's strategic plan is fully supported by the owner, as indicated by the commitment and efforts of the owner to strengthen Bank's capital.
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۷.	Governance Process	
۷.	Governance Process  Criteria/Indicator	Analysis
		Analysis  The Bank has arranged its realistic, comprehensive and achievable Business Plan while considering the principles of prudential banking and being responsive to the internal and external changes.
a.	Criteria/Indicator  The Bank has arranged its realistic, comprehensive and achievable Business Plan while considering the principles of prudential banking	The Bank has arranged its realistic, comprehensive and achievable Business Plan while considering the principles of prudential banking
a.	Criteria/Indicator  The Bank has arranged its realistic, comprehensive and achievable Business Plan while considering the principles of prudential banking and being responsive to the internal and external changes.  Bank's Business Plan is approved by the Board of Commissioners.	The Bank has arranged its realistic, comprehensive and achievable Business Plan while considering the principles of prudential banking and being responsive to the internal and external changes.
a.	Criteria/Indicator  The Bank has arranged its realistic, comprehensive and achievable Business Plan while considering the principles of prudential banking and being responsive to the internal and external changes.  Bank's Business Plan is approved by the Board of Commissioners.  The Board of Directors has communicated Bank's Business Plan to:	The Bank has arranged its realistic, comprehensive and achievable Business Plan while considering the principles of prudential banking and being responsive to the internal and external changes.  Bank's Business Plan is approved by the Board of Commissioners.  The Board of Directors has communicated Bank's Business Plan to

#### K. BANK'S STRATEGIC PLAN

- d. The Board of Directors has implemented Bank's Business Plan ("RBB") effectively.
- e. The arrangement and submission of RBB refers to Bank Indonesia regulation on Bank's Business Plan, and the Bank has taken into account the followings:
  - 1) The external and internal factors that may affect the continuity of Bank's business:
  - 2) Principles of prudential banking;
  - 3) Implementation of Risk Management;
  - 4) Sound Banking principles.
- f. The Board of Commissioners has performed supervision on the implementation of Bank's Business Plan.
- g. The owner does not express seriousness and/or does not take necessary measures to support the Bank's strategic plan, as indicated in the weak commitment and efforts of the owner to strengthen Bank's capital.

The Board of Directors has implemented Bank's Business Plan ("RBB") effectively.

The arrangement and submission of RBB refers to Bank Indonesia regulation on Bank's Business Plan, and the Bank has taken into account the followings:

- 1) The external and internal factors that may affect the continuity of Bank's business:
- 2) Principles of prudential banking;
- 3) Implementation of Risk Management;
- 4) Sound Banking principles.

The Board of Commissioners has performed supervision on the implementation of Bank's Business Plan.

The owner does not express seriousness and/or does not take necessary measures to support the Bank's strategic plan, as indicated in the weak commitment and efforts of the owner to strengthen Bank's capital.

K.	K. BANK'S STRATEGIC PLAN		
3.	. Governance Outcome		
	Criteria/Indicator	Analysis	
a.	Corporate Plan and Business Plan are drawn by the Board of Directors and approved by the Board of Commissioners.	Corporate Plan and Business Plan are drawn by the Board of Directors and approved by the Board of Commissioners.	
b.	Bank's Corporate Plan and Business Plan, along with the realization, have been communicated by the Board of Directors to the Majority Shareholders and to all organizational levels in the Bank.	Bank's Corporate Plan and Business Plan, along with the realization, have been communicated by the Board of Directors to the Majority Shareholders and to all organizational levels in the Bank.	
C.	Bank's Business Plan indicates the continuing growth of the Bank.	Bank's Business Plan indicates the continuing growth of the Bank.	
		The realization of the Bank's Business Plan related Gross Profit has exceeded the target and reached 699.78%, while for Assets it has reached 96.16%, Credit has reached 94.37% and Third Party Funds has reached 92.89%.	
		The Bank's Business Plan related to Credit which has not been achieved is 5.63% mainly due to very tight competition for credit distribution, while Third Party Funds which have not been achieved is 7.11% mainly due to a decrease in Third Party Funds used for customer business activities and there are new products that cannot be launched in 2023.	

#### K. BANK'S STRATEGIC PLAN

- d. Bank's Growth provides economic and non-economic values for the stakeholders.
- e. Bank's strategic plan is made based on the comprehensive analysis by considering business opportunities and strength of the Bank, as well as by identifying its weakness and the threats (Strenght, Weakness, Opportunity, Threat Analysis/SWOT Analysis).
- f. Bank's strategic plan shall be supported by provision of proper infrastructure, such as Human Resources, Information Technology, office network, policy and procedures.

- g. There is intervention of the owner on the sharing of Bank's profit without considering capitalization efforts to support Bank's strategic plan.
- h. The owner is not capable of overcoming the shortfall of Bank's capital or Bank's capital is lower than the specified requirement accordance with the provisions of the Financial Services Authority on Capital Adequacy Ratio.

Bank's Growth provides economic and non-economic values for the stakeholders.

Bank's strategic plan is made based on the comprehensive analysis by considering business opportunities and strength of the Bank, as well as by identifying its weakness and the threats (Strenght, Weakness, Opportunity, Threat Analysis/SWOT Analysis).

Bank's strategic plan shall be supported by provision of proper infrastructure, such as Human Resources, Information Technology, office network, policy and procedures.

The Bank has amended the Strategic Plan of Information Technology (RSTI) which is part of the Business Plan of the Bank with regards to the suitability of the Bank's strategic plan.

There is no intervention of the owner on the sharing of Bank's profit.

Bank's capital meets the specified requirement.